

2026

# Code of Conduct

COMPLIANCE GUIDELINES



WEBER & SCHAER  
GROUP

# Content

- Preamble..... 3
- 1. General Principles ..... 3
- 2. Integrity..... 3
  - Conflict of Interest ..... 3
  - Rejection to Corruption ..... 3
  - Fair Competition..... 4
  - Protection of Confidential Information and Intellectual Property ..... 4
  - Data Protection ..... 4
  - Transparency ..... 4
  - Representation of Interests ..... 4
- 3. Social Responsibility ..... 4
  - Compliance with Human Rights ..... 4
  - Prohibition of Forced Labor ..... 5
  - Prohibition of Child Labor ..... 5
  - Promotion of Diversity and Equal Opportunities ..... 5
  - Protection of Occupational Health and Safety ..... 5
  - Freedom of Association and Collective Bargaining ..... 5
  - Remuneration and Working Hours ..... 5
- 4. Environmental Responsibility ..... 5
  - Environmental and Climate Protection ..... 5
- 5. Supply Chain ..... 5
  - Requirements for Supplying Companies ..... 5
  - Interests of Consumers ..... 6
- 6. Compliance..... 6
  - Complaint and Grievance Procedure ..... 6

## **Preamble**

The Weber & Schaer Group – consisting of Weber & Schaer GmbH & Co. KG, Braun Battenberg Mahlwerke GmbH, Polymer-Service PSG GmbH, Weber & Schaer Americas LP and Weber & Schaer Americas GP Inc. – hereinafter referred to as W&S, is a family-owned trading company founded in Hamburg in 1844.

W&S recognizes its social and environmental responsibility toward its own employees, toward the companies with which it maintains business relationships, toward the environment and the climate, and toward global society. This applies regardless of whether activities are carried out within or outside of Germany.

The W&S Code of Conduct is a voluntary commitment to fair, sustainable and responsible ethical conduct. We make decisions and act in accordance with our Code of Conduct to the best of our ability.

The ethical guidelines described in the W&S Code of Conduct represent minimum standards. We reserve the right to apply more extensive or stricter requirements and to publish them within our quality management system.

## **1. General Principles**

W&S is committed to fulfilling our responsibilities toward society, the environment, and the climate in all our activities. We conduct ourselves fairly toward our business partners and competitors. We protect the health and rights of our employees in the workplace. It is a matter of course that we comply with all applicable laws and other relevant regulations of the countries in which we operate in all our business activities and decisions. If local laws and regulations are less restrictive, our actions are guided by the principles of this Code of Conduct.

## **2. Integrity**

### **Conflict of Interest**

In our interactions with companies with which we maintain business relationships and with government institutions, we strictly separate our interests from the personal interests of employees on both sides. Actions and decisions are made free from irrelevant considerations and personal interests.

### **Rejection to Corruption**

Our employees and business partners must comply with the applicable anti-corruption laws. It is important to note that acts of corruption and bribery - both within the private sector and in the context of public service - are punishable by law and/or subject to fines. Among other things, the following must be observed:

- The granting of personal benefits (in particular those of a monetary nature, such as payments and loans, including the giving of small gifts over an extended period of time) by us or our employees to business partners, civil servants, employees, or other public officials with the aim of obtaining advantages for us, individual employees, or third parties is not permitted.
- Monetary benefits and personal advantages must not be offered, promised, granted, approved, demanded, or accepted in our business relationships, nor do we allow ourselves to be promised such benefits.

Our management and employees may not offer, promise, demand, grant, or accept any gifts, payments, invitations, or services in the course of business that are provided with the intent to improperly influence a business relationship or that risk compromising the professional independence of the business relationship. This generally does not apply to gifts and invitations that fall within the scope of customary business hospitality, tradition, and courtesy. Our employees can find a separate binding guideline regarding the acceptance and offering of gifts, hospitality invitations, and events by employees of our company within our quality

management system. This guideline may provide for exceptions regarding appropriate, low-value, and symbolic gifts, appropriate business meals, and appropriate events.

### **Fair Competition**

We respect fair competition. We comply with applicable laws that protect and promote competition, in particular antitrust laws and other laws governing competition. In our interactions with competitors, these regulations specifically prohibit agreements and other activities that influence prices or terms, allocate sales territories or customer companies, or improperly hinder free and open competition. We do not enter into agreements with our client companies that are intended to restrict their freedom to autonomously determine their prices and other terms and conditions upon resale (price and term setting). Given that the distinction between prohibited cartels and permissible cooperation can be problematic, we provide our employees with a contact person who can be reached in cases of doubt.

### **Protection of Confidential Information and Intellectual Property**

We comply with the applicable laws for the protection of trade secrets and treat confidential information of our business partners accordingly. Our employees are obliged to protect trade secrets and to respect intellectual property. The relevant contractual agreements apply to employees in this regard.

### **Data Protection**

We comply with the legal requirements governing the protection of personal data belonging to our employees, representatives of companies with which we maintain a business relationship, and our investors.

Through regular employee training, W&S ensures that no data can be obtained by unauthorized third parties, e.g., through phishing, social engineering, etc. In this context, W&S employees are not permitted to enter internal information, customer data, project content, or other confidential company data into AI (artificial intelligence) or third-party automated systems (e.g. ChatGPT, Google Gemini, Copilot, etc.). It does not matter whether the content consists of text, documents, screenshots, or other materials.

This does not apply to the use of licensed and approved services or software with a data protection and rights management framework controlled by IT.

### **Transparency**

We fully comply with our disclosure and reporting obligations in a timely manner.

### **Representation of Interests**

In our political advocacy work, we adhere to the codes of conduct for lobbyists as set forth in the German Lobbying Registration Act and the European Union's Transparency Register. Our interests are represented by the German Rubber Manufacturers Association – Wirtschaftsverband der deutschen Kautschukindustrie e. V. (wdk).

## **3. Social Responsibility**

### **Compliance with Human Rights**

We respect and support the observance of internationally recognized human rights and are committed to ensuring that we do not become complicit in human rights violations within our sphere of influence; in particular, we protect and uphold

- the personal dignity, privacy, and personal rights of every individual
- the right to freedom of opinion and expression
- fair treatment of employees, free from physical and psychological hardship, sexual and personal harassment, or discrimination.

### **Prohibition of Forced Labor**

We strictly reject forced labor, modern slavery, or any comparable measures that deprive individuals of their freedom.

### **Prohibition of Child Labor**

We adhere to the United Nations' regulations on human and children's rights. In particular, we comply with the Convention concerning Minimum Age for Admission to Employment (ILO Convention No. 138) and the Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor (ILO Convention No. 182). If a national regulation regarding child labor sets stricter standards, these must be given priority.

### **Promotion of Diversity and Equal Opportunities**

We promote equal opportunity and oppose all forms of discrimination. We treat everyone equally, regardless of gender, age, skin color, ethnic or cultural background, sexual identity and orientation, disability, religious affiliation, worldview, or other personal characteristics.

### **Protection of Occupational Health and Safety**

We ensure occupational safety and health protection in the workplace in accordance with international standards and applicable national regulations. We implement measures for continuous improvement. We ensure that all our employees receive training on occupational safety and health protection as part of their duties.

### **Freedom of Association and Collective Bargaining**

We respect our employees' right to freedom of association and freedom of assembly, as well as their right to collective bargaining and wage negotiations, in accordance with applicable laws and regulations.

### **Remuneration and Working Hours**

Compensation is determined in accordance with applicable laws and, where applicable, existing binding collective bargaining agreements, and is supplemented by the relevant national minimum wage laws. Employees are provided with clear, detailed, and regular information regarding the composition of their compensation. We comply with applicable laws and labor standards regarding maximum allowable working hours.

## **4. Environmental Responsibility**

### **Environmental and Climate Protection**

We are committed to the long-term protection of the environment and the climate for current and future generations. We comply with relevant laws and international agreements. We strive to continuously improve our environmental and climate protection measures by adopting a precautionary approach to enhance our operations across all business areas over the long term. We promote and support environmentally and climate-conscious behavior among our employees and business partners by highlighting the environmentally friendly systems and standards available to us and, upon request, providing support for their implementation. We promote the development and dissemination of environmentally friendly technologies by, where possible, already using them in our own business operations or striving to use them in the future.

## **5. Supply Chain**

### **Requirements for Supplying Companies**

We communicate the principles of this Code of Conduct to the companies that supply us directly and require them to comply with these principles. We expect our business partners to

implement due diligence processes to identify, prevent, and minimize risks of human rights violations and environmental impacts within their own supply chains, including appropriate grievance mechanisms and reporting, based on the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and other relevant guidelines. The business partner shall comply with all applicable laws regarding due diligence throughout the supply chain.

### **Interests of Consumers**

Where consumer interests are concerned, we comply with applicable laws and adhere to appropriate sales, marketing, and information practices.

## **6. Compliance**

We will ensure that our employees and business partners are familiar with the provisions of the Code of Conduct and the obligations arising therefrom. We will base the development and, where necessary, the revision of our policies and processes on the principles of our Code of Conduct.

The Code of Conduct is published on our website and made available to all employees and interested parties. [Downloads - WEBER & SCHAER](#). In addition, the Code of Conduct is made available to our employees through our quality management system.

In the event of material violations of this Code of Conduct by the business partner, W&S reserves the right to terminate the business relationship with the business partner, subject to applicable laws.

### **Complaint and Grievance Procedure**

We offer our employees and business contacts access to a secure mechanism for confidentially reporting potential violations of the principles of this Code of Conduct. This can be found on our website in the footer under "Whistleblower System" <https://www.intersoft-consulting.de/meldestelle/weber-schaer/>.



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René Marc Weber, Managing Partner  
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