PRINCIPLES AND RULES OF CONDUCT

Code of Conduct

JRT ELASTOMER TEC





Foreword

Dear employees,

This Code of Conduct brings together, as a summary and foundation, the key rules and principles that are already binding for us today and will remain binding in the future. They apply both internally and towards our stakeholders (customers, suppliers, shareholders, business partners, employees). We are pleased to present the Code of Conduct of JRT Elastomer Tec GmbH.

Our mission statement describes the values we share and how we want to work together. Relations among our employees and with the stakeholders named above are defined by mutual respect and trust. As a traditional company founded in 1982, we place the greatest importance on sustainability and on further development and innovation. We put long-term success before short-term profit. Integrity is firmly anchored in our corporate culture, and each of us helps to promote it in everyday business. Only together as a team can we preserve these values and achieve something great in line with our corporate purpose.

At the heart of everything we do remain the highest standards for the quality of our products and services and the satisfaction of our customers and partners. We rely on our innovative products on the one hand and on the responsible and lawful conduct of our employees on the other. Each of us bears personal responsibility for acting lawfully and with integrity. The principles and rules of conduct set out here do not cover every situation that may arise in day-to-day business; rather, they contain binding values intended to guide our daily work.

Misconduct by individuals can harm not only us as a company but also each individual considerably. We therefore ask you, dear colleagues, to read this Code of Conduct carefully and to use it with us as a guideline for our daily conduct and actions. If in doubt, always seek the advice and support of the persons responsible.

Management of JRT Elastomer Tec GmbH



Our values

01
Transparency

02
Integrity

03
Innovation

04
Customer focus

05
Respect

06
Reliability

07
Sustainability

08
Openness

09
Flexibility

10
Trust

11
Honest dealings with one another

12
Quality awareness



01 Scope 05

02 Our principles 06

2.1. Lawful conduct and integrity
2.2. Equal opportunities and tolerance
2.3. Responsibility for our reputation
2.4. Leadership and culture of trust

03 Dealing with business partners and third parties 08

3.1. Compliance with competition and antitrust law
3.2. Relations with suppliers and customers
3.3. Donations and sponsorship

04 Prevention of corruption and conflicts of interest 10

4.1. Fighting corruption
4.1.1. Offering and granting benefits
4.1.2. Requesting and accepting benefits
4.2. Avoiding conflicts of interest
4.2.1. Secondary employment

05 Handling company property and information 12

5.1. Handling company property
5.2. Handling information and data protection
5.2.1. Reporting
5.2.2. Confidentiality
5.2.3. Data protection and data security

06 Occupational safety, health and environmental protection 14

6.1. Occupational safety and health
6.2. Environmental protection and sustainability
6.3. Product safety

07 Implementation of the JRT Elastomer Tec GmbH Code of Conduct 15

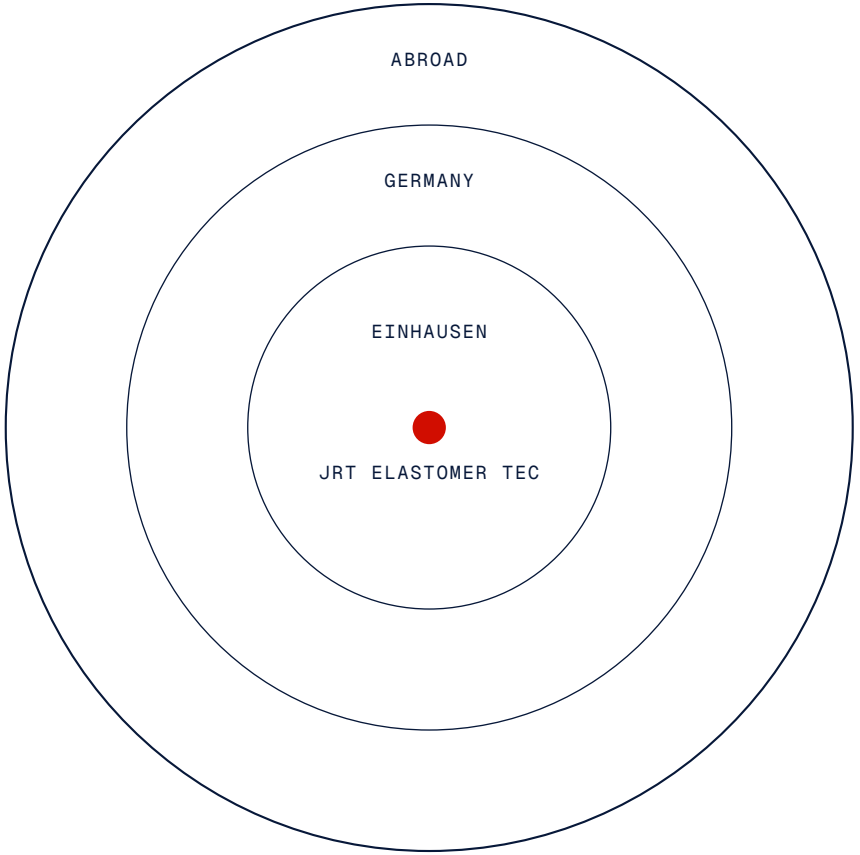
7.1. Responsibility for implementation
7.2. Responsibility for compliance

Scope

We comply with applicable law, in Germany and in our business abroad.

JRT Elastomer Tec GmbH works with customers and suppliers in Germany and abroad. Wherever we operate, we observe the applicable laws and respect generally accepted customs. This is the only way to secure our business success. Any breach of applicable laws or regulations can have serious consequences for both the company and its employees. Managers in particular should be familiar with the fundamental laws, regulations and internal company rules relevant to their area of responsibility. Our Code of Conduct applies to all areas of JRT Elastomer Tec GmbH.

CUSTOMERS AND SUPPLIERS IN GERMANY AND ABROAD



Our principles

We respect every one of us, treat each other with trust and tolerate neither harassment nor discrimination.

2.1. Lawful conduct and integrity

In everyday business we follow the requirements set out in this Code of Conduct as binding, as well as any further legal requirements. Every person has the right to fair, dignified and respectful treatment. We do not tolerate any discriminatory behaviour on the grounds of ethnic origin, nationality, gender, sexual orientation and identity, pregnancy or parenthood, marital status, age, religion, beliefs or disability, or on any other grounds covered by a prohibition of discrimination. Integrity is one of the core values we live by and requires ethical behaviour based on common sense. Every employee is responsible for complying with the Code of Conduct. We point out that we tolerate no violations of this Code of Conduct whatsoever. In the event of a violation, employment-law measures may be taken, regardless of any statutory sanctions. We also work towards ensuring that our business partners follow our principles.

2.2. Equal opportunities and tolerance

We are proud of the diversity within our company. People of different ethnic origins, nationalities, ages, genders, sexual orientations and identities, people who are pregnant and/or parents, and people of different marital status, religion and beliefs and with disabilities are part of JRT Elastomer Tec GmbH and enrich us. We guarantee equal opportunities and equal treatment and tolerate no discrimination on the basis of legally protected characteristics, nor any sexual harassment or other personal attacks. We stand for a working environment shaped by respect and tolerance. Our decisions regarding our employees, customers, business partners and other third parties are always based on objective considerations. The protection of fundamental rights at work is of particular importance to us. We strictly reject forced labour and child labour.

LEGALLY PROTECTED CHARACTERISTICS

Ethnic origin	Nationality	Gender	Sexual orientation and identity	Pregnancy or parenthood
Marital status	Age	Religion	Beliefs	Disability



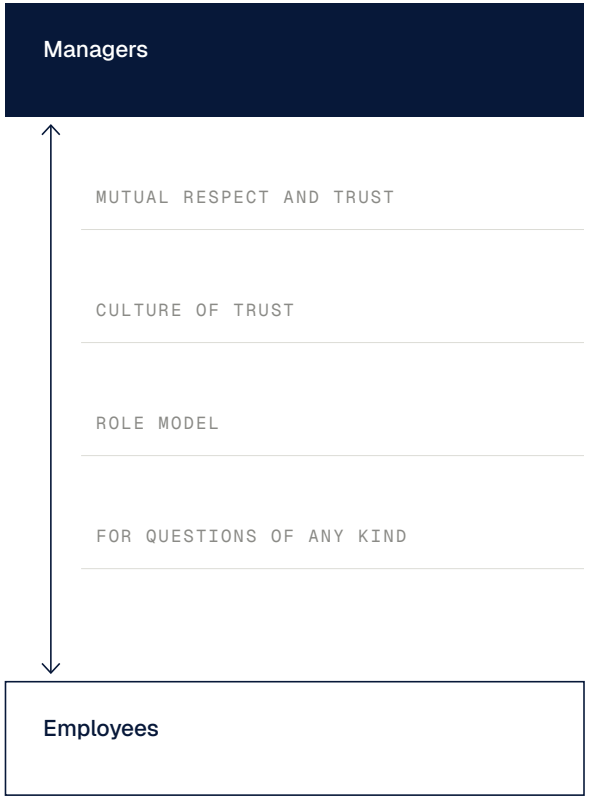
2.3. Responsibility for our reputation

We know that the appearance, actions and conduct of each of us significantly shape the reputation of JRT Elastomer Tec GmbH. Inappropriate or unlawful behaviour can cause considerable financial damage and harm the reputation of JRT Elastomer Tec GmbH. Every employee of JRT Elastomer Tec GmbH serves as a role model. We expect each individual, through lawful and ethical conduct, to help respect, maintain and enhance the reputation of JRT Elastomer Tec GmbH.

We are committed to the principles of the Universal Declaration of Human Rights. We also expect our suppliers and business partners to share these values and to commit to upholding them.

2.4. Leadership and culture of trust

Compliance with the Code of Conduct is the responsibility of each of us. Legal and internal rules are just as binding as ethical behaviour. We place the greatest importance on the commitment of employees in management positions. We expect integrity from our managers at all levels. Every manager is responsible for their employees. Our relationship is built on mutual respect and trust. Our managers promote a culture of trust and, as role models, are available to their employees for questions of any kind.



CHAPTER 3

Dealing with business partners and third parties

3.1. Compliance with competition and antitrust law

3.2. Relations with suppliers and customers

3.3. Donations and sponsorship

3.1. Compliance with competition and antitrust law

The rules of fair competition within the framework of the law must be observed by every employee who has contact with competitors, customers, suppliers or other business partners. Agreements between market participants that restrict competition, such as price fixing, market sharing, capacity agreements, allocation of territories and customers, and resale price maintenance, are strictly prohibited. In addition to agreements, deliberately coordinated behaviour that may lead to a restriction of competition is also prohibited. This includes informal coordination of conduct and the exchange of information that is intended to or may restrict competition. Even the appearance of collusion between competitors must be avoided. Antitrust rules must also be observed in agreements with suppliers and customers. A legal review is required in particular for restrictions on use or resale, exclusivity agreements and clauses that influence resale prices. The exchange of confidential market and company information that could influence market activity (e.g. information on customer relationships, capacities, prices, strategies) is also prohibited. Caution is required not only in market research and benchmarking projects but also at association meetings and other industry events. We treat our competitors fairly. We prohibit our employees from spreading false information about a competitor or from obtaining competition-relevant information through criminal means.

STRICTLY PROHIBITED	LEGAL REVIEW REQUIRED	CAUTION REQUIRED
Price fixing	Restrictions on use or resale	Market research and benchmarking projects
Market sharing	Exclusivity agreements	Association meetings
Capacity agreements	Clauses that influence resale prices	Other industry events
Allocation of territories and customers		
Resale price maintenance		



3.2. Relations with suppliers and customers

We expect our suppliers and customers to share our values and to comply with all legal requirements. We select our suppliers objectively and assess all offers impartially. The business activities of our customers, consultants and business partners must comply with legal regulations. In particular, we comply with anti-money laundering laws, anti-terrorism laws and all applicable export control and customs laws.

WE COMPLY IN PARTICULAR WITH

- Anti-money laundering laws
- Anti-terrorism laws
- Export control and customs laws

3.3. Donations and sponsorship

We see ourselves as part of society and stand by our social responsibility. Through targeted support for humanitarian, social and cultural causes, we want to make a positive contribution to the development of society. All donations we make and our sponsorship activities are voluntary, comply with applicable law and internal rules, and must be agreed in advance with the management. When making donations, we observe the principle of transparency, document, among other things, the purpose, the identity of the recipient and the donation receipt, and request nothing in return. Donations to individuals (including employees and their relatives), to organisations controlled by individuals and to organisations with a political orientation are prohibited in principle.

■ WE SUPPORT	✕ PROHIBITED IN PRINCIPLE	■ WE DOCUMENT
Humanitarian causes	Donations to individuals	Purpose
Social causes	to organisations controlled by individuals	Identity
Cultural causes	to organisations with a political orientation	Recipient’s donation receipt

Prevention of corruption and conflicts of interest

4.1. Fighting corruption
4.1.1. Offering and granting benefits
4.1.2. Requesting and accepting benefits
4.2. Avoiding conflicts of interest
4.2.1. Secondary employment

4.1. Fighting corruption

Our business relationships are based on integrity, and we convince solely through the value of our products and services. Corruption distorts competition and causes significant economic damage. We do not accept corruption at JRT Elastomer Tec GmbH. We are aware that corruption damages the reputation of JRT Elastomer Tec GmbH and can lead to criminal and civil consequences as well as fines, both for the company and for the employees involved.

4.1.1. Offering and granting benefits

We always ensure that our business conduct complies with applicable anti-corruption laws and regulations. Employees of JRT Elastomer Tec GmbH therefore refrain from unlawfully influencing business partners, private individuals or public officials, directly or indirectly, whether through favours or by offering, promising or granting gifts or other benefits. We protect our reputation and want to avoid even the appearance of dishonesty or impropriety in our dealings with business partners. Particular restraint is required in dealings with public officials and office holders because of their role in society. Public officials and office holders include civil servants, judges, politicians, members of parliament and other representatives of public institutions. We rely on transparent and dependable business relationships and also require our business partners to know and comply with our rules on fighting corruption.

GIFTS OR OTHER BENEFITS	PUBLIC OFFICIALS AND OFFICE HOLDERS
✕ No offering	Civil servants
	Judges
✕ No promising	Politicians
	Members of parliament
✕ No granting	Representatives of public institutions



4.1.2. Requesting and accepting benefits

Our employees are prohibited from using their position to obtain benefits. Small courtesies within customary business limits (socially acceptable occasional gifts or invitations to meals or events) are generally unproblematic, provided local customs are observed. Any courtesies that go beyond this and are not appropriate to the occasion and the position of the business partner must be declined. In addition, the independence of neither party may be compromised. Please note that corruption offences remain punishable even if a superior authority has approved them. If in doubt about whether gifts, benefits or invitations are appropriate, always seek the advice of your manager.

We disclose possible or actual conflicts of interest and resolve them as quickly as possible. We reject every form of corruption and bribery and do not tolerate it.

4.2. Avoiding conflicts of interest

We want to avoid the personal and private interests of our employees conflicting with the interests of JRT Elastomer Tec GmbH. We therefore avoid all situations that could lead to a conflict between personal interests and the business interests of JRT Elastomer Tec GmbH. We expect our employees to report any potential conflicts of interest to their manager without delay. Conflicts of interest may arise, among other things, from secondary employment and from business relationships with, or shareholdings in, a competitor or customer of JRT Elastomer Tec GmbH.

4.2.1. Secondary employment

Secondary employment that prevents employees from properly fulfilling their duties at JRT Elastomer Tec GmbH is not permitted, in particular work for competitors. Taking up paid secondary employment requires prior review and written approval. Approval can only be given if the secondary employment is consistent with the legitimate interests of JRT Elastomer Tec GmbH and the rules on maximum working hours are observed. We support and encourage voluntary work by our employees in their free time.

Handling company property and information

We protect confidential information against unauthorised disclosure and misuse. All of us must observe the applicable laws and rules when we collect, store, process or transfer personal data and information.

5.1. Handling company property

Company property may be used for business purposes only. Every employee must handle it properly and with due care and protect it against loss.

5.2. Handling information and data protection

Discussing confidential information in public or passing on information about the company or its customers to third parties without authorisation constitutes a breach of confidentiality obligations and may, for example, give rise to antitrust violations. Confidential information is non-public information intended only for a limited group of people and not for internal distribution or external publication. Employees with access to particularly confidential information are obliged to maintain strict confidentiality, both externally and internally. We take the greatest care, maintain strict confidentiality and comply with applicable laws and rules when collecting, storing, processing or transferring personal data of employees, customers or other third parties.

COMPANY PROPERTY

- Use for business purposes only
- Handle properly and with due care
- Protect against loss

PERSONAL DATA · OBSERVE APPLICABLE LAWS AND RULES





5.2.1. Reporting

JRT Elastomer Tec GmbH attaches great importance to our reports and records being complete, correct, truthful and timely. We comply with the principles of proper national and international accounting standards.

5.2.2. Confidentiality

Protecting business and trade secrets is our responsibility. Each of us is obliged to keep internal confidential or protected information about JRT Elastomer Tec GmbH secret. We treat non-public information from and/or about our employees, customers, suppliers, business partners and other third parties just as confidentially and use it in accordance with applicable laws and contractual requirements. The obligation of confidentiality continues to apply after the employment relationship has ended.

REPORTS AND RECORDS

01
Complete

02
Correct

03
Truthful

04
Timely

5.2.3. Data protection and data security

Protection of privacy and data security are of great importance to us. We comply with applicable laws and regulations as well as internal rules on data protection and IT security. We collect, process and use personal data only for its intended purpose and only to the extent permitted by law. In addition, we ensure a high standard of security in information processing. We make sure that the use of personal data is transparent for the persons concerned. Their rights to information and, where applicable, to object, to restriction and to erasure are respected at all times.

RIGHTS OF THE PERSONS CONCERNED

01
Information

02
Objection

03
Restriction

04
Erasure

Occupational safety, health and environmental protection

Ensuring fair working conditions as well as safety and health in the workplace is an integral part of our corporate culture.

6.1. Occupational safety and health

The safety and health of our employees are of great value to us. We always want to promote the health, job satisfaction and efficiency of our employees. We achieve this by observing the regulations and laws on occupational health and safety, setting targets for continuous improvement and encouraging our employees to look after their own health.

6.2. Environmental protection and sustainability

Environmental compatibility and the greatest possible conservation of resources are among the foundations of what we do. We not only comply with the locally applicable environmental regulations in manufacturing our products and make sure raw materials and energy are used efficiently; we also support our customers and suppliers in their efforts to handle the products they buy from us or supply to us safely and in an environmentally friendly way. In everyone's interest, we want to keep the burden on people and the environment as low as possible and contribute to improving environmental performance. We are committed to sustainable development.

RESOURCES

- Efficient use of raw materials and energy
- Keep the burden on people and the environment as low as possible

6.3. Product safety

Our products must have neither defects nor hazardous properties that could impair health or damage property. It is very important to us to offer our customers safe, high-quality products of flawless quality.

WE SUPPORT

- Health
- Job satisfaction
- Efficiency



Implementation of the JRT Elastomer Tec GmbH Code of Conduct

7.1. Responsibility for implementation

7.2. Responsibility for compliance

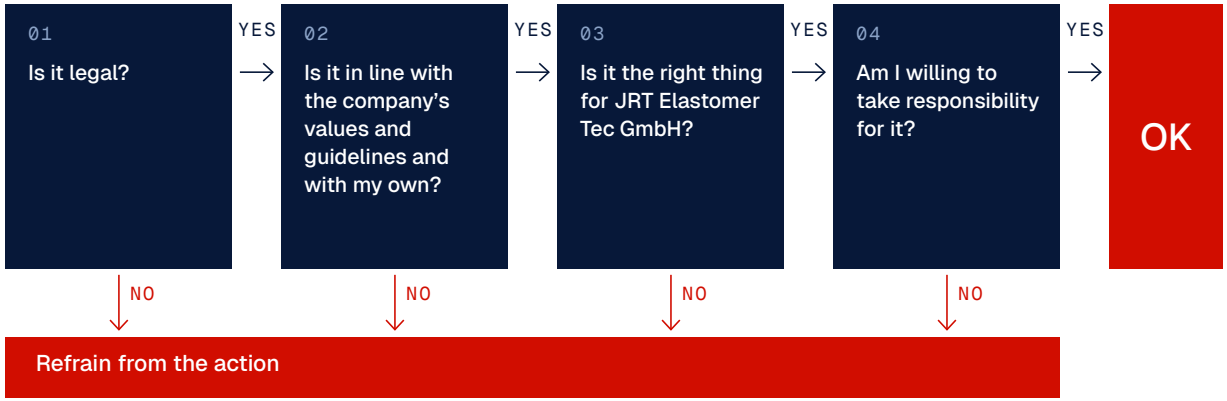
7.1. Responsibility for implementation

In everyday business, the decisions of all employees of JRT Elastomer Tec GmbH should comply with this Code of Conduct as well as with legal provisions and internal rules. JRT Elastomer Tec GmbH promotes awareness of this Code of Conduct and ensures its implementation and appropriate training. We also encourage our business partners, customers and suppliers to incorporate the principles of our Code of Conduct into their own corporate policies.

7.2. Responsibility for compliance

All employees of JRT Elastomer Tec GmbH are obliged to familiarise themselves with this Code of Conduct and to follow its provisions in their daily work. Our managers support employees in complying with this Code of Conduct and are the contact persons for all questions relating to lawful conduct and integrity.

The following four questions can help with individual decisions:



If any of these questions is answered with "no", refrain from the action! Employees are obliged to report violations of the rules of conduct set out in this Code of Conduct to their manager without delay. Reports can also be made anonymously and in confidence. The information provided must be as precise as possible and describe the facts in detail to allow a thorough investigation. The reports are investigated and appropriate measures are taken. We ensure that no whistleblower acting in good faith suffers any disadvantage as a result of a report.

Where individuality begins.

ELASTOMER TEC

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