

FoamPartner Procurement

Code of Conduct for Suppliers

FoamPartner considers compliance, along with quality and reliability, to be the top priority when selecting suppliers. Therefore, it is important that the same values that are the core of our mission are of central importance to our partners: People, performance and innovation. Based on these values, FoamPartner strives for continuous improvement with its products and services – fully in keeping with the motto „best in foam“.

The goal is obvious: competitive, innovative solutions that create added value for our customers. In doing so, we value respect, fairness and courtesy. We care about the health and safety of our employees. We constantly strive to improve our products and services. We insist on sustainable innovation. In short: We want to be one of the market leaders in the field of foam products - "best in foam". To achieve this, we need the help of business partners who are committed to our standards of integrity and responsible entrepreneurship.

1. Applicability of the Code of Conduct, compliance with the law, duty of proof

For the purposes of this Code of Conduct, business partners from whom we expect compliance with all of our standards and requirements listed herein are **all third parties** acting for, on behalf of, or together with FoamPartner, or a subsidiary or sister company. This also includes suppliers, sales partners, consultants, brokers, subcontractors, minority shareholders, sales representatives, and freelancers.

It also includes all their upstream business partners, subsidiaries and affiliates. FoamPartner thereby ensures that the values and expectations from this Code of Conduct are adhered to **along the entire supply chain**.

Naturally, all our business partners adhere to all the laws concerning them. Insofar as this Code of Conduct does not mention in detail an obligation imposed on a business partner by applicable law, or makes a possibly more lenient provision, the possibly stricter statutory provision shall apply.

In order to create the greatest possible degree of trust and transparency, each FoamPartner business partner undertakes to prove the requirements of this Code of Conduct to itself and its respective business partners by means of suitable documentation and written confirmation.

2. Safety & Health

FoamPartner's business partners observe all applicable legal regulations that are intended to ensure the physical integrity and safety of their and our employees. When handling and transporting potentially hazardous substances, our business partners ensure that the **safety and health of their employees and third parties** is not endangered.

3. Environment & Climate Protection

The environment is of the utmost importance to our business partners. Wherever possible and sensible, they use **resource-saving processes**, strive for **energy-efficient equipment** and acquire the corresponding certifications. Our business partners take the necessary care when transporting and handling potentially environmentally harmful substances. They do their utmost to provide their services and goods in a **climate-neutral** manner.

4. Corruption, Finance & Taxes

Neither **insider trading** nor **money laundering** are accepted by our business partners. They take internal action against **corruption** and **bribery** and ensure through appropriate guidelines and agreements that private and business matters are strictly separated. Our business partners also do not participate in cartels.

5. Child labour, fair working conditions & discrimination

Our business partners adhere without exception to all the provisions of the “International Labour Organization” (ILO) conventions as well as the respective national and EU laws. In particular, they do not tolerate child labour or forced labour. They undertake to comply with all applicable regulations on working hours, overtime compensation and minimum wages. It goes without saying that business partners refrain from any discriminatory behaviour, in particular towards their employees, on any basis whatsoever.

6. Protection against retaliation

All employees of our business partners must feel free to report known or suspected **misconduct** or **violations** without fear of **retaliation**. Any action or retaliation against any person who in good faith reports an actual or suspected violation or takes part in an investigation is strictly prohibited.

7. Sanctions, trade embargoes and export controls

Our business partner adheres to **sanctions, trade embargoes** and **export controls** imposed by all countries in which he operates. In the event of such restrictions he may not do business with certain countries, companies or individuals in order to sell the goods and services to us. Furthermore, our business partner is obliged to comply with **export control regulations** that prohibit or restrict the export or re-export of certain goods, services and technologies. This also includes the procurement of **(re)insurance** that facilitates the export or (re)export.

8. Data protection & data security

Data protection is a top priority for our business partners: they implement the requirements of the **General Data Protection Regulation (EU) 2016/679 (GDPR)** (if applicable to you) and the applicable national laws in an exemplary manner and take the principles of "**Privacy by Design**" and "**Privacy by Default**" to heart. You will ensure compliance with the very latest standards for **data security** and will only use contract processors who meet the same requirements and have made a corresponding commitment to the business partner. Our business partners within the EEA avoid **transferring personal data** outside the EEA as far as possible.

9. Intellectual property, business and trade secrets

Our business partners respect the **intellectual property** including **all business and trade secrets** (whether or not marked as such) of third parties. Our business partners take particular care not to violate any intellectual property rights and copyrights of third parties.

FoamPartner, September 2020