

Foreword by the Management

Burwinkel Kunststoffwerk GmbH is a family-run company in the plastics manufacturing industry based in Oldenburger Münsterland, which has been operating successfully in the market since 1978. With many years of experience, a high willingness to innovate and great flexibility, we produce customizable injection molded plastic parts with modern, energy-efficient machines. What drives us:

We want to shape a sustainable future together by staying true to our slogan:

„IN FORM. FÜR MORGEN.“ (*engl. "in shape for tomorrow"*)

Our goal is to balance economic success with ecological and social responsibility. All our actions are based on our core corporate values:

Customer orientation

Innovation

Appreciation

A Sense of responsibility

The following Code of Conduct combines perfect legal compliance with core ethical values and helps us make the right decisions in difficult situations. Our Code not only guides the behavior of everyone within our organization (all employees) but is also a key part of every interaction with our business partners.

Everyone of us is responsible for their own actions. With this Code of Conduct we want to provide a framework and create guidelines that inform everyone's behavior. It is our duty to place integrity at the center of all our internal and business actions.

We pledge ourselves to internationally recognized human rights and social values. We want these to be accepted and shared along our entire value chain. We expect every employee and partner to behave accordingly and implement these rights and values in their business relationships and supply chains.

1. Applicable Legal Provisions

Our actions are based on the applicable laws and regulations of the country in which we operate. In addition, we are guided by the Universal Declaration of Human Rights (UN Human Rights Charter) and the 17 UN Sustainable Development Goals.

In what we do, we are guided by universally accepted ethical values and principles, in particular integrity, righteousness, and human dignity.

2. Basic Ethical and Social Rights

We treat all business partners, whether customers, suppliers, or employees, with respect.

We honor and preserve the dignity, privacy and personal rights of every individual. We ensure compliance with legal working conditions, especially appropriate payment of a legally defined minimum wage. We adhere to the ban of child labor and forced labor.

We live a culture of equal opportunity and mutual trust and respect. Just like we do, we also require our contractual partners to treat all people equally, regardless of their skin color, race, nationality, social origin, sexual orientation, disabilities, political or religious beliefs, or a particular gender or age. This way, we act in accordance with the principles of the General Equal Treatment Act (German abbreviation: AGG) which forbids discrimination.

Furthermore, we uphold the right to freedom of opinion and expression as a basis for mutual trust and meaningful cooperation.

3. Working Conditions and Health Protection

Employees are a company's most valuable asset. We, the company management, are responsible for our employee's health and safety. Therefore, we promote health and safety at work with suitable measures and training. An appropriate risk management system ensures that our preventive and safety measures are the best they can be and help avoid work accidents and occupational illnesses.

4. Environmental and Climate Protection

In regard to our environment and climate, sustainable economic activity and action is a major company goal. With this in mind, we take measures that minimize the impact our actions have on the environment and climate and help us use and protect natural resources effectively. For this, we introduced an environmental management system in 2022 and are certified according to DIN EN ISO 14001:2015. We want to encourage everyone to behave in a way that protects the environment and climate and reduces the CO₂ footprint as much as possible.

5. The Basis of our Business Relations

Business relations with customers and suppliers are characterized by fair competition. Cartel bans and competition regulations are followed.

We reject any form of bribery and corruption, especially the giving or taking of money or other benefits (gifts, donations, favors etc.), that are used as an incentive or reward for specific behavior that is unethical or not in compliance with the law. No personal dependencies, obligations or conflicts of interest may arise that impair objective decision making.

In addition, we comply with legal regulations that prevent money laundering and financing terrorism.

6. Confidential Information, Data Protection and Privacy

We treat business secrets confidentially and take necessary steps to protect confidential information of our business partners from being accessed and seen by uninvolved third parties.

The integrity of all people involved is to be protected. Especially all personal data that is collected, saved, processed and used during a cooperation shall be stored and handled in accordance with the applicable law. The privacy of every individual will be protected.

Furthermore, all confidential information must be treated with great care. Every relevant contract and guideline on the protection of information and cyber security is to be adhered to. Necessary control mechanisms have to be implemented.

7. Complying with the Code of Conduct

The code of conduct described above is binding for all parties involved, regardless of whether we are involved with Burwinkel as a customer, supplier or employee. Violations of the code of conduct will not be tolerated at all.

If someone acts in a manner that violates the code of conduct, they must expect consequences. Depending on the severity of the violation, consequences can range from labor law related measures and claims for damages under civil law to sanctions under criminal law. To prevent this, it is the responsibility of every individual to familiarize themselves with the code of conduct. The code is to be integrated into every action and decision.

Employees and external parties such as suppliers and service providers, who want to report a suspected or potential violation against legal or internal demands, can do so by contacting compliance@burwinkel.eu. Any such information will be handled anonymously and confidentially, forwarded to the management, and evaluated. In accordance with the new whistleblower protection law, informants will not have to expect disadvantages of any kind.

In case of doubt, the management and executives can be contacted for any questions regarding the above regulations. As role models, they have to ensure compliance with the code, evaluate reports of violations and initiate corrective measures or sanctions for any violations.

I hereby accept the rules above and commit myself to implementing them in my area of responsibility.

Location, date

Company / stamp

Name, signature