



FRÖHLICH PLASTICS GROUP

Supplier Code of Conduct

I. Preface

Fröhlich Plastics Group (hereinafter referred to as “FPG”) are committed to honesty and integrity with respect to their entire business conduct towards employees, customers, suppliers, competitors and other stakeholders. FPG recognizes that legal and cultural requirements vary in a global market. FPG expects all of its suppliers to act with the same fairness, honesty and responsibility in all aspects of their business. This Supplier Code of Conduct (hereinafter referred to as “Supplier Code”) highlights important standards that are consistent with FPG’s company values and to which each supplier of FPG must strictly adhere.

II. The Rules

1. Application

This Supplier Code applies to any and all suppliers, consultants, vendors, brokers, merchants, dealers, contractors, agents and other providers of other goods and services to FPG worldwide (hereinafter referred to as “Supplier”). While FPG intends to continue the Supplier Code indefinitely, FPG reserves the right to amend or terminate this policy, at any time and in any manner, for any reason or no reason.

2. Compliance with the Supplier Code

The Supplier acknowledges and agrees to comply with the standards of the Supplier Code which is an integral component of the business relationship between the Supplier and FPG and mandatory for the Supplier.

The Supplier will be familiar with the business practices of its suppliers and sub-contractors and will require all such suppliers and sub-contractors to comply with this Supplier Code.

To clarify any issues relating to the Supplier Code, the Supplier will contact the Purchasing department of FPG.

3. Compliance with Laws, Rules and Legal Regulations

The Supplier will comply with any and all applicable laws, rules and legal regulations in the countries in which it operates and will maintain a system to monitor compliance with such laws, rules and legal regulations.

4. Respect for Human Rights

The Supplier will treat all individuals with respect and fairness and will observe basic human rights set forth, for example, in the Universal Declaration of Human Rights of the United Nations and the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy of the UN International Labor Organization (ILO), including, but not limited to, the prohibition of forced or child labor, and the provision of reasonable wages, social benefits, working hours, freedom of association and other fair working conditions in compliance with applicable laws.

The Supplier will maintain an environment with no retaliation, free of discrimination and harassment on the basis of gender, age, race, skin color, ethnicity or national origin, citizenship, religion or religious beliefs, physical or mental disability, veteran status, sexual orientation or any other characteristics protected by applicable law.

5. Antitrust and Competition Law Compliance

The Supplier will strictly comply with all applicable antitrust laws, trade practice laws and any other laws, rules and regulations dealing for example with monopolies, unfair competition, restraints of trade and competition, and relationships with competitors and customers. The Supplier will not enter into agreements with competitors and other acts, which may unfairly impact competition, including, but not limited to, price fixing or market allocations.



FRÖHLICH PLASTICS GROUP

Supplier Code of Conduct

6. Anti-Corruption

The Supplier will comply with applicable laws and regulations concerning anti-corruption, including those concerning foreign corrupt practices.

The Supplier will not engage in nor tolerate any form of corruption, bribery, theft, embezzlement, or extortion or the use of illegal payments, including without limitation, any payment or other benefit conferred on any individual, company or government official for the purpose of influencing the decision-making process whether or not in violation of applicable laws.

The Supplier will never offer, grant, demand or accept bribes, illegal payments, payoffs, kickbacks, incentives, gifts, entertainment, favors or other benefit of a value in exchange for business opportunities with or in any way related to the business operations of FPG.

The supplier shall take its decisions solely on factual criteria and shall neither be influenced by financial, nor personal interests or relationships.

7. Product Safety, Health, and Environment

The Supplier will be committed to manufacture and deliver safe products to FPG and provide a safe working environment that supports accident prevention and minimizes exposure to health risks to the Supplier's employees.

The Supplier shall comply with valid environmental laws and regulations and shall, to the greatest extent possible, encourage the conservation of resources and environmental sustainability. These endeavours shall include, in particular, the following:

- Improvement of resource efficiency,
- Minimisation of pollutant emissions,
- Reduction of greenhouse gas emissions by reducing fuel and energy consumption and using low-CO₂ energy sources,
- Avoiding the use of substances and materials that are hazardous to the environment and health,
- Improving energy efficiency

What is more, our suppliers are called upon to comply with their due diligence obligations regarding the relevant raw materials - in particular tin, tantalum, tungsten, gold, cobalt, and mica.

These include the implementation of measures targeted at identifying risks - including those related to the direct or indirect financing of armed conflicts and serious human rights violations, which also includes child labour, forced labour and slavery - and taking appropriate measures to mitigate them.

In addition, it also includes that suppliers continuously work on transparency in the upstream supply chain, right up to the raw material extraction. Information on the smelters and refineries used by the supplier or sub-supplier must be provided to the Group should FPG request this.

We expect of our suppliers to avoid using raw materials sourced from smelters and refineries that do not comply with the OECD Guidance requirements on Due Diligence in the Supply Chain of Mineral Resources from Conflict and High-Risk Areas.

The due diligence requirements are an extension of the above-mentioned sustainability requirements on environmental protection, human and labour rights of employees, as well as transparent business relations and fair market conduct, which represent integral parts of the implementation of due diligence.

8. Data Protection, Confidential Information and Intellectual Property

The Supplier will comply with all applicable laws concerning data protection.

It is the Supplier's responsibility to ensure that any confidential business information or trade secrets gained by virtue of the business activities with FPG (hereinafter referred to as "Confidential Information") is held in strict confidence and not improperly used or disclosed to third parties. Furthermore, the Supplier will protect and secure FPG's intellectual property as Confidential Information.



FRÖHLICH PLASTICS GROUP

Supplier Code of Conduct

9. Export and Import Regulations

Suppliers will comply with all applicable import and export control laws, including without limitation, sanctions, embargoes and other laws, regulations, government orders and policies controlling the transmission or shipment of goods and technology.

10. Violations of the Supplier Code

The provisions of this Supplier Code are essential for the business relationship between FPG and the Supplier. Therefore, if the Supplier does not comply with the Supplier Code, FPG reserves the right to terminate the business relationship with the Supplier subject to applicable laws.

The Supplier is encouraged to report violations of the Supplier Code to the FPG compliance officer (fpg-compliance@t-online.de). The information will be treated confidentially and protected.

We hereby confirm that we share, respect and adhere to and apply the Supplier Code values as stated in the above Supplier Code.

Company name: _____

Location: _____

Date and Signature: _____

Function of
Signee: _____

