

CODE OF CONDUCT

1st April , 2026



Landbell Aktiengesellschaft für Rückhol-Systeme and its affiliated companies (“Landbell Group”) strive to have a positive impact on the world we live in. This includes our work towards a more Circular Economy, our firm position in support of the human rights and social rights of workers and our dedication to good and sound business practices and relations. Within its sustainability initiative, Landbell gives a central place to business practices and strategies that identify, measure and address its risks and impacts.

Through its network and actions, Landbell Group promotes international standards set by United Nations texts such as UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and the UN Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights. It also promotes the step by step development of best practices and endeavours to lead the way for its stakeholders. As participant of the United Nations Global Compact, Landbell aligns this Code with the Ten Principles of the UN Global Compact on Human Rights, Labour, Environment, and Anti-Corruption.

PURPOSE OF THIS CODE OF CONDUCT

This code of conduct (“the Code”) contains the rules that are decisive for us in our dealings with our stakeholders, such as colleagues, authorities, customers, suppliers and the broader public. It sets out the minimum standards that are binding on all employees and which we must follow in our everyday work, including senior management teams around the world, whose duty it is to set a good example. The Code increases mutual understanding and ultimately helps us to be successful on global markets. In this code, the term “employee” refers to all full-time and part-time employees, managers, senior managers and members of executive or directors’ boards.

This Code also resonates with Landbell Group’s purpose that is to enable our customers and us to make a positive impact on sustainability. It supports our vision to be a global leader in the circular economy, trusted and preferred by our customers and partners. It furthermore sustains our mission to simplify, with data and expertise, Extended Producer Responsibility for local and global stakeholders.

Finally, the Code encourages you, as our business partners, to go beyond legal compliance to push forward corporate responsibility as well as business ethics. Landbell Group may therefore require evidence of, or run controls over, actions taken in pursuing these objectives. If you delegate any of the work you do for Landbell Group, we also require your next tier suppliers to acknowledge and implement the Code. If you are a Landbell Group’s waste management supplier, please refer to our [Supplier Code of Conduct](#), that each of our vendor should abide by in order to do business with us.

Questions regarding implementation of the Code may be raised at any time to our teams.

LABOUR PRACTICES

Landbell Group is committed to the well-being of its employees and promoting a healthy work-life balance. We require that everyone be treated with dignity and respect, with special attention given to those who most need it, for example migrant workers. Harsh or inhumane treatment including verbal or physical violence, harassment, sexual harassment or abuse, as well as the threat of any such treatment is absolutely prohibited. Disciplinary, judiciary and/or criminal procedures for any breach will be enforced.

Modern Slavery

Landbell Group employs its employees under lawful and decent working conditions. No employee of any company working directly or indirectly for Landbell Group shall ever use any involuntary or exploitative prison labour, slavery or be involved with any trafficking of persons. No threat, force, coercion or penalties may be tolerated nor any restrictions on workers' freedom of movement in and out of the facility.

A direct written labour agreement shall be offered and all its conditions maintained throughout the employment duration. Payment shall be made directly to the employees and never to third party agencies or agents, which do not hold a relevant permit from the authorities. At no time should workers be denied access to their personal identification documents or work permits, if temporarily (and for lawful reasons) held by the company. No worker shall have to pay for their employment.

Child Labour

No one below the age of eighteen (18) should be made to work, under any circumstances. The only exception might be students following an internship program, holiday work or apprentices. Moreover, such students/interns/apprentices shall not perform work that is likely to jeopardize their health or safety, including physically demanding jobs, night shifts and overtime.

Working Hours

With respect to employees' health, working hours are not to exceed the maximum set by local law. Furthermore, a working week should not be more than fifty (50) hours, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.

Wages and Benefits

Employees' wages shall comply with all applicable wage laws, including those relating to minimum wages, overtime compensation and legally mandated benefits. Deductions from wages as a disciplinary measure shall not be permitted.

Freedom of Association

The rights of all workers to form and join trade unions of their own choosing, to engage in peaceful assembly, to go on strike, shall always be respected, as well as the right of employees to refrain from such activities.

Non-Discrimination

Landbell Group does not tolerate discrimination of any sort, whether in hiring, employment practices, or stakeholder engagement and whether based on race, skin tone, national origin, age, sex, sexual orientation, gender identity and expression, disability, health condition, pregnancy, religion, political affiliation, union membership, or any other distinctive moral or physical personal characteristics.

Integrity in HR processes

Recruitment processes, promotions, periodic regular documented assessments of performance and remuneration reviews are performed on a fair and transparent manner. Access to training and competence development ensures equal opportunities for all, preventing nepotism and conflicts of interest in personal decisions.

Concern Raising and whistleblowing

It is important to us that Landbell Group employees and business partners can raise their voice and take action if they experience or witness any violation of this Code or of any regulatory obligation. Landbell Group and its business partners ensure personnel can openly share concerns with management regarding working conditions and management practices through fair and effective grievance processes.

Landbell Group encourages whistleblowers to speak up and shall guarantee their safety and well-being. Breaches of principles laid down in this Code both internal and legal may be reported through secure whistleblowing system which personnel is informed about, without fear of retaliation of any kind, including discrimination, reprisal, intimidation, or harassment.

Health and safety

It is the responsibility of employers to ensure employees' safety at work and prevent work-related injury and illness. A safe and healthy work environment enhances the quality of services that we deliver and the well-being of employees. All employees shall be provided with appropriate workplace health and safety information and training in a language they can understand.

Occupational Safety

Landbell Group avoids or reduces as much as feasible exposure to health and safety hazards (chemical, electrical, fire, vehicles, fall, etc.) by implementing a thorough identification, assessment and mitigation process, which is reviewed regularly. Where hazards cannot be adequately controlled, employees are provided with appropriate protective equipment and information. Beside physical risk, exposure to mental health issues is regularly considered, including via employees' surveys.

Occupational Injury and Illness

Procedures and systems are in place to prevent, manage, track and report occupational injury and illness, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work. Employee exposure to chemical, biological, and physical agents shall be especially identified, evaluated, and controlled.

Emergency Preparedness

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans, response and evacuation procedures, trainings and drills. Emergency drills must be executed at least annually or as required by local law, whichever is more frequent.

ENVIRONMENT

Landbell Group is an international supplier of environmental and chemical compliance services and consulting solutions. Through our services, we assist businesses worldwide with their compliance obligations. We also recognise that our environmental responsibilities extend beyond our services to identify and appropriately address the impacts linked to our business operations and value chain.

We prioritise the following environmental topics, which are based on the nature of our business and the impacts identified through materiality assessment.

Environmental Permits and Reporting

We expect our suppliers and business partners to hold relevant environmental permits and have reporting mechanisms as required by local and regional laws. These include registration with relevant authorities, maintaining permits, and reporting of performance and incidents.

Waste and Pollution

Proper management of waste and pollution is central to our business. We require all our service providers to ensure that a) all waste transport and treatment complies with relevant regulatory requirements, including export restrictions and b) all waste streams are processed, recovered, and disposed of with no waste leakage in the process, following recognised treatment standards.

Climate Action

We are guided by our policy commitment to a) reducing the climate impact of our own operations and b) supporting our customers in meeting their climate goals. This requires taking inventories of our direct and indirect greenhouse gas (GHG) emissions. We expect our suppliers and business partners to support our effort to accurately document relevant GHG emissions according to recognised standards such as the GHG Protocol.

ETHICS

For us, ethical business also covers relations of companies between each other, with their stakeholders, society, and national or regional authorities. As a part of the circular economy and waste management sector, Landbell Group has a shared responsibility to combat fraud and environmental crime under any form. Landbell Group adheres to the highest standards of ethics to maintain a high level of trust and reliability within business partners. Information and training on the processes to implement and reach these standards should be provided to employees in a language that they understand and appropriate for their level of responsibility within the organisation. Disciplinary, judiciary and/or criminal procedures for any breach will be enforced.

Anti-bribery and gifts

In addition to breaching business standards of ethics, bribery jeopardises democracy, the State of Law and has severe consequences on values represented in this Code. Landbell Group shall show zero tolerance towards its employee and business partners for any form of active or passive corruption, extortion, embezzlement, facilitating payments or other type of bribery, under any circumstances. Employees and business partners must never promise, offer, authorize, give or accept anything from or to anyone which might make the receiver indebted, and influence, obtain or retain business, or decisions of public officials, or any other stakeholder.

Conflict of interest

Employees must be free to always make objective and fair decisions during their employment. Conflict of interest can arise when the personal interest of an employee, or their relatives, interferes with Landbell Group's interests, which shall be protected. For this reason, conflicts of interests are disclosed, and measures shall be taken avoid placing any employee in a position to control or influence a business decision in which the employee holds personal interests.

Competition

As a promoter of fair competitive markets and level playing fields, Landbell Group refrains from any anti-competitive behaviour and always acts in compliance with competition rules, as does its Business Partners. Employees are also encouraged to denounce unlawful anti-competitive behaviours from third parties that they might become aware of.

Transparency

All business dealings should be transparently performed and accurately reflected in the financial records. Information regarding labour, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation are unacceptable.

Fraud and money-laundering

Within its activities, Landbell Group actively enforces processes to prevent and detect fraud. Practices like fraudulent invoicing, payments, documentation, data management, shall be detected and reported. If there is any suspicion regarding the existence of an internal and/or external fraudulent scheme, all appropriate measures shall be taken without delay.

Responsible Information management

Information security

Integrity, confidentiality and security of data is to be safeguarded at all times. The information we hold shall be consistent, complete and accurate. It is accessible to the employees and business partners who need it only. Employees who have access to or control of confidential or proprietary information must protect it from misuse and from inappropriate disclosure.

Privacy

Personal data is collected, stored, processed, shared and used for lawful purposes only within the boundaries of the applicable privacy and information security laws. Besides legal requirements, reasonable privacy expectations of everyone we do business with, including suppliers, customers, consumers, and employees should be considered. If there is any suspicion that data protection regulations have been infringed, all appropriate measures shall be taken without delay.

Intellectual Property

Intellectual property rights are to be respected. Transfer of technology and knowledge is to be done in a manner that protects intellectual property rights of the creator.

Artificial intelligence

Artificial intelligence is only to be used under strict human control with due consideration to the privacy and confidentiality of data, as well as strict ethical standards.

QUALITY

Compliance

Any kind of business with Landbell Group shall be made in full compliance with applicable laws and customers' requirements. Business Partners are expected to monitor legal requirements applicable to their business and to set up compliance programmes accordingly.

Due Diligence

Where support from third parties is required to perform business activities, especially waste management activities or other activities that are exposed to risks that may breach of this code, Landbell Group supports the use of adapted due diligence procedures to carefully select the business partners.

Awareness on this Code

We expect the rules in this Code to be explained in a clear and intelligible manner and in a language that personnel of Landbell Group and of Business Partners can understand. Trainings for managers and employees shall be set-up and clear communication organised. The relevant executive managers and managers should ensure that all employees are always familiar with the current version of this Code.

Interpretation

Commitments from the Code may not, in any way be interpreted in a manner that is not compliant with any applicable law. When the provisions of the Code are stricter than legal obligations, the Code shall take precedence. This Code shall take precedence over any conflicting provision contained in any other document issued by Landbell Group, including strategies, policies or procedures, or in any similar documentation issued by our Business Partners.

Related documentation

This Code is implemented within Landbell Group through a set of internal or public documents, including some available to our employees and officers on Landbell Group intranet as well as the following policies:

- [Landbell Group's Human Capital policy](#)
- [Landbell Group's Environmental policy](#)
- [Landbell Group's Business ethics policy](#)

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Uwe Ehteler, COO DACH



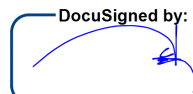
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LANDBELL GROUP is an international supplier of service and consulting solutions for environmental and chemical compliance. Our aim is to reduce the complexity of extended producer responsibility legislation, as well as other product- and packaging-related requirements for producers and distributors. In everything we do, we seek to provide our customers with the most competitive solutions in terms of service quality, compliance and cost.

At LANDBELL GROUP, we prepare our clients for the uncertainties to come. We help them unlock the value of the circular economy and strive to be their best partner on the journey to a more sustainable future.

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