

# Code of CONDUCT

of SUNPOR Kunststoff GmbH

# CODE OF CONDUCT for business partners\*



- I. Introduction
- II. Scope of application
  - 1. Legal compliance
  - 2. Responsibility as a member of society
    - Respect for Human Rights
    - Fair working conditions
    - Harassment and discrimination
  - 3. Corporate responsibility
    - Anti-corruption and fair competition
    - Avoidance of conflicts of interest
    - Export control and customs regulations
  - 4. Health, safety, and environmental protection
  - 5. Responsibility in the Supply Chain
    - Data and information security
    - Whistleblower system
    - Compliance with the code, violations, and consequences

\* These and other terms include all genders.



Responsibility means  
choosing what is right and  
not what is convenient.

Responsibility also means  
being part of the solution  
and not part of the problem.

Roman Eberstaller, CEO

At sunpor we are future-oriented and are taking an innovative path towards the best sustainability and ecological solutions.

We do this with the same approach and values that have guided us in our business behaviour since the beginning and creates trust with our valued partners.

**Responsibility is ultimately about circularity.**

As sunpor, we aim to live up to our social responsibility. This applies to everything we do, our actions, our processes, our products. We are very serious about our commitment to social and environmental sustainability.

» Responsibility means choosing what is right and not what is convenient. Responsibility also means being part of the solution and not part of the problem.«

(Roman Eberstaller, CEO)

The business world has become more global, and this applies not only to our company activities but also to upstream and downstream business processes. We focus on the impact of our corporate activities and on sustainable development throughout the global value chain. sunpor is aware of its responsibility regarding compliance with global labour, social, environmental and anti-corruption standards beyond its own corporate boundaries. Through transparency in our supply chains and downstream process steps, we advocate sustainable action and due diligence in the chemical industry.



# RESPON- SIBILITY

## Scope of application

For SUNPOR Kunststoff GmbH, it is a matter of course to comply with all the relevant legal requirements in conducting our business. To underpin this, we have drawn up a „sunpor Code of Conduct for Business Partners“, which provides binding guidance for our daily business conduct.

Our business partners\* make a significant contribution to our corporate success. We see a common understanding of sustainable and ethical action as an essential foundation of the business relationship and part of all contractual arrangements.

The “sunpor Code of Conduct for Business Partners“, is based on international conventions that are authoritative for compliance with, and improvement of, business practices and working conditions in the whole supply chain.

- > UN Guiding Principles, on Business and Human Rights
- > United Nations Global Compact (UNGC)“.
- > International Labor Organization (ILO) - Fundamental Principles
- > Industry initiative - Responsible Care, and Together for Sustainability

Our business partners are obliged to comply with the requirements set out in this Code of Conduct and to fulfil their responsibility to respect all human rights within their sphere of influence.

## 1. Legal compliance

Our business partners comply with applicable laws and respect all laws at local, national and international level. In addition, they ensure that the implementation of, and compliance with, these laws and guidelines is given along the entire value chain (including among all upstream suppliers, subcontractors, etc.).

\* Business partners are legal entities or natural persons with whom sunpor does business.

## 2. Responsibility as a member of society

### 2.1. Respect for Human Rights

Our business partners support and respect the observance of internationally recognized human rights by actively prohibiting all forms of forced labour, child labour, human trafficking and modern slavery. As a business partner with integrity, they are committed to assessing potential risks and stopping any human rights violations immediately.

### 2.2. Fair working conditions, remuneration and working hours

The applicable legal framework conditions form the basis for fair working conditions in the companies of our business partners. This includes, above all, fair remuneration and social benefits that meet national legal standards, such as the statutory minimum wage, but also compliance with rest periods and restrictions on working hours, as well as the granting of breaks and statutory vacation entitlements.

Furthermore, our business partners respect the right to freedom of association, the right to form unions and to bargain collectively without fear of intimidation or punishment.

### 2.3. Harassment and discrimination

Our business partners create a work environment that is free from discrimination, physical and psychological violence, and harassment in the workplace. Likewise, verbal, and sexual harassment, intimidation or other abusive behavior in the work environment will be dealt with in accordance with applicable laws. This includes ensuring that the necessary corporate precautions are taken to initiate disciplinary proceedings in case of any violation.

Anti-discrimination in a business context means equal employment opportunities regardless of race, religious or political affiliation, gender, age, sexual orientation, nationality, or personal characteristics. Our business partners ensure that this equality of opportunity is present in all corporate decisions.

## 3. Corporate responsibility

### 3.1. Anti-corruption and fair competition

Our business partners behave fairly in competition and respect antitrust and competition law. Accordingly, they do not enter into agreements with competitors regarding pricing, market and customer allocation, bidding or other similar activities that could have anti-competitive effects.

Any form of bribery, extortion, corruption as well as embezzlement is against the law and our business partners must not participate in or tolerate any form, directly or indirectly. Furthermore, our business partners comply with the relevant legal provisions on money laundering prevention, and fulfill their reporting obligations.

### 3.2. Avoidance of conflicts of interest

All decisions made by our business partners are always made based on objective consideration in the best interests of the company and are not improperly guided by personal interests.

Our business partners shall only accept or extend invitations in connection with their activities if they are reasonable, not in expectation of an impermissible consideration. The same principle applies to the granting or acceptance of gifts, other benefits, or advantages of any kind.

### 3.3. Export control and customs regulations

Essential for sunpor is compliance with all international and national foreign trade regulations, especially export control and customs regulations, as well as economic sanctions and trade sanction regulations, and anti-terrorism laws. Embargoes against certain countries, as well as bans on the import or export of certain groups of goods, must be complied with at all times.





#### 4. Health, safety and environmental protection

sunpor's business partners respect and protect the environment and care for the health and safety of employees within the professional environment and sphere of influence. They conduct business in a responsible manner based on applicable regulations and do not take avoidable risks to the health and safety of employees or the environment. It is the responsibility of each stakeholder to report and correct any unsafe or environmentally hazardous activity.

As a business partner of sunpor, we expect active management of environmental and safety risks, as well as continuous development and improvement of processes and products towards higher sustainability.

sunpor sees itself as a partner in the implementation of a sustainability strategy that aims to have the best possible impact on the environment and on human health throughout the entire product life cycle. We expect there to be, in all cases, the best possible contribution made to climate protection, the lowest possible use of natural resources, a focus on waste avoidance and reduction, and the use of recycled materials and circular economy models.

The responsible use of chemicals, reduction of greenhouse gas emissions, and preservation of water quality are prerequisites for doing business with sunpor.

In this context, the demand for product and service reliability under the motto „safety first“ must never be disregarded and must be given top priority.

# HEALTH & SAFETY

## 5. Responsibility in the Supply Chain

### 5.1. Data and information security

All business partners of sunpor must ensure that confidential information is treated as such, and that intellectual property is protected at all times, even after the business relationship has ended.

All (personal) data, information and documents belonging to sunpor are considered company assets and are to be used exclusively for the fulfillment of business obligations. All legal regulations regarding the storage, processing, and transmission of (personal) data and information shall be complied with and shall be protected against internal and external misuse according to the state of the art.

### 5.2. Whistleblower system

sunpor expects its business partners to have established adequate processes for reporting misconduct within the company. This includes ensuring that employees and business partners can make reports without fear of disciplinary action.

In the event of any identified irregularities in the business relationship with sunpor, external partners have the option of reporting these in the following ways. The person making the report is free to do so anonymously or by name.

> **Online:**  
[www.sunpor.at/en/whistleblower-channel](http://www.sunpor.at/en/whistleblower-channel)

or

> **E-Mail:**  
[compliance@sunpor.at](mailto:compliance@sunpor.at)

or

> **Letter:**  
SUNPOR Kunststoff GmbH  
attn: Compliance  
Tiroler Straße 14  
3105 St. Pölten  
Austria

### 5.3. Compliance with the Code of Conduct, violations, and consequences

sunpor expects its business partners to pass on the principles of this Code of Conduct to their own business partners in the supply chain, and to identify potential violation risks within the supply chains and take appropriate measures as required.

sunpor reserves the right to review compliance with the standards defined in this Code. In the event of violations or non-compliance sunpor is obligated to reevaluate the business relationship and to take corrective action, which may include suspension or termination of the business relationship under certain circumstances.



**SUNPOR Kunststoff GmbH**  
Tiroler Straße 14  
3105 St. Pölten  
Austria

Tel. : +43 (0) 2742 291 - 0  
E-Mail: [office@sunpor.at](mailto:office@sunpor.at)  
Web: [www.sunpor.at](http://www.sunpor.at)

A company of O.N. Sunde AS - Oslo, Norway

