

Code of Conduct for Business Partners

Inhalt

| | |
|---|---|
| 1. Foreword..... | 2 |
| 2. Responsible business practices | 2 |
| 2.1 Compliance with laws, human rights and labor standards | 2 |
| 2.2 Prevention of corruption | 3 |
| 2.3 Antitrust and competition law | 3 |
| 2.4 Data protection and privacy | 3 |
| 2.5 Export and import | 3 |
| 3. Achtung der Menschenrechte und Arbeitsnormen | 3 |
| 3.1 Respect for human rights and labor standards..... | 3 |
| 3.2 Occupational health and safety | 3 |
| 3.3 Freedom of association and the right to collective bargaining | 4 |
| 3.4 Equal treatment | 4 |
| 3.5 Wages and social benefits | 4 |
| 3.6 Environmental impacts with negative consequences for human rights..... | 4 |
| 3.7 Land rights..... | 4 |
| 3.8 Abuse of force by private or public security forces | 4 |
| 3.9 Limitation of working hours and regular employment | 5 |
| 3.10 Prohibition of harassment or inhumane treatment | 5 |
| 3.11 Dealing with employees and disciplinary measures | 5 |
| 3.12 Local communities and indigenous peoples | 5 |
| 3.13 Employees' access to food and sanitary facilities at the workplace | 5 |
| 4. Environmental and climate protection..... | 5 |
| 4.1 Waste and emissions..... | 6 |
| 4.2 Compliance with specific environmental conventions..... | 6 |
| 4.3 Process reliability | 6 |
| 5. Product safety..... | 6 |
| 5.1 Conflict minerals..... | 6 |
| 6. Implementation | 6 |
| 6.1 Training and qualification | 7 |
| 6.2 Complaints mechanisms | 7 |
| 6.3 Verification and sanctions | 7 |

Code of Conduct for Business Partners

1. Foreword

Gerlinger GmbH & Co. KG (hereinafter referred to as "Gerlinger") has been a major European manufacturer of technical adhesive tapes, sealants and butyl sealants for all branches of industry, the construction industry and the building trade for over 60 years. The wide range of practical requirements and targeted intensive research and development have resulted in high-performance, application- and process-optimized product solutions, the quality of which can be guaranteed in-house thanks to state-of-the-art production technologies and the complete vertical range of manufacture, from raw materials to adhesive production to the finished product.

Gerlinger is actively committed to sustainability and responsible action. Gerlinger is aware of its responsibility within its own organization, towards customers and suppliers as well as towards the climate and society. In particular, Gerlinger is guided by the values of integrity and fairness, regardless of whether its activities take place in Germany or abroad. Gerlinger therefore supports initiatives and principles such as the UN Guiding Principles on Business and Human Rights, the core labor standards of the International Labor Organization (ILO) and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and is committed to embedding them in its corporate policies and procedures.

This means that we at Gerlinger are expressly committed to the continuous improvement of our performance in the areas of occupational health and safety, climate protection and product stewardship.

Gerlinger wants to work with its suppliers (hereinafter referred to as "business partners") to further develop its sustainability performance in the supply chain. The success of the cooperation between Gerlinger and its business partners is based on mutual trust, transparency, reliability and fairness. Gerlinger assumes responsibility for the implementation of ethical, social and environmental standards in its own company and expects its suppliers to comply with the principles set out in this Code of Conduct and to take appropriate account of them in their own supply chain.

2. Responsible business practices

2.1 Compliance with laws, human rights and labor standards

The business partner undertakes to comply with all applicable national laws and the relevant internationally recognized standards, guidelines and principles. These include in particular the UN Guiding Principles on Business and Human Rights, the core labor standards of the International Labor Organization (ILO) and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. If national and international regulations do not coincide, the business partner should adhere to the standard that provides greater protection for those affected. Compliance with this Code of Conduct and the applicable norms and standards may not be undermined by subsidiary agreements such as deviating contractual agreements or other comparable measures.

Code of Conduct for Business Partners

2.2 Prevention of corruption

The business partner hereby undertakes to comply with all relevant international and local anti-corruption laws. When dealing with business partners (customers, suppliers, service providers) 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.

2.3 Antitrust and competition law

The business partner shall ensure compliance with the relevant national and international antitrust laws and the laws against unfair competition, including price or condition agreements with competitors or other forms of agreements restricting competition, in particular agreements with competitors that have the hidden objective of market sharing or customer sharing.

2.4 Data protection and privacy

The business partner undertakes to comply with the provisions of applicable data protection laws. In addition, the business partner shall respect individuals in a manner that is compatible with the right to privacy and shall ensure that it does not unlawfully and/or arbitrarily interfere with an individual's privacy.

2.5 Export and import

The business partner undertakes to comply with the applicable import and export laws, in particular to comply with official sanctions, embargoes and other relevant laws, regulations, state and national guidelines and principles governing the transfer, provision or delivery of goods and/or technology.

3. Achtung der Menschenrechte und Arbeitsnormen

3.1 Respect for human rights and labor standards

The exploitation of children and young people cannot be tolerated in any form. The business partner is expected to prevent all forms of child labor in its operational processes. The business partner must comply with the minimum age of persons for employment. Where national law regulating child labor or the minimum age for admission to employment prescribes stricter criteria, this law shall take precedence.

The business partner shall not impose any form of involuntary employment or employment under threat of penalty or other sanction, including compulsory overtime, indentured labor, forced prison labor, slavery or debt bondage.

3.2 Occupational health and safety

The business partner undertakes to ensure a safe, healthy and hygienic working environment and to take all necessary measures to prevent accidents at work and damage to health. As part of these efforts, the business partner undertakes to comply with internationally recognized occupational safety standards.

Code of Conduct for Business Partners

3.3 Freedom of association and the right to collective bargaining

The business partner shall ensure that the fundamental right of its employees to freedom of association and the right to collective bargaining are upheld within the framework of national laws. Employee representatives are not discriminated against and have access to exercise their representative functions in the workplace.

3.4 Equal treatment

The business partner must eliminate all forms of discrimination in its workforce. Equal opportunities and equal treatment should be an essential and integral part of formal company policy (including in relation to recruitment, remuneration, benefits, promotion and termination of employment).

The business partner must therefore eliminate and prevent any form of discrimination based on (but not limited to) ethnic, national or social origin, skin color, gender, age, religion, ideology, political orientation and/or activity, membership in a trade union or employee representation, disability, sexual identity or orientation or other personal characteristics or preferences. The business partner shall promote equal opportunities in employment and ensure that the applicable statutory provisions are always complied with. Equal treatment also includes equal pay for work of equal value.

3.5 Wages and social benefits

The business partner guarantees that the wages it pays its employees are appropriate. The appropriate wage is at least the applicable statutory minimum wage or the minimum wage specified for the industrial or service sector. The business partner provides its employees with all appropriate social benefits. Wages are paid on time and written and understandable information about wages is provided.

3.6 Environmental impacts with negative consequences for human rights

The business partner undertakes to avoid harmful soil changes, air, noise and water pollution, harmful noise emissions or excessive water consumption that could impair the resources required for the preservation and production of food, as well as actions that impede access to drinking water and sanitary facilities or damage the health of individuals.

3.7 Land rights

When acquiring, developing or using land, the business partner shall ensure that the prohibition of unlawful clearance and withdrawal of land, forests and waters is observed, in particular if their use secures the livelihood of a person.

3.8 Abuse of force by private or public security forces

When hiring public or private security forces to protect the company's projects, the business partner shall ensure, through appropriate instructions or checks, that the security forces do not interfere with the right to freedom of assembly, do not physically harm employees and refrain from any form of inhuman or degrading treatment.

Code of Conduct for Business Partners

3.9 Limitation of working hours and regular employment

The working time structures introduced by the business partner must comply with the applicable national laws, industry standards and the relevant ILO conventions.

The business partner shall ensure that work is performed on the basis of a recognized employment relationship established by national laws and practices. Obligations arising from the regular employment relationship may not be circumvented through the use of other types of contractual agreements.

3.10 Prohibition of harassment or inhumane treatment

The business partner shall ensure that measures are implemented to prevent physical abuse or discipline, threats of physical abuse, sexual or other harassment, verbal abuse or other forms of intimidation.

3.11 Dealing with employees and disciplinary measures

Gerlinger expects its business partners to treat their employees with dignity and respect. Sanctions, fines, other penalties or disciplinary measures may only be imposed in strict compliance with applicable national and international laws and standards as well as internationally recognized human rights.

3.12 Local communities and indigenous peoples

The business partner undertakes to respect the rights of indigenous peoples and to act responsibly in local communities.

3.13 Employees' access to food and sanitary facilities at the workplace

The business partner shall not restrict access to adequate food, clothing, water and sanitary facilities at the workplace. If the company provides housing, the business partner shall ensure access to adequate housing.

4. Environmental and climate protection

The protection of people and the climate is an integral part of Gerlinger's corporate policy. Gerlinger therefore expects its business partners to take appropriate measures to comply with the principles of environmental and climate protection in accordance with the applicable legal provisions and international standards. This includes, in particular, reducing the climate-relevant effects of its business activities, actively protecting the climate and the environment, avoiding emissions and waste and continuously increasing resource efficiency.

The business partner shall take suitable and verifiable measures and establish effective management systems (e.g. in accordance with ISO 14001 or another management system that meets a comparable standard) to ensure climate protection.

Code of Conduct for Business Partners

4.1 Waste and emissions

Gerlinger requires the business partner to maintain procedures and systems that ensure the safe handling, transportation, storage, recycling and reuse of raw materials, other materials and waste.

The business partner hereby undertakes to minimize the generation and disposal of waste and any form of emission to air, water and/or soil that could have a negative impact on human health, ecosystems and/or the climate. The business partner shall also prevent or, if unavoidable, minimize the unintentional release, emission and/or leakage of hazardous substances into the environment by implementing and actively maintaining the appropriate procedures and systems. The business partner must ensure that all materials and waste are appropriately handled and treated before they are released into the environment, should this be unavoidable.

In addition, Gerlinger expects the business partner to implement and maintain procedures and systems that optimize the consumption of all resources.

4.2 Compliance with specific environmental conventions

Where applicable, Gerlinger requests the business partner to ensure compliance with the prohibitions related to the use and production of mercury and the treatment of mercury waste under the Minamata Convention, the prohibition of the production and use of chemicals and the handling, collection, storage and disposal of waste in an environmentally unsound manner under the Stockholm Convention and finally the prohibition of the export and import of hazardous waste under the Basel Convention.

4.3 Process reliability

The Business Partner undertakes to implement and maintain security procedures to control and maintain the integrity of its business processes in accordance with applicable security standards. The business partner must take appropriate measures to prevent incidents at all its sites and facilities.

5. Product safety

The business partner must comply with all laws and applicable requirements for product safety and quality. In addition, products must be properly labeled. If required, any information on hazardous substances in the respective products must be made available.

5.1 Conflict minerals

The business partner is expected to ensure that no products are supplied to Gerlinger that contain metallic elements whose ores and/or derivatives originate from a conflict region where they may contribute to the direct or indirect financing or support of armed groups and/or contribute to human rights violations.

6. Implementation

The business partner shall actively inform its direct suppliers of the requirements of this Code of Conduct and ensure compliance with it. The business partner undertakes to implement effective risk management processes in all areas addressed in this Code of

Code of Conduct for Business Partners

Conduct and with regard to all applicable legal requirements. The business partner is expected to disclose (upon request) any risks and/or violations of the requirements set out in this Code of Conduct that have been identified in its own business and/or supply chain.

If the business partner has already implemented its own Code of Conduct or a formal company policy containing all the requirements set out in this Code, Gerlinger will require the business partner to provide evidence that it fully complies with these requirements. If the business partner has not implemented its own code of conduct or formal company policies, it hereby agrees to comply with this Code of Conduct and all requirements contained herein as described above.

The business partner shall implement appropriate measures to drive and ensure compliance with the expectations set out in this Code of Conduct in its own supply chains.

6.1 Training and qualification

The business partner is expected to promote and develop the qualifications of its employees through suitable training and further education measures.

6.2 Complaints mechanisms

The business partner shall establish and maintain effective grievance mechanisms for its employees that enable them to report possible violations of the Code of Conduct anonymously.

6.3 Verification and sanctions

Gerlinger reserves the right to monitor and review its business partners' compliance with the requirements of this Code as described above.

Gerlinger will treat any serious breach by the business partner of the obligations, requirements and provisions of this Code as a material breach of contract and will therefore consider appropriate legal action on a case-by-case basis.

The business partner will be given the opportunity to take appropriate corrective action. Gerlinger reserves the right to suspend and/or terminate the business relationship.

Code of Conduct for Business Partners

7. Acknowledgement and consent of the business partner

We have received the Gerlinger Supplier Code of Conduct and hereby undertake to comply with its principles and requirements and to ensure that our suppliers comply with them.

Company

Contact person

Date, Location

Signature