

# **Compliance guideline of the Esders Group**

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## **Definitions and scope of application**

Compliance means adhering to laws, regulations and internal instructions. With the "Compliance Guidelines", we define the ethical and legal framework within which we want to act and remain successful. They contain the basic principles and rules of behaviour that apply within our company. The compliance guidelines adapt to new legal provisions and are based on internationally recognised agreements on human rights, anti-corruption and sustainability.

These guidelines apply to all employees and board members of the Esders Group (Esders GmbH und Esders Abscheiderservice GmbH) and its subsidiaries, hereinafter uniformly referred to as employees.

We have the same claim towards our external business partners and the public.

## **Duty to inform**

Esders guidelines, process guidelines, work instructions, information sheets, etc. exist for individual regulatory areas, which specify the rules of this guide and which must be observed by employees.

In addition, all employees must inform themselves about the EU directives, laws, regulations and internal instructions applicable to their area of responsibility. In cases of doubt, advice must be sought from the HR department, the relevant specialist department or the management.

## **Basic behavioural requirements**

Every employee is obliged,

- comply with the laws, regulations and internal instructions applicable in his area of responsibility.
- to be fair, respectful and trustworthy in all activities and business relationships.
- to respect and promote the reputation of the Esders Group.
- avoid conflicts of interest between business and private matters.
- not to obtain any unlawful advantages for themselves or others. - comply with the laws and regulations on occupational safety, environmental protection and data protection.
- Compliance violations must be reported immediately to the HR department or management.

Every supervisor is also obliged to do so,

- to assess employees solely on the basis of their performance and to ensure compliance with this guideline in his area of responsibility.

## **Human rights**

We respect, protect and demand the applicable regulations for the protection of human and children's rights worldwide as fundamental and universally applicable requirements. We reject any use of child, forced and compulsory

labour, as well as any form of modern slavery and human trafficking. Work by young labourers is only permitted in strict compliance with the minimum age and other legal requirements.

This applies not only to cooperation within our company, but also to the behaviour of and towards business partners.

## **Equal treatment, discrimination**

Discrimination on the grounds of race, ethnic origin, gender, religion, ideology, disability, age or sexual identity is strictly prohibited. This applies in particular to dealings with colleagues, employees and business partners, as well as in the recruitment, promotion or dismissal of employees.

## **Free choice of employment, freedom of association**

We do not employ anyone against their will or force them to work. Employees have the freedom to terminate the employment relationship subject to the agreed notice period. Employees are not required to hand over their identity card, passport or work permit as a precondition for employment. Employees have the right to organise themselves into groups (freedom of association).

## **Wages and benefits, working hours**

Remuneration and social benefits are guaranteed in accordance with the basic principles on minimum wages, overtime and statutory social benefits. Working hours comply with the applicable laws.

## **Prohibition of bribery and corruption**

Corruption damages competition, prevents "fair play", does not correspond to our corporate values and exposes the Esders Group and each of its employees to an unnecessary liability risk.

It is strictly forbidden,

- to offer, promise or grant a personal advantage to domestic or foreign public officials in connection with their official position for the performance or omission of an official act.
- to offer, promise or grant unlawful personal advantages to employees or representatives of domestic or foreign companies.
- support the unlawful acts of other persons.
- to have unlawful acts carried out with the help of others, for example relatives, friends, agents, counsellors, planners and intermediaries.
- to demand or accept unlawful personal benefits.

## **Invitations, gifts and events**

Invitations and gifts are part of human interaction and polite behaviour.

Employees of the Esders Group may accept invitations and gifts from business partners as long as these are within reasonable limits of up to EUR 35 net. Any amounts in excess of this must be authorised by the management.

In order to avoid even the appearance of corruption, the following rules apply:

- Employees of the Esders Group must decline invitations and gifts if they are obviously or presumably linked to a specific expectation of some kind of consideration.
- They must also decline invitations and gifts if accepting them would violate laws or internal directives.
- Employees of the Esders Group may not demand any benefits.

The same applies to the granting of benefits.

Participation in specialised events by employees of the Esders Group is permitted and encouraged. The same applies to the organisation of specialist events.

Invitations to and participation in social and leisure events in the business environment are permitted if they are within reasonable limits. Under no circumstances may they give the impression of harming fair competition or confusing interests.

In general, business meals and invitations to entertainment events do not require approval. However, they must be reasonable in value (e.g. in Germany  $\leq$  €50 per person), conform to normal social behaviour and the rules of courtesy and avoid any appearance of dishonesty.

Invitations from or to business partners may not include spouses or life partners. Exceptions are possible if such an event is usually attended in the company of a partner. In any case, the prior consent of the management is required.

## **Avoidance of conflicts of interest**

All employees must keep their private interests and the interests of the Esders Group strictly separate. Even the appearance of a conflict of interest must be avoided.

In order to achieve this, the following orders may only be placed and the activities may only be carried out if they have been authorised in writing in advance by a managing director:

- Orders to related parties (e.g. spouses, relatives, friends and private business partners)
- Contracts with companies in which related parties work

- Contracts with companies in which related parties hold an interest of 5% or more
- Secondary activities for competitor companies
- Secondary activities for business partners

Employees who wish to acquire or already hold a direct or indirect stake of 5 percent or more in a competitor company must report this to the management. A check is carried out to determine whether a conflict of interest exists.

## **Combating money laundering**

The Esders Group only works with reputable business partners who comply with legal regulations and do not use illegal financial means.

Every employee must comply with the laws against money laundering and immediately report any suspicions of money laundering to the respective head of accounting and the management.

## **Foreign trade and export control**

The Esders Group observes the relevant legal standards of national and international law for export control and thus fulfils its role as a globally active group.

Authorisation requirements for the export of our products must be strictly adhered to. Export and support bans must be observed without exception.

The currently applicable customs regulations must be complied with both when exporting and importing goods.

## **Cooperation with customers and suppliers**

Esders expects employees, customers and suppliers to

- comply with all applicable laws.
- refrain from corruption.
- respect human rights.
- comply with the laws prohibiting child labour.
- comply with the legal provisions governing international trade.
- in particular to comply with export and import bans and embargo regulations.
- protect the health and safety of all employees.
- comply with the relevant national laws and international standards on occupational safety, environmental protection and data protection.
- ensure that these points are also implemented and complied with in our own supply chain.

## **Responsible procurement of raw materials**

The business partners support all efforts to ensure the responsible procurement of resources. The aim is to avoid the procurement and use of raw materials that have been obtained illegally or through ethically reprehensible or unacceptable measures (conflict minerals).

In order to rule out such procurement in the future and to identify possible conflict minerals in manufactured products in the supply chain, business partners are obliged to take precautions to disclose the origin or source of their resources.

## **Occupational health and safety directive, occupational safety**

The occupational health and safety guideline fulfils the legal requirements and emphasises the commitment of the management and employees to a healthy and safe workplace with the goal of "zero accidents". We maintain and promote the health, performance and satisfaction of our employees through continuous improvement of working conditions, workplace ergonomics and a wide range of preventive measures such as risk assessments, preventive fire protection, preventive healthcare and health promotion measures.

The company only uses systems and machines that comply with the applicable machine guidelines, have the relevant certificates, have labelling attached to the machines and ensure machine safety.

In the interests of the health and safety of all employees and visitors, all employees must comply with the applicable laws, regulations and standards on occupational safety at their workplace.

## **Environmental Energy Directive**

As a commercial enterprise, we bear responsibility for the environmental compatibility and sustainability of our sites. We rely on and implement environmentally friendly, advanced and efficient technologies. We pay attention to the careful use of natural resources, reduction of water consumption, continuous reduction of environmental impact, including greenhouse gas emissions (CO<sub>2</sub>) and compliance with environmental protection laws and regulations.

We also assess the environmental compatibility of the manufacturing processes and optimise them where possible and necessary.

Every employee shares responsibility for environmental protection in their area of work and is obliged to comply with environmental protection laws, regulations and standards.

## **Data protection**

As an internationally active company, the use of modern information and communication technology is an indispensable part of the Esders Group's business processes.

Employees are obliged to handle personal data sensitively in all business processes. Personal data may only be collected, used and stored in accordance with the applicable data protection laws. This applies to employee data as well as data from customers, suppliers, competitors and other persons.

In particular, data may only be processed if the data subject has given their prior consent or if this is legally permissible for other reasons. Personal data must be handled sparingly; its processing must be necessary in every case.

To ensure effective data protection, the Esders Group has appointed a data protection officer and issued corresponding guidelines.

## **Protection of the company's assets**

Every manager must establish an organisation in their area of responsibility that protects the company's assets from loss and misuse. Company assets may not be used for private purposes.

The purchase and sale of company assets must be transparent, comprehensible, economical and in line with market conditions. The personal interests of individual employees must not influence decisions and economic transactions.

Company and business-related data must be treated confidentially and may only be used within the scope of the task.

## **Behaviour towards competitors**

- Competition law and antitrust law must be observed.
- Prices, quantities and conditions may not be exchanged or agreed with competitors.
- Agreements with competitors on market sharing are not permitted.
- These rules must also be taken into account in the association's work. Industrial statistics from which individual companies cannot be identified are permissible.

## **Consequences of violations**

Violations of the guidelines may have the following consequences for employees:

- Warning letter
- Dismissal
- Claims for damages by third parties and the Esders Group
- Fines and penalties
- Imprisonment



Violations may have the following consequences for the Esders Group:

- Third-party claims for damages
- Cost-intensive court cases
- Fines and profit skimming
- Loss of image

## **Complaints, contact persons**

If you have any concerns or questions:

- Talk to your line manager or the relevant specialist department, e.g. the HR department for issues relating to employment contracts.
- If it is not possible to clarify the situation with the line manager or the relevant specialist department, or if concerns remain, the management is available as a point of contact.
- The management can be contacted directly at any time, confidentially and anonymously if desired.

If you become aware of compliance violations,

- you are obliged to inform the management immediately.

Your information is important to us! Contact us ([compliance@esders.de](mailto:compliance@esders.de)) to inform us about violations of legal requirements or our compliance guidelines.