



CODE OF CONDUCT



SAERTEX[®]
GROUP

Dear Sir or Madam,

The SAERTEX Group is a globally operating company with 14 locations worldwide and two main business divisions: SAERTEX NCF ("non-crimp fabrics"), specializing in multiaxial fabrics and textile reinforcement materials for fiber-reinforced composites, and SAERTEX multiCom, a provider of GRP liners for trenchless pipe rehabilitation. The group combines technical innovations with sustainability aspects to meet the increasing demands of global markets.

The SAERTEX Group aims to make a valuable contribution to the sustainable development of the countries and regions in which it operates through its economic activities. All companies within the SAERTEX Group are committed to the principles of the social market economy and free and fair global trade. They are aware of their social responsibility and advocate for the economic, social, and ecological sustainability of their value chain both domestically and internationally.

The Code of Conduct reflects the shared understanding of socially responsible corporate action. It also serves as a framework for orientation, guiding the companies within the SAERTEX Group in shaping their decisions and actions individually.

BASIC UNDERSTANDING AND SCOPE

We see ourselves as part of the societies in which we operate and are committed to socially responsible corporate governance. We take into account the direct and indirect effects of our business activities on society and the environment and continuously strive to balance these impacts appropriately in economic, social, and ecological terms.

We act in accordance with universally recognized values and principles such as integrity and legality and, in particular, respect internationally recognized human rights and labor standards, as outlined in the Code of Conduct.

We share the goals and content of the Code of Conduct and will, within our respective legal and practical capabilities, make all appropriate and reasonable efforts to fulfill this voluntary commitment continuously at all of our company locations, both domestically and internationally. If existing national regulations conflict with the content of the Code of Conduct or if the national context makes it impossible to fully comply with it, we will seek ways to uphold the requirements of the Code of Conduct as far as possible.





HUMAN RIGHTS AND LABOR STANDARDS

We respect human dignity and uphold internationally recognized human rights, as set forth in particular in the United Nations (UN) Universal Declaration of Human Rights¹ and addressed in the UN Guiding Principles on Business and Human Rights² as well as the OECD Guidelines for Multinational Enterprises³. Furthermore, we take into account the internationally recognized labor standards of the International Labour Organization (ILO), as outlined in the Code of Conduct below.

In all our business activities, we always strive to neither cause nor contribute to human rights violations. We expect the same from our business partners. Where necessary and feasible, we support our suppliers in this regard.

EMPLOYMENT RELATIONSHIPS

We treat our employees with respect and appreciation. We reject any form of unlawful punishment, abuse, harassment (particularly sexual harassment), intimidation, or any other degrading treatment of employees.

We comply with the applicable labor laws in all employment relationships and expect the same from our contractual partners. At the start of the employment relationship, employees must be provided with clear and comprehensible information about the essential terms of employment, including their rights and obligations, as well as working hours, remuneration, and payment and billing arrangements.

We respect and protect the right of employees to terminate their employment relationship in accordance with the applicable notice period.

[1] Universal Declaration of Human Rights
[2] UN Guiding Principles on Business and Human Rights
[3] OECD Guidelines for Multinational Enterprises

PROHIBITION OF CHILD LABOR AND PROTECTION OF YOUNG WORKERS⁴

We do not tolerate child labor and comply with the applicable legal minimum age for employment. In any case, we do not employ people under the age at which compulsory education ends according to the laws of the place of employment, nor under the age of 15 years.

We expect our business partners to have appropriate means to verify age in order to prevent child labor. If child labor is identified, all necessary measures must be taken immediately to prioritize the well-being, protection, and development of the child.

The rights of young workers under the age of 18 must be respected; they may only be employed if it is ensured that the working conditions do not pose a risk to their health, safety, or morals, nor are harmful to their development.

PROHIBITION OF FORCED LABOR⁵

We reject all forms of forced or compulsory labor, including any form of debt bondage, serfdom, slavery or slavery-like practices, human trafficking, or any other involuntary labor or services that are inconsistent with internationally recognized labor and social standards.

COMPENSATION⁶

We adhere to the legal or, where applicable, collective bargaining provisions regarding compensation for work. We ensure that the wages we pay do not fall below the applicable legal or collectively agreed minimum wage or industry standard. In countries or regions without a legal or collective wage framework, we pay special attention to ensuring that the wages for regular full-time work are sufficient to meet the basic needs of the employees.

We do not tolerate legally unauthorized wage deductions, including wage deductions as a disciplinary measure.



[4] ILO Conventions 138 and 182

[5] ILO Conventions 29 and 105

[6] ILO Conventions 26 and 131

WORKING HOURS⁷

We adhere to the legal or applicable collective bargaining provisions regarding working hours, including overtime, breaks, and vacation. In any case, we ensure that:

- the regular weekly working hours do not exceed 48 hours, plus a maximum of 12 overtime hours per week,
- the right to breaks is observed on every working day,
- after six consecutive working days, a regular day off follows, and legal or religious holidays and vacation are respected. Overtime is compensated or remunerated at least according to legal or collective agreements; its assignment occurs exceptionally and solely on a legal, collective, or contractual basis.

FREEDOM OF ASSOCIATION⁸

We respect the right of employees to freedom of association, freedom of assembly, and the right to collective bargaining and negotiations, as far as it is legally permitted and possible in the respective country of employment. If this is not permitted, we seek appropriate compromises for our employees.

DIVERSITY AND INCLUSION, NON-DISCRIMINATION POLICY⁹

We promote a work environment that enables inclusion and values the diversity of our employees. We are committed to equal opportunities and reject any form of discrimination or unjustified unequal treatment in employment, such as based on national and ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion, or worldview. Furthermore, we adhere to the principle of equal pay for male and female workers for equal work.

[7] ILO-Convention 1; ILO Recommendation 110

[8] ILO Conventions 11, 87, 98, 135 and 141

[9] ILO Convention 100, 111 and 159; ILO Recommendation 164

HEALTH AND SAFETY AT THE WORKPLACE¹⁰

We adhere to national and international labor and health and safety standards, ensuring a safe and health-promoting work environment to protect the safety and health of our employees, safeguard third parties, and prevent accidents, injuries, and work-related illnesses. This includes regular risk assessments of workplaces and the implementation of appropriate hazard prevention and precautionary measures, including the provision of suitable personal protective equipment. We ensure that our employees are trained in all relevant occupational health and safety topics.

EMPLOYEE DEVELOPMENT

We promote the professional and personal development of our employees through targeted training and further education opportunities. Our leaders support this process by creating an environment that encourages knowledge exchange and continuous learning, in order to best prepare our employees for future challenges.

[10] Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)



ENVIRONMENTAL RESPONSIBILITY

The protection and preservation of natural resources concerns and obliges us all. With this awareness, we conduct our business activities while considering ecological aspects and are committed to the goal of a climate-neutral future.

PROTECTION OF THE ENVIRONMENT AND CLIMATE

We take on our ecological responsibility by adhering to the applicable legal requirements and recognized standards for the protection of the environment and climate, and by making efforts to continuously improve the environmental and climate impact of our business activities. We have taken appropriate measures, guided by legal and internationally recognized standards, covering the following areas, among others:

- Proper and responsible handling of hazardous substances, chemicals, and waste, including disposal;
- Efforts to reduce or avoid waste and minimize emissions from operations (e.g., wastewater, exhaust air, noise, greenhouse gases);
- Conservation of natural resources, such as through measures to save water, chemicals, and other raw materials;
- Promotion of the use of circular and other climate- and environment-friendly technologies, processes, raw materials, and products;
- Efforts to increase energy efficiency and the share of green or renewable energy in our energy consumption at company locations.



ETHICAL BUSINESS AND INTEGRITY

We pursue only legitimate business goals and practices, and maintain business relationships solely with reputable partners.

We behave fairly and respectfully towards our business partners and customers. We respect the different legal, economic, social, and cultural backgrounds as well as the conditions of the countries and regions in which we operate. We always align our business actions with universally accepted ethical values and principles, including integrity and respect for human dignity.

We advocate for free and fair world trade and comply with the laws and regulations of the countries and regions in which we conduct business.

CORRUPTION¹¹, FRAUD, TRADE CONTROLS, MONEY LAUNDERING

We reject all forms of bribery, fraud, and corruption and avoid even the appearance of such conduct – whether in the form of granting or accepting improper benefits.

We act in accordance with the applicable import and export control regulations and comply with the legal requirements for the prevention of money laundering.

FAIR COMPETITION

We advocate for free and fair competition. We do not tolerate anti-competitive agreements and ensure that we act in compliance with applicable antitrust laws. We reject competitive advantages gained through unfair business practices.

[11] United Nations Convention against Corruption

PERSONAL DATA, PROTECTION OF CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

We respect the personal rights of our employees, business partners, and customers, and comply with the applicable legal and regulatory requirements for the processing of personal data and information security.

We take great care to ensure that entrusted trade secrets and other confidential information of our business partners and customers are adequately protected from unauthorized acquisition, use, and disclosure, at a minimum in accordance with the relevant legal provisions for the protection of trade secrets.

We respect the intellectual property of our business partners, customers, and other third parties, and ensure that adequate measures are taken to protect intellectual property rights when transferring know-how and technologies.

DIGITALIZATION AND ARTIFICIAL INTELLIGENCE

We leverage the opportunities of digitalization and artificial intelligence to promote efficiency and innovation, and to strengthen our competitiveness. The responsible, secure, and ethically sound use of these technologies is our top priority. At the same time, we promote the digital skills of our employees to successfully shape the transformation together.

CONSUMER INTERESTS

To the extent that our products and services affect consumer interests, we have taken appropriate measures to ensure the safety and quality of the products or services we offer. We ensure that our products or services comply with the relevant legal consumer protection regulations.

As part of our information and sales activities, we consider consumer interests by applying fair business, marketing, and advertising practices, and promoting consumer education. We pay special attention to the interests of children, seniors, people with disabilities, and other vulnerable consumer groups.



IMPLEMENTATION

We make appropriate and reasonable efforts to ensure the continuous compliance with the contents of the Code of Conduct at all our company locations. For this purpose, we have established suitable measures and processes and document their implementation internally in an appropriate manner. The management regularly reviews the implementation and work of the responsible departments and individuals.

COMMUNICATION AND TRAINING

We communicate the contents of the Code of Conduct to our employees, business partners, and other key stakeholders, and provide training to our employees as needed on the entire Code of Conduct as well as specific topics. We expect our employees to comply with the Code of Conduct.

EXPECTATIONS FOR OUR SUPPLY CHAINS

The contents of the Code of Conduct also reflect our expectations of our suppliers and other contractual partners in our supply chains. We expect them to align with the contents of the Code of Conduct or apply a comparable code of conduct, and we encourage them to enforce this expectation with their own contractual partners in their supply chain.

We generally rely on long-term, collaborative business relationships. Therefore, we identify and assess our contractual partners in an appropriate manner before entering into a supply relationship, e.g., through self-disclosure, supplier evaluations, or similar methods. We reserve the right to monitor compliance with our expectations with our suppliers, e.g., through auditing. In cases of serious violations, we reserve the right to take appropriate contractual action, including terminating the business relationship. In any case, we expect that identified violations will be addressed with appropriate measures for prevention or remediation.

REPORTING OF VIOLATIONS

We take every violation of the Code of Conduct seriously. Upon receiving reports of violations, we initiate measures for proper and confidential clarification and, if necessary, take appropriate corrective actions in the form of remediation or prevention.

PROGRESSION

The Code of Conduct of the SAERTEX Group is reviewed at regular intervals. If any changes occur during this period, they will be adjusted independently of the regular review cycle.



We, the management of the SAERTEX Group,

- declare by our signature that we share the goals and contents of the Code of Conduct and, within the scope of our respective possibilities, will make appropriate and reasonable efforts to continuously uphold the self-commitment at all of our locations,
- communicate the contents of the Code of Conduct in an appropriate manner to our employees, business partners, and other key stakeholders,
- expect our suppliers to align with the contents of the Code of Conduct or with another comparable code of conduct, and we encourage them to enforce this expectation with their own contractual partners in their supply chain,
- where necessary, we will implement target-specific guidelines that further specify the contents of this Code of Conduct, ensuring its effective implementation,
- take every violation of the Code of Conduct seriously and enable our employees, business partners, and other individuals to confidentially report any violations to us using the following contact details:

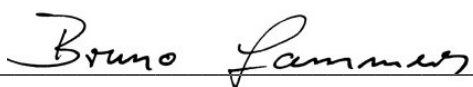
SAERTEX Compliance Whistleblower Portal:

Website: Insider Report – Whistleblowing-Portal by DGC Integrity (<https://insider-report.org>)

Phone: +49 173 45 911 96

Employees who have reported a potential violation of this policy in good faith are not subject to disciplinary actions or any form of retaliation in connection with the reporting.

Saerbeck, 16.12.2024



Bruno Lammers, Managing Partner SAERTEX



Roland Nowicki,
CEO SAERTEX



Christian Beckmann,
CEO SAERTEX



Dietmar Möcke,
CTO SAERTEX

INTERNAL RESPONSIBILITIES

Internally responsible persons for the whistleblowing portal:

SAERTEX | Paul Kipke, Global Head of Quality Management

SAERTEX | Roland Nowicki, CEO and Head of Global HR

SAERTEX multiCom | Michael Clostermann, Manager Sustainability

Internally responsible persons for this policy:

SAERTEX | Gianluca Hoge, Expert Sustainability

SAERTEX | Tobias Göbel, Expert Sustainability

SAERTEX | Roland Nowicki, CEO and Head of Global HR

SAERTEX multiCom | Nele Brenningmeyer, Global Head of Integrated Management Systems

SAERTEX multiCom | Michael Clostermann, Manager Sustainability