

# Sigma Polymer Group Code of Conduct

Sigma Polymer Group is a market leader in the development and production of customized polymer-based solutions for niche applications. The foundation of our business is the ability to create and maintain mutually beneficial long-term relations with our customers, to be an expert in the field of rubber & silicone production, material development and to attract motivated people.

We aim to guard this foundation by being committed to conducting our business in a legally, ethically, socially and environmentally responsible manner.

## Scope and target group

Our Code of Conduct addresses ethical behavior in our work environment, business practices and relationships with external stakeholders. We shall behave appropriately towards existing and potential customers, suppliers, employees, investors and other business partners, as well as towards the communities in which we act.

The Code is applicable to all employees within Sigma Polymer Group worldwide and the Board of Directors. Moreover, we expect our business partners, including suppliers, consultants and independent contractors to adhere to standards similar to those reflected in our Code. Our suppliers, as well as others with whom they do business, including employees, subcontractors and other third parties, are expected to establish and maintain appropriate management systems and actively review, monitor and modify their management processes and business operations to ensure their alignment with the principles set forth in this Code of Conduct.

## Business ethics and integrity

### Legal compliance

Sigma Polymer Group complies with the applicable laws, standards and other legal provisions of the countries in which it operates. We are aware of the continuous development of international regulations and social standards and adopt those that are relevant to our business.

### Competition

Sigma Polymer Group is committed to fair competition. Laws protecting competition, especially anti-trust laws and other regulations that regulate competition, shall be observed. Companies and employees must never engage in any anti-competitive activity such as illegal fixing of prices or sharing of markets.

### Anti-corruption and bribery

Sigma Polymer Group is committed to work against corruption in all its forms, including extortion and bribery. No such illegal activity is tolerated either in action or as negligence by any of our employees, suppliers or business partners. The company shall comply with the applicable criminal law on corruption.

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## **Gifts and entertainment**

Neither Sigma Polymer Group employees nor anyone acting on our behalf may solicit, give or receive, directly or indirectly, gifts, gratuities, special allowances or a benefit which could influence the judgement of the recipient or is deemed unreasonable in the context.

## **Non-complicity**

Sigma Polymer Group cooperates with customers in observing the potential use of its products and services for illegal purposes. Action will be taken in line with our business policy.

## **Confidentiality**

Confidentiality is maintained by Sigma Polymer Group and its employees with regards to its business partners commercial secrets. The communication of confidential information to third parties or the public is prohibited.

## **Company assets**

Sigma Polymer Group employees are expected to be loyal and share the responsibility of protecting the company's assets from loss, damage, misuse and destruction. Company asset shall not be used for personal purposes or in support of activities outside of Sigma Polymer Group.

## **Social**

### **Human rights**

Sigma Polymer Group supports and respects the protection of internationally proclaimed human rights and ensures that company activities are not complicit in human rights abuses, for example, in our relationships with our suppliers.

### **Discrimination and harassment**

Sigma Polymer Group condemns discrimination in hiring and employment. No existing or potential employee should be discriminated because of, for example, race, color, gender, sexual orientation, religion, political view, disability or age. Integrity, privacy and freedom of expression are guaranteed.

### **Freedom of association**

Sigma Polymer Group respects the right of employees to establish or join trade unions and representative organizations of their own choosing in line with applicable local legislations.

### **Child labor**

Child labor and any form of exploitation of children and adolescents will not be tolerated. The corresponding laws must be observed.

### **Labor practices**

Sigma Polymer Group is committed to providing fair compensation and working conditions for all its employees. Working hours shall be set according to the domestic laws in force or industrial standards. All employees are informed and have the right to know the basic terms and conditions of their employment.

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## **Health and occupational safety**

Domestic and international regulations to ensure occupational health and safety in the workplace are to be observed. By supporting risk analyses, training programmes and other precautionary measures, we ensure that our employees can perform their work in a safe and healthy manner.

## **Land rights of communities**

Sigma Polymer Group takes action to ensure that land rights of communities, including indigenous people, will be protected and promoted.

## **Environment responsibilities**

At Sigma Polymer Group we recognize that environmental responsibility is a precondition for the survival and prosperity of all living beings. Consequently, environmental responsibility for us means that our products are designed and produced with environmental consideration.

## **Environmental protection**

Sigma Polymer Group promotes sustainability across all aspects of the business, fulfills the requirements and standards for environmental protection and acts in an environmentally conscious way in all locations in which we operate.

## **Operations**

We operate our business and provide products in a way that minimizes environmental impact. The overall aim is to reduce environmental impact that relates to our activities, products and services.

## **Governance and monitoring of the Code**

All employees should be familiar with our Code of Conduct and other policies relevant to their jobs and apply them in their work. Managing Directors and plant managers of subsidiary companies are responsible for translating the policy and associated policies into local rules and procedures, in addition to those required for compliance with local legislation.

## **Non-compliance with the Code**

Violations of this Code of Conduct will always be taken seriously and may lead to disciplinary actions up to and including termination of employment. In addition, violating the law may subject you and the company to substantial criminal fines, custodial sentences and/or civil damages.

## **Reporting violations**

All employees and other stakeholders who suspects a breach of this policy shall report the matter to relevant supervisors, plant managers or via the Sigma Polymer Group whistleblowing service [whistleblower@sigmapolymergroup.com](mailto:whistleblower@sigmapolymergroup.com).

All communications will be investigated as appropriate and will be kept confidential. No employee acting in good faith will be subject to disciplinary measures for providing information concerning suspected violations of law or company policy.