

Introduction

The spread of globalisation and the growing interconnectedness of the world has opened up a host of international markets that were previously unheard of. The way in which the global community treats people in low-wage countries and raw material extraction areas has made all actors aware of the deplorable conditions in the world. We take resolute action against abuses in order to safeguard human rights and to set an example for our employees and our customers at home and abroad.

Our corporate culture is characterised by open, free and equal treatment of all employees, business partners and other persons.

Based on the Code of Conduct of the Responsible Business Alliance and the UN Guiding Principles on Business and Human Rights as well as the core labour standards of the International Labour Organization (ILO), Electro cycling GmbH has formulated its following Code of Conduct.

The understanding of law and order, on which the following aspects and perspectives are based, is fundamental for Electro cycling GmbH.

Electro cycling GmbH complies with all national and international laws, ordinances, provisions, rules and regulations applicable to it.

Legal obligations

Electro cycling GmbH and its employees are held accountable for:

- compliance with all laws, ordinances, permits, requirements, internal rules and other regulations (in their work),
- the application and implementation of the management system in their area of responsibility,
- the promotion and maintenance of corporate values, mutual respect and appreciation among each other,
- the protection and sensible, efficient use of corporate goods and assets,
- transparent communication with customers, service providers, authorities, etc. that is free from influence (corruption, abuse).

Health, safety and hygiene in the workplace

All employees of Electro cycling GmbH have the right to health, safety and hygiene at work. This right is given the highest priority at Electro cycling.

Electro cycling complies with all applicable health and safety legislation and ensures the health and safety of workers through various programmes and actions.

Hygiene in the workplace is an important prerequisite for health. Owing to this, appropriate facilities for hand cleaning and disinfection have been set up in the company and in the administration. Employees are encouraged to use these facilities to sustain protection against infection or disease.

Electro cycling GmbH provides its workers with sanitary facilities, drinking water and facilities for hygienic preparation, storage and consumption of meals.

In addition, heating and ventilation systems ensure an optimal working temperature and fresh air.

Appropriate company regulations have been drawn up for entering the premises of Electro cycling GmbH, which stipulate, among other things, the compulsory wearing of safety shoes and high-visibility waistcoats.

Workers exposed to dust and noise emissions are provided with sufficiently protective PPE, the use of which is regularly checked by supervisors.

Electro cycling GmbH has appointed an occupational safety specialist with the necessary competences for this area, who carries out regular documented plant inspections, monitors compliance with safety regulations and identifies potential hazards and communicates the same with the plant management so as to remedy them.

The occupational safety specialist is supported in his work by various safety officers to ensure the necessary safety at all times and in all places. This applies not only to the company premises, but also to dismantling activities carried out on behalf of Electro cycling at customers' sites and to transports carried out by Electro cycling.

Electro cycling also holds regular ASA and AK meetings (Occupational physicians and other occupational safety specialists and working group) to discuss health and safety issues arising from new facilities, procedures and processes.

With the help of a recording programme, the risk assessments resulting from the ASA meetings, plant inspections, etc. are carried out, and measures are discussed and debated so that they can be initiated and hazards at least minimised.

These activities comprise the occupational health and safety management of Electro cycling GmbH.

Recruitment, competence and qualification

The recruitment process at Electro cycling GmbH is free from discrimination and bullying.

Applicants are selected and recruited on the basis of the requirements for the positions to be filled. The selection process is completely non-judgemental with regard to gender, skin colour, race, age, religion, nationality or the likes. Applicants are selected and hired exclusively on the basis of their abilities in connection with the fulfilment of individual requirements.

Further training and qualification are promoted and supported by Electro cycling GmbH. This includes internal and external training, the transfer of responsibility to promote independence, and various training and career opportunities.

Working hours and remuneration

Electro cycling GmbH complies with the applicable Working Hours Act and thus with national regulations on working hours. Operational emergencies such as plant breakdowns, repairs, etc. may require a short-term and temporary increase in the agreed working hours to be rendered. These are remunerated accordingly.

The working hours of individual employees are recorded and evaluated digitally via a time recording system using a chip.

Legal rest periods between working hours are ensured by a regulated shift system and a core working time.

In addition, a model of flexible working time in the form of flexitime is made available to administrative staff to support the reconciliation of work and private life.

Electro cycling GmbH offers its employees competitive remuneration, which is supplemented by appropriate additional and social benefits. The principle of pay equity is adhered to.

Company agreements have been concluded between the management and the works council on both working hours and break times as well as flexible working time.

Freedom of association

Electro cycling GmbH leaves it up to its employees to join trade unions and establish employee representation within the framework of the applicable regulations.

Electro cycling GmbH has a works council to represent employees.

Protection against discrimination, harassment, other inhumane treatment

Electro cycling GmbH does not tolerate discrimination, harassment, coercion, abuse of any kind, bullying and other inhumane treatment on the basis of characteristics such as gender, skin colour, race,

age, religion, nationality, political attitudes/beliefs, ethnic or social origin, language, mental or physical disabilities, sexual orientation, etc.

Mutual respect, both internally and in dealings with external persons such as business partners, authorities, etc., is a pivotal constituent of Electrocycling GmbH's corporate culture and a basic requirement for an employment or business relationship with the company.

The practice of any form of discrimination, harassment, coercion, mobbing and other inhumane treatment between employees will be punished up to and including immediate dismissal.

Electrocycling GmbH also expects this behaviour and treatment from its business partners. Electrocycling GmbH resolutely rejects cooperation with customers, logistics companies and other service providers or business partners who support such treatment.

Forced labour and child labour

Furthermore, Electrocycling GmbH rejects all forms of forced labour and child labour and also requires this of its business partners. No business relationships are entered into with companies that practice or support forced labour and child labour. If it is established that business partners with whom a business relationship exists violate this principle, this relationship will be irrevocably terminated.

An exception to the prohibition of child employment may be trainees, provided they have not yet reached the legal minimum age of 18 at the time of employment. In these cases, special laws and regulations apply to the regulation of work and breaks, shift and night work, etc. These regulations will be complied with by Electrocycling GmbH in the given case.

Business integrity

Electrocycling GmbH opposes all forms of bribery, corruption, extortion and embezzlement in its business relationships. This is ensured by transparent communication between employees and transparent presentation of business processes. Here, too, the penalty for violations is termination without notice.

It is forbidden to give or receive any advantages that may be deemed inadmissible.

Employees are not permitted to offer or promise direct or indirect advantages or to grant unlawful benefits for the purpose of obtaining contracts. The same applies in the reverse case, where employees are not permitted to accept direct or indirect advantages or unlawful benefits.

In the case of hospitality or gifts, it must be ensured on both sides of the transaction that these are appropriate.

Attempts by business partners within the framework of the business relationship with Electrocycling GmbH to violate anti-bribery and anti-corruption laws will be punished by immediate termination of the business relationship.

Electrocycling GmbH demands openness and honesty from both its employees and its business partners.

Conflicts of interest

Electrocycling GmbH requires both its employees and its business partners to avoid conflicts of interest and to disclose immediately any such conflicts that have arisen or are about to arise. This is the only way to ensure legally compliant business relations.

Competition and cartels

Electrocycling GmbH strictly adheres to the guidelines and laws that promote fair competition in the market and protect against anti-competitive practices. It also exacts this behaviour from its business partners.

Prohibited anti-competitive actions include:

- Collusion with competitors
- Market sharing
- Production limitations
- Boycotting certain customers
- Bribery of public officials

Crisis areas and sanctioned states

In the case of enquiries from crisis areas about the acceptance of input material (used electrical appliances), Electrocycling GmbH undertakes to check the company in question with regard to its environment, working conditions and treatment of employees, as well as for legal conformity and qualification (permits, certificates, etc.). A business relationship will only be entered into with this company after it has been established that it is in order at all levels.

Electrocycling GmbH does not enter into business relationships with companies in or state governments of countries that have been politically or economically sanctioned by the Federal Republic of Germany. It demands the same from its business partners.

Information and Intellectual Property

The employees of Electrocycling GmbH are obliged to treat business information that is not publicly known, both from themselves and from other companies, as confidential and to protect it against unintentional publication. Electrocycling GmbH expects the same from its business partners should they come into possession of such information or intellectual property.

Violations of this principle will be punished immediately with at least termination without notice or at least termination of the business relationship.

Data protection

Electrocycling GmbH ensures that the rights of all employees and persons coming into contact with it are respected.

Electrocycling only processes personal data within the meaning of the Basic Data Protection Regulation – GDPR (No. 2016/679) if it is necessary and lawful for the provision of the service.

The employees of Electrocycling GmbH who are entrusted with the processing of personal data know their duties and are aware of the confidentiality involved in handling this data. Electrocycling protects personal data against misuse, falsification, loss or access by unauthorised third parties.

This ensures an adequate level of protection for personal data.

Quality/Environment/Energy

Electrocycling GmbH maintains a management system based on the internationally standardised norms of DIN EN ISO 9001 (quality management), 14001 (environmental management) and 50001 (energy management).

This management system ensures that all permits and laws and regulations relevant to Electrocycling GmbH are implemented and their implementation is documented in processes and work instructions.

In addition, the following aspects, among others, are ensured:

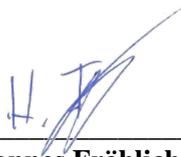
- Reduction of air, water and soil emissions through the use of appropriate process technology.
- Reduction and optimisation of energy consumption
- proper handling of hazardous waste, hazardous materials, etc.

Electrocycling GmbH also expects at least an equivalent approach to these environmental and energy aspects from its business partners.

Implementation and documentation

This Code of Conduct is integrated into the management system of Electrocycling GmbH and, as part of the internal management manual, is the direct responsibility of the management. All employees of Electrocycling GmbH are obliged to comply with the principles of this Code of Conduct and to align their occupational conduct with them.

Goslar, 26.04.2022



Hannes Fröhlich
Managing Director



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