

# MODULE PEOPLE

CODE OF CONDUCT



Though not all OTTO KRAHN Group companies are subject to German laws on representation, these principles apply to them as well.

Increasing digitization also means increasing requirements on the protection of **personality rights**; we are adapting accordingly in order to meet those requirements. The Data Protection module goes into those in more detail.

## **Occupational and social standards**

The OTTO KRAHN Group is a globally active organization. Taking individual countries' legal, social, industrial, technological, and cultural standards into account, we are committed to preserving **fair working conditions** worldwide. This applies to all aspects of employee remuneration, from wages to social services, to working, vacation, and leave times. We take care to follow all minimum wage stipulations, and, as far as possible, to ensure that our suppliers do the same.

We categorically reject all forms of forced labor, child labor, and human trafficking, and we are doing our part to prevent these types of exploitation. Please refer to the statement in the appendix entitled "Modern Slavery Policy Statement", which is derived from the respective U.K. law and which we make on behalf of the entire corporate group.

One significant aspect of our business activity is upholding occupational safety standards. We continuously assess and improve our measures to protect the health of employees, temp workers, service providers, business partners, and neighbors. This is especially true at our production facilities, but our office locations make work safety a top priority as well. Any deficit in this regard, in particular dangers to our employees, will be reported to the relevant internal local health and safety representative or the Health and Safety Director of the OTTO KRAHN Group.

It is important to us to work constructively with **employee representative organizations** established in accordance with applicable national law.

People are one of the most important factors in the success of the OTTO KRAHN Group. We want to continue setting and meeting the very highest standards of quality within markets characterized by continuous change, which is why we regularly offer a wide range of training and educational options, as well as other opportunities to foster employees' technical and personal skills. For example, our training program in Germany includes programs through which trainees can become wholesalers, export clerks, IT specialists, industrial mechanics, machinists, plant operators, and warehouse clerks.

Even in this age of increasing digitization and automation, the OTTO KRAHN Group and its processes are focused on people: employees, customers, suppliers, business partners, applicants, locals, and the interested public. The social responsibility to behave appropriately and fairly toward these people is part of our company culture. The company itself bears this responsibility, as do its managers and every one of its employees, in all of their dealings with internal and external contacts.

The OTTO KRAHN Group counts on its employees to show motivation, competence, and personal responsibility. We want all of our employees to be continuously performance-oriented, dedicated, and full of creative curiosity.

We expect our employees to work together in a professional, cooperative manner, for the good of everyone. We support a culture of open communication, one in which employees discuss and resolve their problems together, regardless of each person's function or status.

Within the framework set by the Code of Conduct and the corresponding modules, we foster OTTO KRAHN Group's **five behavioral attributes**:

**AMBITIOUS      CHALLENGING      COLLABORATIVE**  
**CREATIVE      RESPONSIBLE/OWNERSHIP**

Our managers serve as role models in this regard.

## **Basic human rights**

The maxim we follow above all others is to behave respectfully toward one another, and toward any other people we come into contact with as employees – regardless of nationality, ethnicity, gender, sexual orientation, religion, age, disability, appearance, political views, or union membership status. We **do not tolerate discrimination** in any form. In particular, bullying is strictly prohibited, as is sexual harassment or any other type of harassment.

Our guiding principles are to give everyone **equal opportunity**, and to promote **diversity** in all areas of business. As an internationally oriented group, we benefit from the great diversity among the people active within our organization. One significant aspect of this diversity is that we strive for gender balance in our largely technical workplace environment.

ALBIS PLASTIC GmbH, which belongs to the OTTO KRAHN Group, is subject to German regulations on representative participation. In accordance with the Law Regarding the Equal Participation of Women and Men in Executive Positions in Private Business and Public Service, ALBIS PLASTIC GmbH is obligated to set target quotas for women on its supervisory board, its executive management, and the two levels of management beneath that. These target quotas were first set in 2015; in 2017, they were adjusted for the period ending in 2022.

For readability purposes, this document does not specifically refer to (for example) "male" or "female" employees or other persons. All personal references are expressly intended to refer equally to persons of any gender.

## **Current Activity**

To underpin our policy commitments, the OTTO KRAHN Group continues to review and improve its efforts at minimizing the potential for human trafficking and slavery of any form in our supply chain. These efforts include, but are not limited to:

1. Understanding which parts of our own business and which of our supply chains are most at risk from modern slavery.
2. Conducting supplier audits – our Quality Managers and SCM Teams work with suppliers in Europe, the U.S., and in Asia.
3. Developing and implementing procedures for suppliers (both new and existing) to certify that they are acting in a manner consistent with OTTO KRAHN Group standards.
4. Developing and implementing procedures to evaluate and track supplier compliance with OTTO KRAHN Group standards for human trafficking and slavery in the supply chain.
5. Terminating our relationship with suppliers that fail to improve their performance in line with an action plan or violate our OTTO KRAHN Group Code of Conduct.
6. Conducting ongoing training on the OTTO KRAHN Group Code of Conduct.

We operate the following policies that assist our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

**Whistleblowing** – we encourage all our employees to report any concerns relating to unlawful conduct, malpractice, dangers to the public or the environment, and any other matter of a serious nature.

**OTTO KRAHN Code of Conduct** – sets out the Group's core values which we expect to be observed throughout the Company and helps support our employees in applying these values and principles in the workplace.

## **Training**

The Company is ensuring that all employees working in supply chain management and relevant roles complete training on how to assess the risk of slavery and human trafficking in relation to various aspects, how employees can identify the signs of slavery and human trafficking, and what should be done if this activity is suspected.

Awareness training is provided for all members of the board and any other staff in relevant and appropriate roles.

## **Board Approval**

This statement has been confirmed by the Managing Directors of all OTTO KRAHN Subsidiaries

Should you encounter concrete, reliable information regarding the violation of one of the aforementioned principles, you are obligated to notify your supervisor, the Tax & Legal Director, the Human Resources Director, the Health and Safety Director and/or the CFO of the OTTO KRAHN Group. If you prefer, the information you share will be treated confidentially to the extent permitted by law. You can also make any notifications via our anonymous whistleblower system (<https://www.bkms-system.com/ottokrahn>) which can also be accessed through our websites.



## **Modern Slavery Policy Statement**

The following statement expresses the OTTO KRAHN Group's Modern Slavery Policy Statement and complies with the provision of the UK Modern Slavery Act 2015 (the 'Act'). It applies to all companies of OTTO KRAHN Group including ALBIS PLASTIC Group and KRAHN Chemie group.

Modern Slavery is an unquestionable and indispensable violation of an individual's basic human rights and can occur in many forms, be it slavery, servitude, forced or compulsory labor or human trafficking. As part of the OTTO KRAHN Group, and the plastics and chemical industries, we recognise that we have a responsibility to take a robust approach to prevent slavery and human trafficking.

We are strongly committed to playing our part in preventing slavery and human trafficking in our corporate activities, and to ensuring, as far as we are able, that our supply chains are free from slavery and human trafficking.

The policy applies to all persons working for or on our behalf in any capacity including employees, directors, officers, agency workers, contractors, consultants, interns, and any other third party representatives.

We expect all who have, or seek to have a business relationship with the company to familiarize themselves with this policy and to act at all times in a way that is consistent with its values.

Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspects of our business and business relationship.

and has been approved by the Board of Directors of the OTTO KRAHN Group who will review it annually and update it, if applicable.



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