



CRRC NEW MATERIAL TECHNOLOGIES GMBH

Code of Conduct for Business Partners



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I. Foreword

Dear Valued Business Partners*,

Conducting business with integrity, responsibility and sustainability as well as taking on social responsibility are key elements of our corporate policy. We have committed ourselves to conducting our business in a fair and transparent manner since BOGE Rubber & Plastics was founded and we base our activities on the applicable laws and regulations of the countries in which BOGE Rubber & Plastics operates.

The central corporate values of BOGE Rubber & Plastics are bindingly defined in the Code of Conduct and in the corporate guidelines and policies.

In compliance with these principles, we acknowledge our commitment to sustainable development and fair market behavior and do not tolerate any form of corruption. Our actions are guided by key international guidelines on human rights and working conditions, such as the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

We are responsible for our work, our products and their impact on both our employees and the environment. We at BOGE are therefore not only committed to meeting the minimum legal standards, but aim to exceed them.

We expect our business partners to share this basic understanding. In this respect, this Code of Conduct goes beyond merely adhering to laws and regulations. For us, mutual trust and compliance with the contents stated in this Code of Conduct are indispensable for a successful business relationship.

Damme, March 2022
BOGE Rubber & Plastics Group



Torsten Gehrman
CEO



Christoph Krampe
CFO

*For reasons of better readability, the simultaneous use of the male, female and diverse (m/f/d) pronouns has been dispensed with. All references to persons apply equally to all genders.

II. Introduction

This Code of Conduct for business partners lays out the requirements and specifies the core principles BOGE Rubber & Plastics expects all of its business partners to adhere to when engaging in business.

Business partners of BOGE Rubber & Plastics are natural persons or legal entities from whom goods or services are procured or to whom goods or services are provided, without being employees of BOGE Rubber & Plastics or companies affiliated with BOGE Rubber & Plastics. Business partners can be, for example, suppliers, customers, sales representatives, agents, brokers, consultants or other providers of goods and services.

BOGE Rubber & Plastics expects from all business partners,

- To conduct their business with integrity and fairness on the basis of applicable law and to accept and implement the principles set out in the Business Partner Code of Conduct.
- To ensure that the principles of the Code of Conduct are also observed by their own business partners and to demand this accordingly.
- That they contribute to provide the information necessary for BOGE Rubber & Plastics to establish and carry out a business relationship based on partnership.

III. Working conditions and human rights

1. Human rights and discrimination

BOGE Rubber & Plastics takes its social responsibility very seriously. Compliance with legal and regulatory requirements is just as important to us as compliance with human rights and fair working conditions.

Therefore, we expect our business partners not to tolerate any discrimination on the grounds of color, sex, religion, age, nationality, social and ethnic origin, disability, ideology, sexual orientation or political or trade union activity.

2. Labor standards

BOGE Rubber & Plastics rejects any form of slavery, human trafficking or forced labor, as well as child labor, is committed to its abolition and expects its business partners to do the same.

Business partners must observe the minimum age for admission to employment in accordance with the applicable national regulations, provided that these regulations do not fall below the age of 15.

Business partners must respect the freedom of association and the right to form interest groups. Thus, they grant their employees the right to represent their interests within national laws and regulations.

BOGE Rubber & Plastics requires its business partners to be aware of their social responsibility towards their employees and to ensure fair and appropriate remuneration, other social security benefits and working hours in accordance with applicable laws.

Business partners should also support the development of their employees to guarantee a high level of performance.

3. Occupational Health and Safety

BOGE Rubber & Plastics observes the valid statutory requirements and standards for a safe and healthy working environment and takes appropriate measures to ensure this. We also expect preventive and consistent occupational safety from our business partners and continuous further development to improve the working environment.

IV. Fair and Free Market Behavior

1. Fair competition and antitrust law

BOGE Rubber & Plastics endorses without restriction the principles of fair and free competition as a fundamental component of the market economy. BOGE Rubber & Plastics also expects this from its business partners.

The business partners are therefore obliged to comply with the applicable statutory provisions of antitrust and competition law. In particular, they shall not participate in price agreements or in undertakings to concert the market conduct of competitors.

Likewise, business partners do not exchange sensitive information with competitors.

2. Export control and economic sanctions

Our business partners must comply with all applicable international trade regulations in their global business activities. They shall take care to comply not only with the respective applicable rules and regulations governing imports and exports of goods and services, but also with applicable economic embargoes. As part of the supply chain, BOGE Rubber & Plastics expects from its suppliers to be informed about restrictions on exports and classifications.

3. Corruption, extortion and bribery

Corruption is banned by international conventions and national laws. BOGE Rubber & Plastics does not tolerate any form of bribery among employees or business partners or any business practices that could create the impression of improper manipulation or influence.

The business partners undertake within the business relationship with BOGE Rubber & Plastics neither to offer advantages of any kind directly or indirectly to third parties nor to obtain advantages directly or indirectly for themselves or others. They shall also not allow themselves to be promised advantages which constitute an illegal act according to the applicable anti-corruption laws.

BOGE Rubber & Plastics expects its business partners not to tolerate any form of unlawful gratuity, particularly in business dealings with public officials and authorities in Germany and abroad. Business partners also undertake to make sure their employees act with integrity.

Business partners must also reject facilitation payments (i.e. payments to public officials not required by law with the purpose of inducing the public official to accelerate or carry out an official act to which a right principally exists).

When it comes to providing or accepting gratuities in the form of gifts or invitations, business partners in principle and in particular in connection with their activities for BOGE Rubber & Plastics strictly ensure that they do not even have the appearance of dishonesty or incorrect behavior.

4. Money Laundering

BOGE Rubber & Plastics undertakes to assist in the international battle against money laundering and adopts applicable measures to comply with the relevant provisions. BOGE Rubber & Plastics expects the same of its business partners.

5. Conflicts of Interest

Transparency is of utmost importance to the business partners in all business transactions.

BOGE Rubber & Plastics on the one hand expects its business partners to make decisions exclusively on the basis of business considerations and in the interests of the company. On the other hand, personal or family conflicts of interest in particular, which may lead to irrelevant considerations, are to be avoided.

Business partners shall make sure that no impression of any non-businesslike conduct is given.

6. Donations and Sponsorship

The business partners shall adhere to the principle of acting unselfishly when making donations. Their donations are made only on a voluntary basis and in accordance with the applicable laws and regulations. The business partners do not use their sponsorship activities to gain business advantages unlawfully.

7. Handling of Information, data protection

One of the essential aspects of the cooperation with BOGE Rubber & Plastics is the confidential handling of information.

To protect confidential and personal information, data and projects, business partners must treat such information with strict confidentiality and protect this information from unauthorized access by third parties. Business partners may only use sensitive information and data for authorized purposes and in an appropriate manner. The impact on privacy must be kept to a minimum while respecting the rights of each individual.

Confidentiality agreements must be strictly adhered to.

8. Disclosure of information

Business partners agree to comply with the statutory requirements for financial and non-financial reporting and are committed to archiving correct records.

V. Environmental protection and safety

9. Environmental Protection

The business partners of BOGE Rubber & Plastics are committed to a sustainable, responsible and careful use of resources and raw materials.

They pay attention to an efficient use of energy and resources as well as to the applicable environmental standards for products and processes. They commit their employees to minimize hazards for the environment and to handle resources carefully.

They shall comply with air quality standards in accordance with applicable laws and regulations to protect the environment and strive to reduce polluting emissions when they are discharged to the environment.

In order to protect resources, they are committed to reducing water consumption and maintaining water quality by minimizing the risk of wastewater contamination by monitoring the process effluents discharged to the environment.

With a responsible chemicals management, they must monitor the introduction and use of substances in accordance with occupational health and safety and environmental regulations. They strive to further substitute or reduce hazardous chemicals with a major impact on the environment.

Business partners who supply BOGE Rubber & Plastics with production material shall record environmentally relevant data per calendar year and provide it upon request by BOGE Rubber & Plastics, to the extent required by BOGE Rubber & Plastics customers. The business partner shall keep the environmentally relevant data for a period of at least 10 years from the end of the respective calendar year. The provision of the data shall serve to assess the environmental performance of the partner.

10. Responsible raw material sourcing

Business partners are committed to supporting any efforts to ensure responsible sourcing of resources. The aim is to avoid the procurement and use of raw materials that have been obtained illegally or through ethically reprehensible or unreasonable measures (conflict minerals).

In order to exclude such sourcing in the future and to identify possible conflict minerals in manufactured products in the supply chain, business partners are required to take precautions to disclose the origin or source of their resources.

We will work within our own operations and through our suppliers to increasingly source natural rubber products that are produced and processed in line with GPSNR policy requirements.

We will work with our existing suppliers to identify, prevent and mitigate environmental and social harms in natural rubber supply chains and will evaluate the environmental and social performance of new suppliers/partners prior to engagement. We require our suppliers to set up a due diligence process aligned with GPSNR policy framework for producing and procuring natural rubber and to implement necessary time-bound measures as defined in the forthcoming GPSNR implementation guidelines.

11. Notices and reports

As a means of protecting against company damaging behavior, preventing white-collar crime and protecting employees, every business partner is urged to report criminal conduct, deficiencies and special risks that may have an impact on BOGE Rubber & Plastics.

Neither BOGE Rubber & Plastics nor its business partners will tolerate any form of discrimination against persons who give such notice to BOGE Rubber & Plastics or its business partners.

BOGE Rubber & Plastics requests selected suppliers to perform a self-assessment based on the so-called Supplier self-assessment Sustainability. In addition, BOGE Rubber & Plastics performs a risk-based audit for business partners in order to identify compliance and integrity risks (Business Partner Compliance Due Diligence).

BOGE Rubber & Plastics reserves the right to review the business relationship with each business partner if deviations from this Code of Conduct are reported. BOGE Rubber & Plastics will follow the principle of proportionality, which means that it is carefully examined in each individual case which consequences are appropriate, suitable and necessary. This can even lead to the immediate termination of the business relationship as well as to the assertion of claims for damages.

VI. Contact

Business partners who have any questions or doubts on behavior in compliance with the aforementioned Code of Conduct can contact our Legal/Compliance department at any time.

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