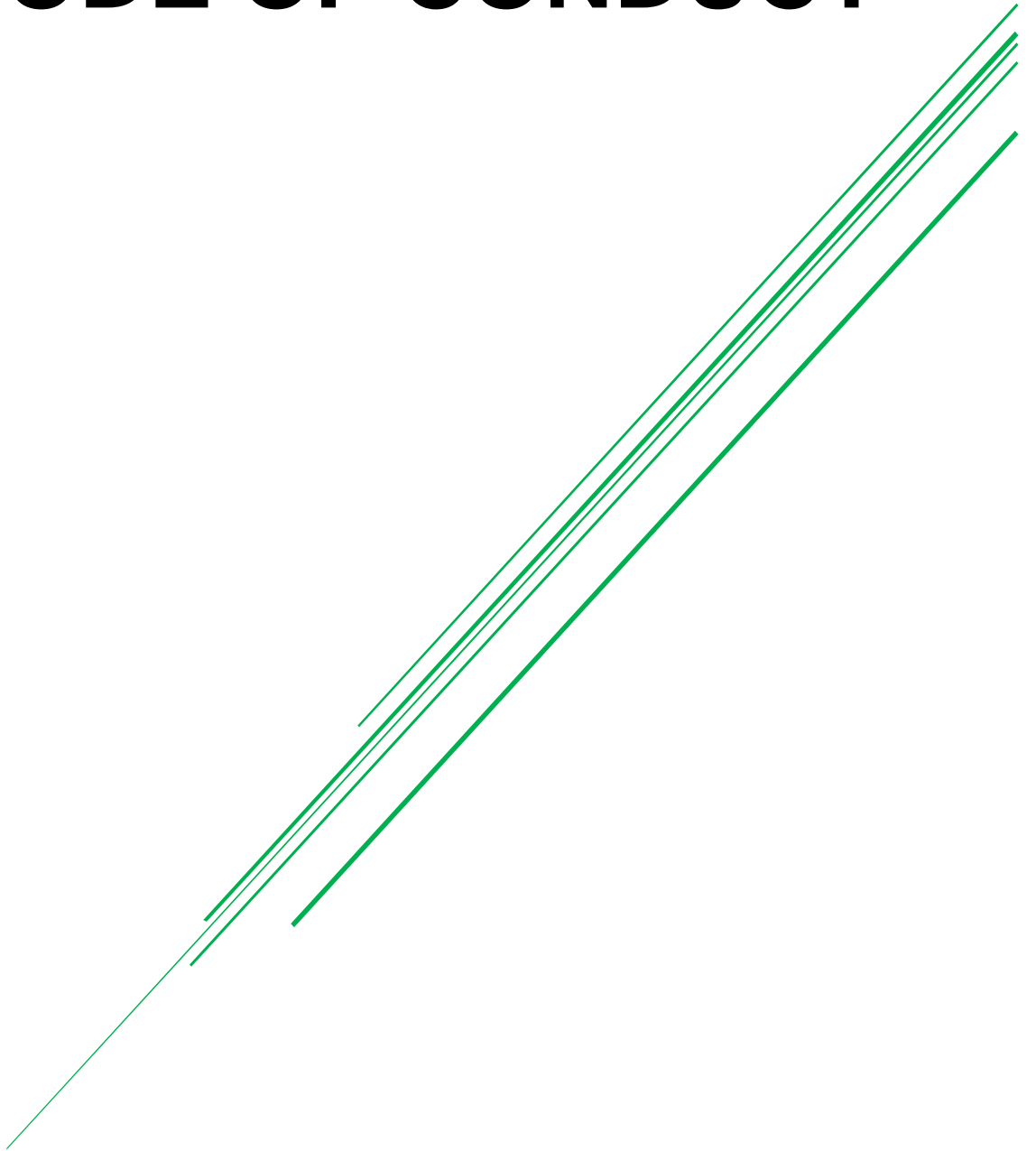


CODE OF CONDUCT



Inhalt

Introduction / Preamble.....	2
Social responsibility.....	2
Exclusion of forced labour	2
Prohibition of child labour	2
Fair remuneration.....	3
Fair working time.....	3
Freedom of association.....	3
Prohibition of discrimination	3
Occupational health and safety.....	4
Occupational health and safety	4
Complaint mechanisms	4
Handling conflict minerals	4
Ecological responsibility	5
Treatment and discharge of industrial wastewater.....	5
Handling air emissions	5
Handling waste and hazardous materials.....	5
Reduce consumption of raw materials and natural resources.....	5
Handling energy consumption/efficiency	5
Ethical business behaviour	6
Fair competition.....	6
Confidentiality / Data protection.....	6
Intellectual property.....	6
Integrity / bribery and taking advantage.....	6
Scope of application, whistleblowing provisions and entry into force.....	7

Introduction / Preamble

Nowotex GmbH Co. KG (hereinafter referred to as 'Nowotex' for short) is committed to ecologically and socially responsible corporate management. We expect the same behaviour from all our suppliers. 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 endeavour to continuously optimise our business activities and our products in terms of sustainability and ask our suppliers to contribute to this in a holistic approach.

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 labour standards of the International Labour Organization (ILO) and the United Nations Global Compact.

Social responsibility

Exclusion of forced labour

No forced labour, slave labour or comparable work may be used. All work must be voluntary and employees must be able to terminate their work or employment relationship at any time. Furthermore, there must be no unacceptable treatment of workers, such as mental and physical hardship or sexual and personal harassment.

Prohibition of child labour

Child labour may not be used at any stage of production. Nowotex undertakes to comply with the recommendation from the ILO conventions on the minimum age for the employment of children. Accordingly, the age should not be less than the age at which compulsory education ends and in any case not less than 15 years. If children are found at work, the supplier must document the measures to be taken to remedy the situation and enable the children to attend school. The rights of young workers must be protected and special protective regulations must be complied with.

Fair remuneration

The remuneration for regular working hours and overtime must correspond to the national statutory minimum wage or the minimum standards customary in the industry, whichever is higher. The remuneration for overtime must in any case exceed the remuneration for regular hours. If the remuneration is not sufficient to cover the costs of normal living expenses and to build up a minimum level of reserves, the supplier is obliged to increase the remuneration accordingly. Employees shall be granted all legally prescribed benefits. Deductions from wages as punitive measures are not permitted. The supplier must ensure that employees receive clear, detailed and regular written information on the composition of their remuneration.

Fair working time

Working hours must comply with the applicable laws or industry standards.

Overtime is only permitted if it is voluntary and does not exceed 12 hours per week, while employees must be granted at least one day off after six consecutive working days. The weekly working time may not regularly exceed 48 hours.

Freedom of association

The right of employees to form and join organisations of their choice and to engage in collective bargaining must be respected. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative options for independent and free association of employees for the purpose of collective bargaining must be provided. Employee representatives must be protected from discrimination. They must be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner.

Prohibition of discrimination

Discrimination against employees in any form is not permitted. This applies, for example, to discrimination based on gender, race, skin colour, disability, political conviction, origin, religion, age, pregnancy and/or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

Occupational health and safety

Occupational health and safety

Nowotex is responsible for a safe and healthy working environment. By establishing and applying appropriate occupational safety systems, necessary precautionary measures are taken against accidents and health hazards that may arise in connection with the work. In addition, employees are regularly informed and trained about applicable health and safety standards and measures.

Complaint mechanisms

Nowotex is responsible for establishing an effective complaint mechanism at company level for individuals and communities who may be affected by adverse impacts. Even where legal systems are effective and well resourced, complaint mechanisms can offer particular benefits, such as rapid access and redress, reduced costs and transnational reach. Employees who raise a complaint about violations of this Code of Conduct or relevant laws must not be subject to any form of disciplinary action.

Handling conflict minerals

For the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt, the company establishes processes in accordance with the Organisation for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and expects its suppliers to do the same. Smelters and refineries without appropriate, audited due diligence processes should be avoided.

Ecological responsibility

Treatment and discharge of industrial wastewater

Wastewater from operational procedures, production processes and sanitary facilities must be standardised, monitored, checked and, if necessary, treated prior to discharge or disposal. In addition, measures should be introduced to reduce the generation of wastewater.

Handling air emissions

General emissions from operations (air and noise emissions) and greenhouse gas emissions shall be standardised, routinely monitored, verified and treated as necessary prior to release. Nowotex is also responsible for monitoring its emission control systems and is required to find cost-effective solutions to minimise any emissions.

Handling waste and hazardous materials

Nowotex follows a systematic approach to identify, manage, 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 handled in a manner that ensures safety during handling, transport, storage, use, recycling or reuse and disposal.

Reduce consumption of raw materials and natural resources

The use and consumption of resources during production and the generation of waste of any kind, 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 economising, by recycling or by reusing materials.

Handling energy consumption/efficiency

Energy consumption must be monitored and documented. Economic solutions must be found to improve energy efficiency and minimise energy consumption.

Ethical business behaviour

Fair competition

The standards of fair business, fair advertising and fair competition must be observed. In addition, the applicable antitrust laws must be applied, which prohibit agreements and other activities that influence prices or conditions when dealing with competitors. These regulations also prohibit agreements between customers and suppliers that are intended to restrict customers' freedom to determine their own prices and other resale conditions.

Confidentiality / Data protection

Nowotex is committed to meeting the reasonable expectations of its client, suppliers, customers, consumers and employees regarding the protection of personal information. Nowotex shall comply with data protection and information security laws and government regulations when collecting, storing, processing, transmitting and sharing personal information.

Intellectual property

Intellectual property rights must be respected; technology and expertise must be transferred in such a way that intellectual property rights and customer information are protected.

Integrity / bribery and taking advantage

The highest standards of integrity must be applied to all business activities. Nowotex has a zero-tolerance policy against all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing standards are in place to ensure compliance with anti-corruption laws.

Scope of application, whistleblowing provisions and entry into force

This Code of Conduct is binding for all employees of Nowotex GmbH Co. KG employees. All employees of Nowotex GmbH Co. KG are bound by the provisions of this Code of Conduct. Our managers have a special responsibility and are called upon to set an example of the Nowotex rules of behaviour and values described. It is the responsibility of line managers to act as the first point of contact for their employees when they have questions about correct behaviour in individual cases and to ensure compliance with this Code in their area of responsibility. If an employee becomes aware of a violation of this Code of Conduct, the management must be informed immediately. We ensure that every report is treated confidentially and guarantee the whistleblower anonymity ('whistleblowing' provision).

We encourage our suppliers, service providers and business partners to also draw up and comply with (their own) code of conduct.