

Code of Conduct

ORAFOL Europe GmbH

As of: January 01, 2024

Introduction

ORAFOL is committed to a social and ecologically responsible corporate policy. We respect human rights as a key element of our corporate governance, and we stand for integrity and a sense of responsibility. The key basis for this is provided by a shared understanding of ethical and sustainable action.

The social and environmental standards and processes described in this code of contact are based on the United Nations (UN) International Declaration of Human Rights, on the UN Guiding Principles on Business and Human Rights, the UN Global Compact, the OECD Guidelines for Multinational Enterprises, and the Declaration on Fundamental Principles and Rights at Work from the International Labour Organization (ILO).

This code of conduct defines the requirements and values that we and all our employees commit to:

1. Laws and other binding obligations

In all business decisions and actions that are relevant to us, we will observe the applicable laws and/or other regulations.

We commit to the continuous improvement of the management system, with the aim of improving environmental aspects, energy performance, quality, and occupational health and safety with the involvement of all employees.

To implement this aim, ORAFOL will provide the necessary resources and maintain open communications with internal and external parties.

2. Social responsibility

ORAFOL is aware of its social and societal responsibility.

As a company aiming for profitable growth, we want to create value in a sustainable manner, and we aim to make a positive contribution towards respect for human rights and human welfare.

Human rights

We treat our fellow humans with respect and commit to complying with internationally recognized occupational and social standards.

In our business activities we are always anxious to avoid causing or indirectly contributing to human rights violations. We make sure that these rights are not violated in our sphere of influence.

Child labor and employment of adolescents

We respect and protect the rights and dignity of children and advocate the removal of the most serious forms of child labor. Child labor as well as any exploitation of children or adolescents is prohibited.

We respect the international Convention Concerning Minimum Age for Admission to Employment.

The minimum age for admission to employment must not be lower than the age at which compulsory education ends, and must in no case be lower than 15 years. National standards for the protection of children and adolescent employees must be observed. In particular, adolescents must not be exposed to hazardous, unsafe, or unhealthy situations.

Ban on slavery and forced labor

We exclude and do not tolerate any form of slavery, forced labor, or compulsory labor.

Any form of labor must be provided willingly and without the threat of punishment. This means that any form of labor must be avoided that is based on physical, psychological, sexual or verbal force and/or abuse, or economic exploitation.

Health and safety

We ensure a safe and healthy working environment in order to prevent accidents, injuries, occupational illness, or any health damage that could result in the context of the activity. Our employees receive regular information and instruction regarding the applicable occupational health and safety standards and safety measures. In the process, they are included in the continuous improvement of our ISO 45001 certified occupational safety system, and their ideas and suggestions are considered.

In addition, ORAFOL provides its employees with free personal protective equipment (PPE) that they require to perform their work duties.

Working hours and leave

The maximum permitted weekly working hours apply in line with the national legislation.

We grant at least as many leave days as required by the applicable laws and regulations, and sometimes more.

Pay

The pay we provide for regular working hours, overtime, and special services complies at minimum with the minimum wage level in line with the applicable laws and regulations, and may exceed it.

Freedom of association and right to collective bargaining

We respect our employees' fundamental right to freedom of association and collective bargaining and grant the associated rights.

Membership in trade unions or workers' representation is not a reason for unjustified unequal treatment.

Ban on discrimination

Any discrimination against employees is prohibited.

Equal opportunities and equal treatment for employees must be promoted. In particular, any distinction, exclusion, or preferential treatment is prohibited at ORAFOL, for example on the basis of skin color, gender, age, religious affiliation, political opinion, physical or mental disability, ethnic, national or social background, nationality, sexual orientation, or other personal characteristics.

In terms of all comparable requirements and duties, the principle of equal pay for equal work is observed without consideration of gender.

Prejudice, insults, harassment, agitation and hate speech

Freedom of expression of opinion is highly respected at ORAFOL. ORAFOL encourages all employees to express factual opinions and criticism in the interest of suggesting improvements (feedback culture).

In line with the EU Digital Services Act (DSA), and in order to ensure this fundamental corporate and social value, we will not tolerate any form of insult, harassment, rhetoric bias, agitation or hate speech, and will sanction any such actions.

This applies expressly both to verbal and non-verbal communication, for example in emails, chats (e.g., MS Teams or WhatsApp), on the Internet (e.g., online platforms), the ORAFOL intranet or any other media (e.g., newspapers).

Corporate communication

We communicate respectfully and in a manner that is clearly comprehensible to all target audiences at the company.

This is how we create and strengthen internal and external trust while guaranteeing a high level of reliability to our partners and customers.

Personal views can be shared at ORAFOL during internal consultations and discussions.

Externally published opinions and positions of employees of the ORAFOL Group must be marked explicitly as such. Personal statements from employees that harm the reputation and corporate image of ORAFOL or third parties will not be tolerated and will entail consequences.

Internal and external messages regarding the company must be agreed with the responsible management.

Regardless of the form that communication takes at ORAFOL, it must comply with our corporate values and be factually correct.

3. Ecological responsibility

Environmental protection and sustainability

Environmental protection is particularly important to ORAFOL. We operate an environmental management certified according to ISO 14001, and it is very important to us to keep environmental risks and negative impacts on the environment to a minimum by means of precautionary measures. We make sure that all applicable national and international environmental legislation, regulation and standards are observed, and we support the use of modern, efficient, and eco-friendly technologies.

Climate protection

We want to continuously improve all our systems and processes at all our locations in terms of energy efficiency. In order to continuously improve, we have introduced an energy management system certified according to ISO 50001.

Energy

We support the procurement of energy-efficient products and services that directly affect our energy performance. We aim to minimize our energy consumption and maximize efficiency in all areas.

In addition, we commit to supporting activities that are designed to continuously improve our energy-related performance. We advocate innovative solutions and promote tried-and-tested procedures in order to optimize energy consumption and minimize our environmental impact.

Quality

The constant improvement of our product quality is an obvious imperative and is closely linked to a customer-focused product range development. The aim is to create an application-oriented product with an appropriate relationship between functionality, cost, service life, and use of raw materials and energy. In order to ensure this, we work according to the highest international standards and are certified in line with ISO 9001.

Protection of natural resources

We protect natural resources as well as possible. In particular, we make sure to refrain from harmful changes to the soil, water and air pollution, noise emissions and excessive water use, and we reduce our withdrawal of water to a minimum. Wastewater quality standards are defined and monitored in line with the applicable legal and official regulations.

Ban on substances of concern

We comply with legal bans on substances, restrictions and declaration rules as well as applicable standards regarding the ban on raw materials and hazardous substances of concern.

In particular, we comply with the ban on products containing mercury, the use of mercury and mercury compounds in manufacturing processes (Minamata Convention), and the production and use of specific chemicals in line with the Stockholm Convention on Persistent Organic Pollutants (POP Convention).

Handling conflict minerals & critical raw materials

We commit to observing the relevant applicable laws and regulations on conflict minerals (Dodd-Frank-Act (DFA), EU Conflict Minerals Regulation) and critical raw materials (European Critical Raw Materials Act). We apply particular care in regard to the origin and avoidance of raw materials.

Environmentally sound handling of waste

We comply with the ban on handling, collecting, storing, and disposing of waste in a manner that is not environmentally sound in line with the regulations that apply according to the applicable legislation as specified in article 6, paragraph 1, letter d, number i, ii of the POP Convention.

Equally, we comply with the ban on the export of hazardous waste in line with the Basel Convention, we document this compliance according to our environmental management system certification in line with ISO 14001.

4. Ethical business behavior

Fair competition

ORAFOL declares its commitment to a policy of integrity and responsible business management. All managers and employees always act with honesty, integrity and fairness in the competition.

We observe all international conventions as well as the competition and cartel legislation in countries where the ORAFOL Group is active.

We do not tolerate agreements or coordinated behavior with other companies that can or are intended to prevent, restrict, or skew the competition.

We will not abuse a dominant market position.

Fraud, bribery, blackmail and corruption

There is a ban on all forms of fraud, bribery, blackmail, corruption, and granting of benefits that could influence decisions actively or passively.

No ORAFOL employee may – directly or indirectly – offer, provide, promise, demand, or accept an unlawful monetary or other advantage with the aim of establishing a business relationship or other type of favor. This can affect the following persons in particular:

- Persons who hold public office, such as a government representative or any other national or foreign civil servant or elected political official
- Representatives or employees of a customer or supplier
- Banks, financial, or credit institutions
- Political parties

Compliance with the relevant applicable anti-corruption legislation must be ensured at all times.

Any form of secret agreement with business partners, customers, suppliers, or competitors is prohibited.

Compliance guidelines and unethical behavior

In addition to this Code of Conduct, ORAFOL has drawn up various compliance guidelines that define the correct behaviors for specific topics:

- Data protection, data security, cybersecurity, protection of work equipment and data
- Gifts, invitations, conflicts of interest
- Money laundering, accurate accounting, records and reports
- Customs and export control regulations

Any employee who violates these fundamental ethical business principles of the ORAFOL Group is at risk of criminal measures or other sanctions prescribed by the applicable legislation. In addition, violations can cause ORAFOL to initiate disciplinary measures against that employee, which can even include dismissal.

5. Reporting violations

All employees of ORAFOL or their suppliers, all residents, and all other affected and third parties should report potential violations of this Code of Conduct to ORAFOL.

Tips or information, ideas, suggestions, and complaints can be sent directly to the ORAFOL Compliance Manager via email (compliance@orafol.de).

In addition, mailboxes for written submissions will continue to be provided on the factory premises. These are collected regularly and forwarded to the Compliance Manager.

In addition, reports can be submitted online via the ORAFOL whistleblower system, which also allows anonymous reports. It can be found on our website, <https://orafol.integrityline.app/>.

All messages are handled confidentially and in line with the applicable data protection regulations.



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Dr. Holger Lodi
Chairman & Chief Executive Officer