

Code of Conduct for Suppliers

Dated: 10 August 2021



PÖPPELMANN

We do it. Better.

This is our standard for all that we do.

This standard and our four principles are the most important components of our corporate policy and our PPx management system.

They provide us with a joint understanding of Pöppelmann's internal and external orientation as a foundation and framework for our actions and ensure that we live up to our responsibility as one of our industry's leading companies.

The Code of Conduct below describes the requirements we place on our suppliers and service providers to ensure that the global requirements for ethical and moral conduct as well as the requirements of competition and antitrust law (compliance) are complied with.



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General rules

Scope of application

This Code of Conduct for Suppliers and Service Providers compiles the important basic rules and principles into one document. It applies to all companies that supply us.

Compliance with laws, regulations and ethical practices

The applicable laws and regulations of the respective countries in which they operate must be complied with. The reliability and legality of their actions, products and processes is always a pre-condition and is non-negotiable.

The daily business activities are guided by generally accepted ethical values and principles, in particular integrity, righteousness and human dignity.

Business secrets and confidential information

Business secrets must be treated confidentially and the necessary steps taken to protect the confidential information of our business partners against access and insight by unauthorised colleagues and other third parties in an appropriate manner.

Global guidelines

Our corporate group is aligned with the Universal Declaration of Human Rights of the United Nations, as well as the core labour standards of the International Labour Organisation (ILO).

The following principles therefore apply in particular to suppliers and service providers:

Basic rules

All members of the group and commercial partners are to be treated with dignity and respect at all times. The daily activities as a commercial enterprise must always be carried out in accordance with the applicable national and international standards and taking account of internationally recognised human rights.

Child labour

Child labour and any kind of exploitation of children and adolescents is rejected and, in this respect, the corresponding laws must be strictly adhered to.

¹ Universal Declaration of Human Rights - UN-Doc. 217, also referred to as the UN Human Rights Charter

Forced labour

Any form of forced labour and any conditions similar to it are rejected. Members of the group must not be compelled into employment, be it directly or indirectly, by means of violence or intimidation².

Appropriate compensation

All employees must receive a fair wage for full-time employment, which at least suffices to cover basic needs. Payments are to be made in a practical way (by cash, cheque, bank transfer) and a payslip is to be provided to an appropriate level of detail³.

Working hours

Working hours must be in line with applicable national legislation, industry standards or the relevant ILO conventions⁴.

Occupational health and safety

National and international regulations for the safeguarding of health and safety at the workplace must be complied with. Appropriate systems are to be set up to prevent risks to health and safety⁵.

Ethical and social principles

A culture of equal opportunity, mutual trust and respect is of great importance. This is why it is imperative to abide by the following principles in particular:

Discrimination

All employees must be treated equally, irrespective of gender, age, skin colour, culture, ethnic origin, sexuality, disability, creed or ideology. Equal opportunities must be promoted and discrimination prevented in the recruitment of employees and when promoting or granting training and further qualification measures.

Harassment

In our company, no employee will be subjected to physical punishment or any other kind of physical, sexual, psychological or verbal abuse or mistreatment.

² Cf. ILO conventions 29 and 105

³ Cf. ILO conventions 26 and 131

⁴ Cf. ILO conventions 1 and 14

⁵ Cf. ILO convention 155



Freedom of expression

The basis for mutual trust and cooperative togetherness is an open and constructive dialogue characterised by mutual respect. Therefore, the right to freedom of expression and freedom to voice opinion must be guaranteed.

Right to privacy

The right to privacy must be respected.

Sustainable environmental and climate protection

Sustainable environmental and climate protection and resource efficiency are important corporate objectives. Both in developing new products and when operating product systems, care is taken to ensure that any resulting impact on the environment and climate is kept as low as possible and that the products make a positive contribution to environmental and climate protection.

In this regard, every employee takes responsibility to conserve natural resources and to contribute to the protection of the environment and climate through their own behaviour.

Antitrust and competition law requirements

We are committed to fair competition. In doing so, the applicable antitrust and competition law requirements must be complied with.

Impermissible agreements regarding prices or other terms and conditions, sales regions or customers, as well as misuse of market power, contradict these principles.

All suppliers are required to cooperate actively in complying with and implementing fair and legal competition in their area of responsibility.

Instances of bribery and corruption will not be tolerated. Executive board members, management staff and all employees must ensure that no personal dependencies or obligations arise towards customers or suppliers. For example, group members must not accept or bestow gifts in a manner which may reasonably be considered to have the ability of influencing commercial decisions. If gift-giving is considered to be polite and customary in a given country, one must ensure that no dependencies or obligations arise as a result and the regulations of the country are adhered to.

Violations of these stipulations will not be tolerated and will be punished by means of corresponding measures.



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Compliance with the Code of Conduct

The executive board and management staff of the supplier have a special role in setting an example and are to be assessed to an especially high level in their actions according to the Code of Conduct. They are the first port of call in case of queries regarding understanding the regulations, and they must ensure that all employees are aware of and understand the Code of Conduct. They are to prevent unacceptable behaviour as part of their management task and take appropriate measures to prevent violations of regulations within their areas of responsibility.

Violations will be prosecuted uniformly and consistently.

Every supplier or service provider has the right to report potential violations of this Code of Conduct through the following means:

- a. Via email to compliance@poeppele.com
- b. In writing (also anonymously) sent by post to the Compliance Officer of the Pöppelmann Group: Mr Jürgen Nordlohne.

This Code of Conduct is continuously checked to see whether it is up to date and is updated accordingly as and when required.