



# CODE OF CONDUCT

of OTTENSTEINER KUNSTSTOFF GMBH & CO. KG

for contractual partners

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## Corporate principles



The company Ottensteiner Kunststoff GmbH & Co. KG<sup>1</sup> as a family-run medium-sized company is aware of its social responsibility. This social responsibility includes that we comply with applicable laws at all times and in all places, respect basic ethical values and act in an exemplary manner. Each of us has to fulfil this responsibility, the management, the executive and each individual employee<sup>2</sup>.

For more than 40 years, OKULEN® has stood for quality, care and reliability. We develop, produce and distribute semi-finished products, moulded parts and machined parts made of thermoplastic materials. In addition to high- and ultra-high molecular weight low-pressure polyethylene (HMW-PE, UHMW-PE) and polypropylene (PP), fluoroplastics such as polytetrafluoroethylene (PTFE), polyvinylidene fluoride (PVDF) and perfluoroalkoxy (PFA) are also processed.

The products of Ottensteiner Kunststoff GmbH & Co. KG are sold worldwide under the brands OKULEN® and OKUSLIDE®. Due to the chemical resistance and good wear and sliding properties, there are many areas of application. In addition to general mechanical engineering, important customer sectors include chemical plant engineering, materials handling technology, the food and ski industries.

Our company policy is centred around

- the economic efficiency of the company and its processes,
- the satisfaction of our customers and
- the motivation and health of our employees,

which we are continuously striving to improve.

Our company management system helps to ensure that all processes are not only designed effectively and efficiently, but are also regularly put to the test. We are striving to meet the requirements of our customers in terms of quality, delivery reliability and service and prove ourselves to be a flexible, competent partner for all requests.

It is important to us to consistently eliminate sources of error in all areas, from order receipt to product delivery, and to prevent errors from occurring in the first place. Every employee has the task to work towards eliminating possible causes of error.

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<sup>1</sup> OKULEN®

<sup>2</sup> used in the following as a gender-neutral term and refers to all employees as well as the management.

The assurance and continuous improvement of quality is a task for the management and for all executives and employees alike. We promote it through conscious commitment and active cooperation across departmental and functional boundaries. Our employees are carefully trained in their tasks and regularly receive further training. By encouraging them to act on their own responsibility within the team, we achieve a collaboration based on trust.

By sustainable development, we mean satisfying our needs today without depriving future generations of the opportunities to do so. Since the foundation of the company in 1977, we have attached great importance to the conservation of resources, material and energy efficiency.

**We are committed to these corporate principles:**

- Securing & expanding our medium-sized family business
- New and further development with regard to products, markets and technologies
- Success-oriented, independent action, also with regard to the overall interest
- Orientation of our business activities towards the customer
- Competence leadership in the respective markets through quality and innovations
- Environmentally friendly and resource-saving production and design of products
- Team-oriented thinking and acting
- Supporting employees and standing up for their legitimate concerns
- Fair business practices and responsible social commitment
- Generating an adequate return to ensure the independence of our company and to fulfil our tasks.

## General Rules



Combining entrepreneurial action with ethical principles is one of the essential factors of long-term success for OKULEN®, and this has been the case for a very long time.

We are convinced that ethical and economic values are interdependent and that the business world must strive to treat each other fairly and act within the framework of the given standards.

In our OKULEN® Code of Conduct we have summarised binding rules of conduct, which we expect all employees to observe.

Cooperation in the company is based on mutual respect, openness and objectivity. We therefore expect every employee to behave in a collegial manner and to show consideration for the personal and professional interests of others. Employees must respect the personal dignity, privacy and personal rights of each individual.

Observance of the law is the highest priority for our company. Each employee must observe the legal provisions of the legal system within which he/she is acting.

These principles apply both to internal cooperation and to conduct towards external partners.

The Code of Conduct of OKULEN® is a self-commitment to ethically impeccable behaviour. It is binding for all OKULEN® employees worldwide.

We also expect our partners to recognise their social responsibility towards their own company, towards customers, suppliers and other business partners, towards the environment and towards society.

This Code of Conduct sets out minimum standards that we expect our customers, suppliers and other contractual partners to comply with.

## 1. Conduct towards business partners and third parties



### 1.1. Conflicts of interest and bribery

OKULEN® expects its employees to be loyal to the company.

All employees must avoid situations in which their personal or financial interests conflict with those of OKULEN®. Specifically, it is forbidden to hold shares in the companies of competitors, suppliers or customers or to enter into business relationships with them in a private capacity if this may lead to a conflict of interest. Such a conflict exists whenever the nature and extent of an interest is likely to influence in any way actions taken in the performance of OKULEN® activities.

No employee is permitted to demand, be promised or accept gifts or other benefits from persons or companies who seek or maintain a business relationship with the company. The management must be informed immediately if such offers have been made to the employee.

This does not apply insofar as it concerns minor small gifts, so-called promotional gifts such as ballpoint pens, pocket calendars, etc.

Invitations must be kept within the limits of business hospitality.

This rule also applies to the offering of benefits to persons or companies with whom we have or seek to have a business relationship.

### 1.2 Compliance with Antitrust Rules

OKULEN® is committed to fair and open competition in the world's markets.

Our company and our employees must not engage in unlawful and/or criminal practices, such as bid rigging, that exclude, restrict or distort competition.

## 1.3 Supplier and customer Relationships

Agreements with customers and suppliers are to be made completely and unambiguously and to be documented including subsequent changes and additions. The internal regulations on the application of double-checking ("four-eyes principle") as well as on the separation of action and audit functions are to be strictly observed by all employees. Suppliers shall be selected solely on a competitive basis after comparing the price, quality, performance and suitability of the products or services offered.

### Special rules for the award of contracts

Employees engaged in the award of contracts shall observe the following rules in particular:

- The employee shall declare to his/her manager any personal interest that may exist in connection with the performance of his/her official duties.
- Suppliers must not be unfairly favoured or hindered in the competition for orders.
- Invitations from business partners may only be accepted if the occasion and scope of the invitation are appropriate and refusal of the invitation would be contrary to the requirement of courtesy.
- No employee may have private orders carried out by companies with which he/she has business dealings if this could result in advantages for him/her. This applies in particular if the employee has or can have a direct or indirect influence on the commissioning of the company.

All business transactions must be completely and properly documented in accordance with the law and the regulations applicable at OKULEN®.

## 1.4. Documentation of business transactions

All business transactions must be completely and properly documented in accordance with the law and the regulations applicable at OKULEN®.

## 1.5. Consultancy and service contracts

Consultancy and service contracts may only be concluded if the person or company has the necessary qualifications for the specific assignment and the assignment is exclusively in the interest of the company and does not contradict the objectives of this Code of Conduct. In particular, commissions and remuneration within the framework of such consultancy and service contracts may only be paid if they are in adequate and justifiable proportion to their activities.

No services may be agreed upon for which it may be assumed that they are wholly or partly intended for the payment of bribes.



## 2. Human rights, labour and social standards



By the following regulations we want to ensure that all employees act in accordance with the internationally recognised human rights as well as the essential labour and social standards.

### 2.1. Human Rights

OKULEN® respects the dignity of the human being and is committed to the observance and protection of human rights. Every employee is required to ensure compliance with these universal fundamental rights.

### 2.2. Rejection of child labour

Child labour and any exploitation of children and young people will not be tolerated by OKULEN®. The minimum age for admission to employment shall not be less than the age at which compulsory education ends and shall in no case be less than 15 years.

### 2.3. Rejection of forced labour

All forms of forced labour are rejected by OKULEN®. No employee shall be forced into employment, directly or indirectly by force and/or intimidation. Employees shall only be employed if they have volunteered for employment.



## 2.4. Equal Opportunities and Prohibition of Discrimination

At OKULEN® women and men of different ethnic origin, religion and belief, disability, age and sexual identity work together. OKULEN® therefore does not tolerate discrimination, sexual or other personal harassment or insult towards its employees, trainees, temporary workers, applicants, business partners or customers. Furthermore, OKULEN® strives to maintain a work environment free of discrimination, harassment, bullying or sexual harassment within the scope of its policies.

Discrimination and harassment in any form related to ethnic origin, gender, sexual identity, religion or belief, age, nationality, disability or any other protected category is a violation of this policy and the law and will be punished under employment law.

However, the company cannot resolve such cases until it is informed of them. It is therefore your duty to bring such issues to the attention of the company so that it can take the appropriate steps to resolve them.

## 2.5. Remuneration and compensation

The right to adequate remuneration is recognised for all workers. Remuneration, compensation and other benefits (social benefits, holidays and others) shall take into account the principle of fairness and shall at least be in line with the respective national legal standards or the level of the national economic sectors and industries.

## 2.6. Qualification

The existing skills and knowledge of the employees have an outstanding importance for OKULEN® to secure the future. OKULEN® therefore supports and promotes measures for the qualification of employees, which are suitable to broaden and deepen the professional and technical knowledge essential for the work activity. Training and further education are of particular importance in the future development.

## 2.7. Working conditions

OKULEN® complies with the respective national regulations and agreements on working time and regular paid leave. Working time including overtime shall not permanently exceed the existing legal and collective agreement standards in the respective countries.

## 2.8. Health and safety

All OKULEN® employees shall provide a safe and healthy working environment. Strict adherence to our safety rules and practices is an indispensable requirement.

Employees are required to report violations of these principles immediately to the responsible departments within the company. Any grievances must be remedied immediately.

### Drugs, Alcohol, Medicines.

We expect our employees to carry out their work and decisions clearly and without any interference from alcohol, drugs and medicines. This principle is for the welfare of the employees and the productivity of the company.

### Personal Protective Equipment

For work and activities that can potentially endanger your health, OKULEN® issues personal protective equipment (PPE) (work shoes, hearing and respiratory protection and the like). The wearing of PPE is not an option for the employee but a basic obligation.

## 2.9. Right to organise and negotiate collectively

The right of employees to form, join or leave associations or organisations of their own choice for the purpose of promoting and protecting the interests of employees shall be respected

The exercise of the activity must not be impaired. In the event that national standards restrict the right to organise and to negotiate collectively, at least the free and independent association of workers for the purpose of bargaining must be made possible and allowed.

Employers and elected employee representatives shall cooperate in a spirit of trust and in the best interests of the employees and the enterprise.

## 2.10 Supply Chain Due Diligence Act (LkSG)

OKULEN® expects its partners to respect internationally recognized human rights as well as comply with environmental due diligence obligations in their supply chains in accordance with the principles of the German Supply Chain Due Diligence Act (LkSG)

### 3. Confidentiality

Every employee shall maintain absolute confidentiality with regard to business and trade secrets as well as operational matters which he/she may assume are to be treated confidentially and shall use his/her information on such matters exclusively for internal company purposes. The obligation of confidentiality shall also apply to other employees of the enterprise if they are not entrusted with corresponding tasks and the employee may assume that the information is not intended for these employees. The obligation of confidentiality does not end with the termination of the employment relationship, but continues indefinitely.

#### Prohibition of photography and filming

The employee is not entitled to reproduce work equipment, models, business papers or the like, to remove them from the business premises or to hand them over to a third party. It is also not permitted to make notes or photocopies of business documents.

Photography, filming and video recording are prohibited on the company premises unless the department management has been informed in advance.

### 4. Donations and Sponsorship

OKULEN® does not make any direct or indirect donations to political organisations, parties or individual politicians. Any exception to this rule must be cleared with the management beforehand.

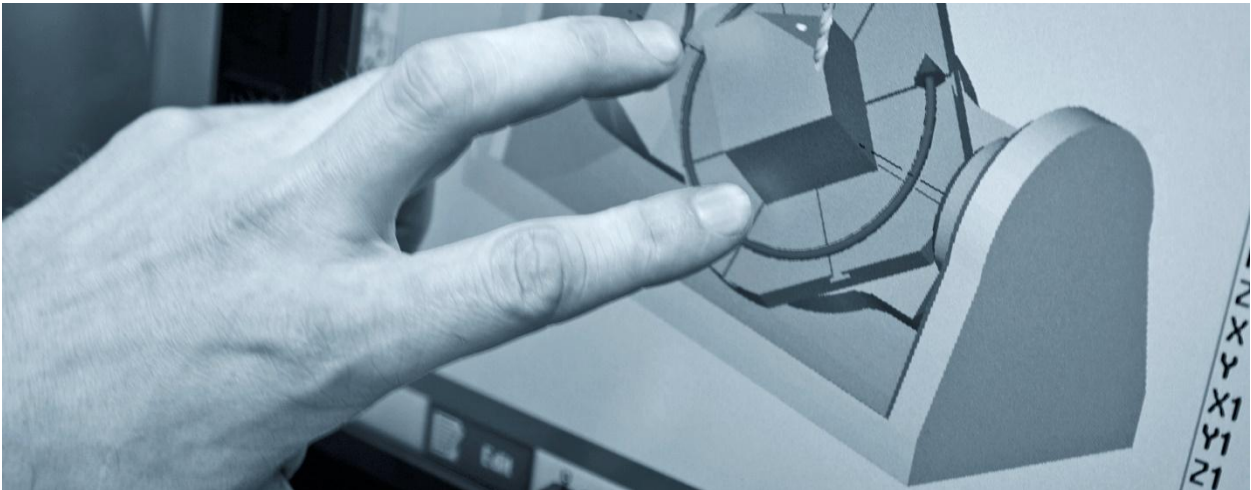
Sponsorship and donations to other, non-political recipients must not be used to circumvent the provisions of this Code of Conduct.

### 5. Money Laundering

Money laundering is the smuggling of illegally generated money or illegally acquired assets into the legal financial and economic circuit. Money laundering is a criminal offence in EU member states of the EU and many other countries.

No employee shall, either alone or in cooperation with third parties, engage in or tolerate acts that violate the applicable anti-money laundering rules.

## 6. Dealing with internal knowledge



All employees are required to ensure a fast and smooth exchange of information within the company. Knowledge relevant to the activity must not be unlawfully withheld, falsified or selectively passed on. Information must be passed on correctly and completely to other areas, unless in exceptional cases there are overriding interests (e.g., secrecy).

## 7. Non-competition clause

The employee undertakes for the duration of the employment to refrain from any direct or indirect activity for a competing enterprise. He/she also undertakes to refrain from any direct or indirect involvement and/or participation in the establishment of a competitor company.

## 8. Data protection

We are committed to complying with the data protection regulations of the EU directives, particularly the General Data Protection Regulation (GDPR). Each employee shall comply with the principles of OKULEN® for the protection of data of employees, customers and investors. The necessary care shall be taken to protect personal data within the scope of the assigned task.

Any deficiencies found must be reported to the manager.

## 9. Environmental protection



OKULEN® is aware of its obligation to respect and protect our environment. The responsible, precautionary and careful treatment of the environment in the sense of sustainable development is the basis of our corporate actions.

Sustainability is a major concern. The central environmental protection issue is the effective use of resources. In order to identify potential for improvement, material and energy flows are to be analysed and measures to reduce energy consumption and emissions are to be developed.

These should already be taken into account when planning the design of new production machines. When planning manufacturing processes, considerations for avoiding waste and increasing the recycling rate should be integrated. This includes the use of the latest technologies, such as heat recovery measures, analysing and optimising compressed air consumption, reviewing and converting lighting systems to energy-saving alternatives, exploiting in-house recycling potential, as well as avoiding waste and differentiated waste management and regular and successful participation in energy audits.

The environmental awareness of the employees is to be raised through information and training.

OKULEN® operates with an energy management system.

**Since 2025, we have been certified according to DIN EN ISO 50001.**

All relevant legal and official requirements must be strictly observed.

Any damage caused to the environment must be reported immediately to the competent authorities in the company.

### 9.1 EU Deforestation Regulation (EUDR)

If partners supply products containing raw materials such as wood, rubber, or their derivatives, we expect proof that these do not originate from deforested or degraded land and comply with the requirements of the EU Deforestation Regulation (EUDR).

## 10. Responsibilities

The ethical principles and rules of conduct of this Code of Conduct form a core of our corporate culture. Adherence to these principles is indispensable - every employee is responsible for them.

The managers bear a special responsibility. They are required to convey the meaning and contents of this code of conduct to their employees, to set an example and to support them in its implementation. This is not intended to restrict the latitude of employees to act responsibly within the permissible framework.

Managers are responsible for ensuring that the code of conduct is followed by their employees. They therefore also monitor and verify its compliance.

## 11. Anonymity / Whistleblower and Complaint Mechanism

As part of our collaboration, we place great importance on maintaining the anonymity and privacy protection of all parties involved. This Code of Conduct is intended to ensure that all partners respect and adhere to the principles of anonymity.

### **Confidentiality**

All partners agree not to disclose confidential information exchanged during the collaboration to third parties. This includes, but is not limited to, personal data, business information, and strategic plans.

### **Anonymity of Participants**

The identity of the partners and their employees shall be anonymized wherever possible. This means that no personal data may be published or used without explicit consent.

### **Data Processing**

When processing data, all measures must be taken to ensure the anonymity of the affected individuals. This includes the use of pseudonyms and the minimization of data collection.

### **Training and Awareness**

All partners are required to train their employees on the importance of anonymity and how to handle confidential information. Regular training sessions should ensure that all parties understand and adhere to the guidelines.

### **Reporting Violations**

Partners are encouraged to report any violations of this Code of Conduct or potential risks to people or the environment confidentially. OKULEN® provides an appropriate point of contact to ensure that concerns can be raised without fear of retaliation. **(Reporting address listed below).**

OKULEN® acknowledges comparable reporting procedures from the partner.



## 12. Self-Commitment and EU Directives



As part of our business activities, we are committed to complying with applicable EU directives and regulations. This Code of Conduct establishes the principles that all partners and employees must follow to ensure that our practices align with the legal requirements of the European Union.

### **Ethical Conduct, Compliance with Laws**

All partners are required to respect the relevant EU directives and national laws that apply in the member states. This includes, but is not limited to, regulations on data protection (GDPR), competition law, environmental standards, and labor law.

### **Responsibility Towards Stakeholders**

Partners recognize their responsibility towards all stakeholders, including customers, employees, suppliers, and the community. We are committed to respecting their interests and incorporating them into our decisions.

### **Data Protection and Data Security**

We are committed to complying with the data protection regulations of EU directives, particularly the General Data Protection Regulation (GDPR). All personal data must be handled securely and confidentially. Partners are encouraged to implement appropriate technical and organizational measures to ensure data security.

### **Anti-Discrimination and Equal Treatment**

In line with EU directives on equal treatment and anti-discrimination, we are committed to creating a work environment that promotes diversity and excludes discrimination based on gender, race, ethnic origin, religion, disability, age, or sexual orientation.

### **Transparent Business Practices**

We promote transparency in our business practices and commit to openly communicating all relevant information. Partners are encouraged to provide accurate and complete information to strengthen the trust of all parties involved.

### **Sustainability and Social Responsibility**

All partners are committed to promoting sustainable practices and taking social responsibility. This includes protecting the environment, promoting diversity and inclusion, and supporting local communities. We recognize the importance of environmental and sustainability standards set by EU directives. Partners are required to promote eco-friendly practices and minimize the environmental impact of their business activities.

### **Continuous Improvement**

We strive for continuous improvement in all areas of our collaboration. Partners are encouraged to regularly review their practices and seek opportunities for optimization.

**Reporting Violations**

Partners are required to promptly report violations of this Code of Conduct or applicable EU directives. We ensure that all reports are treated confidentially and that no reprisals occur against whistleblowers.

**Consequences for Non-Compliance**

Violations of the provisions of this Code may result in consequences, including the review or termination of the collaboration. We take compliance with EU directives seriously and will take appropriate action to maintain the integrity of our business practices.

## Legal notice and Reporting Address

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