

Code of Conduct

1. Preamble

Pokolm Frästechnik GmbH & Co. KG (hereinafter referred to as Pokolm) sees itself as part of an internationally interconnected economy and, as a company, is part of the countries and societies in which Pokolm operates. Pokolm follows the basic principle of the "honorable businessman" and is committed to its responsibility as a company.

- Pokolm monitors the direct and indirect effects of its business activities on the environment and society and strives to strike an appropriate balance between economic, ecological, and social concerns.
- Pokolm acts in accordance with generally accepted values and principles, complies with the law, and, in particular, observes internationally recognized human rights and labor standards as set out below.
- Pokolm stands for the objectives and content of the Code of Conduct and will make every appropriate and reasonable effort within the scope of its legal and actual possibilities to continuously comply with this voluntary commitment at all its company locations in Germany and abroad.

If existing national regulations conflict with the contents of the Code of Conduct or if the domestic context makes it impossible to comply with it in full, Pokolm will seek ways to uphold the requirements of the Code of Conduct as far as possible.

2. Ethical / moral obligation and integrity

Pokolm pursues exclusively legal business objectives and practices and only maintains business relationships with reputable partners. Pokolm treats its business partners and customers fairly and with respect. Pokolm respects different legal, economic, social, and cultural backgrounds and the specific circumstances of the countries and regions in which Pokolm operates. In doing so, Pokolm respects the laws and regulations of the countries and regions in which it conducts business.

Pokolm always bases its business activities on universally accepted ethical values and principles, including integrity and respect for human dignity. Pokolm is committed to free and fair global trade.

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2.1 Corruption, Trade control, Money laundering

Pokolm rejects any form of bribery and corruption. To this end, we avoid even the appearance of such practices, whether in the form of granting or accepting unfair advantages. Pokolm acts in accordance with the applicable import and export control regulations and complies with the legal requirements for the prevention of money laundering.

2.2 Fair Competition

Pokolm advocates free and fair competition. Pokolm does not tolerate anti-competitive agreements and ensures that the company acts in accordance with applicable antitrust laws. Pokolm rejects competitive advantages gained through unfair business practices.

2.3 Handling of personal data, protection of confidential information, and intellectual property

Pokolm respects the personal rights of its employees, business partners, and customers and complies with the applicable legal and regulatory requirements for the processing of personal data and information security when handling personal information. Pokolm protects the trade secrets and other confidential information entrusted to it by its business partners and customers from unauthorized access, use, and disclosure, at least in accordance with the relevant legal provisions on the protection of trade secrets. Pokolm respects the intellectual property of its business partners, customers, and other third parties and ensures that sufficient precautions are taken to protect intellectual property rights when exchanging know-how and technologies.

2.4 Protecting consumer interests

Insofar as Pokolm's products and services affect the interests of consumers, appropriate measures are taken to ensure the safety and quality of the products or services. Pokolm ensures that the products or services comply with the relevant consumer protection regulations. In the context of information and sales measures, Pokolm takes consumer interests into account by applying the legal requirements for fair business, marketing, and advertising practices and consumer education.

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3. Environmental responsibility and commitment

The protection and preservation of natural resources concerns and obliges us all. With this in mind, Pokolm conducts its business activities in an environmentally responsible manner and is committed to the goal of a climate-neutral future.

3.1 Protection of the environment and climate

Pokolm fulfills its environmental responsibility by applying the applicable legal requirements and recognized standards for environmental and climate protection. Pokolm works to continuously reduce the negative impact of its business activities on the environment and climate. Pokolm applies applicable law and takes appropriate measures based on legal and internationally recognized standards, covering topics such as:

- Proper and responsible handling of hazardous substances, chemicals, and waste, including their disposal.
- Measures to reduce or prevent waste.
- Minimizing emissions from operational processes (e.g., wastewater, exhaust air, noise, greenhouse gases).
- Conserving natural resources, for example through measures to save water, chemicals, and other raw materials, and promoting the circular economy.
- Use of climate- and environmentally-friendly technologies, processes, raw materials, and products.
- Measures to increase energy efficiency and the share of renewable energies in energy consumption at company locations.

3.2 Animal and species protection

Pokolm observes the principles of animal welfare and biodiversity conservation and aligns its business activities accordingly. The keeping and use of animals must comply with applicable animal welfare legislation and be species-appropriate. The Washington Convention on International Trade in Endangered Species (CITES) serves as a guideline in this regard.

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4. Human rights and labor standards

Human dignity is inviolable. That is why Pokolm respects the internationally recognized human rights set out in the United Nations Universal Declaration of Human Rights. Pokolm adheres to the internationally recognized labor standards of the International Labor Organization (ILO), as listed in the Code of Conduct below. In all its business activities, Pokolm endeavors neither to cause nor contribute to human rights violations. Pokolm expects the same from its business partners. Where necessary and possible, Pokolm supports its suppliers in this regard.

4.1 Employment relationships

Pokolm treats its employees with respect. Pokolm rejects any form of unlawful punishment, abuse, harassment, intimidation, or other undignified treatment of employees. Pokolm applies the applicable labor law to all employment relationships and expects the same from its contractual partners. At the start of their employment, employees are provided with clear information about the essential working conditions, including their rights and obligations, working hours, remuneration, and payment and accounting procedures. Pokolm respects and protects the right of employees to terminate their employment in compliance with the applicable notice period.

4.2 Rejection of child labor and protection of young employees

Pokolm does not tolerate child labor and complies with the applicable legal minimum age for employment. In any case, Pokolm does not employ anyone under the age at which compulsory schooling ends according to the law of the place of employment, or under the age of 15. Internships are organized in accordance with legal requirements. Pokolm expects its contractual partners to have adequate means of determining age in order to prevent child labor. If child labor is detected, all necessary measures must be taken immediately, focusing on the welfare, protection, and development of the child. In the case of persons under the age of 18, the rights of young workers must be observed; they may only be hired if it is ensured that the working and employment conditions do not pose a risk to their health, safety, or morals, nor are they harmful to their development.

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4.3 Refusal of forced labor

Pokolm rejects forced or compulsory labor in any Form. This also applies to any form of debt bondage, serfdom, slavery or slave-like practices, human trafficking, and extends to all forms of involuntary labor and services that are not compatible with internationally recognized labor and social standards.

4.4 Remuneration principles

Pokolm applies the statutory or, where applicable, collective agreement provisions when remunerating work performed. Pokolm ensures that the remuneration paid to employees in the company does not fall below the applicable statutory minimum wage, or, where applicable, the minimum wage specified in collective agreements or customary in the industry. In countries or regions without a statutory or collectively agreed wage framework, Pokolm ensures that the wages paid for regular full-time work are sufficient to meet the basic needs of employees. Pokolm does not tolerate wage deductions that are not permitted by law, including wage deductions as a disciplinary measure.

4.5 Working Hours

Pokolm applies the statutory or applicable collective bargaining provisions on working hours, including overtime, rest breaks, and vacation time. Pokolm ensures that

- the regular weekly working hours plus the maximum possible overtime are not exceeded.
- Working time regulations are complied with.

4.6 Freedom of Association

Pokolm respects the right of employees to freedom of association and assembly, as well as the right to collective bargaining and wage negotiations, insofar as this is legally permissible and possible in the respective country of employment. If this is not permissible, Pokolm seeks appropriate compromises for its employees.

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4.7 Diversity and inclusion, prohibition of discrimination

Pokolm values the diversity of its employees and promotes a working environment that enables inclusion. Pokolm is therefore committed to equal opportunities and rejects any form of discrimination or unequal treatment based on national or ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion, or ideology. Pokolm lives by the principle of equal pay for male and female workers for work of equal value.

4.8 Health and safety at work

Pokolm complies with national and international occupational health and safety standards. Pokolm ensures a safe and healthy working environment (avoiding accidents, injuries, and work-related illnesses) in order to maintain the safety and health of its employees and third parties.

5. Guiding principle

Pokolm is committed to respectful interaction and a safe working environment. This Code of Conduct outlines what is important to us in this regard. Pokolm expects all employees, business partners, and suppliers to share these values and to uphold them together.

A handwritten signature in black ink, appearing to read "D. Hamm", written over a horizontal dotted line.

Dennis Hamm

Geschäftsführung

A handwritten signature in black ink, appearing to read "Leicht", written over a horizontal dotted line.

Sascha Leicht

Geschäftsführender Gesellschafter