

Code of Conduct



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www.oke-group.com

We act in a socially responsible manner with regard to the market, the environment, the workplaces and our stakeholders. Our Code of Conduct describes our contribution to sustainable development.

1. Code of conduct

These rules of conduct are a code with the obligation to act fairly, sustainably and responsibly according to ethical principles and to recognise the social responsibility of the company. They apply to all companies of the OKE group and are also passed on to suppliers. The principles commit us to a strict separation of business and private interests and require that all decisions in the business area are to be made free of personal interests. The granting of personal benefits is not permitted.

OKE Group, a global supplier to a wide range of industries, is committed to growth built on socially responsible actions and behaviours. We are committed to upholding the principles (A/RES/217, UN Doc. 217/A-(III)) of the United Nations based on the Universal Declaration of Human Rights on Fundamental Principles and Rights at Work. In our business, we strive to create a trustworthy and respectful working environment and comply with applicable international labour standards.

Through our environmental and energy management system, we ensure that environmental risks are avoided and resources are conserved, that the energy efficiency of facilities is ensured and that energy conservation is considered. Employees are encouraged to behave in an environmentally and energy-conscious manner. Environmental protection and energy efficiency are continuously improved in the OKE Group.

To this end, the OKE Group has introduced management systems that comply with the above requirements. These management systems are designed to ensure the following:

- The compliance with applicable laws and standards.
- The determination of customer requirements in relation to our activities and products.
- Identify and mitigate operational risks associated with these rules in connection with these rules.
- Furthermore, we strive for continuous improvement in all business areas.

2. Compliance with laws and standards

The OKE Group fully complies with the laws, rules and

regulations of the country in which it operates in all its activities. We encourage all participants, employees, partners, suppliers and customers alike to go beyond legal compliance and promote social and environmental responsibility and business ethics by adhering to internationally recognised standards.

3. Business practices and anti-corruption

We always act in an honest, trustworthy and reliable manner in all our business activities and explicitly distance ourselves from corruption, extortion and bribery. The proprietary property as well as the intellectual property of a business partner is protected in a responsible manner. All legal requirements regarding anti-corruption, fair competition and the prevention of cartels are implemented in the group and are part of our Code of Conduct.

3.1. Prohibited agreements and business relationships

We ensure that information on prices, costs or other competition-related aspects is not disclosed to third parties. The OKE Group strives for fair business practices and prohibits prohibited or advantage-related agreements.

Any personal advantage in return for preferential treatment in business dealings may not be accepted, offered, demanded, promised, granted or approved if it is given with the intention of improperly influencing a business relationship or if there is a risk of impairing the professional independence of the business partner.

4. Fundamental rights of employees

We understand and will comply with our responsibilities regarding workers' rights and workplace safety standards. We are committed to treating all employees with respect and not to use threats of physical violence or other forms of physical coercion or harassment.

4.1. Fair recruitment and employment practices

Hiring takes place without regard to gender, race, colour, nationality, religious affiliation, age, disability, sexual orientation or other personal characteristics. We respect the dignity, privacy and personal rights of our employees and treat them equally.

4.2. No forced or child labour

OKE Group does not employ forced or unpaid temporary workers and ensures that recruitment procedures comply with applicable laws regarding minimum age. We support legitimate training programmes to ensure compliance with all relevant laws and regulations.

4.3. Freedom of association and assembly

The OKE Group respects the right of workers to freely assemble and join a workers' organisation of their choice to the extent permitted by and in accordance with applicable laws and regulations. Such persons shall not be discriminated against or given preferential treatment.

4.4. Fair working hours with fair remuneration

The OKE Group is committed to applying, as a minimum, all applicable laws and regulations regarding remuneration. We manage operations so that overtime does not exceed the maximum allowable under applicable law, unless absolutely necessary due to exceptional operational circumstances and employees agree.

4.5. Safe, healthy and fair working conditions

The OKE Group is committed to providing its employees with a safe and non-harmful workplace in accordance with current applicable laws and regulations. In addition, emergency plans and fire safety concepts are implemented in all companies. We respect the dignity, privacy and personal rights of all persons invol-

ved in the course of their business. We do not tolerate physical or psychological violence or reprisals, threats of physical or psychological violence, sexual or other harassment, and verbal abuse or other forms of intimidation or retaliation against employees who provide reports of suspected or actual misconduct.

5. Environmental compatibility and environmental sustainability

OKE Group is committed to being environmentally responsible and energy efficient in all our operations. We have installed renewable energy generation systems at various sites. As a minimum, we will comply with all applicable laws, regulations and standards related to environmental protection and energy (for example, regulations for chemical and waste disposal, recycling, waste water treatment and discharge, CO₂ emission, obtaining permits and preparing reports).

Furthermore, we will comply with all additional environmental protection requirements for raw materials and end products and will not use prohibited substances according to the REACH regulation. To this end, the OKE Group has implemented management systems that comply with the above requirements.

6. Financial responsibility

We document all significant business transactions in a traceable and timely manner. Internal and external reports (e.g. financial accounts, quality reports, time records, expense claims or other submissions) must be accurate and complete so that the recipient can form an accurate picture. In doing so, we adhere to the presentation of facts and a factual manner of expression. Hasty conclusions are to be avoided. Documents needed for ongoing or anticipated internal investigations or official enquiries must not be destroyed, removed or altered.

Financial records shall be prepared in accordance with applicable law and generally accepted accounting principles (financial responsibility). We also comply with commercial, tax and special legal retention periods for documents (original or electronic) where necessary and structure the relevant records in a comprehensible manner.

7. Data protection and data security

The OKE Group takes comprehensive account of data protection when dealing with the personal data of its employees, customers and business partners. The data protection officer of the OKE Group supports the departments in this respect.

Personal data are only collected, processed or used if this is legally permitted or if the person concerned agrees to it.

8. Plagiarism

The intellectual property of the company must be protected. Plagiarism must not be circulated or acquired and must be reported immediately to the management. Theft of intellectual property from others is strictly prohibited.

9. Export controls and economic sanctions

We comply with all applicable import and export control laws, sanctions and embargoes that impose restrictions on the export or re-export of goods, software, services and technology to certain destinations and prohibitions on transactions involving certain restricted countries, regions, organisations and individuals.

10. Compliance and notice

This Code of Conduct has been approved by the management and brought to the attention of all employees. Our employees comply with our employees comply with this Code without exception in the performance of their duties. If there is any uncertainty as to whether a particular action could be critical in terms of the Code of Conduct, a brief self-check can provide guidance. In such a situation, each employee can ask himself or herself the following questions:

- Do I have a good feeling about the matter or am I worried?
- What if it was in the newspaper tomorrow?
- What would my family and friends say?

Answering these questions can provide an initial as-

essment of the situation. If employees have any uncertainties or questions, or if they have direct evidence of violations, they can contact their supervisor, any other department head, the human resources. If they have any questions or direct indications of violations, employees can contact their supervisors, any other department head, the human resources department or the management, or submit information via the anonymous mailbox in the company. Another option is the confidential whistleblower portal:

<https://oke-group.rexx-systems.com/whistleblowing/>

This portal is of course also available to external persons.

As a company, OKE Group pledges to protect everyone who stands by our principles and to ensure that drawing attention to wrongdoing does not have a negative impact. The reports are taken seriously and investigated. There is no need to fear discrimination because a genuine and understandable concern is raised in relation to workplace misconduct.

11. Actions in the event of non-compliance

Procedures, practices or actions by employees that are contrary to this Code shall be corrected and will result in disciplinary action. Depending on the severity of the violation and history (e.g. repetition), this may result in an admonishment, warning or even termination.

If suppliers or other business partners do not comply with the requirements, this would be discussed with the supplier and remedial action urged. Depending on the severity of the violation and previous history (e.g. repetition), it may also lead to a termination of the business relationship.

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