

Code of Conduct of SITRAPLAS GmbH dated September 1, 2025

This Code of Conduct of SITRAPLAS GmbH is an integral part of all employment relationships with our employees and has therefore been written in German (official language).

This translation of the Code of Conduct has been translated into English for informational purposes only and is intended solely for communication with our English-speaking business partners.

Bünde, September 1, 2025



Tim Hencken, Management SITRAPLAS GmbH

Principles of our commitment

Objectives and scope

SITRAPLAS GmbH (hereinafter referred to as “the Company”) is a forward-thinking and sustainable enterprise. In close collaboration with our customers and business partners, we develop innovative product solutions that deliver maximum customer value while meeting the highest standards of quality.

In our daily actions, we are perceived as representatives of our company. A positive, motivated impression and responsible behavior contribute significantly to the success of our company. We strive to be a reliable, trustworthy, and ethically sound partner for all our business relationships.

This Code of Conduct sets forth standards for all employees of the SITRAPLAS, including management - regardless of role, rank, or level of influence. Every individual is expected to uphold this voluntary commitment consistently and responsibly.

This shared framework for action describes our proper and responsible conduct in business, legal, and ethical matters and is decisive for our dealings with our colleagues, customers, suppliers, business partners, and the environment. We expect our business partners, customers, and suppliers to embrace the same fundamental understanding.

Due to the wide range of laws and regulatory requirements, it is nearly impossible to provide a ready-made solution for every possible situation. However, this Code of Conduct includes a comprehensive set of principles designed to ensure consistent actions in accordance with legal and ethical standards. We are required to adhere to this Code even when applicable laws or regulations are less stringent. At the same time, it cannot be ruled out that stricter laws and regulations may apply than those outlined in this Code of Conduct. In such cases, those stricter laws and regulations shall take precedence.

How we work together

We comply with laws and guidelines.

We are committed to complying with all laws applicable to our company—both nationally and internationally—as well as with relevant, internationally recognized standards and guidelines. We fully adhere to the principles outlined in this Code and do not circumvent its regulations through contractual arrangements or similar measures.

We respect each other.

Our corporate culture is defined by a family-oriented atmosphere. Direct contact regardless of hierarchical levels, short decision-making processes, continuity in leadership, and long periods of service distinguish us. We face challenges as a team and are entrusted with the freedom to act. Collaboration and individual initiative are actively encouraged. Each person is a valued member of our family-owned business. We foster an open and trusting communication environment—characterized by mutual respect, appreciation, and tolerance.

We firmly oppose all forms of discrimination, harassment, or intimidation based on gender, origin, religion, age, sexual orientation, disability, political opinion, nationality, belief system, or social and ethnic background. All employees, customers, and suppliers are entitled to fair, respectful, dignified, courteous, and non-discriminatory treatment.

If we experience sexual harassment or any other form of unacceptable treatment, we are encouraged to report it. All complaints will be handled with the highest possible level of confidentiality. The company reserves the right to take disciplinary action against employees who engage in inappropriate behavior toward colleagues, customers, or suppliers.

We do not tolerate any form of forced or child labor. We actively support international efforts to promote and protect human rights. Based on current information, none of the minerals used in the production of our products originate from conflict-affected or high-risk areas.

We protect personal, private data.

Data protection safeguards the individual's right to informational self-determination—that is, the right of every person to decide for themselves how their personal data (such as name, postal address, email address, telephone number, financial information, etc.) is disclosed and used. It is essential to prevent violations of fundamental personal rights.

We place a high priority on the protection of personal data. Accordingly, the company does not process personal data (e.g., collect, store, modify, transmit, block, delete) or use it unless full compliance with applicable legal requirements has been ensured in advance and the processing is transparent to the data subject. If we have access to personal data in the course of our activities or have become aware of such data, we may only process this data if there is a legal basis for doing so or with the consent of the person concerned. A data protection officer is available to us for all data protection issues.

We create a safe and healthy working environment.

Occupational safety and health protection are integral components of all operational processes. Every employee is responsible for contributing to a safe and healthy working environment and for complying with applicable occupational health and safety regulations. Our occupational safety specialist supports us in striving to reduce workplace accidents to zero.

We perform our duties and make decisions with clarity and without the influence of alcohol, drugs, or other impairing substances. The consumption of alcohol on company premises is strictly prohibited. Exceptions may be granted by management, for example, during company-sponsored events.

We protect the environment and climate.

Environmental and climate protection, along with the responsible use of available resources, are of great importance to us.

Our company places particular emphasis on the development and implementation of innovative products and sustainable processes. In operating our production facilities, we ensure that environmental and climate impacts are kept to a minimum. We use natural resources responsibly and efficiently. We actively avoid waste and aim to minimize, reuse, and recycle our waste and residues.

How we conduct business

We avoid conflicts of interest.

We are aware that decisions relating to our professional activities must not be influenced by private interests or personal relationships. Conflicts of interest - or even the appearance of such conflicts - must be avoided at all times. We address potential conflicts openly and honestly, working together to clarify the situation and coordinate our next steps. Conflicts of interest can arise, among other things, from:

- Secondary activities
- The undertaking of any secondary employment is subject to the provisions of our employment contracts. Such activities must not conflict with the business interests of the company or interfere with the performance of your duties. If an employment contract does not contain specific provisions regarding secondary employment, written approval from management must be obtained.

- Gifts and invitations

Offering gifts and invitations may create the impression that the giver or host expects something in return or seeks to gain an advantage. We do not tolerate any form of benefit that could cast doubt on our integrity or influence our decisions.

Business-related gifts that we receive privately may constitute improper influence.

Business-related gifts received in a private capacity may constitute improper influence. The offering and acceptance of gifts and invitations is only permitted if it occurs within the scope of proper business conduct and reflects generally accepted and ethically sound local business practices—for example, small gifts of nominal value that do not require concealment by the recipient or create a sense of obligation, or meal invitations that are customary in the context of ongoing business relationships.

If we are unsure whether a specific action is permissible, or if we are offered benefits that may exceed a nominal value, we must consult with management.

- Political activities

The company does not support any political parties or groups, either financially or in any other way. If we participate in political activities, we may only do so as private individuals and not as representatives of our company.

We do not tolerate corruption or bribery and combat money laundering.

Our business decisions and contracts are based solely on transparent, performance-related, and quality-based criteria. We ensure full transparency in our dealings with customers, suppliers, and public authorities. The company does not tolerate corruption and fully adheres to international anti-corruption standards as well as national and local regulations aimed at preventing corruption and bribery.

We are committed to complying with applicable anti-money laundering laws. These laws include, among other things, the obligation to identify contractual partners, select permissible forms of payment, and determine how possible money laundering transactions can be detected. If we suspect money laundering, we report it to management without delay.

We are committed to fair competition.

We adhere to the principles of fair competition for the benefit of all market participants. We are committed to ensuring and maintaining free and undistorted competition. This principle is core element of antitrust laws worldwide and is therefore binding for our company.

Non-compliance with antitrust and competition regulations can have serious consequences, including fines, claims for damages, and reputational harm. For this reason, we do not engage in price-fixing or territorial agreements aimed at distorting or restricting competition. Even the exchange of pricing information with competitors constitutes a violation of antitrust law.

We treat insider information confidentially.

We are aware that the use and disclosure of insider information is prohibited by law. If, in the course of our work, we become aware of information that is not publicly known and that is relevant to trading in securities, we will not use this information.

We handle media communications responsibly.

As a globally active company, our reputation is significantly influenced by how we present ourselves externally, particularly in our interactions with the media. A consistent and truthful public image is therefore essential. When speaking publicly about our business, we rely on sound judgment and consult with management if any concerns arise.

To ensure a consistent public image, any publications, interviews, or similar communications related to the company must be coordinated with management in advance.

We take social responsibility seriously.

As a family-owned company, we also have a strong social commitment. The company particularly supports organizations and institutions in our region that focus on the development and support of children and young people. Our corporate group promotes these projects through appropriate financial or material donations. The company considers itself politically neutral and therefore does not provide financial contributions to political parties or party-affiliated institutions.

How we handle information and property

We protect information and intellectual property.

As a company focused on research and development, we are aware that intellectual property is valuable and a key foundation for business success. We all share the responsibility to protect both our internal company knowledge and that of others.

The company entrusts us with a great deal of information in the course of our daily work and responsibilities. We protect and keep confidential any information that is marked as confidential or subject to non-disclosure obligations through agreements with our business partners.

Internet, intranet, and email communication are essential tools in our daily work, and we highly depend on their functionality. Inappropriate use of the Internet, intranet, email, or computer systems is not permitted. We use information and communication technology appropriately. We also treat the personal data of our customers, suppliers, and business partners as confidential. The company's operations heavily rely on the functionality of IT systems (our network and the necessary hardware). Business processes are no longer conceivable without these technical systems. We strictly adhere to the relevant security policies.

We do not use third-party intellectual property without the permission of the copyright holder and respect trademark laws. We protect the company's rights and licenses from unauthorized use and loss.

We report transparently and reliably.

We are aware that careful handling of financial records is of utmost importance to our company, as it builds and secures trust.

The company is committed to ensuring that all business books, records, accounts, and other documents relevant for accounting purposes meet the highest standards of accuracy and reliability. This enables the preparation of financial statements in accordance with applicable laws and the relevant generally accepted accounting principles.

We cooperate with authorities and local governments.

Our company works cooperatively and transparently with government authorities based on applicable laws and in a spirit of mutual trust. Therefore, all lawful orders issued by public authorities must be followed, while also safeguarding the company's legal rights.

We report violations and protect whistleblowers.

This Code of Conduct cannot provide detailed guidance for every individual situation. Applying and implementing the standards outlined in this Code in day-to-day business may, in some cases, require clarification. In case of uncertainty, we contact management directly.

We strive to foster an open environment that allows us to address issues without fear of retaliation. This is especially true in connection with this Code.

If we become aware of behavior that violates the rules set out in this Code of Conduct or in other laws and regulations and/or constitutes a criminal offense, we inform management accordingly.

Reports should be submitted with the disclosure of our identity and not anonymously. Every suspected violation is investigated with the highest level of confidentiality. Reporting a violation of our Code of Conduct and participating in an investigation will not result in any adverse employment consequences for the employee involved, provided there is no misuse on the part of the employee. However, clearly false and defamatory reports made with malicious intent may result in disciplinary action or, if applicable, legal consequences.

Actions that are inconsistent with this Code must be corrected immediately and may be subject to disciplinary measures, up to and including termination of employment. If a violation of this Code of Conduct also constitutes a breach of applicable law, claims for damages and/or criminal prosecution may also follow.

Final statement.

This Code of Conduct is an integral part of the employment relationship and essential to the company's operations. Violations of the binding rules set out in this Code will not and cannot be tolerated. Failure to read or acknowledge this Code of Conduct does not exempt anyone from the responsibility to comply with it.

We commit to acting responsibly and to following this Code of Conduct for our own benefit and for the benefit of the company.

(Translated from German on August 28, 2025)