



Code of Conduct /
Verhaltenskodex
INDRA Recycling GmbH
3. Industriestr. 2
68766 Hockenheim



Code of Conduct

Foreword

Our Code of Conduct is a guideline for the whole of INDRA Recycling GmbH, which means it applies equally for all of us. Directed specifically at senior management, executive staff and all our employees, it both presents the standards we want to meet in terms of living out the values and principles set out in it, and is at the same time an outward sign of the responsible way in which we conduct ourselves towards our business partners, customers and employees.

Obligation on company management

INDRA Recycling GmbH considers itself duty-bound to act in an economically, socially and environmentally aware manner. The company strives to pursue its business on a professional and ethically moral basis and to engage in fair competition on all markets in which it is involved. This includes compliance with applicable laws and the acceptance of cartel prohibitions and restraints on competition. We want at all times to avoid procuring unfair advantages over customers, suppliers or competitors.

Team spirit, constructive cooperation

We continually re-evaluate existing solutions and develop new ideas for the benefit of our customers. To that end we encourage construction cooperation among our staff. Their interests and their expectations of us are important for our work and further development. Only through consistent teamwork can we be successful in the various business fields.

Standards of cooperation

We expect all our employees to act in accordance with the highest professional standards at all times. If employees infringe existing policies, rules or regulations in the course of their activities or through their conduct, the employees concerned must expect disciplinary measures.



Open communication with employees

We do not cover up misconduct. If employees report actual or suspected misconduct in good faith, we will not tolerate any reprisals or attempts at intimidation against them. We understand "in good faith" to mean that the employee is convinced that their statement reflects the truth. This applies regardless of whether or not a subsequent investigation confirms the version put forward by the employee.

Dialogue with cooperation partners

All business information of our partners and their trade secrets will be treated sensitively and confidentially as a matter of principle. Any necessary documents will be prepared and stored properly and returned or destroyed after the end of the cooperation.

Customer focus

We will always be fair and honest in our conduct towards customers and business partners. We will record the wishes, needs and expectations of our customers and business partners so that we can ensure these are implemented appropriately in products, services or other processes. Our primary goal is to build stable, long-term relationships with our customers and business partners on a basis of trust.

Acceptance of gifts and donations

a) Gifts to our employees

Our employees will not demand or accept from customers or suppliers any personal benefits that influence or could influence their conduct in respect of their own activities for the company. If third parties offer gifts, these may only be accepted if they conform to general practice allowed under tax law (promotional gifts with the logo of the company providing them, such as calendars or pens). Management must be informed of gifts with a value of more than € 50. If this is not possible, these gifts must always be refused.

a) Gifts by our employees

Gifts from us may likewise only be offered within the customary scope for the business relationship and to a materially reasonable extent. The recipient must not associate them with any obligation that could influence their business decisions.



c) Donations

As a company, INDRA Recycling GmbH does not in principle donate to political parties, individual persons or organisations whose goals conflict with our corporate philosophy or could damage our reputation. Donations will always be allocated in a transparent manner.

Bribery and corruption

We do not tolerate any form of bribery or corruption, regardless of whether this damages our financial interests or those of third parties. We employ control mechanisms to ensure that bribery, theft, embezzlement, fraud, tax evasion or money laundering are prevented. Our employees are prohibited from accepting or granting favours of any kind (cash, travel, gifts, etc.) that are linked to the granting of an improper benefit to the giver (awarding of contracts or projects, etc.). Our business partners are also encouraged to avoid conflicts of interest that entail a risk of corruption.

Data protection

We will treat all personal data of our customers, business partners and employees with the greatest care. This includes their names, addresses, telephone numbers and date of birth or information about their current health status. Our employees have a duty to take all data security measures that are capable of protecting our IT system from both internal and external data theft. This applies especially for the misuse of passwords within the company and the unauthorised downloading of files, in particular of inappropriate material from the internet.

Protection of the environment

Protection of the environment and the climate is very important to us. Our employees are encouraged to treat all natural resources that are used in our company (e.g. energy, water, land) with care. We expect our employees to act responsibly in the manufacture and distribution of our products and/or services. For the protection of our employees we comply with all laws and regulations that concern health and safety at the workplace. To that end our executive staff will in particular take measures to create a healthy and risk-free work environment for our employees.



Compliance with applicable law

We obligate our executive staff to familiarise themselves and comply without exception with the laws, rules and regulations of relevance to their area of responsibility. Our executive staff in particular have considerable responsibility for fulfilment of the Code of Conduct. The business practices of our business partners and their own suppliers must likewise take due account of the applicable laws. This especially affects imports, exports and domestic trade, technologies and services as well as payments and movements of capital. Our business partners must exclude any breach of economic embargoes or of provisions of trading, import or export controls as well as the financing of terrorism.

Fair competition

We consider ourselves duty-bound by fair competition and will abide by laws and regulations. We do not reach agreements on prices, terms and strategies with competitors, suppliers, other companies and dealers that inhibit fair competition. We will not take part in any boycott in breach of competition.

Prohibition of discrimination

All forms of discrimination are prohibited as a matter of principle. This is the case regardless of whether the discrimination is on the grounds of nationality, ethnicity, age, sex, sexual orientation, marital status, pregnancy, disability, religion or world view. Promotions and appointments will always be made without discrimination.

Handling of internal company matters

We attach the utmost importance to the careful and responsible handling of the products manufactured, the working materials and methods used and the intellectual property of the company.

Protection against child or slave labour

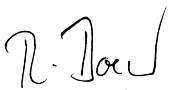
We absolutely reject all forms of child or slave labour without exception, and we expect our business partners to do so as well. Children of school age (less than 16 years old) may not be employed even if the statutory requirements of the respective country of our supplier would allow this.

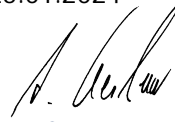



Implementation and enforcement

As a company, INDRA Recycling GmbH undertakes to make every necessary effort to live out the values and principles set out in this Verhaltenskodex / Code of Conduct:

Hockenheim, 25.01.2024


R.Boecker,


A.Gerstner


T. Jelley

Place, date Senior management