



# Code of Conduct

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**EREMA Group Code of Conduct**

Applying to all companies in the EREMA Group

## Contents

<b>Foreword</b> .....	3
<b>I. Scope of application of the Code</b> .....	4
<b>II. Reporting violations of the Code of Conduct</b> .....	4
<b>III. Complying with the law and relevant protection standards</b> .....	4
<b>IV. Accounting, tax compliance</b> .....	4
<b>V. Corruption and bribery, money laundering, political neutrality</b> .....	4
<b>VI. Competition and antitrust law</b> .....	5
<b>VII. Preventing fraud</b> .....	5
<b>VIII. Conflicts of interest</b> .....	5
<b>IX. Appreciation, respect, integrity and fair working conditions</b> .....	6
<b>X. Product safety, sustainability and environmental responsibility</b> .....	6
<b>XI. Compliance in the supply chain</b> .....	6
<b>XII. Foreign trade and export control</b> .....	6
<b>XIII. Secrecy and confidentiality, protecting the property of EREMA and our business partners</b> .....	7
<b>XIV. Data protection, business and trade secrets</b> .....	7
<b>Publication date</b> .....	8
<b>Contact/Imprint</b> .....	8

### Note:

The wording of this document uses third person plural pronouns and is intended to include everyone and be gender neutral.

The EREMA Group consists of the following legal entities: EREMA Group GmbH, Unterfeldstrasse 3, 4052 Ansfelden, Austria, FN 321968 h, VAT no. ATU69250847 / EREMA Engineering Recycling Maschinen und Anlagen Gesellschaft m.b.H., Unterfeldstrasse 3, 4052 Ansfelden, Austria, FN 83762 f, VAT no. ATU22536003 / 3S Schnecken + Spindeln + Spiralen Bearbeitungsgesellschaft m.b.H., Pühretstrasse 3, 4661 Roitham, Austria, FN 98235 p, VAT no. ATU22090109 / PureLoop GesmbH, Unterfeldstrasse 3, 4052 Ansfelden, Austria, FN 427108 a, VAT no. ATU69176278 / EREMA North America, Inc., 23 Old Right Road - Unit #2, MA 01938 Ipswich, USA, federal employer identification number 043168461 / EREMA Shanghai Import and Export Co.Ltd, Room 1009, Tomson Commercial Building, 710 Dong Fang Road, Pudong, 200122 Shanghai, China, registration number 310115400298692 / OOO EREMA, Business Park "Rumyanchevo" Building A, entrance 4, 4th floor, office 413A/2/ 22 km of the Kievskoe highway, 142784 Moscow, RUSSIA, registration number 515746183414 / KEYCYCLE Ltd, Unterfeldstraße 3, 4052 Ansfelden, Austria, FN 513391m, UID ATU74595716 / PLASMAC SRL, Piazza Giovine Italia 3, 20123 Milano, Italy, MI 2543933, registration number IT10582220967 / Dean Toi (Pty) Ltd, 27 Mopedi Road, Sebenza, Johannesburg, South Africa, registration number 2019/498838/07, tax number 9148908248

## Foreword

Based in Ansfelden near Linz in Austria, EREMA Group is the world's leading manufacturer of plastics recycling solutions. With the companies EREMA Group GmbH, EREMA Engineering Recycling Maschinen und Anlagen Gesellschaft m.b.H, and its business unit POWERFIL, as well as the companies 3S Schnecken + Spindeln + Spiralen Bearbeitungsgesellschaft m.b.H, PURE LOOP GesmbH, UMAC GmbH, PLASMAC SRL, KEYCYCLE GmbH and PLASTICPRENEUR, the EREMA Group covers the entire spectrum of mechanical plastics recycling - from planning and engineering through to developing and manufacturing recycling technologies as well as producing system components and trading previously owned systems. The recycling machines supplied by the group of companies are currently operating in 108 countries worldwide and recycle approximately 25 million tonnes of plastic every year into high-quality recycled pellets. Focusing on our mission: Another life for plastic. Because we care.

This Code of Conduct describes the principles that apply to the entire EREMA Group and therefore form the basis for legally compliant, sustainable and ethically correct conduct. Taking responsibility, focusing on customers and solutions as well as showing appreciation - these values are the foundation for the way we interact with each other, with customers, suppliers and business partners. A commitment to complying with these values and the Code of Conduct is binding for management, team leaders and all employees as well as for suppliers and business partners.



*Horst Wolfsgruber, CFO, and Manfred Hackl, CEO,  
EREMA Group GmbH (Photo: EREMA Group)*

## **I. Scope of application of the Code**

This Code of Conduct and all rules of conduct based on it are binding regulations that apply to all companies in the EREMA Group, their management, team leaders and employees, as well as to all our customers, suppliers and business partners. The Code is not only a set of rules for proper conduct, but also describes our corporate culture.

## **II. Reporting violations of the Code of Conduct**

Violations of this Code of Conduct result in appropriate consequences being taken. If you have any questions about, find out about, or experience any violations of this Code, please report them in writing by email to: [codeofconduct@erema-group.com](mailto:codeofconduct@erema-group.com). People who report violations are protected under Directive (EU) 2019/1937 of the European Parliament and of the Council dated 23 October 2019 on the protection of individuals reporting violations of EU law.

## **III. Complying with the law and relevant protection standards**

The EREMA Group is committed to legally complying with all protection standards relating to occupational health and safety, employee protection and environmental protection. The same applies to discrimination and equal rights, which include people of different genders and ethnicities, different social origins and different affiliations to political minorities, professional associations and religious communities, as well as groups of different world views. The EREMA Group is also committed to complying with the prohibition of child labour, the protection of privacy and constitutionally guaranteed freedom, fundamental rights and human rights, as well as the prohibition of violating the law on protection against unfair competition. The same applies to regulations concerning antitrust law, corruption, secrecy and the protection of intellectual property.

The management of each company within the group are committed to acting with the diligence of prudent business people.

All teams and employees in the EREMA Group, at dealers and sales representatives, at consultants and legal representatives, as well as all contractual and business partners, suppliers and customers are required to strictly observe and strictly comply with all of these regulations. In the event of a suspected violation, EREMA will cooperate unconditionally with government authorities. We also attach great importance to complying with all contractual duties of protection and due diligence.

## **IV. Accounting, tax compliance**

Global business operations and corporate governance require a comprehensive understanding of accounting and tax issues. That is why the EREMA Group pays the utmost attention to correct accounting as well as the application of tax law. We reject any form of tax evasion or tax fraud without exception. We therefore consider compliance with tax regulations and full cooperation with the relevant tax and fiscal authorities to be a matter of course.

## **V. Corruption and bribery, money laundering, political neutrality**

The EREMA Group takes a clear stand against corruption and bribery and does not participate in any kind of unethical, morally reprehensible or risky behaviour under any circumstances. We conduct business with third parties in a fair and ethical manner.

Our employees do not solicit or accept undue economic advantages (either direct or indirect), such as bribes or other financial benefits. They also do not offer and grant such benefits to anyone. Bribery is prohibited without exception.

In accordance with the applicable national legal regulations, hospitality that complies with general business practice, invitations to meals within the scope of normal business practice

and other benefits of low financial value, where an influence on the business or official decision appears to be ruled out from the outset, are permissible.

The EREMA Group unconditionally rejects any money laundering practices and examines all business cases to assess any money laundering risks. This ranges from the due diligence of business partners to checking conspicuous methods of payment. Money laundering and related practices are not tolerated. It goes without saying that we comply with all relevant national and international regulations and cooperate fully with the relevant authorities.

We do not participate in political activities, we do not fund political parties, and we do not endorse political candidates or elected officials.

## **VI. Competition and antitrust law**

Competition and antitrust laws can vary from country to country. All applicable laws, directives and regulations are binding for all people acting on behalf of the EREMA Group without exception. The EREMA Group has always upheld impressive standards in terms of the highest quality, innovative strength and customer focus.

All our business activities are conducted in a fair, ethical and transparent manner to gain the full trust of customers and business partners, the public and all our employees. It is a matter of course for us and our employees that we do not participate directly or indirectly in anti-competitive, monopoly-run or other illegal and unfair business practices. These include, in particular, price fixing, overpricing, setting production or sales restrictions, deliberately partitioning the market by allocating customers and suppliers to specific territories or lines of business through express or tacit agreements, or other agreements aimed at restricting free competition or the free market. We also do not participate in international cartels.

In countries without applicable competition laws, the EREMA Group also strives to conduct business in a fair and ethical manner and never to engage in practices that distort or restrict competition. We also reject conduct that uses unfair means and measures, serves to mislead customers or humiliates a competitor.

## **VII. Preventing fraud**

Any act of deception as well as any unfair behaviour towards contractual partners, including within the EREMA Group, goes against our principle of ethically correct and legally compliant behaviour and will therefore not be tolerated under any circumstances. We make all employees aware of the particular risks of fraudulent business practices and ask them to report all cases of fraud drawn they suspect to their line manager, or to the Compliance Officer, Horst Wolfsgruber, CFO EREMA Group GmbH, or by email to [codeofconduct@erema-group.com](mailto:codeofconduct@erema-group.com). In the event that criminal proceedings or investigations are initiated, we will unreservedly cooperate with the authorities.

## **VIII. Conflicts of interest**

The EREMA Group treats all its suppliers, customers and business partners fairly and respectfully in the course of its business. The private interests of employees and the interests of the Group must be strictly separated in order to avoid conflicts of interest and, where this is not possible, to make them transparent. We reject personal interests and relationships having an influence on our business activities, and instead make decisions on the basis of facts and objectivity.

If our employees intend to engage in sideline activities, start up their own companies, take out significant shareholdings in third-party companies or sign employment or service contracts with third-party companies, this must be approved by the respective company in the EREMA Group. Activities that compete with the business activities of EREMA Group companies are generally not permitted.

## **IX. Appreciation, respect, integrity and fair working conditions**

In accordance with our mission statement, the EREMA Group strives to create a safe working environment with a culture of respect and equal opportunity, which is also reflected in all hiring, training and career development processes. The EREMA Group ensures respect for human rights at all times in the way it conducts its business and in its dealings with its employees and does not accept any violation of these rights. We comply with all existing labour and health laws and regulations and are committed to providing equal opportunities. Furthermore, we stand for fair remuneration and regulated working hours and create framework conditions for a healthy work-life balance. Child labour, illegal labour or forced labour are strictly prohibited in the EREMA Group. With regard to the minimum working age, we adhere to the International Labour Organization Convention.

We reject any form of discrimination relating to the hiring process, promotion, pay, age, nationality, race, colour, ethnicity, religion, creed, social status, origin, marital status, gender, physical or mental impairment, as well as any form of bullying, violence, and harassment.

Safety, health protection and hygiene in the workplace are given top priority in the EREMA Group. We comply with legal requirements and standards recognised internationally, and we strive to identify and correct shortcomings in health and safety, and continuously improve workplace conditions. Employees are made aware of the necessity to strictly follow all safety regulations and to report any hazards or security breaches immediately. Line managers have a special responsibility here. The safety regulations are reviewed on an ongoing basis.

## **X. Product safety, sustainability and environmental responsibility**

Since the company was founded in 1983, the EREMA Group has stood for sustainable business over the long term. As a global company, we are aware that we have a great responsibility towards our employees and customers, products, the environment, and society in general.

Our products and services are subject to the highest quality and safety standards. That is why responsible and efficient use of energy, economically sustainable products and services for our customers, and measures to implement circular economy and reduce CO<sub>2</sub>-emissions as a result, are an essential part of our business activities. We use natural resources responsibly and work on resource-conserving business models that aim to achieve circular economy. We ensure this with the continuous further development and distribution of environmentally friendly technologies.

## **XI. Compliance in the supply chain**

Adherence to this Code of Conduct is of key importance to the management team and the employees at the EREMA Group. That is why we expect our suppliers, customers and business partners to fully support this Code and conduct their business accordingly. Furthermore, we advise to support compliance with the OECD Guidelines for Multinational Enterprises. These Guidelines of the Organization for Economic Co-operation and Development (OECD) provide an important framework for responsible business conduct worldwide and must be respected as a fundamental part of this Code. The incorporation of these guiding principles underlines our commitment to ethical business conduct and sustainable supply chain management.

## **XII. Foreign trade and export control**

As a globally active group of companies, we are aware of both the framework conditions and the risks of cross-border trade. Complying with all relevant national and international regulations is a matter of course for us. From receiving a customer inquiry to the delivery and carrying out of the ordered products and services – we comply with all trade and export control

regulations, including all applicable sanctions and embargoes, in all our business processes. We expect the same from our contract partners.

No delivery of high- technology to the Russian Federation:

(1) EREMA contract partners must not resell, export or re-export, directly or indirectly, goods supplied in the context of or in connection with a business activity with EREMA and falling within the scope of Article 12g of Council Regulation (EU) No 833/2014 into the Russian Federation or for use in the Russian Federation.

(2) All EREMA contract partners shall undertake their best efforts to ensure that the purpose of paragraph (1) is not frustrated by any third parties further down the commercial chain, including by possible resellers.

(3) Every contract partner shall set up and maintain an adequate monitoring mechanism to detect conduct by any third parties further down the commercial chain, including by possible resellers, that would frustrate the purpose of paragraph (1).

(4) Any violation of paragraphs (1), (2) or (3) shall constitute a material breach of contract, and EREMA shall be entitled to seek appropriate remedies, including, but not limited to: (i) contract termination; and (ii) injunctive relief and (iii) specific performance like temporary or preliminary injunction.

(5) Every contract partner shall immediately inform EREMA about any problems in applying paragraphs (1), (2) or (3), including any relevant activities by third parties that could frustrate the purpose of paragraph (1). He shall make available to EREMA information concerning compliance with the obligations under paragraph (1), (2) and (3) within two weeks of the written request of such information.

### **XIII. Secrecy and confidentiality, protecting the property of EREMA and our business partners**

The EREMA Group attaches the greatest importance to the protection of (intellectual) property, of business and trade secrets and of any kind of confidential information.

The property of the EREMA Group and our business partners includes both tangible objects and intangible goods, such as business-related information, trade secrets, know-how and even industrial property rights. This also includes our inventions and patents, which are of special significance to the long-term success of the companies in the group. All employees treat this property with the utmost care and responsibility. This includes refraining from making negative remarks in a professional context through verbal or written statements on social networks, in the media or in private.

### **XIV. Data protection, business and trade secrets**

Current, former and future employees of the EREMA Group of Companies, as well as business partners, suppliers, other contractual partners and anybody else involved, can rely on their personal rights, business and trade secrets being protected. In addition, we strive to protect private and family life in accordance with the European Convention on Human Rights.

The EREMA Group is also committed to complying with all national and international data protection regulations and to implementing appropriate data security measures accordingly. In particular, even after termination of employment or a contractual relationship, we keep confidential all personal data that has been entrusted to us data processing or made accessible to us exclusively on the basis of our professional work.

Secrecy and protection against unauthorised access by third parties also apply to business and trade secrets of the companies in the EREMA Group, and the companies of our business

partners. We use and process all data - including personal data - exclusively for pre-contractual, contractual and post-contractual purposes. Sensitive data, such as membership of a religious community or employee representation or similar data not relevant to business, is not required and does not need to be submitted.

All EREMA contract partners are obliged to comply with the applicable laws, ordinances, directives and regulations on IT security.

### Publication date

The EREMA Group Code of Conduct takes effect on January 01, 2023, and is communicated in an appropriate manner:

- Publication for employees on internal notice boards and intranet
- Presented to new employees in the welcome folder
- Announcement of the Code of Conduct on the EREMA Group website

### Contact/Imprint

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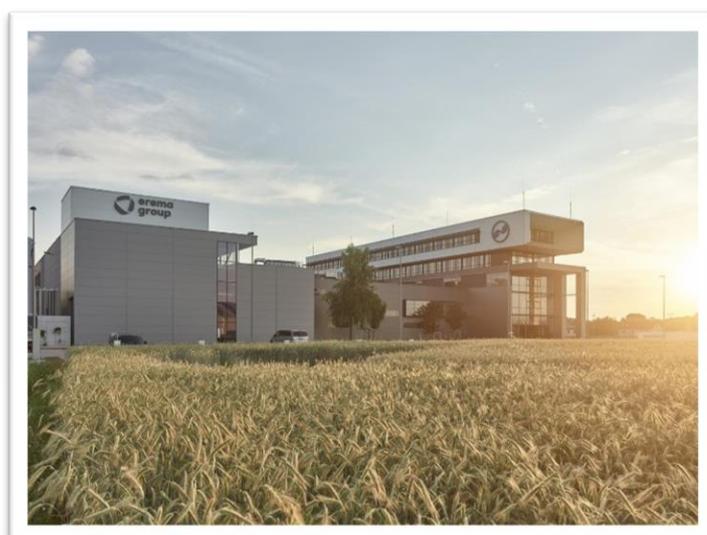
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Management:

DI Manfred Hackl, CEO

Dr. Horst Wolfsgruber, CFO



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Court of jurisdiction: Linz

VAT number: ATU69250847

Compliance Officer:

Dr. Horst Wolfsgruber, CFO EREMA Group GmbH

Still have any questions? Please contact the Compliance Team:

Ilse Fischer-Wolfsteiner, MSc, MBA, Quality & Sustainability Manager

Julia Krentl, MSc, Corporate Communication

Mag. iur. Alexander Teuschl, Corporate Counsel

Feel free to contact us at any time [codeofconduct@erema-group.com](mailto:codeofconduct@erema-group.com)