



10/2024

Code of Conduct

MOTAN GROUP
SANDRA FÜLLSACK
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VERSION 2.0

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Whenever this guideline refers to "management" or similar, the simultaneous use of diverse, feminine and masculine forms of writing has been dispensed with for reasons of readability. All references to persons nevertheless apply to all genders.

Preamble

Our Code of Conduct outlines our expectations for members of the motan group, as well as the steps to report unacceptable behaviour. We are committed to providing a welcoming and inspiring community for all and expect our Code of Conduct to be honoured in order to maintain a positive environment for everyone.

We highly regard the confidence and trust placed in us by our business partners and customers. Our goal is to earn and maintain this trust through our actions and behaviour in our daily business life. For us, this forms the base for sustainable business.

As a global corporation, we are not only obliged to comply with a variety of different laws and regulations, we are also confronted with many different cultures and mentalities. This Code of Conduct shall provide a common language of our universal values and principles.

This Code of Conduct applies to all community spaces, including online forums, events and social media. It also applies when an individual is representing motan in public spaces.

1 Common Rules for working together

1.1 Expected behaviour

Be Respectful

Treat everyone with respect and consideration. This includes respecting different point of views and experiences.

Be Considerate

Think about how your actions and words will affect others. Be mindful of your language and tone.

Be Inclusive

We embrace diversity and view it as an important part of our corporate culture. We welcome and support people of all backgrounds and identities. This includes, but is not limited to, members of race, ethnicity, culture, national origin, colour, immigration status, social and economic class, educational level, sex, sexual orientation, gender identity and expression, age, size, family status, political belief, religion, and mental and physical ability.

Collaborate Openly

Foster a culture of openness and transparency. Be willing to share knowledge and provide constructive feedback.

1.2 Unacceptable Behaviour

Harassment and Discrimination

Harassment, discrimination, or exclusionary behaviour of any kind will not be tolerated. This includes, but is not limited to, offensive comments related to gender, gender identity and expression, sexual orientation, disability, physical appearance, body size, race, religion and other protected categories.

Violence and Threats

Any form of violence or threats, whether physical, verbal or written, are strictly prohibited.

Disruption

We appreciate the opinion of others and ensure and encourage freedom of opinion and expression. Sustained disruption of talks or events, including online discussions, is unacceptable.

Inappropriate Behaviour

Any behaviour that is disrespectful or in another way is inappropriate is prohibited.

2 Business Standards

2.1 Commitment to Rule of law

Every member of the motan group is required to comply with the applicable statutory laws as well as our internal rules and guidelines.

Special requests and wishes from customers, suppliers or any other types of business partners will only be granted within the confines of the applicable rules and laws, even at the risk of losing potential business opportunities.

Standards of consumer protection must always be fulfilled.

2.2 Bribery and Corruption

Bribery and Corruption are not tolerated within the motan group. You are responsible for abstaining from personal dependencies or obligations to any customers. Personal gifts or other benefits may only be allowed or accepted if they are of minimal value and may not influence the decisions for granting or accepting orders from customers or suppliers.

We expect you to ensure that every offer or receipt of gifts, invitations, entertainments, or business courtesies is permitted by law and regulation, for a legitimate purpose, reasonable and not intended to influence. Exchanges need to be consistent with reasonable marketplace customs and practices and are not allowed to violate common rules and standards.

Any form of facilitation payment as well as asking or promising anything of value to or from an elected or public official to influence actions or obtain an improper advantage are not permitted.

In cases of doubt, please notify your supervising manager or the motan group CSR Team.

All business transactions must be transparent and documented. Invoices must reflect the prices agreed with the business partner. Discounts or credits must be documented and accounted for. All records referring to a business transaction, regardless of format, must serve as evidence of the business transaction and fully and accurately represent the transaction or event being documented. Records need to be retained based on all applicable legal and contractual retention requirements.

2.3 Corruption and money laundering

The motan group supports the worldwide efforts against corruption and money laundering. Signs of possible illegal transactions can be unusual payments, payments via third (non-contractual) parties or use of several bank accounts.

2.4 Fair competition

The motan group supports the rules of fair competition. Price fixing, the abuse of market power or other unfair competitive practices are forbidden as well as agreements to waive competition.

2.5 Conflicts of Interest

If a conflict of interest arises between you and a related party (e.g. family member) during a business transaction, the supervising manager must be informed.

2.6 Company Property and Trade Secrets

Company property is to be handled with the utmost care.

Employee know-how is our greatest asset. You are obliged to follow the guidelines regarding trade secrets and confidentiality in accordance with your contract. Special care is to be taken when creating and storing data or documentation to prevent the information from falling into the hands of third parties.

This shall also apply for company property and trade secrets of our business partners.

2.7 International and trade compliance

We respect international embargo and export regulations. We expect you to ensure that all actions comply with all applicable laws and regulations that apply to the import and export of goods or services.

By choosing suppliers we expect you to ensure that they comply with all applicable laws and regulations regarding hazardous substances and conflict minerals as well as to avoid the use of raw-materials which originate from conflict-affected and high-risk areas and contribute to human rights abuses, corruption, the financing of armed-groups or similar negative effects.

In cases of insecurities please notify your supervising manager.

3 Global Standards

3.1 Human Rights

We clearly commit and explicitly support human rights standards and oppose every form of human rights abuse.

Child Labour

We do not accept any kind of child labour. We expect you not to use child labour or conduct business partners using child labour. "Child" is defined as any person under the statutory minimum age applicable to local law and the minimum working ages defined by the International Labour Organization (ILO).

Forced Labour

We oppose any kind of forced labour. Nobody shall be employed or be made working against their own will. We expect you to not use any kind of forced labour and to not conduct business with business partners that promote or use such practices.

Human Trafficking

We do not support any kind of forced recruitment, transportation, or receipt of persons for the purpose of exploitation. We expect you to commit to the same value and refrain from using or providing labour or service procured illegally and notably through migrant smuggling.

3.2 Employment practices

The motan group supports all applicable laws and regulations in the countries we operate in. This includes all forms of rights, wages and benefits as well as working conditions. The right to form and be active in associations needs to be respected as well as the freedom of speech.

3.3 Health and Safety

The safety, health and welfare of all employees, visitors, and everyone else involved in the business activity must be ensured. This means, at minimum, that all applicable laws and regulations, and health and safety procedures must be respected and implemented.

3.4 Environmental

The motan group supports the goals of sustainable environment protection and strives for environmentally friendly production methods and a responsible use of natural resources.

We want you to support the motan group in its efforts and to respect the environment and work on minimizing your own environmental impact linked to your activities. This means, the use of resources and energy shall be as efficient as possible.

4 Reporting Incidents

If you are subject to or witness unacceptable behaviour, or have any other concerns, please notify your supervising manager or the motan group CSR Team under compliance@motan.com as soon as possible.

Reports can also be made anonymous through the motan group whistleblower-system which is publicly available under www.motan-group.com.

5 Consequences of Unacceptable Behaviour

Unacceptable behaviour from any motan group member, including decision-making authority, will not be tolerated. Anyone asked to stop unacceptable behaviour is expected to comply immediately. If a motan group member engages in unacceptable behaviour, the Managing

Director of the respective motan company or the Chief Executive Officer of the motan holding gmbh may take any action they deem appropriate, up to and including a temporary ban or permanent expulsion from the motan group without warning.

6 Addressing Grievances

If you feel you have been falsely or unfairly accused of violating this Code of Conduct, you should notify you Managing Director or the motan group CSR Team a concise description of your grievance. Your grievance will be handled in accordance with our existing governing policies.

7 Acknowledgement

By participating in the motan group, you agree to abide by the Code of Conduct. We value you participation and hope to foster an environment where everyone can contribute to the success of our community.

This Code of Conduct is created by the motan holding gmbh and is a binding guideline for all business transactions of the motan group. The respective Managing Director is responsible for informing every employee about this Code of Conduct and ensuring its implementation.

8 Contact Information

For any questions or concerns regarding the Code of Conduct, please contact the motan group CSR Team under compliance@motan.com.

9 Validity of guideline

This guideline comes into effect immediately and replaces the formerly applicable Code of Conduct from January 31st, 2018.

Konstanz, 24.10.2024



Sandra Füllsack (CEO, motan holding gmbh)

10 Revision List

Version	Date	Reason for the amendment	Name
1.0	31.01.2018	Primary Publication	Sandra Füllsack
2.0	24.10.2024	Adaption to new Strategy	Sandra Füllsack