



+ CORPORATE SOCIAL RESPONSIBILITY

CODE OF CONDUCT

Preamble

Our code of conduct is a guideline for all departments of KTP Kunststoff Palettentechnik GmbH and therefore applies equally to every employee. In detail, it is addressed to the executive board and management, managerial staffs and all employees.

It represents the requirement to implement agreed values and principles and signals to the outside a responsible behaviour towards business partners, customers and employees.

Applicability

The code of conduct applies to all locations and business units of KTP Kunststoff Palettentechnik GmbH. At the same time, KTP demands that its suppliers also comply with the principles anchored in this code of conduct.

The company attaches great importance to the careful and responsible handling of the products manufactured, the equipment used and the intellectual property of the company.

Duties of the executive board and management

KTP Kunststoff Palettentechnik GmbH regards it as its duty to act in an economic, social and environmentally conscious manner.

The company strives to conduct its business competently on an ethical and moral basis and to compete fairly in all markets in which it is active. Compliance with applicable laws and the acceptance of bans on cartels, competition restrictions, export checks and economic sanctions are matters of course.

These prevent the taking of impermissible advantages over customers, suppliers or competitors.

Financial responsibility

Our books and our accounts are kept with accuracy, completeness and transparency. The company adheres to the national and international accounting rules and disclosure requirements. We ensure that our records represent a reliable basis for an auditing company's production of the company's financial statements.

Protection against counterfeits and copies

Pursuant to the company's policies, our suppliers are committed to developing, implementing and maintaining effective methods and processes to detect and minimise the risk of counterfeit parts and materials in our supply chain. Any copies or counterfeit parts detected are to be quarantined immediately. The supplier is obliged to inform us, as recipients, immediately.

Export controls

In order to guarantee secure commercial transactions, we work in compliance with the criteria for export control and under observance of prevailing economic sanctions. We never work outside these regulations. Our control over this is automated through regular screening of our business transactions. Our suppliers are also obliged to carry out appropriate checks on their business partners.

Law

The company undertakes to comply with applicable laws in the countries in which it is active. This is equally demanded of KTP's suppliers.

Child labour and forced labour

The company strictly rejects any kind of child labour or forced labour without exception and expects the same of its business partners. If the local laws do not specify higher age limits, no persons shall be employed who are of a compulsory school age or younger than 16 years of age (subject to the exceptions set out in the ILO Convention 138). Employees younger than 18 years of age may not be assigned to carry out dangerous tasks and can be excluded from the night shift, taking into account their training requirements.

Children of a compulsory school age (younger than 16 years of age) may not be employed even if this is allowed by the legal regulations in the respective supplier's country.

Harassment

Employees of KTP shall not be subjected to corporal punishment or other physical, sexual, psychic or verbal harassment or abuse.

Remuneration

Remunerations, including wages, overtime and fringe benefits are paid at least at the rates specified in applicable laws (minimum wage) or higher.

Working hours

If national regulations do not specify shorter maximum working hours – except in the case of extraordinary company circumstances – employees shall not be required to work more than 48 hours per week on a regular basis or more than 60 hours per week in total (including overtime). Employees shall be granted the equivalent of at least one free day in each 7-day period.

Anti-discrimination and racism

Every form of discrimination is prohibited. KTP acts on the basis of the General Act on Equal Treatment. This applies in particular to:

- National or ethnic origin
- Gender
- Marital status
- Religion and ideology
- Handicap
- Age
- Sexual identity or orientation

In all employment decisions, including but not restricted to job advertisements, appointments, promotions, remunerations, fringe benefits, training, notices of

termination and redundancies, employees shall be treated exclusively according to their skills and qualifications.

Occupational health and safety

In order to avoid accidents and personal injuries, KTP provides safe working conditions and workplaces that meet the applicable legal regulations as minimum criteria.

Environment

The company handles natural resources responsibly and in an environmentally friendly manner in all locations in which it is active. It meets the regulations and standards for environmental protection and continuously improves them. Managerial staffs are trained to take measures to create a sustainable and safe working environment for employees. These principles are our guidelines for Environmental & Energy and documented with ISO 50001, 14001 and 14064-1 certification.

We achieve the reduction of greenhouse gases through the use of renewable energies (primarily photovoltaics) and our ambition to achieve energy efficiency in our production facilities and administration. With the installation of rain gutters at our new location in Lisdorf and the extensive planting of trees, we are making a significant contribution to the sustainable use of natural resources. At all our locations, we avoid waste and encourage our employees to use all resources carefully and sparingly.

Data protection and dialogue with cooperation partners

Personal data of customers, business partners and employees shall be treated confidentially, sensitively and with the greatest of care. These include their names, addresses, telephone numbers and dates of birth, as well as information about their current state of health. Employees are obligated to take all data security measures suitable for protecting the IT system against both internal and external data theft. This applies in particular to the misuse of passwords in the company as well as to the unauthorised downloading of files and software from the Internet. Required documents are created and stored properly and, if necessary, returned or destroyed following conclusion of the cooperation. More detailed regulations are laid down in corresponding confidentiality agreements, non-disclosure agreements and our data protection concepts, which comply with the applicable data protection regulations and are constantly monitored by our data protection officer.

Customer orientation

KTP always behaves towards customers and business partners in a fair and honest way. Wishes, needs and expectations of customers and business partners are accounted for individually in order to ensure the goal-oriented implementation of products, services or other processes. The highest goal is to establish a long-term and stable relationship on the basis of trust.

Conflict of interests

Personal relationships and private interests have no influence on our entrepreneurial decision-making in everyday business. For this reason we avoid any interactions with our suppliers and business partners which might lead to a conflict with our obligations. This may be the case in particular if there are financial, personal or family relationships with a supplier, customer or business partner. Employees of our company are bound to confidentiality within their employment contract.

Acceptance of gifts and donations

a) Gifts to employees

Employees shall neither demand nor accept personal favours from customers or suppliers than influence or could influence their own behaviour with regard to their own activity for the company. If gifts are offered by third parties, they may only be accepted if they correspond to common practice and are recognisable as politeness or courtesy (promotional gifts with the logo of the presenting company, for example calendars or ballpoint pens). The executive board must be informed of any gifts offered which exceed the usual value. Gifts should always be refused if this is not possible.

b) Gifts by employees

Gifts may also only be offered by the company itself to an extent that is normal for the business relationship and is within a materially appropriate scope. The recipient may not associate any obligation with this that would influence its business decisions.

c) Donations by the company

As a matter of principle, KTP Kunststoff Palettentechnik GmbH does not donate to political parties, to individuals or to organisations whose goals contradict the corporate philosophy or could damage the reputation of KTP. Donations are always given transparently.

Bribery and corruption

No form of corruption shall be tolerated – irrespective of whether the company's assets or those of third parties are damaged as a result. The company takes precautionary measures to prevent bribery, theft, misappropriation, fraud, tax evasion or money laundering. Employees are prohibited from accepting or granting favours (cash, travel, gifts, etc.) that are coupled to an improper advantage (award of contract or project, etc.). The employees' employment contracts contain a corresponding clause.

Whistleblowing / protection against retaliation

We place great value on the protection of whistleblowers and we reject any form of retaliation in the workplace, e.g., degradation, reputational damage, negative performance appraisals etc.

The identity of whistleblowers is protected throughout any investigations, i.e., the right of anonymity applies. These protective measures apply for any person reporting a potential infringement providing:

a) they had reasonable grounds to believe that the information they had reported was true at the time of reporting and fell within the scope of a directive.

b) the information had been reported internally, externally or via a public announcement (including all relevant institutions, bodies, offices or agencies).

Protection also applies to whistleblowers whose identities have been leaked and who could suffer retaliation.

Provisions for conflict minerals

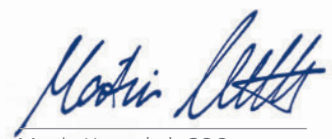
No conflict materials such as tungsten, gold, tin, tantalum, cobalt, mica or similar substances are used in KTP's procurement and production processes.

Implementation and enforcement

KTP Kunststoff Palettentechnik GmbH undertakes to make every effort to uphold the principles and values described in this code of conduct.



Andreas Wintrich, CEO



Martin Hentschel, COO



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We are certified to:

EN ISO 9001

EN ISO 14001

EN ISO 50001

EN ISO 14064-1



MADE IN GERMANY