

CSR-Verhaltenskodex

Code of Conduct

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Inhaltsverzeichnis

1. PORTICA STATEMENT	3
2. PURPOSE, SCOPE, AND USERS.....	4
3. CODE OF CONDUCT.....	4
3.1.1. Law and Legislation	4
3.1.2. Kommunikation.....	4
3.1.3. Corporate Citizenship	4
3.1.4. Forced Labor	4
3.1.5. Integrity and Anti-Corruption.....	4
3.1.6. Child Labor	5
3.1.7. Harassment.....	5
3.1.8. Remuneration	5
3.1.9. Working Hours	5
3.1.10. Non-Discrimination	5
3.1.11. Health and Safety.....	5
3.1.12. Freedom of Association and Collective Bargaining	6
3.1.13. Environment.....	6
4. REGULAR REVIEW OF THIS CODE OF CONDUCT.....	6
4.1. EVENT-DRIVEN REVIEW	6
4.2. ANNUAL REVIEW AT THE ANNUAL QUALITY MEETING.....	6
4.3. INVOLVEMENT OF RELEVANT STAKEHOLDERS	6

1. PORTICA Statement

The Code of Conduct of PORTICA GmbH is an integral part of our corporate identity. It forms the foundation for responsible, fair, and ethical conduct in all areas of our company. Honesty, fairness, and trustworthiness shape our daily behavior and how we work together.

The conduct of each individual employee directly influences the credibility of our company and the trust placed in us by customers, suppliers, business partners, investors, employees, and the public.

As part of our CSR initiative "THE FUTURE IS NOW," we live by these principles together with our employees. This includes, in particular, full compliance with all applicable laws — such as those combating bribery and corruption — as well as respect for and adherence to internationally recognized human rights and social standards.

The PORTICA Code of Conduct, in its current version at any given time, is binding for all employees, regardless of their role or position. We expect our managers to embody the principles enshrined in this Code, to communicate them clearly, and to actively ensure their implementation and observance.

Tobias te Neues

Managing Director, PORTICA GmbH Marketing Support

Thorsten Wenzek

Corporate Compliance Officer / CSR-Manager

2. Purpose, Scope, and Users

The objective of this top-level Code of Conduct is to define the purpose, direction, foundations, and fundamental rules for the CSR management system.

This Code of Conduct applies to the entire CSR management system as defined in the organizational handbook for the CSR scope of application.

Users of this document are all employees of PORTICA GmbH as well as relevant external parties.

3. Code of Conduct

3.1.1. Law and Legislation

PORTICA complies with the applicable laws and regulations of Germany and the EU.

3.1.2. Kommunikation

PORTICA is committed to communicating this Code to all its employees and suppliers.

3.1.3. Corporate Citizenship

PORTICA, in collaboration with its affiliated companies te Neues Druckereigesellschaft mbH and GEDAK GmbH, demonstrates civic engagement by making positive contributions to the community of Kempen/Viersen, where it primarily operates.

3.1.4. Forced Labor

No form of forced labor, including prison labor and debt bondage, shall be used.

3.1.5. Integrity and Anti-Corruption

PORTICA aligns its actions with universally accepted ethical values and principles, in particular integrity, righteousness, respect for human dignity, openness, and non-discrimination on the grounds of religion, belief, gender, and ethnicity. PORTICA rejects corruption and bribery as defined by the relevant UN Convention. It promotes transparency, ethical conduct, and responsible governance and oversight within the company by appropriate means.

3.1.6. Child Labor

Child labor shall not be used. Unless local laws stipulate a higher age limit, no persons shall be employed who are still of compulsory school age or younger than 15 years (subject to the exceptions provided under ILO Convention 138). Employees under the age of 18 shall not be assigned to hazardous work and may be exempt from night work, taking their training requirements into account.

3.1.7. Harassment

Employees shall not be subjected to any form of corporal punishment or any other physical, sexual, psychological, or verbal harassment or abuse.

3.1.8. Remuneration

Remuneration, including wages, overtime, and benefits, shall be provided at least at the level stipulated by applicable law, or above it. Remuneration granted for full-time employment must be sufficient to meet the basic needs of the employee.

3.1.9. Working Hours

Unless national regulations stipulate a lower maximum working time, and except in cases of extraordinary business circumstances, employees shall not be required on a regular basis to work a standard working week of more than 48 hours per week, or a total weekly working time of more than 60 hours (including overtime). Employees shall be granted the equivalent of at least one day off in every 7-day period.

3.1.10. Non-Discrimination

In all employment decisions — including but not limited to hiring and promotion, remuneration, benefits, training, layoffs, and terminations — all employees shall be treated strictly on the basis of their skills and qualifications.

3.1.11. Health and Safety

In order to prevent accidents and personal injury, PORTICA provides safe and healthy working conditions that meet, as a minimum standard, the applicable statutory requirements.

3.1.12. Freedom of Association and Collective Bargaining

PORTICA recognizes and respects the legal right of employees to freedom of association and collective bargaining.

3.1.13. Environment

PORTICA applies environmentally friendly practices at all locations where it operates, continuously improving them. It complies with the environmental protection regulations and standards applicable to its respective operations and handles natural resources responsibly.

4. Regular Review of this Code of Conduct

4.1. Event-Driven Review

The Code of Conduct shall be reviewed whenever cause arises. This may be due to internal or external factors, such as:

- Changes in legal requirements
- Complaints or violations of the Code of Conduct
- Relevant organizational changes

4.2. Annual Review at the Annual Quality Meeting

As part of the annual quality meeting, the Code of Conduct shall be reviewed with respect to the following points:

- **Relevance:** Are the stated values and standards still current?
- **Implementation:** Are the requirements being lived and adhered to within the company?
- **Areas for improvement:** Are there new topics (e.g., sustainability, diversity) that should be incorporated?

4.3. Involvement of Relevant Stakeholders

Relevant internal and, where appropriate, external stakeholders (e.g., specialist departments, compliance officers) shall be involved in the review process. This ensures that the Code of Conduct reflects the needs and requirements of all parties involved.