

# BUSINESS CODE OF CONDUCT



## **Business Code of Conduct of P+S Polyurethan Elastomere GmbH & Co. KG**

### **Principles and goals:**

The public image of P+S GmbH & Co. KG in the public perception is also shaped in particular by the appearance and behaviour of each employee. The content and principles of the United Nations Global Compact, which focuses on human rights, labour standards, environmental protection and anti-corruption, form the basis for our Code of Conduct set out below.

Each individual employee (hereinafter to be regarded as female, male or diverse, and not constituting any form of discrimination) of P+S GmbH & Co. KG is jointly responsible for ensuring that their actions or omissions do not damage the image of P+S with regard to social as well as environmental issues, but rather promote these in a sustainable manner.

The following behavioural guidelines are therefore to be regarded as binding rules that apply to every employee. These rules should help to facilitate the ethical and legal issues of daily work. Any staff member may contact us to ask questions, make comments or give alternative suggestions connection with this Business Code of Conduct to their line manager or the Human Resources Department or any other person designated for this purpose.

### **1. Basic behavioural requirements**

#### **Law-abiding conduct**

Compliance with applicable laws and regulations is paramount in our company. Each employee must comply with the legal

and internal regulations applicable to the performance of their duties. Violations of applicable law must be avoided at all costs. Particularly affected are those that can be punished with imprisonment, a financial penalty or a fine.

Every employee must expect disciplinary consequences in the event of gross violations - irrespective of any sanctions prescribed by law - due to the violation of their duties in accordance with the employment contract.

#### **Responsibility for the reputation of P+S GmbH & Co. KG**

The appearance and conduct of each individual at P+S shapes the reputation of P+S GmbH & Co. KG. Even the inappropriate appearance and behaviour of an employee can cause considerable damage to the company.

Therefore, every employee is required to pay heed to the reputation of P+S GmbH & Co. KG in public. The fulfilment of their tasks must be oriented towards this in all respects.

#### **Mutual respect, honesty and integrity**

We expect respectful interaction with each other in the company. Discriminatory behaviour towards colleagues, irrespective of gender, age, skin colour, ethnic or social origin, sexual identity, any disabilities, as well as religious or general world view or political opinion, whether in recruitment, remuneration, promotion or dismissal, will not be tolerated. In doing so, we support and respect international human rights and ensure that we are not complicit in the violation of human rights. We particularly condemn all forms of child labour and forced labour (including trafficking, indentured or bonded labour).

We are open, honest and have integrity and stand by our responsibilities in performing our

daily tasks. We are reliable partners for our colleagues, customers and suppliers. We only make commitments if we can keep them.

In our company, we continuously strive for fair employment conditions, we pay fair wages and take the needs of employees into account in operational measures. Furthermore, we enable our employees to establish a workers' representative body and thus recognise the right to conduct collective or collective bargaining.

### **Leadership, responsibility and supervision**

Supervisors, managers and trainers bear responsibility for the employees entrusted to them. They must earn their recognition through exemplary personal conduct, performance, reliability and especially social competence. They set out clear, ambitious and realistic goals, lead through trust and give staff as much autonomy and freedom as possible. In addition to the HR department, they are also available to employees at any time for professional and personal concerns.

Every supervisor, manager or trainer has organisational and supervisory duties to fulfil. They are responsible for ensuring that no violations of legal or internal regulations occur in their respective area of responsibility that could have been prevented by appropriate supervision. Even if tasks have been delegated, the responsibility still lies with the supervisor, manager or trainer.

#### **The following principles apply:**

- The supervisor must carefully select employees according to personal and professional suitability. The duty of care increases with the requirements profile for the employee (duty of selection).
- The tasks set for the employee shall be clearly, completely and bindingly stated by the supervisor. Here, too, special

attention must be paid to compliance with the legal provisions (obligation to give instructions).

- Compliance with the legal provisions must be continuously checked by the supervisor (duty of inspection).
- The supervisor must clearly communicate to the employees that violations of the applicable laws and guidelines will not be tolerated and will have consequences under labour law (obligation to communicate).

## **2. Dealing with business partners and third parties**

### **Observance of competition law and antitrust law**

Fair competition allows for free development. The imperative of integrity also applies especially in competition for market share.

Every employee in the company is obliged to comply with all fair competition regulations. In particular, employees must not engage in discussions with competitors or suppliers in which prices or capacities are discussed. Likewise, further agreements, e.g. contrary to existing offers or internal instructions, are not permitted. The same applies to agreements not to compete or to the submission of sham bids.

We assure our suppliers of fair contractual conditions and consideration, but in return we expect them to behave fairly and correctly towards their employees and suppliers.

### **Offering and granting benefits**

In the daily competition, we fight for orders with our quality and the price of our innovative products and services.

In connection with our business activities, our employees may neither directly nor indirectly

offer or grant unauthorised advantages to third parties, either in the form of monetary payments or in the form of other benefits.

Any gifts or gratuitous benefits to employees of business partners must therefore be chosen in such a way as to avoid any impression of dishonesty or impropriety on the part of the recipient of the benefit. In case of doubt, the recipient should be asked to obtain prior approval for receipt from their superior. If the recipient refuses in this regard, it must be assumed that the recipient regards the receipt as incorrect.

Employees who conclude contracts with "decision-makers" (purchasers, salespersons, intermediaries, agents or comparable third parties) in the course of their daily work must ensure that they do not offer or grant any unauthorised benefits.

#### **Requesting and accepting benefits**

No employee may use his or her position or authority in the company to demand, accept, obtain or be promised benefits. This also includes measures against both customers and suppliers which are detrimental to the economic well-being of P+S GmbH & Co. KG. However, this does not apply to the acceptance of occasional gifts of a small value, which may be considered reasonable in the ordinary course of business. However, other gifts must be refused or returned.

#### **Special rules for the award of contracts**

Anyone who applies for an order from P+S GmbH & Co. KG expects from us a fair and unbiased examination of their offer.

Employees who are involved in the awarding of contracts in the company must adhere to the following guidelines in particular:

- The employee shall immediately declare to their superior any form of personal

interest that may be associated with the awarding of contracts.

- When awarding contracts, suppliers must not be unfairly treated, favoured or disadvantaged in competition.
- Invitations from business partners may only be accepted if both the occasion and the scope of the invitation are appropriate (\*) in the context of general business activities, and refusal would be contrary to the rule of courtesy.
- Gifts from business partners must be refused and returned, unless they are insignificant occasional gifts of low value, or the nature & extent of the gift is within reasonable (\*) limits of normal general business activity.

\* A maximum of EUR 100 is to be regarded as customary in the course of general business activities

#### **Donations**

As a locally committed company, P+S GmbH & Co. KG makes donations in cash or in kind for education, science, for art, culture and sport and for social causes. Our company receives requests for donations from various institutions or associations.

The following guidelines apply to the awarding of donations:

- Requests for donations from individuals are to be rejected as a matter of principle.
- Payments to private accounts are not permitted.
- No grants may be made to persons or organisations whose reputation and objectives are not in line with those of P+S GmbH & Co. KG.
- In principle, donations or grants must be transparent. This means that both the recipient of the donation and the

specific type of use must be known. It must therefore be possible to account for the reason and nature of the donation at all times.

- Donations should be tax deductible.

### **3. Avoidance of conflicts of interest**

#### **Principle of avoidance**

P+S GmbH & Co. KG attaches great importance to ensuring that its employees do not have a conflict of interest or loyalty during their employment. Such conflicts may arise if an employee works for or has a stake in another company, for example. Therefore, the principle of avoiding conflicts of interest applies.

#### **Non-competition clause**

Employees are not permitted to operate a company that competes in whole or in part with P+S GmbH & Co. KG. It is also not permitted to invest directly or indirectly in a non-listed company that is in competition with P+S GmbH & Co. KG.

Participating in a company that is a business partner of P+S GmbH & Co. KG requires written consent. Should the employee have official dealings with this company in the course of fulfilling their duties, consent may be refused or, if necessary, withdrawn.

In the event that close relatives are involved in a competitor or other aforementioned company, this must be declared by the employee to the Human Resources Department and documented accordingly in the personnel file.

#### **Secondary activities and assumption of political office**

P+S GmbH & Co. KG has a fundamentally positive attitude towards active participation

in politics and the assumption of political office. The Human Resources Department must be notified in advance in writing of the taking up of any secondary employment or political office for remuneration. Secondary employment can be prohibited if its nature or extent leads to an impairment of the work performance, contradicts the duties in the company, or if there is a risk of conflicts of interest.

### **4. Dealing with facilities and information**

#### **Use of facilities**

All equipment and facilities in the offices, workshops, production and all social and recreation rooms (furniture, machines, tools and other operating and business equipment) may only be used for business purposes and must be treated appropriately and with care. (Duty of care)

Under no circumstances should information be accessed or passed on that incites racial hatred, glorifies violence or other criminal offences, or has content that may be sexually offensive against the respective cultural background.

No employee is permitted to make recordings of files, images, sound documents or otherwise reproduce them without the prior consent of superiors, unless they are directly necessary for the performance of daily tasks.

#### **Records and reports**

The core of open and effective cooperation is accurate and truthful reporting. This applies not only to internal communication but also to external relations with customers, suppliers and other parties involved in general business activities.

All records and reports shall be accurate and truthful. In addition to the general basic

principles of proper accounting, records must always be complete, accurate and formally correct. This also applies, for example, to information on expense claims.

### **Secrecy**

Employees are required to maintain confidentiality about internal company data and matters that have not been disclosed to the public. Among other things, this concerns details relating to the organisation of P+S GmbH & Co. KG as well as its technical facilities, recipes, and general figures of the internal reporting system. This obligation continues beyond the termination of the employment relationship.

### **Data protection and data security**

Access to the internet and intranet serves the general exchange of information and dialogue within the framework of general business activities and thus contributes to the success of the business. Nevertheless, the use of electronic communication also entails certain risks with regard to data security and the protection of personal data. Effective precautions against such risks are important components of IT management, executives and, last but not least, every employee. (see also the data protection declaration of P+S GmbH & Co. KG in the download section under: [www.pus-polyurethan.de](http://www.pus-polyurethan.de))

## **5. Environment, society and technical safety**

High priority is given to the corporate goals to protect the environment and use its resources responsibly.

Protecting the environment is also an essential and integral part of our product development and all areas of production. The environmental management system ISO 14001 introduced at P+S GmbH & Co. KG ensures compliance with the law and defines

high standards. Environmental protection already extends to the choice of materials to be used in development, the choice of processing technologies, as well as the handling of the raw materials and supplies used from production through to disposal.

Every employee contributes to this with exemplary performance in their area of responsibility in these areas.

Furthermore, we acknowledge our co-responsibility for general public concerns. We support socio-political measures and stand up for the disadvantaged within and outside society. Equally, we encourage and enable our staff to have their own meaningful engagement in community work.

### **Occupational safety**

Through our responsible cooperation among colleagues and employees, we offer the best possible precautions against accident hazards. In addition to the technical planning of workplaces, facilities and processes, but also for safety management, occupational safety focuses on there being a high degree of responsible conduct. Every employee in the company is also a role model. The contents and measures of the ISO 45001 introduced in the company help us to make our everyday work even safer.

### **Complaints and tips**

Any employee may lodge a complaint with the supervisor, the human resources department or any other person or body appointed for this purpose, including the employee representative body, or point out any circumstances which indicate a violation or disregard of the aforementioned Business Code of Conduct. Such matters will be thoroughly investigated and appropriate action will be taken if necessary. Own research and possible own retaliation will not

be tolerated. We ask that employees always exhaust the scope of internally available options first.

### **Introduction and control**

The sustainability of the introduction of the Business Code of Conduct will be promoted by the management of P+S GmbH & Co. KG as well as the executives through active communication.

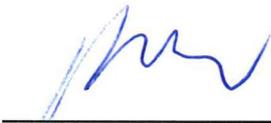
A regular review of compliance with laws and guidelines is carried out in the organisational units of P+S GmbH & Co. KG.

In the event of deviations, misconduct is counteracted through targeted advice and, if necessary, instruction.

Employees in all areas of operations have been assigned to help ensure fair and corruption-free competitive behaviour.

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These guidelines of the Business Code of Conduct were issued by the management of P+S GmbH & Co. KG on 1.12.2021 and will come into force as of this date.

Management:   
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Manfred Heckert

Management:   
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Jürgen Bleick

### **References:**

- United Nations Global Compact ([www.unglobalcompact.org](http://www.unglobalcompact.org))
- United Nations International Bill of Human Rights ([www.un.org/en/universal-declaration-human-rights/index.html](http://www.un.org/en/universal-declaration-human-rights/index.html))
- International Labour Standards (ILO) ([www.ilo.org/global/standards/lang--len/index.htm](http://www.ilo.org/global/standards/lang--len/index.htm))
- International Organization for Standardization (ISO) ([www.iso.com](http://www.iso.com))