

Code of Conduct

Suppliers



The rules of behavior applicable to our suppliers, as contained in the

Code of Conduct of the Ecoclean Group (Code of Conduct)

Contents

Foreword	3
1 Scope of application	4
2 Legality principle	4
3 Records and reports	4
4 Relations to society and the public, corporate responsibility	5
5 Donations	5
6 Conduct towards business partners, competitors and third parties	5
7 International business relations (export controls)	6
8 Conduct towards employees and amongst colleagues	7
9 Conflicts of interest	7
10 Treatment of Ecoclean property	7
11 Data protection, confidentiality	8
12 Product quality and safety	8
13 Sustainability, occupational safety and health, environmental protection	9

Foreword

The Code of Conduct of the Ecoclean Group establishes various rules of behavior for day-to-day work, which must be complied with by Ecoclean employees. We expect the business partners of Ecoclean, namely the suppliers, to behave in the spirit of the Ecoclean Code. We have therefore listed below all the rules of behavior of the Code which are applicable to you as a supplier. We assume that our suppliers will identify with these rules of behavior and take all measures necessary to ensure that they are complied with. Ecoclean also expects that you make appropriate efforts to ensure that the Code is complied with by your sub-contractors. In this way, you will be supporting the conviction held by Ecoclean that business success and the observation of ethical standards go hand in hand with each other.

Suppliers can direct any questions they may have on the Code of Conduct to the Corporate Compliance Officer at Ecoclean GmbH.

1 Scope of application

Ecoclean's Code of Conduct applies to all companies of the Ecoclean Group. Ecoclean is committed to ensuring that the Code of Conduct is applied in its entirety or that comparable rules of conduct are in place.

Where local law at Ecoclean locations gives rise to specific requirements, those requirements apply; in such cases, the Code of Conduct applies complementarily.

Ecoclean uses its best efforts to see that the principles of this Code of Conduct prevail in the cooperation with its business partners, especially its customers and suppliers.

2 Legality principle

Ecoclean and every individual employee comply with prevailing laws and internal rules. Ecoclean's Code of Conduct and the rules of ethical conduct defined therein are the guiding principles governing all business activities of the Ecoclean Group. The "argument" that it is permissible to deviate from the prevailing rules in individual instances for the purposes of business successes, and thus ultimately in the company's interest, is not accepted.

3 Records and reports

All business transactions must be recorded completely, correctly, in a timely manner and in accordance with the specified procedures.

All records, reports and entries in documents and books of the Ecoclean corporation must conform to the principles of proper bookkeeping and balancing.

4 Relations to society and the public, corporate responsibility

Ecoclean is aware of its responsibility to society and therefore seeks to play an active role as partner in the community. Ecoclean has a long tradition of supporting local social institutions and organisations. Ecoclean's activities are also consistent with the Global Compact¹, in which the United Nations has formulated principles for fair working conditions and responsible business.

5 Donations

Donations are only made if the recipient and purpose are known. Payments to private accounts are not permitted.

No direct or indirect political donations may be made to election candidates, office-holders, or political parties in Ecoclean's name.

Ecoclean does not involve itself in party political activities. However employees are free to pursue lawful political activities in their own time. Ecoclean welcomes civic, charitable, and social commitment by its employees.

6 Conduct towards business partners, competitors and third parties

Fair competition

Ecoclean supports fair competition and complies with competition and antitrust regulations.

¹ More information on the United Nations Global Compact can be found at www.unglobalcompact.org

Any form of direct or indirect bribery or favours, whether accepting or making payments, gifts or favours of any kind beyond the lawfully permitted framework and customary scale, is prohibited.

Our policy is to promote Ecoclean products fairly, honestly, and lawfully. False or misleading representations or deceptive marketing practices are not tolerated. In the interest of presenting a uniform global corporate identity marketing activities are to be coordinated with the Ecoclean Global Marketing Team.

Money laundering prevention

Ecoclean complies with its legal obligations for money laundering prevention and does not participate in money laundering activities. Money laundering is the channeling of assets (not only cash) which result from criminal activity into regular financial and economic circulation.

Commissions, consultants

Ecoclean employs consultants and intermediaries only in conformity with the legal framework conditions. This ensures that remunerations are paid only for consulting and mediation services actually performed and the remunerations are in an appropriate ratio to the performed service.

7 International business relations (export controls)

Ecoclean complies with laws and regulations that regulate the way in which companies may export and import products, services and information, and settle payments.

Business activities with countries, persons, or organisations on which sanctions have been imposed are subject to restrictions and can be illegal as a whole. Infringements can result in heavy fines and, for natural persons, also prison sentences.

8 Conduct towards employees and amongst colleagues

Every employee has a right to fair treatment, courtesy, and respect. Discrimination and harassment are not tolerated at any of Ecoclean's locations worldwide. In particular, no discrimination on grounds of a person's ethnic-cultural background, disability, gender, religious faith, age, or sexual orientation is tolerated. Child labour² and forced labour are prohibited, opposed without exception, and actively avoided.

Ecoclean employees are free to join labour interest groups permitted by law.

It is expected from every Ecoclean employee that they will not become involved in criminal proceedings (for instance because of residence, tax, customs, or currency offences) in their working and private lives. Any criminal investigation can have negative repercussions for the company.

9 Conflicts of interest

Business and private interests are strictly separated at Ecoclean. The individual's own position within the company may not be abused for their own personal gain or that of their family or friends.

Preference may not be given to business partners out of personal interests.

Employees are requested to disclose any suspected or actual conflict of interests to their superior and to collaborate with the superior to resolve this conflict.

10 Treatment of Ecoclean property

Company property, whether tangible or intangible, is intended to assist employees in performing the duties Ecoclean assigns them. It may only be used for lawful business purposes and not for personal

² according to ILO Convention No. 138 and No. 182

gain. Ecoclean employees ensure that company property is protected against loss, theft, and improper use.

Know-how, patents, and property rights are of utmost importance for Ecoclean as a technology group. Superiors and employees know that and handle intellectual property with special care and responsibility.

11 Data protection, confidentiality

Personal data on Ecoclean's employees and business partners are only stored, processed, and used in compliance with legal regulations.

Confidential information supplied by business partners is treated confidentially and used only for the agreed purpose. Conversely, Ecoclean trusts that Ecoclean documents are handled with due care. Obligations or agreements for particular secrecy are observed at all times. Ecoclean takes appropriate measures to ensure that confidential information is protected.

12 Product quality and safety

Ecoclean develops innovative solutions and manufactures products of high technological standard that guarantee safe operation. Energy efficiency and the economical use of materials are at the forefront of Ecoclean's R&D work.

It is the mission of every individual Ecoclean employee to see that Ecoclean products meet the highest demands in terms of safety, health, environmental protection and quality, and that they also conform to the respective legal requirements.

Ecoclean's production facilities are certified to ISO 9001 standards. In individual instances, certifications are conducted according to additional or specific quality management systems such as VDA³ 6.4.

13 Sustainability, occupational safety and health, environmental protection

Ecoclean is constantly striving to reduce the consumption of energy, materials, and resources, and thus further the sustainability standards, at all its locations. This contributes to the company's successful long-term performance. Compliance with the laws for the protection of the environment is matter-of-course.

Ecoclean is committed to creating and assuring a safe, protected, and healthy working environment. Safety regulations and practices are complied with.

14 Energy consumption and greenhouse gas emissions

As our worldwide presence continues to grow, so does our responsibility for our actions, which must reflect our global commitment to the environment. We expect our suppliers and their contractors to comply with all applicable environmental protection regulations, codes and standards. It is imperative that suppliers be committed to environmental compliance, minimize the environmental impact of their activities, and continuously strive to improve environmental performance. Suppliers must keep records enabling them to answer inquiries about consumption of resources, emissions, environmental compliance, environmental risks and liability, as well as other sustainability indicators.

We expect our suppliers to measure their energy consumption and to reduce avoidable consumption. Energy audits can be a first step towards identifying potential opportunities.

³ VDA = Verband der Automobilindustrie e.V., Berlin (German Automotive Industry Association)

Greenhouses gases, and in particular carbon dioxide (CO₂), intensify the greenhouse effect which leads to global warming. Saving energy significantly contributes to reducing CO₂ emissions. Fluorinated greenhouse gases (F-gases) are between 100 and 24,000 times more harmful to the climate than CO₂ (source: German environmental agency Umwelt Bundesamt). Fluorinated greenhouse gases are mainly used nowadays as refrigerants, aerosol propellants, foam and insulation blowing agents, and fire extinguishing agents. In the interest of reducing emissions from these substances, apart from technical measures it is above all necessary to introduce targeted substitute agents or alternative technologies. (Source: German environmental agency Umwelt Bundesamt).

15 Chemicals management

Suppliers should have procedures in place to notify local authorities of any accidental release or introduction of hazardous substances into the environment, or of any other environmental emergency. The REACH regulation and Candidate List must be observed (<https://echa.europa.eu/candidate-list-table>).

Suppliers from Germany must in addition comply with the Chemicals Prohibition Ordinance (ChemVerbotsV) and its implementation.

We expect our suppliers to safely dispose of their waste materials in accordance with national legislation, and to opt for recycling and environmentally conscious disposal options.