



## CODE OF CONDUCT

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 practises and relations. 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, through its network and actions. It also promotes the step by step development of best practices and endeavours to lead the way for its employees, supply chain, partners and other stakeholders.

### **PURPOSE**

This code of conduct (“the Code”) contains the principles and rules that are decisive for us in our dealings with colleagues, business partners, customers and the broader public. The principles set out in this document are minimum standards that are binding for all employees and therefore also for Landbell Group senior management teams around the world. The Code of Conduct thus represents a set of guidelines to follow in our everyday work. It increases mutual understanding, supports us in carrying out our everyday work and ultimately helps us to be a successful service provider in our global markets. It is the duty of managers to set a good example.

The Code also encourages you, as our business partners, to go beyond legal compliance in order to push forward social and environmental 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 [compliance@landbellgroup.com](mailto:compliance@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.

Through several thematic sections, the Code describes the minimal actions Landbell Group, its employees and its business partners shall strive for. These commitments 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 employee 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. 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 employee under fair wage 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 employee 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.** Employee 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 employee 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.

**Grievance Process.** Landbell Group and its business partners ensure employees are able to openly share concerns with management regarding working conditions and management practices 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 acknowledges the need for all to participate in the preservation of our environment and recognizes that environmental responsibility is an integral part of delivering circular economy related services. Identifying and minimizing adverse effects of our activities on the environment and natural resources is a necessity and should be integrated into business practices.

**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 to their level of responsibility within the organisation.

**Gifts. Anti-Bribery.** Landbell Group expects from its employee and business partners a zero-tolerance policy to any forms of corruption, extortion, embezzlement and any other form of active or passive bribery. Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given, or accepted and 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 must be ensured 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. 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, processed and used for lawful purposes only within the boundaries of the applicable legal framework. Beside legal requirements, reasonable expectations of personal data of everyone we do business with, including suppliers, customers, consumers, and employees should be protected. Privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared shall be complied with. 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.

**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 employee 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.

Approved by the Board of Directors of Landbell on 15 December 2021:



Jan Patrick Schulz, CEO



Tim Scholz, CFO