

Code of Conduct for the Marabu Group and their business partner

Table of contents

- I. Preamble..... 2
- II General..... 3
 - 1. management systems..... 3
 - 2. obligations to suppliers..... 3
- III Environment..... 3
 - 1. environmental legislation..... 3
 - 2. avoidance and reduction of environmental pollution 4
 - 3. environmentally friendly products..... 4
 - 4. waste..... 4
 - 5. chemicals..... 4
- IV. People..... 4
 - 1. modern slavery, child and forced labor 4
 - 2. discrimination and disciplinary sanctions..... 4
 - 3. occupational health and safety..... 5
 - 4. working hours, wages and social benefits..... 5
 - 5. freedom of association 5
 - 6 Minorities and indigenous peoples..... 5
 - 7 Disciplinary measures 6
- V. Business ethics..... 6
 - 1. fairness in competition 6
 - 2. prohibition of corruption 6
 - 3 Intellectual property 6
 - 4. money laundering..... 7
 - 5 Data protection and IT security 7
- VII Compliance..... 7
 - 1. business partner..... 7
 - 2. reporting of violations..... 7
 - 3 Entry into force and validity 7

I. Preamble

The Marabu Group¹ attaches great importance to social and ecological sustainability in its cooperation with business partners and throughout the entire supply chain², in particular to eliminate risks to people and the environment. It includes all steps in Germany and abroad that are necessary for the manufacture of products and the provision of services, from the extraction of raw materials to delivery to the end customer.

The following Code of Conduct is a binding standard based on applicable law for all business activities of the Marabu Group. This applies both to internal employees and to all business partners along the supply chain.

The Code of Conduct contains general rules of conduct within the company and towards third parties as well as organizational guidelines to ensure compliance with regulations and processes within the company. These principles represent minimum standards for our business relationships. They are based on the international guidelines and principles listed below:

- Universal Declaration of Human Rights
- United Nations Global Compact (UNGC)
- UN Guiding Principles on Business and Human Rights
- UN Convention on the Rights of the Child
- UN Convention on the Status of Women
- OECD Guidelines for Multinational Enterprises
- Core labor standards of the International Labor Organization (ILO)
- Paris climate protection agreement
- Minamata Convention
- Basel Convention
- Stockholm Convention on Persistent Organic Pollutants (POPs Convention)

Compliance with international conventions and the laws and legal systems of the countries in which we do business is a fundamental principle at Marabu. Every employee must observe the applicable legal regulations of the legal systems and the Marabu guidelines within the framework of which he or she acts. Violations of the law must be avoided under all circumstances.

In addition, the implementation and monitoring of the aforementioned standards must be ensured by means of a corresponding internal procedure for business partners and their suppliers along the supply chain.

All employees of the Marabu Group and their business partners contribute to a corporate culture that is characterized by fair and cooperative collaboration. Respect and trust in our day-to-day dealings with one another are among the fundamental convictions of the management and employees. In addition, every employee is committed to behaving responsibly and with integrity. This behavior should be characterized by a high degree of environmental awareness and risk awareness as an integral part of the employees' daily work. The personality and dignity of each individual must be respected.

¹ The Marabu Group is to be understood here as all subsidiaries and branches in which Marabu GmbH & Co. KG, Tamm, holds a majority interest as well as their branches.

² The supply chain refers to all products and services of business partners, including their direct and indirect suppliers.

All employees are to be granted equal opportunities and equal treatment, regardless of their skin color, religion, gender, nationality, sexual orientation or political views, provided these are based on democratic principles and tolerance towards those with different opinions.

Mutual appreciation is based on inner conviction and includes a willingness to act. This also means that problems in the workplace are addressed and solutions are sought together. Only in this way can an environment characterized by openness, tolerance and fairness develop.

As part of their management role, managers prevent unacceptable behavior. They act as mediators in such conflicts. Every employee undertakes to refrain from any form of discrimination (bullying).

All employees, especially managers, are aware that they represent the company at all times through their behavior and thus shape its reputation externally and the culture internally. All employees treat others in the same way as they expect others to treat them. This results in fair and respectful treatment of customers and other external persons who have a business relationship with the company. Fairness and appreciation also apply to advertising and the company's own public image, both internally and externally.

Note:

For ease of reading, only the masculine form is used in these guidelines.

II General

1. management systems

The Marabu Group prefers suppliers who have actively implemented a quality management system in accordance with ISO 9001, an environmental management system in accordance with ISO 14001 and an occupational health and safety management system in accordance with ISO 45001 or equivalent systems.

The Marabu Group expects its suppliers to integrate sustainability requirements into their organization and processes and to improve their environmental performance by setting targets and monitoring environmental performance indicators.

2. obligations to suppliers

The Marabu Group expects its suppliers to comply with and monitor due diligence obligations in order to prevent and mitigate negative impacts in their own supply chains.

The general expectation is that suppliers will confirm this Code of Conduct or apply a similar/equivalent code of conduct to their own suppliers and require them to minimize the social and environmental impact of their corporate activities.

III Environment

1. environmental legislation

The relevant environmental protection laws and regulations in all countries in which Marabu and its suppliers operate must be complied with. Harmful soil changes, water and air pollution as well as noise emissions and excessive water consumption must be avoided or continuously

reduced as far as possible. Valid limit values must be complied with. In this respect, the legal requirements for immission and water protection as well as all regulations regarding hazardous substances are complied with. This applies in particular to the storage, handling and disposal of hazardous substances.

2. prevention and reduction of environmental pollution

Environmental pollution should be avoided or at least reduced as far as possible by proportionate means. Emissions are monitored accordingly. The protection of the environment and climate and the promotion of biodiversity is a permanent task that can only be achieved by constantly improving the level of protection through a continuous reduction in the consumption of resources and the amount of waste. A permanent reduction in carbon equivalents should be aimed for.

3. environmentally friendly products

When developing products and services, care is taken to ensure that their use is economical in the consumption of energy and natural resources. Where possible, products should be suitable for reuse, recycling or safe disposal.

4. waste

In Germany, waste must be treated according to the waste hierarchy of the Closed Substance Cycle Waste Management Act. As a general rule, prevention is always preferable to reuse, recycling, recovery and disposal. Waste must be collected, stored and disposed of in an environmentally friendly manner. The import and export of hazardous waste and other waste from countries that are not party to the Basel Convention must be avoided.

5. chemicals

Regulated substances are only used in accordance with the legal requirements of the respective markets. The supplier is encouraged to work proactively with the Marabu Group to progressively reduce potentially hazardous substances wherever possible, regardless of their legal regulation.

IV. People

1. modern slavery, child and forced labor

The Marabu Group does not tolerate forced labor, child labor, sexual exploitation, servitude, criminal exploitation, human trafficking, organ harvesting or other forms of exploitation or abuse of human beings, neither at its own premises nor at those of its suppliers. The minimum age for admission to employment shall be observed in accordance with the applicable national regulations. Supplier is encouraged to apply appropriate policies, guidelines, risk awareness, risk assessments and due diligence processes throughout its supply chain to prevent modern slavery and child labor.

2. discrimination and disciplinary sanctions

The Marabu Group does not tolerate discrimination and expects its suppliers to prohibit any kind of discrimination within their organization. This excludes physical or psychological punishment. This applies in particular when employees in good faith report company practices

that violate national, international or internal regulations. Everyone is treated with dignity and respect. We provide equal employment opportunities and conditions based on individual ability, regardless of the characteristics of the employee or applicant, including, but not limited to:

- Gender, gender identity or gender expression
- Sexual orientation
- Nationality, race, ethnicity, skin color or cultural background
- Age
- Religion or world view
- Disability, genetics or health information including pregnancy
- Trade union membership

Humiliating or physical punishment is not tolerated, nor is verbal, psychological, physical or sexual harassment or abuse.

Diversity and inclusion are actively promoted and appropriate working conditions are created that do justice to all categories of human diversity. Employees are also encouraged to raise awareness and work proactively to identify, reduce and eliminate the causes of discrimination.

3. occupational health and safety

The Marabu Group pays attention to a healthy and safe working environment in all areas and locations. Occupational safety regulations must be complied with and long-term measures and guidelines for occupational safety and health protection must be implemented. Safety information is available to all employees and they are trained accordingly. Potential hazards from machinery, equipment, materials or other chemical, biological or physical substances are identified, evaluated and reduced and prevented as far as possible through suitable processes and/or preventive measures. Hazardous substances must be handled, transported, stored, recycled and disposed of safely.

4. working hours, wages and social benefits

There must be an awareness of social responsibility towards all employees. Remuneration, working hours and annual leave must be fair and appropriate and at least meet local and national requirements. Employees must be granted the social benefits and living wages to which they are entitled by law or contract. If there are no statutory or collectively agreed regulations, remuneration and benefits should be based on industry-specific and local standards. The aim is to ensure a decent standard of living for employees and their families.

5. freedom of association

The right to freedom of association must be guaranteed at all times. In accordance with the relevant laws, employees have the right to assemble and to form or join trade unions and employee representative bodies. In addition, employees have the right to collective bargaining to resolve workplace and wage issues. The business partner guarantees the right to freedom of association.

6. minorities and indigenous peoples

The Marabu Group respects the rights of indigenous peoples, minorities and local communities. We expect our suppliers to do the same. Indigenous peoples, minorities and local communities

should be protected and promoted throughout the supply chain in accordance with the UN Declaration on the Rights of Indigenous Peoples.

Suppliers are required to obtain Free, Prior and Informed Consent (FPIC) as defined by the United Nations Program on Reducing Emissions from Deforestation and Forest Degradation (UN-REDD Program) from current land users before carrying out deforestation or forest degradation activities. This is to ensure that appropriate compensation is paid and that no land grabbing takes place.

7. disciplinary measures

Disciplinary measures must be taken within the framework of national law and internationally recognized human rights. Any inappropriate disciplinary measure, such as in particular the withholding of salary, social benefits or documents (e.g. ID cards) and the prohibition to leave the workplace, must be avoided.

V. Business ethics

1. fairness in competition

Every employee of the Marabu Group and our suppliers are obliged to comply with the rules of fair competition. Our suppliers must ensure that their employees also comply with the applicable legal regulations. Violations of the antitrust laws applicable in individual countries must be avoided. In particular, no anti-competitive agreements or arrangements will be made with competitors, suppliers, customers or other third parties in order to gain a possible dominant market position. Suppliers shall ensure and take measures to ensure that information that is sensitive under competition law, such as prices, sales conditions or quantity restrictions, is not exchanged and that no behavior takes place that unlawfully restricts or may restrict competition.

2. prohibition of corruption

When accepting and granting benefits to business partners, any benefit may not be granted in connection with the initiation, award or execution of a contract. No employee of the Marabu Group may offer, promise, grant or accept benefits offered to business partners and representatives or employees of public institutions, units, officials and employees of state-owned companies as well as candidates, representatives and employees of political parties or these themselves.

Benefits may take the form of monetary payments, other non-cash benefits such as specifically calculated invitations to events, flight tickets, lavish hospitality or other promises. Furthermore, it is prohibited to demand or accept gifts or hospitality that are not within the scope of what is socially customary or do not take place in the course of normal cooperation.

Marabu will not consider any transactions that involve a violation of legal regulations.

3. intellectual property

The employees of the Marabu Group and our suppliers protect the intellectual property of the Marabu Group, such as trademarks, patents, designs, copyrights, trade secrets, samples, models and know-how, and respect the intellectual property of third parties. Suppliers shall ensure that the products they supply to the Marabu Group do not infringe the intellectual property of third parties.

4. money laundering

Compliance with the legal provisions for the prevention of money laundering applicable in the respective countries is a prerequisite.

5. data protection and IT security

All data protection regulations applicable in the respective countries, within the EU in particular the General Data Protection Regulation (GDPR), must be complied with.

VII Compliance

1st business partner

All business partners of the Marabu Group along the supply chain are requested to comply with the provisions of this Code of Conduct. Compliance must be confirmed with a signature or by sending a separate guideline with the same principles. If this is not done after several reminders, Marabu reserves the right to demand corrective measures in the event of partial or complete non-compliance with the Code of Conduct, which must be implemented within a reasonable period of time. In the event of non-compliance with the deadline, serious violations or generally repeated violations of the principles and requirements set out in the Code of Conduct, the Marabu Group has the right to terminate the cooperation without notice and without compensation. In addition, the Marabu Group reserves the right to review the implementation of these guidelines itself or through third parties and to verify them through supplier audits.

2. reporting of violations

All employees of the Marabu Group and our business partners are obliged to report violations of this Code of Conduct immediately. This can be done anonymously using the form set up for the [Whistleblower Protection Act](#), to the Works Council or to the direct contact person.

The business partner shall assist in the investigation of violations. In doing so, the legitimate interests of the business partner and the rights of employees, in particular with regard to data protection and business secrets, shall be observed. This also applies to violations at the business partner's suppliers. Employees who make reports must therefore not be disciplined or disadvantaged.

3 Entry into force and validity

The present version of this guideline comes into force today. It will be presented by the management to all employees of the Marabu Group and business partners.



Tamm, July 03, 2024

Management of Marabu GmbH & Co. KG