



Code of Conduct

31. AUGUST 2023

GLOBUS GUMMIWERKE GMBH
Bökenbarg 10, 23623 Ahrensböök, Deutschland

Undertakings

For employees of Globus Gummiwerke GmbH
on compliance with the Code of Conduct

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Rules

Globus Gummiwerke GmbH recognises its social responsibility. All parties involved bear responsibility towards their own company, customers, suppliers and society.

The actions of the company and its employees are based on the values of integrity and fairness.

This Code of Conduct is a voluntary code that emphasizes the interest in fair, sustainable, responsible and ethical principles of action.

The ethical guidelines described are based on the principles of the UN Global Compact, the ILO Conventions, the United Nations Universal Declaration of Human Rights, the UN Conventions on the Rights of the Child and the Elimination of All Forms of Discrimination against Women, as well as the OECD Guidelines for International Companies. The following digits I until VI establish minimum standards and are intended to prevent situations that may call into question the integrity of the company and/or employees.

I. General principles, law and order

We are committed to:

- to live up to our social responsibility in all business activities,
- to comply with the applicable laws and other relevant provisions of the countries in which we operate in all business actions and decisions. Business partners are to be treated fairly. Contracts are adhered to, considering changes in the framework conditions.

II. Corruption/antitrust law/forced labour/child labour

a. Corruption

When dealing with business partners and state institutions, the interests of the company and the private interests of employees on both sides are strictly separated. Actions and decisions are made free of extraneous considerations and personal interests.

Among other things, the following must be noted: Management and employees of Globus Gummiwerke may not offer, promise, demand, grant or accept any gifts, payments, invitations or services in business transactions that are granted with the intention of inadmissibly influencing a business relationship or where there is a risk of endangering the professional independence of the business partner. In principle, this is not the case with gifts and invitations that are within the scope of customary business hospitality, custom and courtesy.

In case of doubt, a member of the management should be contacted for clarification.

b. Behaviour towards competitors

We respect fair competition. We comply with applicable laws that protect and promote competition, in particular applicable antitrust laws and other laws regulating competition.

In dealing with competitors, these regulations prohibit agreements and other activities that influence prices or conditions, allocate sales territories or customers or impermissibly hinder free and open competition. Furthermore, these regulations prohibit agreements between customers and suppliers aimed at restricting customers' freedom to autonomously determine their prices and other conditions for resale.

Since the distinction between prohibited cartels and permissible cooperation can be problematic, a member of the management should be contacted in case of doubt.

c. Forced labour

We reject any form of forced labour and select our suppliers accordingly.

d. Child labour

We comply with the regulations of the United Nations on human and children's rights. We are committed to complying with the Convention on the Minimum Age for Admission to Employment (Convention 138 of the International Labour Organization) and the Convention on the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (Convention 182 of the International Labour Organization). If a national regulation on child labour provides for stricter standards, these must be observed as a matter of priority.

III. Principles of Social Responsibility

a. Human rights

We respect and support the observance of internationally recognized human rights.

b. Discrimination

We undertake to oppose any form of discrimination within the framework of the applicable laws and regulations. This refers to discrimination against employees based on gender, race, disability, ethnic or cultural origin, religion or belief, age or sexual orientation.

c. Health protection

We guarantee occupational health and safety in the workplace within the framework of national regulations. We also support continuous development to improve the world of work.

d. Trade secrets

With us, all employees treat trade and business secrets confidentially.

Confidential information and confidential documents may not be passed on to third parties without authorization or made accessible in any other way. Unless authorization has been granted to do so or the information is publicly available.

IV. Ethics escalation policy

We are aware that ethical issues can be complex and that not all situations may be clearly covered by this Code of Conduct. That is why we are committed to maintaining an open dialogue and a transparent escalation policy.

- In situations where the application of this Code of Conduct is unclear or in the event of suspected violations of this Code, the affected employees should discuss the problem with their direct supervisor.
- If for any reason this is not possible or appropriate, the matter should be referred to the next higher level or to the relevant compliance department.
- We protect any employee who raises concerns in good faith from retaliation. Anonymity is guaranteed as far as legally permissible and practicable.

V. Environmental protection and resource conservation

a. Energy saving

We are committed to the sustainable and efficient use of energy. We are committed to efficiently using and saving energy in all areas of our operations, including production, logistics and office environments. Measures to save energy and increase energy efficiency are regularly reviewed and implemented.

b. Water conservation and water saving

Water is a valuable and vital resource. We are committed to sustainable water management and strive to minimize water consumption in our operations. This includes the efficient use of water, the reuse of water wherever possible and safe, and the protection of water quality through effective wastewater treatment.

c. Waste management

Waste prevention and efficient waste management are of great importance to us. We are committed to reducing waste as much as possible, recycling reusable materials and disposing of the rest properly. We also promote waste prevention initiatives among our suppliers and customers.

The implementation of these principles requires the commitment and participation of all employees and business partners. We therefore encourage everyone to actively contribute to environmental protection and resource conservation.

VI. Suppliers

Our suppliers are obliged to comply with the principles of this Code of Conduct and to promote compliance with its suppliers in the best possible way and to ask them to follow the Code of Conduct as well.

Ahrensböök, 31.08.2023



Matthias Risch, Managing Director



Dirk Hackenberg, SVP Sales & Marketing

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