

Preamble

The SUTCO GROUP = Sutco RecyclingTechnik GmbH, Sutco Polska, Sutco UK, Sutco Iberica and Sutco Brasil, Sutco Singapore and Sutco Sweden (hereinafter called “Sutco”)

is committed to support the enforcement of principles with respect to human rights, labour law and environmental protection, complying with the internationally accepted standards with respect to these issues in all its business activities. These responsible actions in our company are defined in the

“Code of Conduct”

The guideline for the conduct towards executives, labour council, employees, business partners and the public.

To ensure compliance with the principles of this code, Sutco expects this of its suppliers as well. Sutco is committed to making sure that its suppliers accept this Code of Conduct, reflecting these principles defined in their companies.

This code is based on the fundamental principles of the:

- International Bill of Human Rights;
- International labour organizations (IA, ILO as well); and
- Relevant conventions and guidelines of the United Nations

What Sutco stands for:

Our fundamentals:

We are an innovative company globally operating on firm principles, which form the fundamentals for our company and our employees.

Competence and diversity as well as our capabilities make us a leading company in our industry.

Our vision:

As a technology-based company, we aim at solutions which positively influence the environment in a sustainable fashion.

Our mission:

Generating intelligent concepts and solutions for the treatment of waste, providing a long-standing and reliable technology for our customers.

Central principles:

The management, executives, employees and business partners are committed to observing and complying with the applicable laws and regulations. This commitment is of course applicable to valid directive and guidelines as well as generally accepted standards of values of the cultural societies and countries where Sutco is active.

1. Economic sustainability

We provide values with all our partners along the entire chain for waste and recycling to promote efficiency, preserve the environment as well as maintaining and optimizing them. According to the entire value-creation chain of the recycling circuit, we respect and promote fair trade practices from the products our technology produces.

We support the extension and creation of waste management concepts and new opportunities developed from them for companies and the further development of efficient solutions and technologies.

2. Product safety and product quality

The quality and safety of our products are the basis of our success and a central principle of our company.

We thoroughly and sustainably use improvements necessary for that, always complying with internationally accepted quality management systems. Also, only raw materials which were subjected to a selection process before are processed.

3. Protection of the company property

The property and the resources of the company are properly protected from loss, theft and misuse.

The tangible and intangible property of the company is exclusively used for business purposes. The superiors and employees are jointly responsible for the fact that the type and extent of business travels are always in an appropriate relation to the respective purpose of travels and are planned as well as done efficiently, taking account of time and cost aspects.

4. Prohibition of corruption

We do not tolerate corruption no matter what the form may be.

An illegal provision of benefits for third parties, e.g. to officials or employees of private companies, is prohibited in the company.

The prohibition of corruption also means that personal benefits in connection with business activities may neither be requested nor accepted, offered or granted. Just in a connection with gifts and favours.

Granting high-grade gifts, gifts of money and financial benefits to employees and representatives of other companies is basically prohibited. As an exception, only low-grade presents may be granted as far as they are appropriate and no quid pro quo is expected. Such presents should also be provided with the respective brand logo.

5. Prevention of laundering

Every employee is requested to have unusual financial transactions, in particular in connection with cash, which could give reasons for a suspicion of laundering, be reviewed by the competent financial and/or legal or compliance department.

6. Contributions

Sutco commits itself in different ways. Sutco is committed to providing contributions and other possibilities of social engagement in a different way in a social interest.

No financial contributions, in particular gifts and sponsoring measures, are made to political parties domestic and abroad, party-related or party-like organizations, individual elected representatives or candidates for political authorities.

7. Data protection and information security

The protection of personal data, in particular that of employees, customers and suppliers, is of particular importance to Sutco.

Sutco will acquire or process personal data only if this is strictly necessary or legally required for completing a job assignment. Personal data may not be acquired or processed without the consent from the person involved or a legal permissibility.

8. Confidential company information

Sutco will take all required action to protect confidential information and business documents from an access and inspection by non-authorized persons or other third parties in a suitable way.

Every Sutco employee must protect business issues and treat them confidentially toward third parties.

9. Occupational safety

Taking general knowledge of the industry and the possible specific dangers into account, Sutco is committed to providing a safe and hygienic working environment and takes appropriate action for the prevention of accidents and injuries resulting from or in connection with the work.

We make sure that the employees participate in regular training sessions with respect to the safety regulations including the site specific and, if required, work-specific regulations, repeating such training sessions for new or a newly assigned employees as well as in case of an accident.

Sutco is committed to providing appropriate personal work and/or protective equipment for the employees at the expense of the company.

Also, we are committed to making sure that the employees have a rest room and rest periods which comply with their basic needs.

10. Working conditions, compensation and disciplinary conduct

Sutco is committed to making sure that the employment conditions are completely available for the employees and they consent to them voluntarily.

Also, the company is committed to making sure that the wages and social benefits are provided in complete compliance with all applicable laws and individual agreements, and the compensation is paid by bank transfer.

Sutco makes sure that no employee is paid under statutory or trade standards (minimum wage).

We are also committed to making sure that wage deductions for disciplinary reasons are not allowed. Exceptions from these regulations are exclusively admissible according to the nationally applicable laws or freely negotiated agreements.

11. Discrimination of employees

Sutco is committed to non-discrimination with respect to recruitment, payment, access to training sessions, promotion, termination or pensions, neither with regard to race, national or social origin, caste membership, religion, disablement, sex, sexuality, diseases such as HIV, family obligations, civil status, membership in a trade union, political association, age or other circumstances which may give reasons for a discrimination.

In the buildings and other premises made available by our company, if existing, we will not accept conduct which is similar to threat, ill-treatment, exploitation or a sexual harassment. This also includes gestures, language or physical contact.

12. Child labour

Sutco will not actively take part in or support child labour.

(Children under 16 years)

It may happen that Sutco employs young employees for a definite period of time (persons between 14 and 18 years), e.g.: school internship. The binding school laws are applicable to these young employees, and Sutco is committed to complying with them.

Children and young employees will not be exposed to situations neither at the workplace nor outside of it which endanger the physical or psychic health and/ or development.

13. Ecological sustainability

Sutco attaches special importance to an optimized production and minimization of wastage. Our aim is low or no pollution caused by our activities, products and manufacture of our system.

Due to a responsible environment management we are aware that the protection of the environment and the natural resources is an important issue in our company.

During the production, storage, transport, use and disposal of the products developed and marketed by us, special attention is attached to the protection of the environment.

The use of products whose origin is protected for environmental reasons is prohibited in the company.

All employees in the company are obliged to use the energy, water and raw material resources economically and efficiently.

This includes the following aspects:

- Use of scarce natural resources such as energy and water
- Prevention of
air emissions and water pollution,
noise, odour and dust emissions,
possible and actual soil erosion and pollution
- Handling hazardous products such as
promotion of environmentally beneficial packagings,
promotion of careful raw material extraction, by influencing suppliers
as well.
- Use of ecologically efficient technologies and materials in all company areas
for environment preservation, economy and reusability.

14. Others

Suppliers.

According to the Code of Conduct, we are committed to the compliance with all applicable local, national and international laws and regulations. This is a minimum standard for Sutco and all suppliers. In countries or in special situations where there is no applicable law or no applicable regulation for certain activities, Sutco expects the compliance with this code from its suppliers.

Employees

This Code of Conduct is given to every employee

The Sutco Code of Conduct combines applicable national, legal and in-house regulations. If necessary, the Code of Conduct will be modified in compliance with country-specific particulars.

Wilful violations of these regulations will result in consequences within the scope of the applicable regulations.

Sutco will take special measures to check as to whether or not the regulations contained here are complied with and are in line with the national legislation.

Violations of the Code of Conduct of any type will not be tolerated. Employees affected will be urged to change their behaviour.

In case of severe violations penal or disciplinary measures may result.

This Code of Conduct becomes effective on its approval by the management.

Bergisch Gladbach/Germany, 2021



Michael Ludden
CEO

