


## **Code of Conduct for Suppliers, Contractors, Haulage Agents or Waste Management Companies**

Scholz Recycling GmbH  
Berndt-Ulrich-Scholz-Straße 1  
73457 Essingen

Tel.: 07365 840

Fax: 07365 1481



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### Preamble

Scholz Recycling GmbH is a globally active company and considers itself obliged to meet high standards of ethics, environmental protection, quality and fairness. At Scholz Recycling GmbH, we strive to fulfil our very high environmental and social responsibilities in order to meet the requirements of our various stakeholders.

We have set this out in the following statement and under the title

**Code of Conduct for suppliers, contractors, haulage firms or waste management companies** combined.

For ease of reading, the Code of Conduct is written in the masculine form. Naturally, all references to persons apply equally to all genders.

All companies that supply goods or services to us, **hereinafter referred to as business partners**, must comply with this Code of Conduct. Compliance with the Code of Conduct may form part of a potential audit.

We expect all businesses with whom we work to comply with this Code. Business partners are required to oblige their suppliers in writing to comply with the standards and regulations set out in this document.

Failure to comply shall be regarded as a serious breach of duty in relation to all agreements between us and the business partner. A breach of this Code may constitute grounds for Scholz Recycling GmbH to terminate the business relationship, including all associated contracts. Compliance with the Code forms part of our general supplier development process.

As compliance with this Code of Conduct is a general element of the business and production orientation of the business partner, the latter shall bear all costs arising from compliance with the Code.

The business partner undertakes to inform its employees about the Code of Conduct.

The Code is based on national laws and regulations as well as international standards and conventions. Scholz Recycling GmbH expects its business partners to comply with all relevant laws and regulations, as well as the requirements of international standards and conventions.

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Scholz Recycling GmbH is committed to respecting human rights and protecting the environment. Our Code is guided by national and international guidelines and conventions, such as the principles of the UN Global Compact, the International Chamber of Commerce's Charter for Sustainable Development, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, and the relevant conventions of the International Labour Organisation (ILO). The Code of Conduct is based, among other things, on the following legal requirements: the State Act on the Management of Waste (LkSG), the Basel Convention, the Waste Shipment Ordinance, the General Data Protection Regulation (GDPR), the Conflict Minerals Regulation, anti-money laundering laws, EU sanctions and embargoes, as well as other applicable regulations.

Scholz Recycling GmbH regularly conducts risk analyses within its own business operations and among its direct suppliers. This enables potential risks to be identified and prioritised in accordance with the principle of proportionality. In this context, appropriate preventive measures are taken. Throughout the supply chain, Scholz Recycling GmbH fulfils its due diligence obligations and implements any remedial measures, which are monitored and controlled accordingly. Scholz Recycling GmbH reserves the right to verify the business partner's compliance with the requirements set out in this Code of Conduct. Such verifications may be carried out on a regular basis or on an ad hoc basis, in particular where there are indications of possible breaches or irregularities.


To this end, Scholz Recycling GmbH – either itself or through a commissioned third party – is entitled, following reasonable notice, to carry out audits at the business partner's premises or to request self-disclosures and further relevant information. The business partner undertakes to facilitate the audits by providing appropriate support, e.g. by granting access to relevant premises, allowing inspection of documents and providing the necessary information.

When conducting the audits, the legitimate interests of the business partner, in particular trade and business secrets, shall be taken into account. The aim is to strengthen trust, ensure compliance with common standards and promote transparent, cooperative partnership.

### **Code of Conduct for Suppliers, Contractors, Haulage Agents or Waste Management Companies**

#### **I. General Principles**


- The business partner undertakes to fulfil its social responsibilities in all its activities, in particular with regard to the welfare of people and the environment. The business partner must ensure that its company contributes to sustainable development.

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- The business partner undertakes to comply with the applicable laws and other relevant regulations of the countries in which it operates in all business transactions and decisions. Furthermore, the business partner undertakes to treat its own business partners fairly, whilst taking into account changes in the operating environment.

## II. Human and labour rights


- The business partner respects and supports compliance with internationally recognised human rights. All employees must work voluntarily. No forced or compulsory labour (including child labour) and no form of modern slavery, slavery-like practices or human trafficking will be tolerated. Child labour performed by children under the age of 15, or work by children below the local statutory school-leaving age, is not permitted.
- Any form of discrimination or harassment is prohibited. The business partner must not make any discriminatory decisions regarding employment. No form of discrimination by the business partner on the grounds of gender, race, disability, age, sexual identity or religion will be tolerated. Equality in recruitment and employment is a key priority. Business partners shall ensure a working environment that is free from harassment. It shall be ensured that employees are not subjected to physical or psychological inhuman treatment, corporal punishment or threats. The business partner embraces diversity, actively promotes inclusion and creates an environment that fosters an inclusive culture, leadership and the individuality of every single person in the interests of the company.
- Private or public security forces shall not be deployed to protect the company if such deployment results in a breach of applicable human rights, civil liberties or labour rights.
- Business partners shall ensure a working environment in which known or suspected misconduct or breaches can be reported without fear of reprisal.
- The business partner must comply with the applicable legal regulations on wages and salaries (such as the minimum wage, social security contributions and continued payment of wages in the event of illness). The business partner advocates fair working conditions and, to this end, complies with statutory regulations on working hours, privacy protection and remuneration. The business partner is aware of the wage levels required to ensure a living wage in the countries in which it operates and undertakes to pay these. In this context, all employees also receive at least the statutory social security benefits.

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- Protection of rights to land, forests and water bodies: The business partner opposes the unlawful forced eviction and unlawful expropriation of land, forests and water bodies in connection with land acquisitions, the development of land, and other uses of water bodies, forests or land areas.
- Protection of minorities, vulnerable groups and indigenous peoples: The business partner ensures decent living conditions for local communities, minorities and vulnerable individuals and communities.

### III. Market conduct

- In dealings with business partners and government institutions, the interests of the company and the private interests of employees on both sides are strictly separated. Actions and (purchasing) decisions are made free from irrelevant considerations and personal interests. No form of bribery, manipulation or corruption is accepted.
- The business partner respects fair and free competition. The business partner therefore complies with the applicable laws that protect and promote competition, in particular the applicable competition laws. In particular, no anti-competitive agreements or arrangements shall be entered into with competitors, suppliers, customers or other third parties.
- The business partner is responsible for selecting its business partners. It shall act with integrity and protect the reputation of our company. The business partner shall endeavour to maintain business relationships only with those business partners whose compliance with the rules it has verified through appropriate measures. Furthermore, the business partner shall take appropriate measures to prevent any identified breaches.
- Within the context of business relationships, gifts, hospitality and invitations are customary and permitted. However, only reasonable gifts may be given. Exceeding customary – and legally permissible – practices is not permitted. Gifts that give the impression of influencing behaviour or create an expectation of a quid pro quo must be consistently declined. Gifts and invitations must always be handled transparently. The granting of benefits is also subject to the principle of appropriateness. Even the mere appearance of undue influence must be avoided. Internal guidelines on the acceptance and granting of such benefits must always be observed.
- Dealing with public officials and elected representatives requires compliance with strict regulations. Gifts, benefits or similar to civil servants, politicians, members of parliament, etc. are strictly prohibited. Influence must not be exerted at any time and will never be condoned.
- In the context of international activities, it is imperative that foreign trade, tax and customs laws are complied with. National and international regulations must be implemented.

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- The applicable import and export regulations must be observed. This also includes compliance with sanctions lists and anti-terrorism lists.
- The business partner undertakes to comply with the legal provisions against money laundering. The identity of customers, suppliers and business partners must be carefully verified before any business transactions take place. The financing of terrorism is prohibited.
- The business partner shall require its employees to respect trade and business secrets.
- The business partner shall comply with the legal framework for proper accounting and financial reporting. Financial records must be truthful, accurate and complete. The business partner shall publish business data and report on business activities truthfully and in accordance with the applicable laws.
- The business partner shall ensure that intellectual property is protected and, in doing so, shall comply with the relevant laws. Furthermore, the use, further processing or placing on the market of counterfeit goods is not permitted. The unauthorised use of third-party intellectual property shall be avoided. The intellectual property of competitors, business partners and other third parties shall be recognised. It may only be used with the permission of the respective intellectual property rights holder. In this context, the business partner shall play its part in identifying and removing counterfeit parts in circulation.
- Confidential information/documents must not be disclosed to third parties without authorisation or made accessible in any other way. Data requiring protection must be collected, processed, secured and deleted in an appropriate manner. The processing of personal data must always be carried out in accordance with the applicable data protection laws (EU GDPR, BDSG).
- We expect our business partners to develop, document and effectively implement appropriate measures to ensure their business continuity. These include, in particular:
  - the identification of critical business processes and resources,
  - the assessment of potential risks and vulnerabilities,
  - the development and maintenance of business continuity plans (BCPs),
  - regular testing and updating of these plans,
  - as well as training relevant staff in how to deal with crisis situations.

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The aim is to maintain delivery capacity or restore it as quickly as possible, even in the event of disruptions – such as natural disasters, cyber attacks, pandemics or other unforeseen events. We also expect our business partners to involve their key subcontractors in these measures.

#### IV. Health and Safety

- The business partner shall ensure occupational safety and health protection in the workplace. The business partner shall comply with the applicable requirements and safety standards. This includes, amongst other things, that the business partner
  - informs its employees about the identified hazards and the associated protective measures,
  - provides suitable protective equipment,
  - monitors work-related health risks and the resulting protective measures,
  - ensures that its employees are medically fit for the tasks to be performed,
  - carries out the examinations required by law,
  - ensures the responsible and safe handling of chemicals, labelling the chemicals used and ensuring they are stored correctly.
- The business partner's facilities must comply with all safety and hygiene standards in accordance with national regulations.
- To prevent accidents at work, the use of the prescribed personal protective equipment (PPE) is a fundamental requirement at Scholz Recycling GmbH's premises and is also expected of the business partner.
- Regular training of the business partner's employees present at Scholz Recycling's premises serves to enhance safety.
- Our accident management policy stipulates that all workplace accidents, near-misses and suspected health and safety risks must be reported internally. The subsequent root cause analysis helps to continuously improve working conditions and reduce the risk of accidents. In the case of accidents that have already occurred, the analysis focuses in particular on preventing a recurrence. By investigating near-misses, the risk of workplace accidents occurring can be minimised. As part of incident management, other incidents are also recorded and evaluated in addition to workplace accidents. We expect our business partners to inform their employees that any accidents, near-misses or other incidents occurring at Scholz Recycling GmbH's premises must be reported.
- We have established an emergency response plan based on identified risks. The assessment of potential emergency situations leads us to implement plans and procedures for responding to emergencies, thereby reducing the consequences of such events.

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An appropriate emergency response organisation (disaster preparedness) is in place for any disasters that may occur. External visitors can find out about the procedures via relevant notices. We expect our business partners to have implemented an emergency response plan as well.

Fire safety plays a particularly important role in emergency preparedness and is a high priority within our company. A fire on the premises can not only cause significant property damage but also endanger human lives and the environment. Fire prevention is therefore of paramount importance. Sufficient quantities of fire extinguishers are kept on the premises and are regularly checked to ensure they are in working order. The marking of escape and rescue routes is mandatory. Employees and all persons on the premises are regularly instructed on the procedure to follow in the event of a fire. Fire safety regulations must also be strictly adhered to by business partners.

#### **V. Principles of social responsibility**


- Scholz Recycling GmbH respects freedom of assembly, freedom of association and the right to collective bargaining. We expect our business partners to respect freedom of assembly and the right to collective bargaining as well.
- The legal provisions regarding the misuse of inside information are observed. We expect inside information to be treated as confidential at all times.
- Equal opportunities for women and men: The business partner ensures equal opportunities for women and men in all aspects of training and employment, as well as in personal and professional development and advancement.

#### **VI. Environmental protection and sustainability**

- We expect our business partners to respect environmental protection and to comply with the environmental laws and regulations of the country in which they are based. Compliance with environmental laws and regulations must be ensured through internal business process regulations at the business partner.
- The business partner attaches great importance to climate protection as well as to the efficient use of resources and energy. The business partner undertakes to comply with and fulfil the requirements of climate and resource protection. Decisions and actions are expected to be based on the principles of environmental, social and economic sustainability.

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- The business partner raises awareness among its employees regarding climate-friendly behaviour in the workplace. This includes, in particular, the economical use of resources. Every employee should be encouraged to actively contribute to reducing environmental impact. Everyone should have the opportunity to put forward suggestions for greater sustainability.
- Reduction of greenhouse gas emissions: The business partner should prioritise climate protection by reducing greenhouse gas emissions arising from its operational activities. It is expected that greenhouse gas emissions will be calculated in accordance with the GHG Protocol.
- Sustainable management of natural resources: The business partner ensures the sustainable use of resources such as water, energy, raw materials and air quality in its operational activities.
- Sustainable energy use: The business partner takes into account the efficient use of energy for heating and propulsion purposes, as well as in the planning and operation of machinery and plant. Potential savings are assessed and factored into decisions.
- Decarbonisation: Considerations regarding the decarbonisation of operational activities are taken into account during planning and operation, and potential opportunities are assessed.
- Renewable energy: Renewable energy is used to reduce dependence on international energy markets, to reduce greenhouse gas emissions and to achieve decarbonisation.
- Waste prevention, reuse and recycling: The reduction of operational waste, its preparation for reuse, and the efficient recycling of waste are a matter of course for the business partner.
- The business partner must comply with the applicable regulations and prohibitions governing the export and import of hazardous waste. In the event of any cross-border shipment of waste, the provisions of the Basel Convention and EU Regulation No 1013/2006 must be observed.
- The business partner shall identify chemicals or other substances classified as harmful to the environment and ensure that the necessary environmental, safety and hazardous goods requirements are met during handling, transport and storage. Proper disposal of these substances must be ensured.
- The business partner shall ensure compliance with the requirements of the Minamata and Stockholm Conventions regarding mercury and POPs (persistent organic pollutants). The business partner shall comply with the ban on the manufacture, use or handling of mercury or products containing mercury. Furthermore, they shall observe the ban on the production, use, environmentally unsound handling, collection, storage and disposal of persistent organic pollutants.

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- The business partner is committed to preventing harmful soil changes, water or air pollution, and excessive water consumption, as well as reducing wastewater generation.
- Biodiversity, animal welfare, land use and deforestation: In addition to protecting water, air and soil quality, the business partner supports initiatives for biodiversity and animal welfare, as well as those against land use and deforestation.
- Noise emissions: The business partner reduces noise emissions as far as possible to minimise the impact on people and the environment.
- Environmental and health protection: The business partner contributes to the protection of flora, fauna and the population from potential health risks caused by economic activities.

### **VII. Responsible sourcing of raw materials**

- The business partner conducts transactions involving the relevant raw materials (3TG) within the scope of the EU Conflict Minerals Regulation with the requisite due diligence (Conflict Minerals EU Regulation 2017/821). The business partner therefore ensures compliance with due diligence obligations in the supply chain for Union importers of tin, tantalum, tungsten, their ores and gold, which may originate from conflict-affected and high-risk areas.
- Risks relating to the direct and indirect financing of armed conflicts, forced labour, serious human rights violations, child labour and slavery are to be avoided by exercising due diligence.

### **VIII. Compliance with the Code of Conduct for suppliers, contractors, freight forwarders or waste management companies**

- The provisions of this Code of Conduct apply to all business partners and must be complied with by them without exception. All parties must familiarise themselves with the Code of Conduct.
- The business partner undertakes to comply with the reporting and documentation obligations under the Supply Chain Due Diligence Act, provided the company falls within its scope, to adhere to applicable principles, and to document the regulations and requirements in a report and disclose this accordingly.
- A breach of laws, guidelines or other regulations may result in damage to Scholz Recycling GmbH and the business partner. In addition to damage to image and reputation, penalties and fines may also be incurred. In order to identify breaches of the rules at an early stage, it is important to us that issues can be addressed openly and without fear of negative consequences. Even suspicions of potential breaches can be communicated in confidence.

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- We have set up a reporting channel for reporting breaches within the supply chain in accordance with the Supply Chain Due Diligence Act. The reporting office is operated via the Legal Tegrity portal and enables external third parties to report human rights and environmental risks, as well as breaches of human rights or environmental obligations, in accordance with Sections 8 and 9 of the Supply Chain Due Diligence Act (LkSG).

The reporting office can be contacted as follows:

In writing: [Online reporting channel \(https://app.whistle-report.com/report/2a100efb-1170-45b1-b267-17ce9f9e9f5e\)](https://app.whistle-report.com/report/2a100efb-1170-45b1-b267-17ce9f9e9f5e)

By telephone: via the telephone channel on our online reporting portal From within Germany: +49 800 3800 999 (Mon–Fri: 09:00–17:00)

From abroad: +49 69 99998839 (Mon–Fri: 09:00–17:00)

- In addition to receiving reports, the reporting office’s responsibilities include initiating appropriate follow-up measures, in particular conducting internal investigations, as well as cooperating confidentially with the whistleblower. The whistleblower will receive confirmation of receipt of the report within seven days, and feedback on the follow-up measures taken and planned will be provided within three months. Reports may also be submitted anonymously.

The contents of this Code of Conduct are to be regarded as **minimum standards** and should not prevent business partners from exceeding these standards.

Where other regulations or laws impose stricter requirements, these shall take precedence over this Code of Conduct. In order to ensure high standards, Scholz Recycling GmbH reserves the right to amend this Code of Conduct. The business partner will be informed accordingly in the event of any such amendment.

By signing below, the supplier confirms receipt of the Code of Conduct and undertakes to observe and implement the provisions contained therein.

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Company Name

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Date, Signature