



D-008_Principles of Corporate Responsibility Anti-Corruption Policy and Code of Conduct and Ethics Escalation Policy



The adherence to ethical values, fair treatment of one another, and corresponding actions within the company and throughout the entire supply chain are, in the opinion of the management of EPSa GmbH, indispensable components of responsible and economic behavior in the market.

As a prerequisite, fulfilling the requirements of all stakeholders as well as conformity with external demands and ethical principles is considered self-evident. All objectives and strategic directives of the management of EPSa GmbH are chosen in such a way that respectful and dignified treatment of employees, safe working conditions, and environmentally conscious actions can be ensured.

The implementation of the code of conduct established by the management of EPSa GmbH is binding for every employee. The executives, and especially the management itself as well as the leadership team, are committed to its implementation at all times within the scope of their leadership responsibilities and act with the awareness of having a role model function.

Discrimination

EPSa GmbH rejects any form of discrimination, regardless of the reasons, and acts accordingly, especially in personnel decisions. We require our employees to unambiguously oppose discrimination in the same manner.

Disciplinary Measures

EPSa GmbH distances itself from all disciplinary measures that are based on physical punishment, mental or physical coercion, and/or verbal insults.

Confidentiality

EPSa GmbH requires its employees to maintain absolute confidentiality towards third parties regarding all information related to business processes; the same applies to compliance with all data protection requirements.

Health and Safety

EPSa GmbH considers it its duty to protect the health and safety of its employees and designs working conditions accordingly. Every employee is encouraged to support the implementation of this requirement through consistent actions in accordance with safety guidelines.

Social Engagement

EPSa GmbH is aware of its responsibility towards its environment and actively fulfills it. Open and honest communication is maintained with all interested external parties.

Conflicts of Interest, Bribery, and Corruption

EPSa GmbH urges all employees to behave in such a way that their personal or financial interests do not conflict with those of EPSa GmbH or influence internal company processes (especially decision-making). Any actions that could give the appearance of bribery or favoritism are prohibited for employees. This also includes such offers to third parties.

Antitrust and Competition Law Rules

EPSa GmbH markets its products and services openly and fairly. Price-fixing agreements or other illegal behaviors that would result in a distortion of competition are not practiced.



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Freedom of Association & Right to Collective Bargaining

EPSa GmbH grants all employees the right to freedom of association and collective bargaining and commits to adhering to all agreements made on this basis with the workforce and/or their representatives.

Suppliers and Imports

EPSa GmbH expects its suppliers to consistently implement all contents of this document. For imports, it is ensured that all applicable legal requirements are met, including the indication of the country of origin and the correct classification of goods.

Human Rights

EPSa GmbH respects the dignity of every person. Compliance with international human rights is therefore a matter of course. Child labor, forced labor, and working conditions that do not comply with international or national laws are not tolerated.

Motivation and Training

For EPSa GmbH, the identification of employees with corporate goals, the targeted and needs-based training of the workforce, and the development of leadership skills are self-evident and are actively pursued.

Protection of Assets

Employees perform their work tasks in a manner that ensures the protection of the material and immaterial property of EPSa GmbH.

Environmental Protection

Ensuring environmental protection and all related processes are part of the corporate policy and thus of the daily actions of EPSa GmbH and its employees.

Commitment

All employees are fully aware of the principles of corporate responsibility. They act according to these principles in the course of their work. In case of questions regarding implementation or interpretation, as well as reporting violations, the immediate supervisor should be informed. Violations by employees will be promptly corrected (if possible) and will result in disciplinary measures. Violations by business partners will be communicated openly to them, and a change in behavior will be requested. If this is not effective, EPSa GmbH aims to terminate the business relationship. If third parties become aware of violations of these principles of corporate responsibility by employees of EPSa GmbH or business partners, they are requested to inform the management.

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Datum


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