



HUMAN RIGHTS AND WORKING CONDITIONS

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Dear colleagues,

POLLRICH GmbH takes its social responsibility very seriously. Compliance with human rights and fair working conditions are an integral part of our corporate culture.

Together with our employees, we have drawn up this code on human rights and working conditions, which has been signed by the management. The Code is based on the key international standards on human rights and working conditions, such as the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

This Code explains how our company promotes human rights and good working conditions and implements the core labor standards of the International Labor Organization (ILO). The Code applies to employees, suppliers and authorized sales partners. This is our contribution to the long-term success of our company.

Frank-Martin Bub
Managing Partner

MORE THAN JUST
AN EMPLOYER.

Table of Contents

1.	INTRODUCTION	4
1.1	Goals	5
2.	PROMOTION OF HUMAN RIGHTS AND GOOD WORKING CONDITIONS	6
2.1	Ban on child labor	7
2.2	Ban on forced labor	7
2.3	Freedom of association and the right to collective bargaining	7
2.4	Protection against discrimination	8
2.5	Right to health and safety at work	8
2.6	Remuneration	
2.7	Working hours	
2.8	Qualification	
2.9	Right to privacy - protection of personal data	
2.10	Rights of local communities	
3.	CORPORATE ETHICS	
3.1	Responsible and ethical business practices	
3.2	Strict ban on bribery in the public and private sector	
3.3	Conflicts of interest	
3.4	Money laundering	
3.5	Protection of assets belonging to POLLRICH	
3.6	Tax evasion	
3.7	Fair competition	
4.	DEALING WITH BUSINESS PARTNERS	
4.1	Suppliers	
4.2	Authorized sales partners	
5.	IMPLEMENTATION OF THE POLLRICH CODE ON HUMAN RIGHTS AND WORKING CONDITIONS	
5.1	Responsibility	
5.2	Audit and regular reporting	
5.3	Review and dialog	
5.4	Whistleblowers protection	
5.5	Processing questions and comments	
	FINAL PROVISION	

1. INTRODUCTION

The POLLRICH GmbH is aware that our actions carry a responsibility for human rights and in this way contribute to a more just world. We are therefore committed to respecting and protecting human rights in all our business activities.

Responsible, sustainable and lawful conduct is therefore one of the essential values of POLLRICH GmbH and is firmly anchored in our corporate strategy.

POLLRICH GmbH is committed to respecting internationally recognized human rights. It made its position clear in the "Code of Conduct and Values" published in 2016, which was signed by both management and employee representatives at POLLRICH GmbH and its sister company ROTAMILL GmbH, and renewed with this Code.

Our company always acts fairly and honestly and respects this regardless of the personal or cultural background of all employees. We enable our employees to exercise their rights, as far as possible, within the legal framework. They have the right to decent working conditions, protection against discrimination and equal access to training at all times.

We guarantee fair working conditions based on the applicable labor and social security law. In addition, we ensure that the requirements of international organizations (e.g. UN, OECD, ...) as well as national laws on the implementation of human rights are

met in our company.

Thanks to this commitment, we can be sure that no human rights violations occur within our company.

1.1 GOALS

This Code defines and explains how POLLRICH GmbH promotes human rights and implements the ILO core labor standards in its business activities. It applies worldwide at all locations and to all business areas of POLLRICH GmbH and focuses on the topics that are of particular relevance to the company and its employees.

The POLLRICH Code of Human Rights and Working Conditions applies in particular to:

- Employees
- Suppliers
- Authorized sales partners

This POLLRICH Code of Human Rights and Working Conditions reaffirms and clarifies the commitment to respecting human rights. It supplements the POLLRICH Code of Conduct and Values as well as all other existing company principles, guidelines and instructions. It is to be implemented in accordance with the applicable legal regulations of the respective markets and locations, taking into account the different cultures.

Should national law conflict with the implementation of individual aspects of the POLLRICH Code of Human Rights and Working Conditions, POLLRICH GmbH strives to give human rights the greatest possible effect within the given legal framework.



2. PROMOTION OF HUMAN RIGHTS

POLLRICH GmbH respects the human rights of its employees and aims to exceed the minimum standards with its working conditions. Cooperation within POLLRICH GmbH is characterized by mutual respect and the values laid down in the corporate strategy of POLLRICH GmbH. These determine the attitude and behavior of employees worldwide and include aspects such as responsibility, appreciation, transparency, trust and openness. The managers of POLLRICH GmbH have a special role model function in this regard. They exemplify the values and thus apply them in everyday leadership.

The following sections describe the key human rights and working conditions issues for POLLRICH GmbH.



2.1 PROHIBITION OF CHILD LABOR

POLLRICH GmbH does not tolerate any form of child labor.

Children must not be kept from their education by gainful employment and thus restricted in their development. Their dignity must be respected and their safety and health protected. In accordance with the ILO core labor standards, POLLRICH GmbH complies with the minimum age for employment and strictly rejects child labor. This applies in particular to the worst forms of child labor, such as hazardous activities that can damage the health, safety or morals of children.

2.2 PROHIBITION OF FORCED LABOR

POLLRICH GmbH does not tolerate any form of forced or compulsory labor.

In accordance with the ILO core labor standards, POLLRICH GmbH strictly rejects the use of forced or illegal compulsory labor in its business activities.

2.3 FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING

POLLRICH GmbH recognizes the right of all employees to form employee representative bodies and to conduct collective bargaining to regulate working conditions.

The culture at POLLRICH GmbH is characterized by trusting and constructive cooperation with the respective employee representative bodies. Even in contentious discussions, the goal remains to maintain sustainable cooperation for the benefit of the company and its employees. Employees are neither favored nor disadvantaged because of their membership or non-membership in a union or employee representative body. At locations that do not have an employee representative body, POLLRICH GmbH promotes regular dialogue between employees and the company.

2.4 PROTECTION AGAINST DISCRIMINATION

Equal opportunity for all employees is a fundamental principle of our corporate policy.

POLLRICH GmbH does not tolerate discrimination against its employees. No one may be disadvantaged, favored or harassed on the basis of characteristics such as gender, skin color, religion, nationality, political or other beliefs, ethnic origin, disability, age, sexual orientation or any other characteristic protected by local law, such as membership of a national minority, pregnancy or former military affiliation (veteran status). POLLRICH GmbH supports government programs that serve to overcome the consequences of discriminatory practices or other disadvantages from the past. In addition, POLLRICH GmbH promotes an open and inclusive corporate culture.

2.5 RIGHT TO HEALTH AND SAFETY AT WORK

The protection and promotion of the health of all employees is a top priority for POLLRICH GmbH.

The company consistently complies with applicable occupational health and safety laws worldwide and sets its own standards that go beyond this to improve occupational safety. Effective measures and investments make it possible to guarantee compliance with the corresponding requirements regarding occupational safety and the ergonomic design of workplaces, thus reducing the risk of accidents.

The responsible managers perform their duties in accordance with the applicable occupational health and safety requirements of POLLRICH GmbH. They ensure that the employees concerned are regularly instructed in the relevant aspects of health and safety at work. For this purpose, the managers are regularly trained. In addition, the company actively promotes the physical and mental health of its employees with initiatives in the area of health management.

POLLRICH GmbH also takes appropriate protective measures to ensure the safety of its employees and visitors at all locations. Based on site-specific risk analyses, appropriate measures are implemented in accordance with applicable law.

2.6 REMUNERATION

POLLRICH GmbH offers its employees competitive and performance-related remuneration, which is supplemented by additional benefits.



POLLRICH GmbH remunerates its employees fairly, both internally and externally. Uniform principles form the basis for a globally balanced remuneration system. Where available, the remuneration complies with the respective legally guaranteed minimum wages or minimum standards of the respective economic sectors. In addition, POLLRICH GmbH strives for an above-average positioning of the total remuneration package (remuneration and additional benefits) for its employees compared to the relevant job market.

At all POLLRICH GmbH locations, performance and work results are a central yardstick for remuneration. The company remunerates employees for their individual or collective performance in accordance with local principles.



2.7 WORKING HOURS

POLLRICH GmbH complies with at least the applicable national working time regulations. In addition, our working time principles describe the principles applicable at POLLRICH GmbH regarding rest periods, free time, vacation and life balance. They provide worldwide support in the design of working time regulations.

The arrangement of working hours and breaks takes into account both operational and individual concerns. It is based on ergonomic criteria, such as medically recognized physical and mental stress parameters.

POLLRICH GmbH promotes the compatibility of work and private life. It offers its employees

a large number of different working time models, childcare options and advice on caring for relatives in order to enable them to achieve a balanced life balance in different career and life phases. Each POLLRICH GmbH location develops appropriate measures with a view to its regional and country-specific conditions.

2.8 QUALIFICATION

POLLRICH GmbH promotes the long-term employability of its employees. It hires new employees based on their individual skills and promotes or develops them accordingly. The company specifically develops the skills and talents of its employees through future-oriented training and development opportunities in order to ensure a high level of performance and employability in the long term. The focus is not only on professional qualification, but also on personal development. Access to qualification and training measures is based on the principle of equal opportunities for all employees.

2.9 RIGHT TO PRIVACY - PROTECTION OF PERSONAL DATA

To safeguard the personal rights of employees and customers regarding the use of their personal data, POLLRICH GmbH maintains high data protection standards. POLLRICH GmbH is generally guided by German and European data protection standards in order to guarantee the best possible respect for personal rights at all locations.

Innovative information technologies and increasing media networking can pose major challenges when dealing with personal data in everyday business. Corporate data protection works to ensure that the use of such data complies with the law, that the impact on privacy is kept to a minimum and that the rights of each individual are guaranteed, including the right to information, correction, blocking or deletion of data.

2.10 RIGHTS OF LOCAL COMMUNITIES

POLLRICH GmbH respects the human rights of local communities at its sites that could be affected by POLLRICH GmbH's business activities. In addition, it is the company's declared goal to minimize the impact on the local population during site preparation and development, as well as during ongoing operations. For this purpose, ecological and social analyses are carried out on various factors such as water availability, traffic conditions and emissions. At its locations, POLLRICH GmbH is committed to using environmentally friendly and resource-efficient processes and procedures and to minimizing negative effects on the local population.



3. BUSINESS ETHICS

POLLRICH GmbH requires its employees and the third parties with whom we cooperate to support our efforts with regard to ethical and integerous conduct.

3.1 RESPONSIBLE AND ETHICAL BUSINESS PRACTICES

POLLRICH GmbH is committed to following the highest standards in its relations with all its partners and relevant stakeholders, and especially throughout its supply chain, with regard to health, the environment, working conditions, and social justice.

3.2 STRICTLY PROHIBITED BRIBERY IN BOTH THE PUBLIC AND PRIVATE SECTORS

POLLRICH GmbH does not tolerate any form of bribery or corruption, i.e., directly or indirectly demanding, accepting or offering things of value from persons in order to unlawfully influence the actions or decisions of such persons within the scope of their functions, including for the purpose of obtaining an unlawful or undue advantage.

3.3 CONFLICTS OF INTEREST

A conflict of interest exists when an employee's personal relationships or outside activities compromise or appear to compromise the employee's objectivity, his/her judgment, or his/her ability to act in the best interests of the company.

Employees must avoid any conflicts of interest and ensure that their actions and decisions are not influenced by interests that appear to conflict with the interests of the company. Their actions must always be to the advantage of ROTAMILL GmbH.

Accordingly, the following applies:

- Employees must avoid acquiring shares or engaging in activities that could impair their judgment or ability to act in the best interests of the company.



- Owning shares in companies of market participants, working in a company that competes with POLLRICH GmbH and direct or indirect financial, professional or personal involvement in such a company may constitute or appear to be a conflict of interest.
- Employees must disclose any actual or potential conflict of interest so that appropriate remedial action can be taken. Disclosure is made via the appropriate reporting form.

3.4 MONEY LAUNDERING

Due to its position in the value chain, POLLRICH GmbH bears responsibility in the fight against money laundering and terrorist financing. In this sense, employees are obligated to comply with internal guidelines and procedures, which include due diligence rules and procedures for reporting unusual or suspicious transactions.

3.5 PROTECTION OF POLLRICH ASSETS

The protection of its assets is crucial to the future and continued existence of POLLRICH GmbH. In particular, know-how, information, hardware, tools and intellectual property rights may only be used for POLLRICH GmbH's business activities and in compliance with internal guidelines and standards.

Abusive actions or suspected abusive actions must be reported in accordance with POLLRICH GmbH's whistleblower guidelines or through other channels.

3.6 TAX EVASION

POLLRICH GmbH is committed to complying with tax laws and to maintaining business relationships with third parties who do not engage in any illegal tax practices. POLLRICH GmbH has appropriate procedures and controls in place to protect against tax evasion, which are implemented by local finance, tax and legal teams.

3.7 FAIR COMPETITION

POLLRICH GmbH treats its partners with respect and does not use any methods that are prohibited by competition laws and regulations.

POLLRICH GmbH expects its employees and third parties with whom the company does business to comply with applicable competition laws and regulations at all times.



4. DEALING WITH BUSINESS PARTNERS

POLLRICH GmbH expects its business partners to comply with human rights, in particular the ILO core labor standards, the principles of the UN Global Compact and the UN Guiding Principles on Business and Human Rights. It actively promotes compliance with and implementation of these principles along the value chain.

4.1 SUPPLIERS

POLLRICH GmbH expects its suppliers to respect human rights in their business activities. For POLLRICH GmbH, the commitment of suppliers to fulfill their social responsibility and, in particular, to comply with the ILO core labor standards is an indispensable prerequisite for lasting business relationships.

As a globally active company, POLLRICH GmbH works with a comprehensive supplier network. The increasing internationalization of purchasing and increasingly complex supply chains increase the risk of being directly or indirectly associated with human rights violations. To promote compliance with social standards in its supplier network, POLLRICH GmbH is involved in cross-industry initiatives and networks, conducts enablement measures with suppliers and has set up a multi-level risk management process.

The POLLRICH GmbH sustainability standard for the supplier network informs suppliers about basic principles, standards to be complied with and requirements regarding social responsibility. It is an integral part of the request documents for new suppliers.

The General Terms and Conditions and the International Purchasing Conditions of POLLRICH GmbH oblige suppliers to respect human rights and, in particular, to observe the ILO Declaration on Fundamental Principles and Rights at Work. They are also requested to demand this from their respective suppliers in an appropriate manner, e.g. by agreeing sustainability principles with their suppliers.

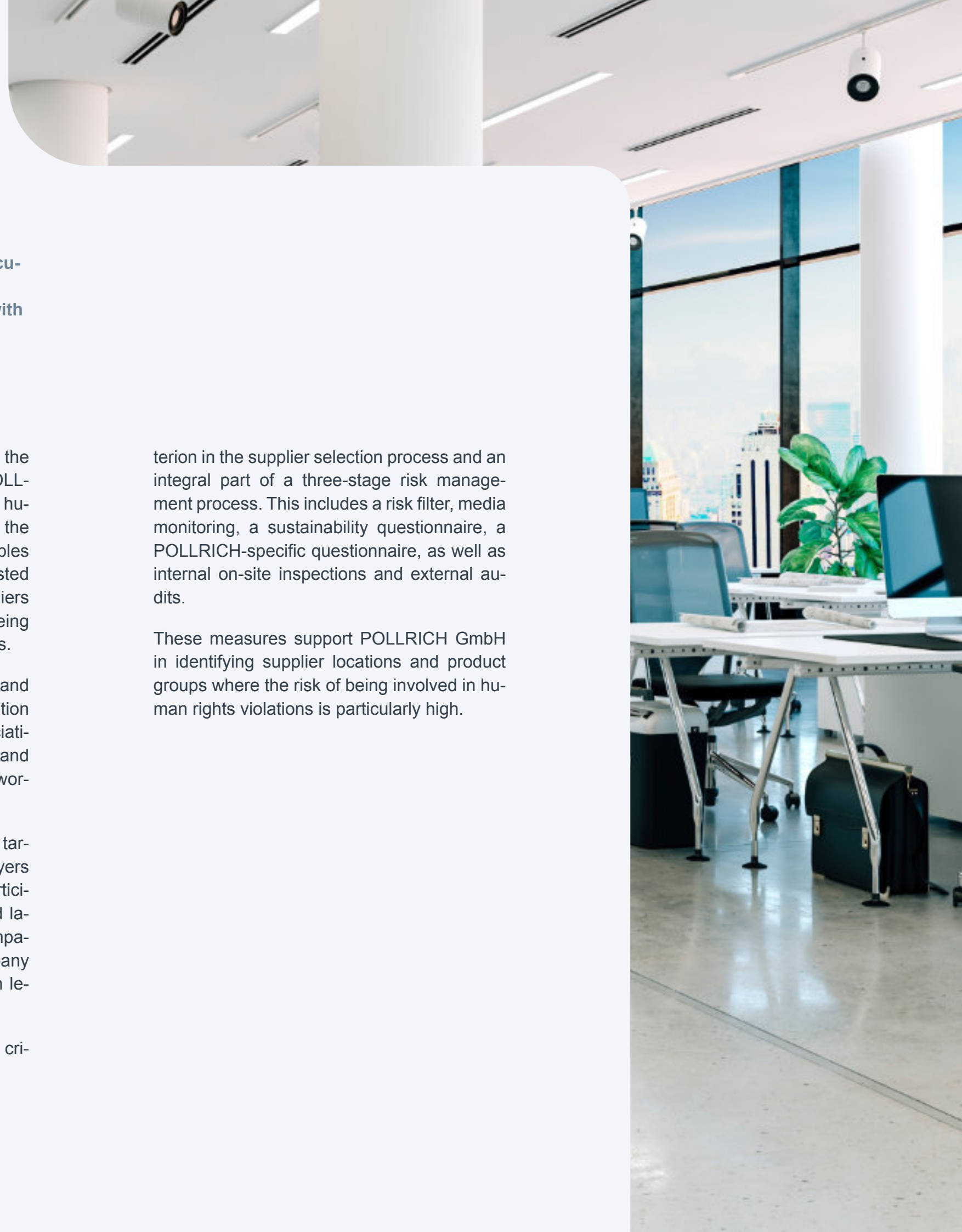
In addition to the prohibition of child and forced labor, the prohibition of discrimination and the safeguarding of freedom of association, suppliers must comply with health and safety standards and ensure appropriate working conditions.

POLLRICH GmbH offers a wide range of target-group-specific training courses for buyers and suppliers. In the training courses, participants are sensitized to human rights and labor standards and informed about the company's requirements. In this way, the company also supports suppliers in complying with legal standards.

Respect for human rights is an evaluation cri-

terion in the supplier selection process and an integral part of a three-stage risk management process. This includes a risk filter, media monitoring, a sustainability questionnaire, a POLLRICH-specific questionnaire, as well as internal on-site inspections and external audits.

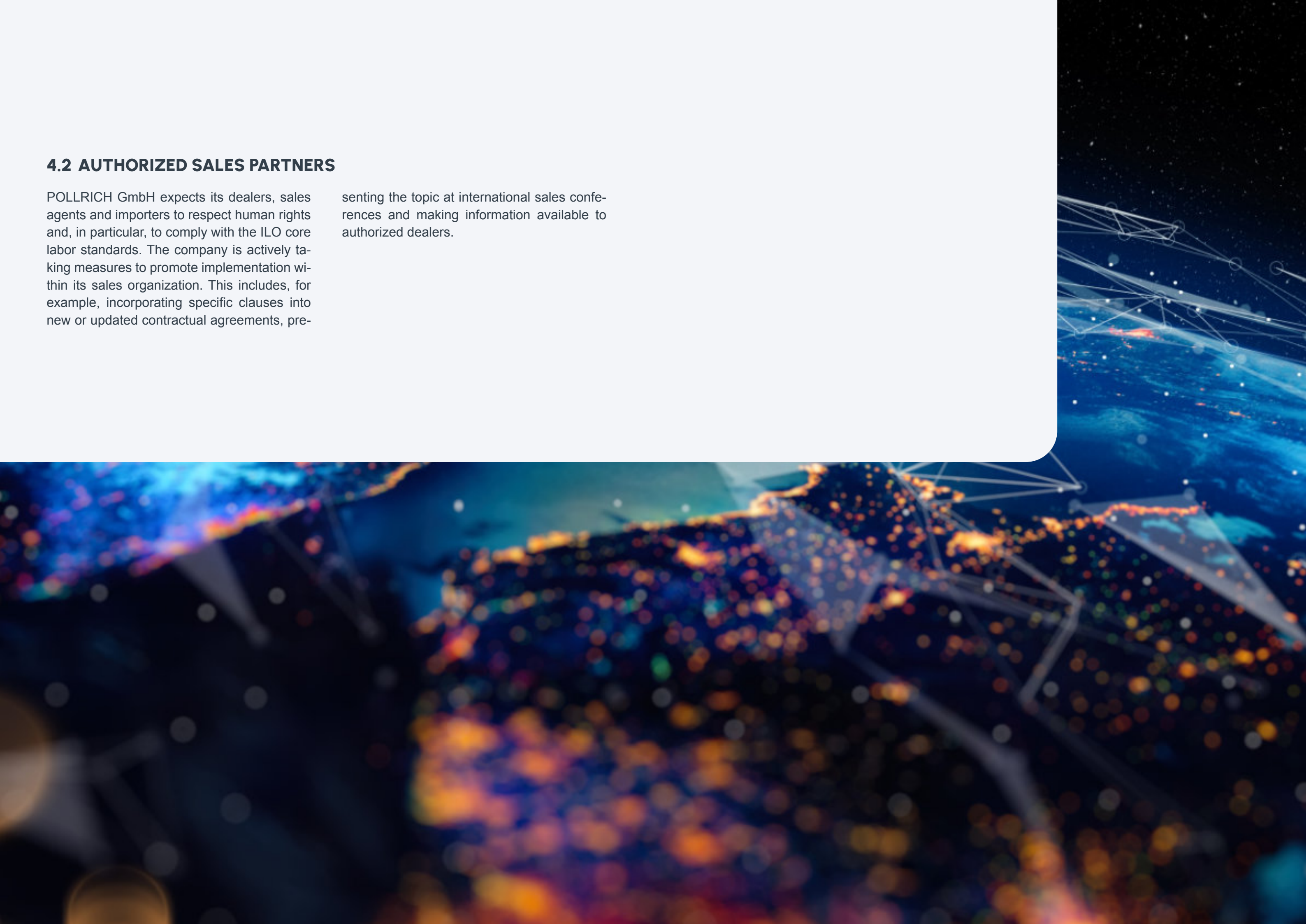
These measures support POLLRICH GmbH in identifying supplier locations and product groups where the risk of being involved in human rights violations is particularly high.



4.2 AUTHORIZED SALES PARTNERS

POLLRICH GmbH expects its dealers, sales agents and importers to respect human rights and, in particular, to comply with the ILO core labor standards. The company is actively taking measures to promote implementation within its sales organization. This includes, for example, incorporating specific clauses into new or updated contractual agreements, pre-

senting the topic at international sales conferences and making information available to authorized dealers.



5. IMPLEMENTATION OF THE CODE

In implementing the POLLRICH Code of Human Rights and Working Conditions, POLLRICH GmbH is guided by the requirements of the UN Guiding Principles on Business and Human Rights. Based on a systematic internal risk analysis, the management process for human rights in the company and with regard to our business partners is constantly being further developed. Human rights are an integral part of POLLRICH GmbH's corporate culture, operational management processes such as risk management, and essential investment decisions.

The POLLRICH Code of Human Rights and Working Conditions is communicated to all employees. In addition, employees are trained on the company's related positions and requirements.

5.1 RESPONSIBILITY

Managers are responsible for implementing the POLLRICH Code of Human Rights and Working Conditions in their respective areas.

Each manager is obligated to inform their employees about the content and significance of this Code and to advise and support them in applying the principles in their daily actions. At the same time, managers must observe the Human Rights Code in the performance of their management duties, e.g. in dealing with employees or as a basis for their business decisions. All indications of possible human rights violations must be clarified by the manager prudently and promptly.

All employees are obligated to comply with this POLLRICH Code of Human Rights and Working Conditions and to align their professional conduct with the principles formulated therein.

If there are indications of possible human rights violations, the employee can contact their own manager or contact one of the contact points listed below. All questions and information will be treated confidentially. The human resources team will follow up on the information and initiate corrective measures if necessary. This may allow problems to be solved early on and prevent greater disadvantages for those affected.

5.2 REVIEW AND PERIODIC REPORTING

The status of implementation of the POLLRICH Code of Human Rights and Working Conditions is reported in regular internal announcements. In addition, there is regular coordination with all employees and the human resources team, which also includes a report on incoming reports and their processing. POLLRICH GmbH publishes up-to-date information on the anchoring of human rights in the company and with business partners.

5.3 REVIEW AND DIALOGUE

This Human Rights Code was developed in dialogue with the relevant departments of POLLRICH GmbH and external experts.

As the challenges of respecting human rights for companies are constantly changing and the requirements of external business partners are also taken into account, this Code is continuously updated.

5.4 WHISTLEBLOWER PROTECTION

POLLRICH GmbH attaches great importance to integrity and lawful conduct. To ensure this, we have set up a whistleblower system that allows employees to report possible violations of laws or internal regulations.

Reports are made anonymously:

Employees can access the secure whistleblower portal via the following link, where reports can be submitted anonymously and confidentially:

<https://report.hintcatcher.com/ktBdqOJpjDJYSVxGFHTJ/>

Employees should note that the reporting channel is not intended for submitting general complaints about other employees. In the event of deliberately false reports, claims for damages can be made. It is therefore helpful if reports that are based on rumors or suspicion are marked as such.

5.5 QUESTIONS AND CONCERNS

The processing of incoming questions and concerns is handled by the HR team. Relevant specialist departments are also consulted on a case-by-case basis. The team reviews the reported issues and initiates the necessary measures.

If the review reveals that POLLRICH GmbH has directly or indirectly caused or contributed to a violation, appropriate corrective measures will be taken. Violations by employees of the human rights principles described in the Code may lead to labor law consequences in accordance with local legislation.

FINAL PROVISION

The POLLRICH Code of Human Rights and Working Conditions enters into force on the day of its signing and supplements the Code of Conduct and Values created in 2016 in its latest version. No individual claims or claims of third parties can be derived from it. Only the German version of this Code is binding.





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