


ESG Compliance	Code of Conduct	Pages:	4
		valid from:	01.07.2023
		Responsible:	Group ESG & Compliance Manager
		Phone-Nr.:	

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1. Aim of the Code of Conduct

Proper business conduct means compliance with the recognized standards of ethical conduct and applicable laws. We have issued this Prefere Group Code of Conduct (“the Code”) to define basic guidelines for our conduct.

Prefere Group will use its best efforts to identify ethical, legal, environmental, employment, health & safety, and human rights issues and to resolve matters consistent with this Code. Any inconsistency with this Code must be identified, corrected and are subject to any disciplinary actions needed. In the worst case this may even include termination of employment.

Please ask for advice if you have doubts how to handle business matters which may be affected by compliance issues – irrespective whether the business occurs within Europe or abroad! If you are in doubt about the accuracy of any actions, please seek advice either from the company’s CEO, CFO or Group ESG & Compliance Manager, or consult with your immediate superior.

In relation to compliance, please also refer to Prefere Group’s existing rules and policies (“Group ESG Compliance Guideline”, “Competition Law Compliance”, “Financial Crime Compliance”, “Data Protection”, “Code of Safety”, “Information Security Policy”).

2. Scope of the Code of Conduct

This guideline shall be applicable to all companies in which Prefere Resins Holding holds a direct or indirect participation of more than 50% of the shares, as well as to Prefere Resins Holding itself. Further, this Code is applicable to all areas of Prefere Group’s business. It is a non-negotiable

requirement that all Prefere Group's employees, without any exception, shall follow this Code.

The latest version of the Code can be accessed at Prefere Group Share Point under "Code of Conduct".

3. Ethical principles

Prefere Group is committed to full compliance with all applicable laws and regulations. This applies in particular to the following four fundamental principles:

3.1 Human Rights:

see item 4 (Human rights)

3.2 Child labour:

Child labor and any kind of exploitation of children and young people (except apprentices during vocational training) are strictly rejected. The corresponding laws for the protection of children and adolescents are observed.

3.3 Forced labour:

Any kind of forced labour is strictly refused. Employees may not be forced to work, neither directly nor indirectly by force or intimidation.

3.4 Remuneration and working hours:

All employees in full employment receive a fair wage that is at least always sufficient to cover basic needs. Working hours are always within the legal framework of the national legal system. Additional work over and above this is done on a voluntary basis and never against the will of the employees.

4. Human Rights

Prefere Group and its employees shall respect and comply with human rights, which are based on highly accepted international declarations, such as by UN, ILO and OECD.

Prefere Group and its employees shall respect the principles of equal opportunity and treatment without regard to race, birth, gender, creed, political persuasion, social status or origin. Any kind of harassment at the work environment is strictly forbidden.

5. Recruitment and Employment and Privacy

Prefere Group applies equality of opportunity in its recruitment and employment practices and procedures. All employment must be offered and provided based on the merits of the applicant. Employees and applicants for employment shall be treated and evaluated according to job-related skills.

Prefere Group acquires and retains employee personal information only for the need of business and to carry out personal administration. Access to personal data is limited to company personnel or contracted service partners who have appropriate authorization and need for the information. Prefere Group and its employees shall comply with all applicable laws and rules relating to privacy, see also item 9.

6. Conflicts of Interest and Bribes

Prefere Group's employees, their relatives and companies controlled by them must avoid situations leading to a conflict of interest between an individual and Prefere Group. Any private activity in Prefere Group's area of business may lead to conflict of interest.

Prefere Group's employees shall always act with integrity and shall not engage in fraudulent activity, corruption or bribery of any kind even if such would benefit Prefere Group. Prefere Group and its employees shall never offer, solicit or accept a bribe of any form. No one of Prefere Group's employee

shall accept or offer any personal benefits or business courtesies except items given in the ordinary course of business. The accepted benefits and provided business courtesies shall be of moderate value (please refer also to Anti-Bribery training). It is strictly prohibited and against Prefere Group policies to pay or even offer to pay bribes or illicit payments to government officials or other parties, in order to obtain or retain business.

7. Money laundering/financial crime

All employees must take care that Prefere Group cannot be abused for money laundering or other illegal purposes. As a general rule, employees must obtain sufficient information about the business environment of the contracting party, the contracting party itself and the purpose of the intended transaction before entering into any business transaction. In case of suspicion, investigations must be carried out. Transactions that appear unlawful, need to be rejected.

8. Competition/antitrust rules

Prefere Group is committed to the principle of pursuing its business objectives through legally and ethically impeccable business means. It participates in competition by lawful and fair means. The obligation to observe the rules of competition law also applies to each individual employee.

Behavior that constitutes a violation of antitrust law includes agreements with competitors on prices, terms, or the allocation of customers.

The submission of sham offers that may affect the pricing of products or services is also illegal.

9. Confidentiality and Privacy

Non-public information about Prefere Group shall be kept secret and protected against unauthorized access.

Prefere Group's employees shall not disclose nor use non-public information about Prefere Group for personal profit of the employee or anyone else other than Prefere Group.

10. Environmental protection

For employees, there is an obligation to consider the effects on the environment in their actions and decisions and to avoid or reduce burdens on the environment as far as possible.

11. Code of Conduct Coordinator for Prefere Group

The Compliance Coordinators for Prefere Group are the CEO, the CFO and the Group ESG & Compliance Manager.

The Group ESG & Compliance Manager acts as a guide and coordinator across the manufacturing sites, regions and holding company functions with respect to compliance aspects, and serves as staff function within the Group's Company.

Any employee may approach the Group ESG & Compliance Manager at any time to raise concerns, ask questions, request information or make complaints relating to compliance. Any concerns and complaints will be handled confidentially, anonymously and without any retaliation.

Inquiries by external regulatory authorities must always be reported to the Group ESG & Compliance Manager.

Contact details for the Group ESG & Compliance Manager are as follows:

Prefere Resins Holding GmbH, Dr.-Hans-Lebach-Straße 6, 15537 Erkner, Germany

Email: compliance@prefere.com

Additionally there is an anonymous way of reporting any compliance issue via the following Whistleblower Link: <https://prefere.integrityline.com/>

Description of the Whistleblowing process:

- IT-supported platform where
 - you can report any breach of Code of Conduct or official legislation
 - it will be ensured your report will be treated anonymously and without any retaliation
- Process works as follows
 - Contact the whistleblower hotline via an encrypted connection using the published link
 - You can establish a personalized mailbox to ensure communication
 - You can always access your mailbox at anytime and anywhere
 - You might receive questions to clarify or gain a better understanding of the circumstances of the incident you want to report
 - Swift communication within given timelines is ensured
- The Link can also be found on Prefere's internet website

12. Further applicable documents

This Group Policy is applicable in addition to and close integration with the following policies in their respective current version:

- Group ESG Compliance Guideline
- Competition Law Compliance
- Financial Crime Compliance
- Data Protection
- Information Security Policy
- Code of Safety

13. Final provisions

This Group Policy is valid from July 1st, 2023 and replaces the prior version.