



Code of conduct

19. JULI 2024

GLOBUS GUMMIWERKE GMBH
Bökenberg 10, 23623 Ahrensböök, Deutschland

Declaration of commitment

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

Globus Gummiwerke GmbH
Bökenberg 10
D - Ahrensböök

+49 4525 – 810
info@globus-gummi.de

Sparkasse Holstein
DE30 2135 2240 0179 1826 70
BIC: NOLADE21HOL

Manager
Matthias Risch

District Court of Lübeck
HRB37EU
Ust.-ID No.: DE 135121595

Registered office the company
D – 23623 Ahrensböök

I. Rules of behaviour

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 guided by 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 in particular on the principles of the UN Global Compact, the ILO conventions, the United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the Declaration of Principles on Multinational Enterprises and Social Policy (MNE Declaration), the UN Conventions on the Rights of the Child and on the Elimination of All Forms of Discrimination against Women, as well as the OECD Guidelines for international companies and the guiding principles of the automotive industry to improve sustainability in the supply chain. The following digits II until V set minimum standards and are intended to prevent situations that may call into question the integrity of the company and/or its employees. Globus Gummiwerke GmbH observes the principles of the Global Compact and works towards achieving their goals in its management.

II. 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 must be treated fairly. Contracts are adhered to, considering changes in the framework conditions.

III. Corruption/Antitrust/Forced Labor/Child Labor

a. Anti-Corruption-Politics

In 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 irrelevant considerations and personal interests.

Among other things, the following must be observed: Management and employees of Globus Gummiwerke may not offer, promise, demand, grant or accept 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. This is generally not the case with gifts and invitations that are within the framework of customary business hospitality, custom and courtesy.

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

We do not tolerate corruption, bribery or extortion; they prevent fair competitive conditions. Gifts that are associated with or could appear to be intended to influence business decisions or to obtain any other improper advantage are not promised, offered, granted, demanded or accepted in our business relationships, nor do we accept them. A particularly strict standard is to be applied when dealing with persons to whom special criminal and liability regulations apply (e.g. public officials).

b. Fair competition (antitrust law)

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 dealings 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 that are intended to restrict customers in their freedom to determine their prices and other conditions autonomously when reselling.

Because 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 and do not tolerate any form of compulsory labour. We are strictly against forced or compulsory labour in the sense of the relevant ILO core labour standards as well as all forms of slavery, in particular modern forms of slavery and human trafficking.

d. Child labour

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

IV. Social Responsibility Principles

a. Human rights

Responsible, sustainable and lawful action is one of the company's core values and is firmly anchored in our corporate culture.

Accordingly, we align our corporate governance with ethical principles.

This includes a clear position of the company on human rights, fair working conditions and high environmental and social standards. We are committed to complying with these in our international business activities. We expect the same from our suppliers.

In doing so, we rely on trusting business relationships, which also include an appropriate degree of control. That makes us credible. Our holistic and strategic approach forms the basis of our actions to respect and adhere to internationally recognised human rights and the associated environmental rights.

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

b. Discrimination

The equal treatment of all employees is a fundamental principle of our company policy. In accordance with the relevant ILO conventions, we continuously strive to ensure a working environment free of discrimination, which we believe is the essence of socially just and dignified working conditions. We treat all people equally, regardless of gender, age, skin colour, ethnic origin, sexual identity and orientation, disability, religious affiliation, ideology or other personal characteristics.

c. Protecting local communities and indigenous populations

The company is mindful of the rights of local communities and indigenous peoples who may be affected by doing business at our sites and considers the local impact of our operations. Where the local legal systems are deficient, we are guided by the recognised international minimum standards regarding illegality.

d. Human rights protection in the deployment of security forces

The company rejects any use of excessive force, torture and violation of freedom of association and association by private or state security forces to protect its business activities.

e. Right to health and safety at work

The protection and promotion of the health of employees is a top priority for the company. In accordance with the relevant ILO conventions, we believe that by creating an effective culture of prevention, these causes can be eliminated and accidents at work, injuries and occupational diseases can be prevented.

We maintain the health of our employees by taking appropriate health and safety measures that adequately cover the following topics:

- Compliance with applicable laws and alignment with international standards related to health and safety at work
- Appropriate workplace design, safety regulations and provision of appropriate personal protective equipment
- Implementation of preventive controls, emergency measures, an accident reporting system and other appropriate measures for continuous improvement
- Enabling access to drinking water in sufficient quantities as well as access to clean sanitation facilities for employees.

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

f. Dealing with conflict minerals

The company takes due care to avoid the use of conflict minerals in our products in order to prevent human rights violations, corruption and financing of armed groups or the like.

g. Working time

The Company shall ensure, within the limits of applicable law, that safe and healthy working conditions prevail, that work breaks, reasonable limits on working hours and regular paid leave are guaranteed, and that the applicable international standards on working hours are complied with, but at least the ILO conventions applicable at the place of employment.

h. Payment of an appropriate wage

The company is committed to a reasonable wage that is at least equal to the minimum wage set by applicable law and enables our employees to at least secure their livelihood. Employees are informed clearly, in detail and regularly about the composition of their remuneration.

i. Freedom of association and the right to collective bargaining

The company recognises the right of all workers to form employee representatives and to engage in collective bargaining to regulate working conditions, in accordance with the relevant ILO core labour standards and in accordance with applicable law.

j. Trade secrets

With us, all employees treat company 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 authorisation has been granted to do so or the information is publicly available.

k. Export control

Globus Gummiwerke GmbH undertakes to comply with the relevant export controls.

Comply with legal norms – in particular licensing requirements, export and support bans – in the context of the transfer and export of our goods.

l. Money Laundering Prevention

Money laundering refers to the process of smuggling illegally obtained money or illegally acquired assets into the legal financial and economic cycle. The company complies with its legal obligations to prevent money laundering and does not involve us in transactions that serve to conceal or integrate criminal or illegally acquired assets.

m. Protection of personal data, information and intellectual property

To protect personal rights regarding the use of personal data, the locally applicable data protection regulations are complied with. Thus, personal data is collected confidentially, only for lawful, pre-determined purposes and in a transparent manner.

Globus Gummiwerke GmbH protects confidential information and respects intellectual property; Technology and know-how transfer must be carried out in such a way that intellectual property rights and customer information, trade secrets and non-public information are protected. We comply with the applicable laws on the protection of trade secrets and treat confidential information of our business partners accordingly.

With us, all employees treat company 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 authorisation has been granted to do so or the information is publicly available.

V. Ethics escalation policy

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

- 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 appropriate compliance department.
- We protect any employee who raises concerns in good faith from retaliation. Anonymity is guaranteed as far as legally permissible and practically feasible.

VI. Environmental protection and resource conservation

The company is committed to the goal of protecting the environment for current and future generations. The company supports environmentally conscious actions by its employees.

Raw materials used in procurement and processing can have environmental risks for people and the environment as well as negative effects on human health and require special measures. The company acts in accordance with international agreements on the management of mercury, persistent organic pollutants or hazardous waste. We work in accordance with applicable laws and are guided by international standards to minimize negative impacts on the environment and continuously improve our activities for environmental and climate protection.

a. Energy saving

We are committed to the sustainable and efficient use of energy. We are committed to using and saving energy efficiently 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 conservation

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.

Implementing these principles requires the commitment and participation of all employees and business partners. We therefore encourage everyone to actively work for environmental protection and resource conservation.

VII. Supply chain

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

The Company will encourage its suppliers to ask their suppliers to follow this Code of Conduct.

Ahrensböök, 19.07.2024



Matthias Risch, Managing Director