

THE FRAMAS CODE

Responsible behavior starts with you.

Our **Code of Conduct**
applies to everyone
working at and with
frammas.





CONTENTS

1) Who we are

Introduction	1
Why we have a code	1

2) Employees

Team Spirit	2
Harassment, Abuse and Discrimination	2
Wages, Salaries and Benefits	2
Working Hours	3
Freedom of Association Collective Bargaining	3
Employment Relationship	3
Forced Labor	4
Child Labor	4
Social Activities and Social Media	4
Safe Working Environment	4

3) Customers and Business partners

Legal and Ethical Business Practices	5
Foreign Trade and IT/Software Compliance	5
Bribery and Corruption	5
Conflicts of Interests	6
Antitrust and Competition	6
Protection of Assets, Products and Sensitive Information	6

4) Society and Investors

Community Work	7
Relationships with Governments	7
Speaking on Behalf of frames	7
Accurate Records	7
Cooperation with Auditors	7
Land Rights	7

5) Environment

Use of Materials	8
Energy Efficiency and Climate Protection	8
Environmental Protection	8

6) Responsibilities

Compliance with the frames code	9
Non-Retaliation Policy	9

7) Contact

10

WHO WE ARE

INTRODUCTION

framas has partnered with well-known global brands for decades. We see ourselves as a flexible and innovative provider of creative and customer-centric solutions, and our actions create sustainable value for our customers, employees, business partners and shareholders. Underpinning all of this is our commitment to the principles of good governance.

WHY WE HAVE A CODE

The framas group is a global player in the plastics processing industry, with extensive technological expertise built up over 70 years. Our approach is centered on innovation, and we develop forward-looking solutions for the shoe and injection molding industry. We are aware of our social and environmental impact and the responsibility we have, and we continuously seek out new ways to improve. The quality and functionality our products speak for themselves.

The purpose of our Code of Conduct is to lay out guiding ethical, environmental, and business principles and expectations to serve as a starting point for us to make better choices every day.

This Code of Conduct applies to all our employees and business partners alike.

Innovation, Technology & Tradition

THIS IS FRAMAS.



EMPLOYEES

At framas, we are committed to protecting and promoting the welfare of all our employees. Our team spirit guides us through our daily working life and help us as we strive to achieve optimal outcomes.

All framas employees must comply with and follow the framas Code of Conduct to the letter. When asked to do so, they must also participate in control activities conducted by us and our customers.

TEAM SPIRIT - WE ARE...

Transparent – We are a transparent company. This is reflected in how we communicate with one another and in our regular team and one-on-one discussions on projects and progress, where we actively encourage everyone to speak openly and give feedback.

Engaged – We are diligent and committed in our work and are mindful of the best interests of all stakeholders. We enable everyone to access the opportunities and resources available to achieve the best results.

Focused – We are fully focused and conscientious in our work.

Team players – We aim to rely on each other. If you need assistance, we help out and work to find a solution together.

Goal-oriented – We pursue our goals with great commitments, and as we do so we seek out chances for self-development and ways to optimize work processes.

Considerate – We take care of each other and do our best to act in the interests of all involved. If we pursue a goal, we strive to keep the whole picture in mind and consider how our actions may potentially impact the environment.

Open to feedback – We welcome constructive feedback and value the exchange of new ideas and perspectives this brings. When faced with an obstacle, we strive to overcome it as soon as possible.

Appreciative – Mutual recognition and appreciation are important to us and we like to share them. It is crucial to give colleagues feedback on their work.

HARASSMENT, ABUSE & DISCRIMINATION

framass promotes diversity, equality and inclusion and prohibits all forms of discrimination, racism, inequality and exclusion. We foster a climate of dignity and respect, in which no one is exposed to physical, verbal, sexual or psychological harassment or abuse of any kind. Our recruitment and em-

ployment practices guarantee equal treatment, irrespective of gender, race, social origin, religion, ideology, age, disability, health status, sexual orientation, nationality, marital and parental status, a pregnancy, union membership, social group, or ethnic origin.

WAGES, SALARIES & BENEFITS

Wages, salaries and benefits at framass guarantee a decent living and meet the needs, reasonable savings expectations and outgoings of employees. We continuously raise our employees' living standards through our compensation systems, benefits, and other services.

We offer pay that equals or exceeds the minimum wage required by law. We offer paid annual leave, paid public

holidays, and paid overtime as well as statutory severance pay when employment ends. Disciplinary deductions from pay are not permitted.

Employees are made aware of the structure of wages, salaries, and benefits. We do not engage in bogus training or apprenticeship practices that are used to avoid paying wages, salaries, and benefits.



EMPLOYEES

WORKING HOURS

The regular working week at framas does not exceed 48 hours. If employees need to work overtime in exceptional cases, their weekly working hours are capped at a maximum of 60 hours. In principle, overtime is voluntary, but in exceptional cases it may be ordered, within the limits as

permitted by the law of the country where the employees are employed, and must not be requested on a regular basis. Our employees must also be allowed to rest for at least 24 consecutive hours within every seven-day period and they receive paid annual leave.

FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING

At framas, we recognize and respect our employees' right to join and organize associations of their own choice and to bargain collectively without fear of harassment, interference, or retaliation. We ensure that associations are free to operate at framas and that mechanisms are in place to resolve workplace disputes, including emplo-

yeer grievances, and to ensure effective communication with employees and their representatives. Where these rights are partly restricted by law, framas allows for parallel means of independent and free association and bargaining to be developed in observance of local laws.

DISCIPLINARY PRACTICES

Disciplinary action must always be explained to employees orally in clear, understandable language and be recorded in writing.

EMPLOYMENT RELATIONSHIP

At framas, staff are always employed lawfully in observance of local regulations and practices. Before entering into an employment relationship, we provide clear and comprehensible information about the employees' rights, obligations and working conditions, including working hours, pay, vacation entitlement, protection against dismissal, parental leave and payment provisions.

We never hire staff through trainee schemes without intending to impart skills or provide regular employment. Furthermore, we never resort to sub-

contracting, home-working arrangements, or temporary contracts to full permanent positions in situations where the sole purpose is to avoid providing benefits or to undermine employees' rights.

The in-house security staff and contractors we hire to ensure the safety and security of our employees and facilities must not violate the ban on torture and cruel, inhumane, or degrading treatment, damage life or limb, infringe the right to organize, or restrict freedom of association.



FORCED LABOR

framas never uses or takes advantage of forced labor, whether in the form of prison labor, indentured labor, bonded labor, or other forms of coerced labor including any form of modern slavery and human trafficking. This also includes intimidation and punishment for holding or expressing political views. framas' employees are never locked inside factory premises for any reason.

They always have the right to leave their workplace unhindered at any time and to terminate their employment relationship with a reasonable period of notice. When employees are hired, they are never required to leave a deposit or personal documents. Furthermore, framas takes responsibility for the employment eligibility fees of all workers, including recruitment fees.

CHILD LABOR

At framas, we prohibit all forms of child labor, both in our own operations and in our supply chain. We are therefore strongly committed to comply in the strictest terms with the minimum age of employment and the ban of child labor and take immediate action to eliminate them. The use of child labor is unacceptable and can harm children's education, health and mental or social development.

framas does not employ anyone against the local legal minimum age, either directly or indirectly. Especially apprentices and interns, should be pro-

tected by special regulations. framas ensures that apprentices and interns do not work at night or outside of the workplace and are protected against conditions that affect their health, safety, and moral wellbeing and/or endanger their psychological and physical development. Apprentices and interns have access to effective grievance mechanisms, educational systems and occupational health and safety programs. To verify each employee's date of birth, framas maintains official documentation and ensures reliable mechanisms in the recruitment process.

SOCIAL ACTIVITIES & SOCIAL MEDIA

framas is present on social media. Our employees are free to talk about framas, however they must always consider the impact of their words and only communicate information after it has been made public. Our employees must never disparage individuals or competitors and never use discriminating, threatening or abusive language. Our employees must conduct personal political activities on their own time and with their own resources.

Out of respect for others, our employees must not promote any personal political views or beliefs on company premises or websites (including posting or distributing notices or other materials). Any such political statements and remarks by framas employees will not be tolerated and will have disciplinary consequences.

EMPLOYEES

SAFE WORKING ENVIRONMENT

framas provides and actively promotes a safe and healthy working environment that reduces the risk of accidents, injury, and illness.

This includes, but is not limited to, occupational health care, access to clean drinking water and adequate sanitary facilities, compulsory insurance systems, electrical safety, free-of-charge personal protective equipment and adequate lighting and heating, ventilation, and air conditioning systems.

other facilities are constructed safely in accordance with local laws, certified construction approvals or international construction standards.

framas prohibits weapons on all company premises at each framas location.

framas has appointed health and safety representatives to ensure that:

framas production sites, offices and

- ***systems are in place to identify, assess, prevent, and combat potential dangers to the health and safety of workers***
- ***effective measures are set to avoid and prevent potential accidents, injuries and illnesses to workers involved with the related workflow***
- ***employees receive proper and documented health and safety training***
- ***workers are not exposed to physical, chemical, or biological hazards above occupational exposure limits and the disposal of chemicals and hazardous waste is responsibly managed***
- ***fire prevention and emergency action plans are in place to protect workers during normal working operations and emergency situations. These include alarm systems, safe exit routes and safe shelter locations***



CUSTOMERS & BUSINESS PARTNERS

At framas, we work in cooperation with our customers and business partners to meet the standards for compliance, sustainability, and quality.

All framas subcontractors must comply with and follow the framas Code of Conduct to the letter. When asked to do so, they must also participate in control activities conducted by us and our customers.

LEGAL & ETHICAL BUSINESS PRACTICES

Violations of legal and ethical business practices are complex and can have severe consequences for both framas and the individuals involved, including negative publicity and reputational damage, significant fines, penalties, and imprisonment. Those sanctions are even more extreme in cases involving government officials.

Business conduct is regulated by international and local laws. Ethical business conduct is the basis for complying with law and is reflected by our framas values as laid out in this code of conduct. We promote ethical business behavior to ensure that business is conducted in a consistently legal and ethical manner.

FOREIGN TRADE & IT/ SOFTWARE COMPLIANCE

framass is committed to complying with import and customs laws and export controls. We will not conduct business, either directly or indirectly, with companies, organizations, bodies, financial institutions, or governmental entities that are subject to EU sanctions

regulations and/or are included in any other official restricted/sanctions list.

framass is committed to fulfilling the legal requirements for IT compliance at all times, including but not limited to the licensed use of software.

BRIBERY & CORRUPTION

Bribery and corruption run counter to our commitment to integrity and violate our customers' and business partners' trust. They are also illegal in every jurisdiction where we do business.

framass employees shall report any suspected, actual, attempted, or potential instances of bribery or corruption involving any framass employee or business partner.

framass is committed to the highest standards of integrity and seeks to avoid even the appearance of impropriety. We immediately reject any bribes offered to us – for ourselves or a third party associated with us – and never offer any bribes to or demand any bribes from anyone, under any circumstances. We identify and take steps to stop any potential bribery or corruption or the appearance of bribery or corruption involving framass or any of our business partners.

When offering, giving, and receiving gifts, tickets or entertainment, the exact threshold for bribery can be difficult to pinpoint. To avoid the appearance of bribery, the offering, giving and receiving of gifts, tickets or entertainment must be fully transparent and recorded, may not convey a sense of having to reciprocate, and must be legal in the jurisdiction in which it occurs.



CONFLICTS OF INTERESTS

framras has its own trustworthy nature. It means that we are maintaining personal relationships. But framras also uses good judgment and recognizes when a personal or business relationship creates a conflict of interest or the appearance of a conflict of interest.

Remember: a conflict of interest is not necessarily a violation of our Code of Conduct in itself but failing to disclose it is.

framras complies with all global procurement policies when assessing, selecting, and managing suppliers or

other partners. This covers managing business partners on objective criteria such as quality, price, reliability, sustainability and suitability for the identified need.

framras prohibits employees from using their position at framras for private gain or to obtain benefits for themselves, their friends or relatives.

No employee may serve on the board of any framras competitor, customer, vendor, supplier, contractor, licensee, agent, distributor, or any other entity with which framras does business.

ANTITRUST & COMPETITION

Fully complying with antitrust and competition laws is not just about protecting our reputation and avoiding litigation, but about benefitting our customers and business partners: competition creates more choice, lower prices, and higher-quality products for our customers.

framras strives to outperform competitors fairly and honestly. Favoritism and nepotism have no place at framras. We seek a competitive advantage through superior performance and products. We never unlawfully restrict competition by agreeing, colluding, sharing

information or otherwise coordinating with any competitor, business partner or other third party to fix or inflate prices, divide any market, or otherwise limit competition.

At framras, contractual business relationships must be proper, lawful, and documented. framras terminates any interaction with a competitor, business partner or other third party that might violate antitrust or competition laws. Any suspicious interaction is reported to our group management without delay.

PROTECTION OF ASSETS, PRODUCTS & SENSITIVE INFORMATION

At framras, we also deal with property that is owned or created by our customers and business partners. We assure the highest level of confidentiality with respect to the assets, products and sensitive information of each and every customer and business partner.

PRODUCTS & ASSETS

We carefully protect our products and assets from intentional or unintentional theft, misappropriation, embezzlement, waste, loss, and misuse at every stage of the design, development, and production processes. We show the same respect and care for products and assets owned by our competitors, suppliers, and customers.

At framras, we never compromise on the quality of our products and assets. Our goal is to always exceed the customer's expectations, and as such we are committed to applying only the highest standards of quality, style, and design. In addition to framras' own published standards, all products must be tested, packaged, labeled, and sold in compliance with applicable industry and legal requirements.

SENSITIVE INFORMATION

To protect framras' and our business partners' intellectual property, all framras employees are required to comply with confidentiality and non-disclosure agreements signed before and during their employment with framras. We do not disclose any sensitive information to unauthorized persons, family members or friends. These include, but are not limited to, trade secrets, new product designs, innovations, patents, engineering or manufacturing ideas, financial forecasts, business plans, customers, and personal data, and any non-public reporting. We protect sensitive information against unintentional disclosure by only allowing it to be accessed or shared with framras employees on a need-to-know basis and by using it in an appropriate public setting. The same applies to sensitive information belonging to competitors, suppliers, and customers. We only use the intellectual property of others if we have permission or a license to do so.

framras takes appropriate actions and applies appropriate technical solutions to prevent cyber criminals from disrupting our business. Our framras IT Policy governs the correct use of software and hardware, protection against theft at our business premises, Internet access, the protection of data and sensitive information, password management, and the use of communication systems.



SOCIETY & INVESTORS

At framas, we support social engagement and strive for a well-founded and trusting relationship with the general public and investors.

COMMUNITY WORK

We support causes and organizations that align with our beliefs when there is a specific strategic, business or community need to do so. framas encourages

employees to make a difference on a personal level and supports their involvement in volunteering and other charitable activities.

RELATIONSHIPS WITH GOVERNMENTS

framas interacts with governments and government officials across the globe. We always do so openly and

transparently, and never seek to influence a government official, create an expectation of special treatment, or pursue any other improper purpose. Donations, gifts or other contributions to public officials, political parties, politicians, or related institutions are strictly prohibited.

SPEAKING ON BEHALF OF FRAMAS

Employees must not speak publicly on behalf of framas without prior permission. Only the local general directors are authorized to communicate with the media and elected officials regarding

public issues that affect framas. The general directors may delegate authority to speak on behalf of framas to one or more qualified persons.

ACCURATE RECORDS

framas ensures financial integrity and accurate records and accounts that reflect all corporate assets, liabilities and transactions. We also respect the tax laws and international standards in the countries where we operate. We aim to be a good corporate citizen and pay all of the local and national taxes

required by law. To this end, we have established and maintain procedures and internal control mechanisms to reinforce our compliance with legal, accounting, tax and other regulatory requirements in every jurisdiction where we operate.

COOPERATION WITH AUDITORS

To evidence compliance with our own standards and our customers' codes of conduct, framas cooperates with independent auditors engaged to carry out financial, social and environmental

audits. We provide those auditors access to our business and manufacturing premises for systematic and unannounced inspections.

LAND RIGHTS

framas is committed to comply with the ban on unlawful eviction and the ban on unlawful taking of land, forests and waters in the acquisition, develop-

ment or other use of land, forests, and waters in the course of our business activities and in our supply chain.



ENVIRONMENT

At framas, we are aware of our responsibility for the environment and the duty to protect our natural resources.

We constantly strive to control and mitigate our impact by leveraging lean production, innovation, and efficient systems. framas encourages employees to adopt a mindset of increased awareness in their daily activities. We constantly measure and monitor our environmental footprint.

At framas, we systematically search for ways and implement methods to reduce waste, energy use and water consumption, and avoid any kind of emissions and pollution. We comply with the applicable local and international laws and requirements and are regularly audited by independent third parties. By recycling production rejects and integrating recycled materials in our main products as well as bio-based alternatives, we help our customers reach their targets and offer sustainable products.

USE OF MATERIALS

framas is committed to complying with the legislation on hazardous chemicals and the EU regulation on the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH). framas also complies with prohibitions on the use of banned or harmful substances, including but not limited to substances of very high concern (SVHCs), persistent organic pollutants (POPs), ozone depleting substances (ODSs), asbestos containing materials (ACMs) or mercury compounds. These include in particular the ban of the ma-

nufacture of mercury-added products, the use of mercury and mercury compounds in manufacturing processes and the treatment of mercury waste contrary to the Minamata Convention. framas follows the recommendations of industry bodies including the Zero Discharge of Hazardous Chemicals (ZDHC) Program and the Apparel and Footwear International RSL Management (AFIRM) Group to avoid the use of banned substances during production and manufacturing.

ENERGY EFFICIENCY & CLIMATE PROTECTION

framas is committed to complying with the 1.5 °C global warming target, and to achieve climate neutrality along the entire value chain – from raw material production to own operations – by 2050. We use energy efficiently, reduce harmful emissions, and use environmentally friendly renewable energy where possible.

We collect and analyze information about our energy usage and our greenhouse gas emissions and continue to refine our energy management to further reduce our carbon footprint. This includes evaluating our carbon footprint on a regular basis and reporting on both aspects. framas is committed to developing, maintaining, and reviewing a science-based target approach to meet the 1.5 °C global warming target.

ENVIRONMENTAL PROTECTION

We are committed to comply with the prohibition of causing harmful soil changes, water pollution, air pollution, harmful noise emissions or excessive water consumption that significantly impairs the natural bases for the preservation and production of food, denies a person access to safe and clean drinking water, makes it difficult for a person to access sanitary facilities or destroys them or harms the health of a person.

Waste management

Handling, collection, storage, and disposal of waste must be performed in a manner that is environmentally sound and in accordance with the regulations in force in the applicable jurisdiction, in particular with regard to the import and export of hazardous waste.

Biodiversity

framas is committed to conserving biological diversity and mitigating any significant direct impact on biodiversity. We use environmentally friendly materials in an effort to minimize our indirect impact on biodiversity.



RESPONSIBILITIES

COMPLIANCE WITH THE FRAMAS CODE

All of framas' employees and business partners are responsible for observing the prohibitions listed in this Code of Conduct and the ban on performing any act that otherwise violates the law. framas expects all employees and business partners to act in compliance with the law and to adhere to

this Code of Conduct and encourages all employees, business partners and third parties to report any information they become aware of regarding behavior that violates our Code of Conduct and/or the law, or if they have reason to suspect that such conduct may have occurred.

NON-RETALIATION POLICY

framass enforces a non-retaliation policy that allows employees, business partners and third parties to express their concerns directly to management or to framass without fear of retaliation. Any framass employee, business partner or third party who reports their reasonable suspicion that our Code of Conduct may have been violated is

protected against any form of retaliation, regardless of whether or not the suspicion turns out to be justified. Conversely, any framass employee who pressures or threatens an employee or third party not to report a suspected violation of our Code of Conduct will themselves be subject to disciplinary action.

6



CONTACT

YOUR CONTACT TO FRAMAS

Any employee, business partner or third party who suspects that our Code of Conduct may have been violated is encouraged to take one of the following actions without delay:

- contact the framas Compliance Department by e-mail: **compliance@framass.com** or
- speak with your local manager
- contact our local Human Resources team in your country or region or
- contact the Works Council, where available

framass will follow-up on all inquiries.

WE ARE ALWAYS HERE TO HELP

If you are in doubt about when our Code of Conduct applies or have questions about how the Code of Conduct may affect a business decision, our Compliance Team is always available to support or guide you through any decision, no matter how big or small. Together we will find the right solution.

If you have any questions or comments regarding the setup and implementation of the framass Compliance Program, please feel free to reach out to one of the contacts listed above. Further specific policies are in place that supplement the framass Code of Conduct.

THE FRAMASS CODE...

...of Conduct was developed based on the following sources:

- UN Global Compact **<http://www.unglobalcompact.org>**
- Guiding Principles of the Organization for Economic Cooperation and Development **<http://www.oecd.org/maintopic>**
- Universal Declaration of Human Rights **<http://www.un.org/Overview/rights.html>**
- International Labour Standards of the International Labour Organization **<http://www.ilo.org>**
- Minamata Convention on Mercury **<https://www.mercuryconvention.org/en>**
- Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade **<http://www.pic.int/>**
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal **<http://www.basel.int/>**
- Stockholm Convention on persistent organic pollutants **<http://chm.pops.int/>**
- Vienna Convention for the protection of the Ozone Layer and its Montreal Protocol on substances that deplete the Ozone Layer **<https://ozone.unep.org/>**
- Convention on Biological Diversity **<https://www.cbd.int/>**
- Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) **<https://cites.org/eng>**

framass Kunststofftechnik GmbH
Rodalber Straße 180
66953 Pirmasens · Germany

