

Code of Conduct
of
Dokumental GmbH & Co KG

1. Validity

Dokumental GmbH & Co KG ("DOKUMENTAL" or "we"/"us") is committed to ethical, ecologically and socially responsible corporate governance by means of this Code of Conduct. We also expect our employees to observe the principles of ecological, social and ethical behaviour and to integrate them into the corporate culture. We also strive to continuously optimize our business activities and our products and services in terms of sustainability.

We expect the same behaviour from all our business partners.

The Code of Conduct is based on national laws and regulations as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on the Rights of the Child and Business Conduct, the United Nations Guiding Principles on Business and Human Rights, the International Labour Standards of the International Labour Organization and the United Nations Global Compact.

2. Behavioural maxims of DOKUMENTAL

2.1. Compliance with the law

Compliance with law, rules and regulations is for us an essential basic principle of responsible business conduct. We adhere to legal prohibitions and requirements at all times, even if this involves short-term business disadvantages or difficulties for the Company or individuals. Where national laws are more restrictive than the rules applying at DOKUMENTAL, the national laws take precedence.

2.2. Social responsibility

2.2.1. Respectful interaction in the workplace

All DOKUMENTAL employees should always feel valued and respected. We do not tolerate any condescending, demeaning, insulting or otherwise disrespectful words or actions towards our employees.

2.2.2. Prohibition of discrimination

We do not tolerate disadvantage or discrimination based on age, ethnic background, skin colour, gender, sexual orientation, identity or expression, national origin, religion, disability, genetic information or personal characteristics and preferences.

2.2.3. Exclusion from forced labour

Employment relationships are entered into voluntarily, are based on contractual agreements which comply with the relevant laws and employees must have the right to terminate the employment relationship at any time.

2.2.4. Ban on child labour

We are opposed to child labour. Unless stricter national laws apply, we require all our business partners to comply with the recommendations of the ILO conventions on the minimum age for the employment of children.

2.2.5. Fair pay

The remuneration paid to workers shall comply with all applicable laws on remuneration, including, for example, laws on minimum wage or overtime. We adhere to the applicable collective agreements. Deductions from wages as a punitive measure are not permitted. The basis on which workers are remunerated is communicated to employees on an ongoing basis through a payroll statement.

2.2.6. Fair working time

The working hours comply with the legal and collectively agreed requirements. Overtime is only permitted if it is voluntary and does not exceed 12 hours per week. Employees must be granted at least one day off after six consecutive working days. The weekly working time may not regularly exceed 48 hours.

2.2.7. Freedom of association

The right of employees to freedom of association, to join trade unions, to appeal to employee representatives or to become members of works councils is respected and guaranteed. We are committed to and demand from all our business partners that employees must be able to communicate openly with the company management without fear of reprisals or harassment.

2.2.8. Health protection; safety at work

We ensure a safe and healthy working environment. By setting up and applying appropriate occupational safety systems, we take the necessary precautions against accidents and damage to health that may arise in connection with our work. In addition, employees are regularly informed and trained about applicable health and safety standards and measures.

2.2.9. Dealing with conflict minerals

For the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt, DOKUMENTAL establishes processes

in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict and High-Risk Areas and also requires this from its business partners. Smelters and refineries without appropriate, audited due diligence processes should be avoided.

2.2.10. Complaints mechanisms

We are committed to and require all our business partners to establish an effective grievance mechanism at company level for individuals and communities that may be affected by negative impacts.

2.3. Ecological responsibility

2.3.1. Legal and regulatory requirements

We observe the strict legal and official environmental regulations. This applies in particular to the treatment and discharge of waste water and the handling of air emissions (especially greenhouse gas and noise emissions) and we strive to reduce the generation of waste water and minimize any emissions. We ensure that we cooperate with the responsible authorities in the greatest possible transparency and take precautions to avoid or minimize negative environmental impacts as far as possible.

2.3.2. Handling waste and hazardous substances

We follow a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste. Chemicals or other materials that pose a risk if released into the environment shall be identified and managed in a manner that ensures their safe handling, transportation, storage, use, recycling or reuse and disposal.

2.3.3. Reduce consumption of raw materials and natural resources

The use and consumption of resources during production and the generation of all types of waste, including water and energy, must be reduced or avoided. This is done either directly at the point of origin or through procedures and measures, e.g. by changing production and maintenance processes or procedures within the company, by using alternative materials, by making savings, by recycling or by reusing materials.

2.3.4. Dealing with energy consumption/efficiency

We monitor and document our energy consumption and strive to find cost-effective solutions to improve energy efficiency and minimize energy consumption.

2.4. Ethical business conduct

2.4.1. Fair competition

We comply with the standards of fair competition and the applicable antitrust laws. In the case of agreements between competitors, the strict regulations of European antitrust law must be observed worldwide - regardless of whether looser regulations or no regulations at all may apply in the countries concerned.

2.4.2. Data protection/confidentiality

The protection of personal data is guaranteed in accordance with the relevant statutory provisions. Non-public information entrusted to us under a confidentiality obligation must be treated confidentially by us as well as by our business partners with regard to the non-public information entrusted to us. We undertake and require all our business partners to comply with the laws on data protection and information security and the official regulations when collecting, storing, processing, transmitting and passing on personal information.

2.4.3. Integrity/bribery, taking advantage

We apply the highest standards of integrity in all our business activities. We pursue a zero-tolerance policy with regard to the prohibition of all forms of bribery, corruption, extortion, embezzlement and money laundering, as well as tax offenses. To ensure compliance with the relevant legal provisions, procedures are in place to monitor and enforce the standards.

2.4.4. Protection of whistleblowers

We are committed to and require all our business partners to comply with the legal requirements for the protection of whistleblowers.

2.5. Supply chains

DOKUMENTAL fulfils its legal, social, ecological and ethical responsibility by doing everything in our legal and factual power to ensure that all companies involved in our supply chains observe the above principles of conduct and accept them as binding for themselves