

1 INTRODUCTION

Dear Team Member,

welcome to the 3P Services Code of Conduct. This is our guide for correct behaviour in the company.

Our values and behaviours provide the foundation for our Code. They define how each of us must act to ensure that 3P Services image is protected and that we continue to build the trust that drives our company's success. We work every day to earn the trust of our customers, suppliers, and team members as well as to encourage our mutual trust.

We believe that all 3P team members can make the right decisions when faced with difficult situations and are guided by their good judgment. However, we should never feel left alone in the process. It is the responsibility of all of us to seek help from our supervisors or other internal sources when needed. Have the courage to raise issues or concerns if you observe a possible violation of this Code of Conduct.

Our Code of Conduct contains binding rules that apply equally to all of us. It obligates us to act accordingly and to refrain from doing anything that contradicts these rules. We expect all suppliers, subcontractors, and their employees to behave in a manner consistent with our Code and support them in meeting this expectation. Therefore, we ask you to read this Code of Conduct carefully and join us in using it as a guide for our daily behaviour.

Wietmarschen, 01.09.2023



Felix Schmidt
Managing Director



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Human Resources Manager



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QHSE Manager

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2 PREAMBLE

NOTE:

To make this document easier to read, short concise explanations have been used. This document is for everyone and all employees can have an equal impact on the subjects discussed.

PURPOSE OF THE CODE OF CONDUCT:

Our Code of Conduct comprises the essential principles and rules for our actions together and represents the demands we make on ourselves, also in relation to our environment. It serves to protect you as a team member and ensures that the company's image is not endangered. All our interlocutors such as customers, suppliers, team members, applicants expect a trustful cooperation from us.

MISCONDUCT:

You agree to comply by this Code of Conduct. Failure to comply with the Code will be taken very seriously and will result in disciplinary action.

TEAM:

From the strength of one individual grows an even stronger team. Together we can accomplish even more and therefore the success of the whole team always counts more than the individual success.

OURGOALS:

We set the highest standards for ourselves. We act entrepreneurially, with confidence, courageously and performance-oriented - with the goal of being the best. The commitment and skills of everyone are the basis for this. Health and safety in the workplace are a top priority.

ASK FOR HELP:

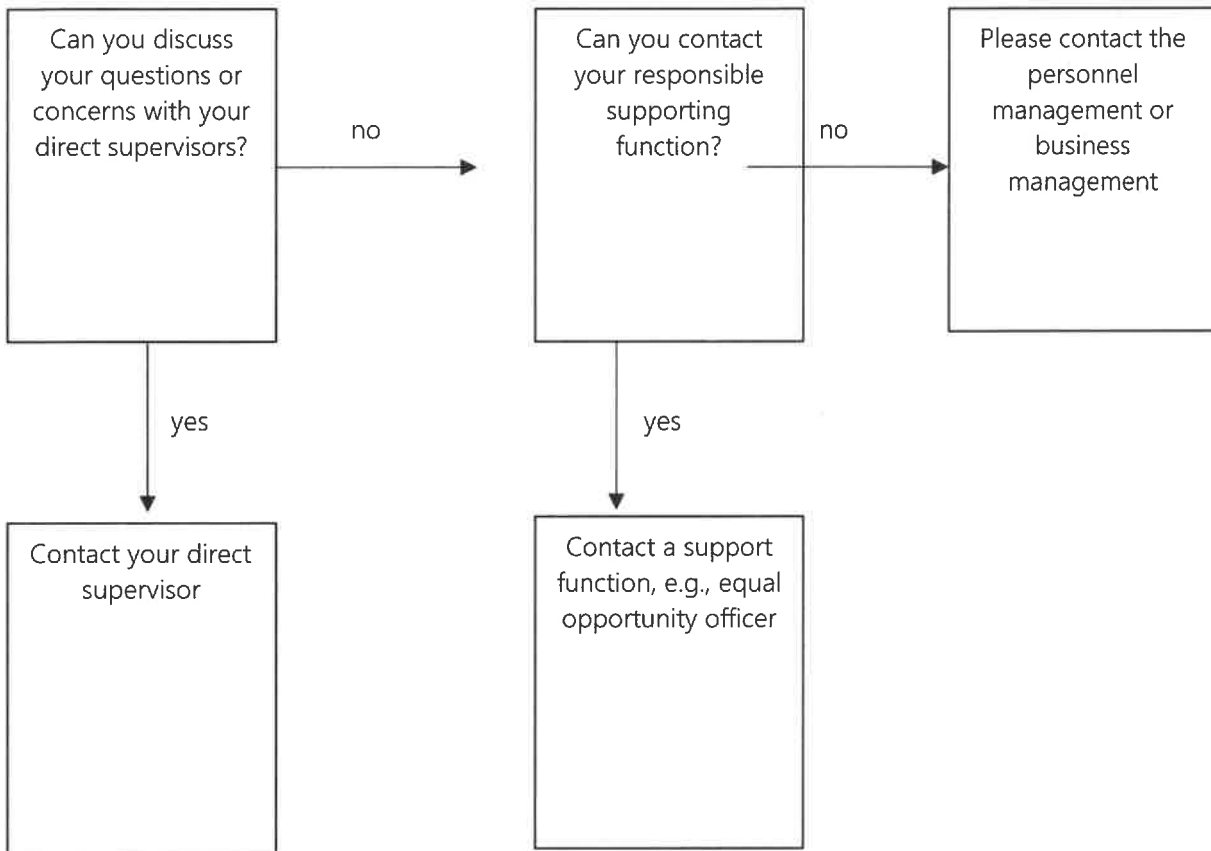
If you have any difficulties in interpreting or applying the Code of Conduct, please contact your supervisor. If you are unclear, you will also find support from the QHSE Manager or our Equal Opportunity Officer.

ADDRESSING ISSUES:

Each of us is responsible for addressing unsafe, immoral, or dangerous behaviours. If you have questions, need help, or want to address an issue, there are several options available to you on the next page.

3 PROBLEM SOLVING

HOW CAN I ADDRESS A PROBLEM?



Daniel Koers is our data protection officer. You can reach him at extension -246. A data protection officer monitors compliance with data protection regulations and is the contact person for data protection issues.

Marina Keil is our equal opportunity officer. You can reach her at extension -287. She is a neutral point of contact for "unequal treatment" in the job, e.g., by colleagues or work processes.

Katrin Sur offers an internal office hour every Tuesday from 8:00 a.m. - 10:00 a.m. in her office. However, she is also available at any time outside these office hours for problems and reporting of grievances. Extension -280.

4 LAWS AND REGULATIONS

As a company, we comply with laws, rules, and regulations in everything we do and in all countries in which we operate. Where national laws are more restrictive than those in effect at 3P, national law takes precedence. 3P Services never engages in money laundering, such as activities from criminal transactions that are disguised by legitimate funds or the use of legitimate funds to finance criminal activities, such as terrorism. We must be aware of the identity of all our customers. Each team member is required to review unusual transactions, especially involving cash, that may give rise to suspicion of money laundering by the appropriate department when in doubt.

Furthermore, we comply with all German laws even during our activities abroad, especially regarding working conditions (child labour, minimum wage).

THIS IS WHAT WE EXPECT FROM YOU:

- Each team member is required to comply with laws and policies.
- Always attend training on legal compliance.
- The identity of your customers must always be known to you.
- Always remain vigilant in your day-to-day work and watch for signs of non-compliance.

5 ANTI-CORRUPTION MEASURES

We conduct our business in a fair and legal manner. Corruption and anti-competitive violations are not tolerated. Bribes or anti-competitive agreements are not a means for us to do business. Violations will not be tolerated and will result in sanctions against the individuals involved. We never engage in any form of corruption. This includes bribes paid or received.

THIS IS WHAT WE EXPECT FROM YOU:

- Never pay cash, checks or vouchers to gain an unfair advantage or to persuade someone to do certain things.
- Never accept bribes in any form.
- Always ensure transparency in all types of transactions.
- Report all suspicious bribery attempts and offers.

6 GIFTS, HOSPITALITY AND ENTERTAINMENT

In many cultures, gifts and invitations to entertainment events are an important part of building and strengthening business relationships. However, some gifts and invitations may inappropriately influence the recipient's decisions or create the appearance of improper influence. We never offer our customers or suppliers special treatment that is against the law or that would damage 3P Services image if discovered.

In any case, gifts, invitations and other benefits must be transparent and correctly documented in the business records. The nature and frequency must be in proportion to the occasion and the position of the recipient. There must never be an appearance of dishonesty or impropriety.

THIS IS WHAT WE EXPECT FROM YOU:

- Never accept gifts, etc. worth more than 10 EUR without first obtaining approval from your department head.
- Never make a gift during a bidding process and do not accept gifts from suppliers, in any form, during this time.
- Never offer special treatment that is unlawful, disrespectful, or where there is moral doubt.

7 CONFLICTS OF INTEREST

A conflict of interest may arise when a team member's personal, social or financial activities affect his or her objectivity and loyalty. All business is conducted in an objective manner at 3P Services. In addition, we ensure transparency of our business decisions and support individual decision makers as soon as a potential conflict of interest becomes apparent.

THIS IS WHAT WE EXPECT FROM YOU:

- Report any situations that could result in a conflict of interest or even the appearance of a conflict of interest to your direct supervisor.
- Always ensure that conflicts of interest between your private affairs and business activities are fully transparent.
- Never refer business to a company in which you, close friends or family members have an interest, or provide them with more favourable business terms.
- Never provide employment to close friends and family members unless they are the most suitable person for the job.
- Discrimination must be prevented in career advancement and promotion processes. Everyone has the same opportunities for career advancement.

8 FAIR COMPETITION

3P Services is committed to the principle of fair, open and unrestricted competition. We conduct our business exclusively in a fair and legal manner. This principle is very important to us because it reflects our views. We ensure that all agreements comply with global and local competition laws. In addition, we do not participate in price-fixing or bid-rigging arrangements that contradict free competition.

THIS IS WHAT WE EXPECT FROM YOU:

- Never share information with anyone outside of 3P Services.
- Never enter into agreements with competitors.
- Inform your supervisor immediately if third parties offer you competitively sensitive information.

9 CONFIDENTIAL INFORMATION, APPEARANCE AND COMMUNICATION IN PUBLIC

All assets, information and data are not to be disclosed to third parties. You are requested not to damage the image of 3P Services through your behaviour and appearance in public, especially in private. Behavior that damages the image will not be tolerated.

THIS IS WHAT WE EXPECT FROM YOU:

- Never share information internally with team members who do not need to know it, and do not share information outside of 3P Services, even after the employment ends.
- Store your data only on company-owned work equipment. As soon as you leave your workplace, lock your screen.
- Behave considerately on the road when traveling in company vehicles.
- Internal problems are to be solved internally and must not be brought to the outside.

10 DIVERSITY, EQUALITY AND INCLUSION

All team members are committed to an inclusive, collaborative, friendly, and harassment-free environment for all, regardless of gender, gender identity or expression, age, sexual orientation, physical or other impairment, appearance, body size, origin, colour, religious affiliation, or non-affiliation.

THIS IS WHAT WE EXPECT FROM YOU:

- Behave considerately and respectfully in word and deed.
- Make an effort to work well together so that you can avoid conflicts from the beginning.
- Refrain from demeaning, discriminatory or harassing language and behaviour
- Be aware of your surroundings and other team members. Alert supervisors, Equal Opportunity Officers, Human Resources or management if you notice a dangerous situation, someone in distress or violations of this Code of Conduct, even if they seem trivial at first.

11 HUMAN RIGHTS

We respect internationally recognized human rights and support their observance. We strictly reject any form of forced and child labour.

THIS IS WHAT WE EXPECT FROM YOU:

- Always adhere to human rights.
- Immediately report human rights violations in our company or at our business partners.

12 OCCUPATIONAL HEALTH AND SAFETY

Nothing is more important to us than the health, safety, and security of our team members. For this reason, we behave responsibly. We must be attentive, disciplined and look out for each other. Everyone must be a role model for safety. Our aim is that everyone works in a safe and healthy environment, regardless of where we are in the world.

THIS IS WHAT WE EXPECT FROM YOU:

- Do not perform work for which you are not qualified.
- Stop work if it is not safe.
- Make sure your performance is not affected by lack of sleep, alcohol, or other drugs (including prescription or over-the-counter medications).
- Report unsafe or unhealthy working conditions.
- Report accidents, incidents, or unsafe conditions immediately. Never assume that someone else has already reported the risk or problem.
- Familiarize yourself with emergency procedures (emergency exit, first aid kit, fire extinguisher) for your workplace.
- Always look for ways to make your work environment even safer.

13 BEHAVIOR TOWARDS TEAM MEMBERS, SUPPLIERS AND CUSTOMERS

Equal opportunities, trust and mutual respect are of great importance to us. We promote equal opportunities and prevent discrimination of any kind. We treat all team members equally, regardless of gender, age, skin colour, culture, ethnic origin, sexual identity, disability, religious affiliation, or world view. Discrimination is fundamentally unacceptable to us. Likewise, we do not tolerate any form of harassment or bullying in the workplace. We treat each other fairly and openly, both with team members and with customers. It goes without saying that violence and bullying will not be tolerated.

WE EXPECT YOU TO:

- Always be respectful of cultural differences.
- Never make inappropriate remarks or send offensive messages.
- Always make decisions based on individual performance to avoid discrimination.
- If you feel you have been treated unequally, given unequal opportunity, discriminated against, bullied or harassed, report the incident immediately.
- Enter only the area in which you work. Do not enter a department manager's office or the accounting department without being asked to do so.
- Allow registered visitors into the building only when accompanied by you.
- Do not bring weapons or weapon-like items onto 3P Services property.

14 ENVIRONMENTAL AND CLIMATE PROTECTION

Sustainable environmental and climate protection are important corporate goals for us. We are therefore committed to the responsible use of natural resources. Both in the development of new products and in the provision of services, we take care to minimize their impact on the environment and the climate.

As part of our business processes, we strive to achieve a balance between economy, ecology, and social responsibility. In addition to the efficient use of natural resources, we are constantly working to optimize our work process to further reduce resource consumption.

THIS IS WHAT WE EXPECT FROM YOU:

- Always comply with the applicable environmental regulations
- Bear the responsibility to treat natural resources with care.
- Always suggest changes yourself on how to reduce waste or minimize energy consumption.

15 WHISTLEBLOWING

Any team member, our suppliers and our partners who become aware of potential violations or misconduct against the law and our Code of Conduct are encouraged to report it. We are fully committed to protecting whistleblowing and treating it confidentially and anonymously.

THIS IS WHAT WE EXPECT FROM YOU:

- Always report possible misconduct or violations of the law and the Code of Conduct to the best of your knowledge and belief
- Be aware that you should also report suspected cases.

16 CLOSING WORDS

We promote active and open communication of this Code of Conduct and the values, rules and standards on which it is based among all cooperation partners. Each cooperation partner ensures the implementation of the Code of Conduct in its own company.

Our managers must be measured against this Code of Conduct because of their role model function. They ensure that all employees know, understand, and apply the Code of Conduct and are the first point of contact for questions on the understanding or interpretation of individual regulations. Across the company, we stand for trusting and good cooperation between team members and managers, which is reflected in an open exchange of information, honest dealings, and mutual support.