

# Markert Group Code of Conduct

Side	Topics
2	<b>Foreword</b>
3	<b>Scope</b>
4 – 5	<b>Key Principles</b>  <i>1. Compliance with laws and guidelines while respecting cultural values</i> <i>2. Employees as representatives of our company</i> <i>3. Product safety and product quality</i> <i>4. Fair competition and antitrust law</i> <i>5. Prohibition of corruption</i>
6	<b>Environment</b>  <i>6. Health and safety at work</i> <i>7. Diversity and Equal Opportunities</i> <i>8. Diligence in the handling of data</i>
7	<b>Conflicts of interest, gifts and invitations</b>  <i>9. Dealing with Conflicts of Interest, Gifts and Invitations</i>
7 – 8	<b>Handling of information, company resources and finances</b>  <i>10. Diligence in the handling of accounting and financial documents</i> <i>11. Handling of confidential information and the protection of intellectual property</i> <i>12. Use of our company resources</i>
8 – 9	<b>Society and Community</b>  <i>13. Responsibility towards our environment</i> <i>14. Social Commitment</i> <i>15. Prohibition of child and forced labour</i>
9	<b>Precautions to comply with the principles</b>

## Foreword

With the Code of Conduct, the Markert Group has set itself a guiding goal of manifesting values in the form of standards and ethical principles for all managers and employees at all levels and in all subsidiaries.

The Code of Conduct is intended to provide you with guidance on how to behave in critical situations and make the right decisions in your daily work.

We ask you to familiarize yourself with the Code of Conduct and to internalize the contents.

These guidelines are specifically designed to raise awareness of these important issues while also protecting our employees.

You as open-minded employees with integrity, play a crucial role for the Markert Group – now and in the future.

Together, we are driving Markert Filtration **and** Markert Marsoflex **forward through our innovative strength**, using the values and rules of the Code of Conduct to create a clear guideline.

Every employee can contribute to strengthening the good reputation of our companies, but also be personally proud to be a part of the Markert Group.

Neumünster, 14.03.2024



p.markert@markert-group.com, Mar 15, 2024 07:53:20 AM UTC

Managing Partner

## Scope

### To whom does the Code of Conduct apply?

This Code of Conduct is a voluntary commitment to acting ethically. It describes the principles and the basis for our decisions and actions.

The Code of Conduct is intended to help employees, managers and shareholders alike to understand our principles and act accordingly.

The Code of Conduct applies to the entire **Markert Group**.

Foreign subsidiaries can supplement country-specific guidelines, provided that they comply with the Code of Conduct as a code of reference.

### How to use the Code of Conduct correctly.

The Code of Conduct is designed to help you make the right decision when it comes to legal or ethical issues in your day-to-day work.

Of course, it is not possible to predict all the situations that may arise. In addition, the scope of the Code of Conduct is not sufficient to cover all existing rules and guidelines.

Every employee should therefore take every opportunity to find out about applicable rules and guidelines. Of course, we are aware that laws and guidelines are not always easy to understand. In addition, legal regulations of different countries must be observed.

It is therefore not always easy to assess whether a certain conduct is ethically impeccable and in accordance with the law in every respect.

Every single employee can find themselves in a situation in their day-to-day work in which they have to face moral, legal or ethical problems. Here, the following questions can help you make a decision:

- Is the decision in line with the principles of our company?
- Am I convinced that the decision is legal and does not violate any legal requirements?
- Am I convinced that I am acting morally, legally and ethically right with my decision – in the sense of the Markert Group, but also according to my personal standards?

If you are still unsure, you should not be afraid to inform your supervisor to discuss the next steps together.

## Key Principles

### 1. Compliance with laws and guidelines while respecting cultural values

We are committed to observing and complying with applicable laws and regulations. Of course, this obligation also applies to applicable directives and guidelines as well as recognised values of the cultures and countries in which we operate.

### 2. Employees as representatives of our company

We are aware that we and our actions and behaviour are perceived as representatives of the Markert Group. With our work and our behaviour, we contribute to the positive perception and support the economic success of the group of companies. We all have the task of observing the Code of Conduct, carrying its principles into the company and ensuring compliance with it through our conduct. Managers bear an additional responsibility: they are role models for their employees, support them with questions and concerns about compliance with legal requirements and help them to behave ethically at all times.

### 3. Product safety and product quality

We are aware that ensuring quality as well as the safety and reliability of our products are the basis of our success – and thus a central corporate principle. We implement the necessary improvements thoroughly and sustainably. In doing so, we always act in compliance with internationally recognized quality management systems. We aspire to meet the high-quality demands of our customers on our products at all times. This requires the commitment of every employee. We understand quality as a dynamic process of continuous improvement of all quality-related services.

Every single employee can contribute to ensuring that the quality of our products is constantly improved and that our product promises are kept. This applies in particular to the employees who are entrusted with the development, manufacture, marketing and sale of Markert products.

- Comply with all legal requirements regarding product development and labeling.
- Ensure that all production processes are carried out in compliance with hygiene standards and occupational health and safety regulations.
- Carry out constant quality control.

#### 4. Fair competition and antitrust law

We stand by the rules of fair competition for the benefit of all market participants. Our group of companies is committed to safeguarding and maintaining free and undistorted competition. This principle is central to the antitrust laws that exist worldwide and is therefore binding for us.

In order to protect yourself and the Markert Group from the consequences of a violation of the legal provisions, all antitrust conduct is prohibited. These are in particular:

- Coordination and agreements with competitors on prices, conditions, distribution of markets, customers or territories, capacity or production restrictions.
- Exchange with competitors about sensitive information such as prices, price changes, margins, discounts and sales.
  
- Undue influence on dealers in the determination of retail prices.
  
- Abuse of a dominant position.

#### 5. Prohibition of corruption

We do not tolerate corruption – no matter what form it takes. The unlawful transfer of benefits to third parties – such as public officials or employees of private companies – is prohibited by us. The prohibition of corruption applies without restriction, i.e. regardless of to whom, in what place in the world and for what reason such advantages are granted. Anti-corruption laws exist worldwide and must be observed by all companies, employees, agents and representatives. Violations of these laws can constitute serious criminal offences and cause significant damage to both the individual and the group of companies. The prohibition of corruption also means that personal advantages in connection with business activities may not be demanded, accepted, offered or granted. Experience has shown that especially in connection with gifts or favors, questions arise again and again in everyday working life. You can find out how to properly handle invitations or gifts in this Code of Conduct under Section 9.

Protect yourself from committing a crime, if in doubt, contact your supervisor or the managing director if, for example, you are confronted with a case of corruption or have questions about the legality of benefits, payments and financial agreements.

## Environment

### 6. Health and safety at work

The Markert Group has an obligation to all employees to offer safe and healthy working conditions and to continuously develop them. Compliance in the area of occupational safety is regularly reviewed. In addition, occupational safety training courses are carried out on a regular basis.

Every single employee can contribute to making the working environment at the Markert Group safe. The following rules of conduct should be self-evident:

- Comply with occupational health and safety guidelines.
- Behave prudently enough so that no one can get into danger.
- Act thoughtfully and carefully to avoid safety-threatening situations. If a dangerous situation cannot be avoided, make sure that the problem is rectified immediately and that colleagues are informed accordingly.
- Report any incidents that threaten safety to your supervisor or supervisor and senior management.

### 7. Diversity and Equal Opportunities

As a company, the Markert Group represents diversity, tolerance and equal opportunities. The diversity of our employees is valuable to us. After all, the diverse background of our employees fosters creativity and allows us to better understand our customers worldwide. Direct or indirect discrimination must therefore be excluded in all decisions and in all areas of the company. This applies regardless of gender, age, race, skin colour, religion, ideology, gender orientation or disability. Cultural, ethnic or national origin, political and philosophical convictions must also play no role.

Every single employee can contribute to the success of the Markert Group by respecting the diversity of the company. Fact-oriented, friendly and fair interaction with each other should be just as much a matter of course as trusting cooperation.

### 8. Diligence in the handling of data

We ensure that modern information and communication technology is used properly. Personal rights as well as data of our customers, contractual partners and employees enjoy the highest possible protection. Data collection and processing are carried out in accordance with the applicable laws. We comply with existing reporting obligations to national supervisory authorities and control bodies.

## **Conflicts of interest, gifts and invitations**

### **9. Dealing with Conflicts of Interest, Gifts and Invitations**

We are aware that decisions in connection with professional activities for the Group must not be influenced by private interests or personal relationships. Situations in which conflicts of interest may arise should therefore be avoided. The proper way to deal with potential conflicts is to fully disclose all the facts. Even in connection with gifts and invitations, only absolute transparency can protect against damage to the group of companies and the affected employees. The granting of high-quality gifts, cash gifts and financial benefits to employees and representatives of other companies is also prohibited in principle. Only in exceptional cases may low-value gifts be granted, provided that they are appropriate and no consideration is expected. Such gifts should be provided with the respective brand logo. In virtually all jurisdictions, gifts and invitations to and from public officials are particularly sensitive and therefore generally prohibited.

As a matter of principle, do not accept gifts or inappropriate invitations from a business partner, with the exception of low-value gifts such as promotional and promotional items, as well as appropriate gifts of a representative nature. Gifts and invitations addressed to the home address may not be granted or accepted.

## **Handling of information, company resources and finances**

### **10. Diligence in the handling of accounting and financial documents**

We are aware that diligence in the handling of financial records is of paramount importance to our company. We therefore adhere to our obligations arising from national and international accounting rules. The company's accounting is identical externally and internally in accordance with International Financial Reporting Standards. Our financial records are the basis for the management of the business. They accurately and promptly reflect the course of business and the relevant facts to the stakeholders.

- Make the most of standardized processes and ensure compliance with accounting regulations.
- Keep your records carefully and ensure that they are stored in accordance with the law and guidelines.
- Collaborate with internal and external auditors.

## **11. Handling of confidential information and the protection of intellectual property**

We are aware that intellectual property is a valuable asset and the basis for the success of our company. That's why it's important to protect this information. Intellectual property includes inventions, product and packaging prototypes, product concepts, details about customers and suppliers, and other trade secrets.

Every single employee should contribute to the protection of this information. Confidential information concerning the company must be kept secret. This means that they must not be passed on to unauthorized persons – including family and friends.

Protect files and files from unauthorized access. Passwords must be selected according to security requirements, changed at regular intervals and not passed on to others. Make sure that no third party can access data assets when you are not at your workplace. Conduct conversations with confidential content in such a way that unauthorized third parties do not know about them. This is especially true for telephone conversations via telephone speakers and video conferences. Use confidential information only for business purposes.

## **12. Use of our company resources**

The Markert Group provides all employees with company resources to achieve their common goals. Only an efficient use of all resources at all levels can ensure the company's long-term success. Waste or misuse of company resources – including working hours – is detrimental to the operational and financial performance of the group of companies and thus affects us all. Every single employee can make his or her contribution.

- Be cost-conscious and carefully consider whether expenditure is necessary and proportionate.
- Take care of the company's property, protect it from damage, destruction and theft.
- Keep private use of IT infrastructure, including e-mail, internet access and telephones, within reasonable limits.

## **Society and Community**

### **13. Responsibility towards our environment**

We are aware that the protection of the environment and natural resources is an important goal of our company. We develop and distribute products that place particular emphasis on environmental protection in the manufacture, storage, distribution, transport, use and disposal. All employees therefore have a duty to use energy, water and raw materials sparingly and efficiently. The use of renewable raw materials and the development of environmentally friendly packaging should be supported by everyone.



#### **14. Social Commitment**

We are aware that we have a great social obligation as a group of companies. For this reason, we grant donations in cash and in kind in an appropriate form, which are intended exclusively for the promotion of projects within the framework of the fields of education, family and culture. Financial contributions to political parties or similar institutions as well as to individuals are not granted.

#### **15. Prohibition of child and forced labour**

We do not use or condone unlawful labor by children under the age of 15 or the use of forced labor.

#### **Precautions to comply with the principles**

##### **Consequences of non-compliance with the principles**

This Code of Conduct combines applicable legal and operational regulations. The obligation to comply with the principles listed in the Code of Conduct arises either directly from the laws, company regulations, company management and guidelines or as an ancillary obligation in the employment contract from the employment contract. Deliberate violations of the guidelines will result in consequences within the framework of the applicable regulations.

#### **Handing over the Code of Conduct**

Every employee is given this Code of Conduct. If necessary, the Code of Conduct will be modified to take into account country-specific characteristics.