

REMONDIS – Code of Ethics

Introduction

Business and ethics are inextricably linked at REMONDIS – no matter what activity is carried out at our company, it must always comply with the highest legal and ethical standards. Priority is given to ensuring that our Code of Ethics is strictly adhered to across all sections of our company and across all countries. And we do this because this is something we truly believe in, not just because our business partners, the authorities and the general public expect it of us.

REMONDIS' Code of Ethics is based on its Compliance Guidelines. These guidelines were introduced many years ago and have been continuously updated to reflect the latest market requirements. One premise has remained the same throughout: that we operate responsibly so that we can continue, as always, working for the future.

Respect for human rights

The REMONDIS Group respects human rights and adheres strictly to the European Convention on Human Rights (ECHR). We do not tolerate any form of forced labour or any form of child labour. We comply with the legal minimum working age determined by each country or set out in collective wage agreements provided that this age is not below the minimum working age prescribed by the International Labour Organisation (ILO). No matter where in the world we operate, we ensure that the statutory labour laws of the country in question form the basis for the minimum working standards for our employees – for example regarding working conditions, health & safety, remuneration and employer contributions. One of our fundamental aspirations is to establish German and European standards, even if these are not necessarily guaranteed by local laws.

Non-discrimination

Any decision made by the company to recruit or promote members of staff is based solely on their qualifications and job performance. We promote equal opportunities and the equal treatment of employees. We do not tolerate any form of discrimination for reasons of race or ethnic origins, sex, religion or belief, disability, age or sexual orientation. Discriminatory measures that may undermine the premise of interactions being free of distinction, exclusion, preference or harassment are forbidden without exception, no matter how minimal their impact may be.

Legally compliant working hours

We always respect and comply with all working time regulations. The permitted maximum working time set out in legislation and work regulations is never exceeded. Overtime is limited to the statutory and/or contractual conventions applicable at the respective location. We ensure that all required rest breaks are adhered to and attach the greatest importance to the health, safety and satisfaction of our employees. It goes without saying that there is an unrestricted right to freedom of association and collective bargaining at our company.

Health & Safety

Comprehensive measures are taken to protect and safeguard the health and safety of our employees. Besides adhering to all country and industry-specific health and safety regulations, we also have our own dedicated health and safety programmes that our managers must promote and monitor. These programmes focus on the health and safety aspects of our work processes and working conditions as well as the safety behaviours of individuals and the work safety culture at the company as a whole. People from all levels of the business are continuously sharing information as part of our zero accidents culture, so that even better results can be achieved when it comes to preventing accidents and work-related illnesses.

Sustainability

We are committed to conserving natural resources and protecting the environment across all of our business divisions. We fully back the United Nation's Sustainable Development Goals (SDGs) and do everything in our power to contribute towards all of these 17 goals. It goes without saying that we comply with all environmental protection standards. With recycling being one of our key activities, protecting natural resources and preventing carbon emissions and pollution are at the very core of our company philosophy. In addition to this, we take every step possible to reduce emissions across all of our business divisions. To achieve this goal, we operate both an environmental management programme and an energy management programme. Moreover, we also provide information and training courses for our employees to raise awareness of environmental and climate issues and promote an environmentally conscious workplace.

Fair competition

The REMONDIS Group is fully committed to free markets. Breaches of competition law – no matter where, for what reason or to what extent – are absolutely forbidden at our company. This standpoint is reflected and adhered to across all of our business processes. When working with our suppliers and customers, we prohibit any action that could even remotely promote illegitimate influence on competition. This includes agreements made regarding prices, market shares, capacities and the allocation of customers and regional markets as well as any other form of influence that may be problematic under competition law. Any company disposals, acquisitions and joint ventures are subject without fail to merger control by the antitrust authorities responsible for the relevant country.

Integrity in our business dealings

Avoiding and tackling corruption plays a very important role at REMONDIS. We will not engage in business transactions that violate legal provisions or company rules relating to giving or receiving advantages. We accept that this policy may result in us losing business, but increased sales and profits can never be a justification for illegal business activity. This applies across the entire Group, without any exceptions. Moreover, we ensure that decisions are always taken in the interest of the company and based purely on objective criteria. It is absolutely forbidden for employees to mix their private interests with those of the company and action will always be taken against employees that do this. The same is true if documents are falsified or incorrect accounts submitted.

Handling of confidential information and information security

As a matter of principle, we only ever use confidential information for business purposes and do not disclose technical data about products and processes, marketing and sales strategies, customer data, non-public financial and transactional information or personal data to third parties. The same is true for trade and company secrets as well as for REMONDIS' know-how and the know-how of its business partners. If information is disclosed, then only to the extent that has been expressly agreed on and that is permitted. This obligation not to disclose confidential information applies to all of our employees, even after their contract of employment ends. A number of our company's IT and business processes have been certified in accordance with the ISO 27001 international standard. In addition to this, we have also set up sustainable operational and strategic structures that will enable us to further extend information security within the whole of the REMONDIS Group and make sure we are ready and prepared to face new challenges, for example in the area of cyberattacks.

An unambiguous stance on plagiarism

We protect our own intellectual property and respect the intellectual property of others. We categorically reject the use of plagiarism. We use all legal means available to us to fight the plagiarism of REMONDIS' own technologies and products. We expect all of our employees, customers and suppliers to take a strict approach against the acquisition and use of counterfeit parts and the unauthorised copying of technologies developed and/or patented by us.

Financial responsibility

Handling company assets and company property responsibly is the economic basis for our successful operations. Any decisions we make are always aimed at safeguarding and growing our company assets. Our ethical and moral guidelines apply to our financial decisions and investments as well. We never speculate on raw materials or on rising or falling prices. Moreover, we never participate in fields of business that involve short-term gains or put the company at risk. We handle our company's resources in an appropriate, responsible, sustainable and legitimate way. Moreover, we protect our company against misuse, damage, ruin, loss and theft. Any form of fraud, disloyalty, theft, embezzlement and tax evasion is forbidden, regardless of whether such action damages the assets of the company or of a third party.

Full cooperation with the authorities

We seek to maintain a constructive relationship with all the relevant authorities while safeguarding our own interests and rights. If information has to be forwarded to the authorities, then such information is always complete, correct and comprehensible and made available openly and punctually.

Whistleblower policy

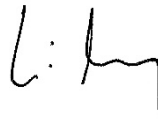
We have set up our own whistleblower system to enable both our own employees and third parties to report any actions or activities that may involve violations of laws or compliance regulations. Each and every case reported is carefully investigated by our compliance department and action is always taken should a violation have occurred. We guarantee that whistle-blowers will be given anonymity and that their data will be kept confidential and secure. Whistle-blowers need

not worry that reporting a possible wrongdoing will have a negative impact on them or that sanctions will be taken against them. On the contrary: we encourage everyone to report known or suspected wrongdoings to their line manager or the compliance department immediately. We guarantee that the employees will be fully protected against retaliation.

Luenen, August 2023



Ludger Rethmann
Board Chair
REMONDIS SE & Co. KG



Herwart Wilms
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