

CODE OF CONDUCT

February 15, 2023



Through its core environmental business, the Landbell Group strives to have a positive impact on the world we live in. This includes our work towards a more Circular Economy, our firm position in support of the human rights and social rights of workers, our dedication to protect the environment, and a strong commitment to good and sound business practices and relations. Within its sustainability initiative, Landbell gives a central place into business practices and strategies to identify, measure and address its impact. Through its network and actions, Landbell Group promotes international standards set by United Nations texts such as UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and the UN Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights, or the UN Rio Declaration on Environment and Development, 1992. It also promotes the step by step development of best practices and endeavours to lead the way for its stakeholders.

PURPOSE

This code of conduct (“the Code”) contains the rules that are decisive for us in our dealings with our stakeholders, such as colleagues, authorities, customers or suppliers and the broader public. It sets out minimum standards that are binding guidelines for all employees to follow in our everyday work, including senior management teams around the world whose duty is to set a good example. The Code of Conduct increases mutual understanding and ultimately helps us to be successful on global markets.

The Code also encourages you, as our business partners, to go beyond legal compliance in order to push forward sustainable responsibility as well as business ethics. Landbell Group may therefore require evidence of, or run controls over, actions you took in pursuing these objectives. Support or questions regarding implementation of the Code may be raised at anytime at sustainability@landbellgroup.com. If you delegate any of the work you do for us, we also require your next tier suppliers to acknowledge and implement the Code.

Commitments from the Code may not, in any way be interpreted in a manner that is not compliant with any applicable law. When the provisions of the Code are stricter than legal obligations, the Code shall take precedence.

LABOUR PRACTISES

The term “employee” refers to all full-time and part-time employees, managers, senior managers and members of the Executive Board. Landbell Group is committed to the well-being of its employees and of the employees of its business partners, and requires that all are treated with dignity and respect, with special attention given to those who most need it, as for example migrant workers. Harsh or inhumane treatment including mental or physical violence, sexual harassment or abuse or verbal abuse, of employee as well as the threat of any such treatment shall be absolutely prohibited. Disciplinary, judiciary and/or criminal procedures for any breach will be enforced.

Modern Slavery.

Landbell Group employs its employees under fair wages and working conditions. No employee of any company working directly or indirectly for Landbell Group shall ever use any involuntary or exploitative prison labor, slavery or trafficking of persons. No threat, force, coercion or penalties may be tolerated nor any restrictions on workers' freedom of movement in and out of the facility. A direct written labour agreement shall be offered and all its conditions maintained throughout the employment duration. Payment shall be made directly to the employees and never to third party agencies or agents, which do not hold a relevant permit from the authorities. At no time should workers be denied access to their personal identification documents or work permits, if temporarily (and for lawful reasons) held by the company. No worker shall have to pay for their employment.

Child Labour.

No one below the age of 15 should be made to work, under any circumstances. The only exception might be students following an internship program, holiday work or apprentices. Moreover, such students/interns/apprentices shall not perform work that is likely to jeopardize their health or safety, including physically demanding jobs, night shifts and overtime.

Working Hours.

With respect to employees' health, working hours are not to exceed the maximum set by local law. Furthermore, a working week should not be more than 50 hours, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.

Wages and Benefits.

Employees' wages shall comply with all applicable wage laws, including those relating to minimum wages, overtime compensation and legally mandated benefits. Deductions from wages as a disciplinary measure shall not be permitted.

Freedom of Association.

The rights of all workers to form and join trade unions of their own choosing, to engage in peaceful assembly, to go on strike, shall always be respected, as well as the right of employees to refrain from such activities.

Non-Discrimination.

In hiring or in employment practices, Landbell Group and its business partners shall never engage in or tolerate, either in hiring, or in employment practices, discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, or any other distinctive moral or physical characteristics.

Concern Raising and whistleblowing

Landbell Group and its business partners ensure employees are able to openly share concerns with management regarding working conditions and management practices through fair and effective grievance processes. Besides, Landbell Group encourages whistleblowers to speak up and shall guarantee them safety and well-being. Breaches of principles laid down in this Code as well as to any legal or regulatory obligation may be reported through secure whistleblowing system employees are informed about without fear of discrimination, reprisal, intimidation, or harassment.

HEALTH AND SAFETY

While circular economy related business is not risk free, it is the responsibility of employers to ensure employees' safety at work and prevent work-related injury and illness. A safe and healthy work environment enhances the quality of services that we deliver and the well-being of employees. All employee shall be provided with appropriate workplace health and safety information and training in a language they can understand.

Occupational Safety.

Landbell Group and its business partners avoid or reduce as much as feasible exposure to health and safety hazards (chemical, electrical, fire, vehicles, fall, etc.) by implementing a thorough identification, assessment and mitigation process, which is reviewed regularly. Where hazards cannot be adequately controlled employees are to be provided with appropriate protective equipment and information. Employee exposure to the hazards of machinery or physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks is to be avoided as much as possible. If it is not avoidable, such task shall be identified, evaluated, and controlled to ensure acceptable and minimum health related risks.

Occupational Injury and Illness.

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work. Employee exposure to chemical, biological, and physical agents shall be especially identified, evaluated, and controlled.

Emergency Preparedness.

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response and evacuation procedures, trainings and drills. Emergency drills must be executed at least annually or as required by local law, whichever is more frequent.

ENVIRONMENT

Landbell Group recognizes the need for all to participate in the preservation of our environment. Minimizing adverse impacts of our activities on the environment and natural resources is a necessity. It acknowledges that environmental responsibility is an integral part of delivering circular economy related services, and gives particular attention to transparency of waste routes and processing. In case of doubt, the precautionary principle will be followed.

Environmental Permits and Reporting.

Landbell Group requires all business partners to hold all environmental permits as required by law (e.g. discharge monitoring), approvals, and registrations, to maintain them, and to abide by all of their provisions, including the reporting of performance and events to the relevant authorities.

Pollution Prevention and Resource Reduction.

Emissions and discharges of pollutants to water, air, soil, or as waste are to be minimized, or eliminated, at the source, or by adapting practices or equipment or by other means. The use of natural resources, including water, energy, fossil fuels, minerals, and virgin forest products, is to be reduced as much as possible, and improvement is to be measured annually.

Hazardous Substances.

Chemicals and other materials posing a hazard to humans or the environment are to be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. Wherever possible, their use shall be replaced by environmentally sound equivalent products.

ETHICS

For Landbell Group, ethical business also covers relations of companies between each other, with their stakeholders, society, and national or regional authorities. As a compliance company, we regularly gain deep insights into the economic foundations of other companies. To establish and maintain a high level of business reliability and trust the highest standards of ethics shall be adhered to. Information and training on the processes to implement and reach these standards should be provided to employees in a language that they understand and appropriate for their level of responsibility within the organisation.

Gifts. Anti-Bribery.

Landbell Group expects from its employee and business partners a zero-tolerance policy for any forms of corruption, extortion, embezzlement and any other form of active or passive bribery which jeopardise the world of trust, democracy and honesty Landbell Group wishes to do business in. Actual or attempts to bribe or other acts in view of obtaining undue or improper advantage will be reported to the relevant authorities. This prohibition covers promising, offering, authorizing, giving or accepting anything of value which might make the receiver indebted, either directly or indirectly through a third party, to influence, obtain or retain business, direct business to public officials, business partners, employees or any other person, or otherwise gain an improper advantage. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

Confidentiality.

The security of customer data and the confidentiality of information are of the greatest importance and it must be ensured that at all times confidential information is protected against access by third parties. Employees who have access to or control of confidential or proprietary information must take the appropriate and prescribed security precautions to prevent misuse and disclosure.

Transparency.

All business dealings should be transparently performed and accurately reflected in the financial records. Information regarding labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

Intellectual Property.

Intellectual property rights are to be respected. Transfer of technology and know-how is to be done in a manner that protects intellectual property rights.

Privacy.

Personal data is collected, stored, processed, shared and used for lawful purposes only within the boundaries of the applicable privacy and information security laws. Besides legal requirements, reasonable privacy expectations of everyone we do business with, including suppliers, customers, consumers, and employees should be considered. If there is any suspicion that data protection regulations have been infringed, all appropriate measures shall be taken without delay.

QUALITY

Compliance.

Any kind of business with Landbell Group shall be made in full compliance with applicable laws and customers requirements. This means that business partners are expected to monitor legal requirements applicable to their business and to set up compliance programmes accordingly.

Due Diligence.

Where the support from third party suppliers is required to perform business especially when managing waste, Landbell Group supports the use of adapted due diligence procedures to carefully select the supply chain and business partners, including *vis-à-vis* rules laid down in this Code.

Awareness on this Code.

We expect you to cascade down to your employees and suppliers the rules in this Code of Conduct in a clear and intelligible manner and in a language that they can understand. Trainings for managers and employees shall be set-up and clear communication organised. The relevant executive managers and managers should ensure that all employees are familiar with the current version of the Code of Conduct at all times.

Jan Patrick Schulz, CEO



Uwe Ehteler, COO DACH



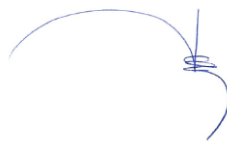
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LANDBELL GROUP is an international supplier of service and consulting solutions for environmental and chemical compliance. Our aim is to reduce the complexity of extended producer responsibility legislation, as well as other product- and packaging- related requirements for producers and distributors. In everything we do, we seek to provide our customers with the most competitive solutions in terms of service quality, compliance and cost.

At LANDBELL GROUP, we prepare our clients for the uncertainties to come. We help them unlock the value of the circular economy and strive to be their best partner on the journey to a more sustainable future.

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