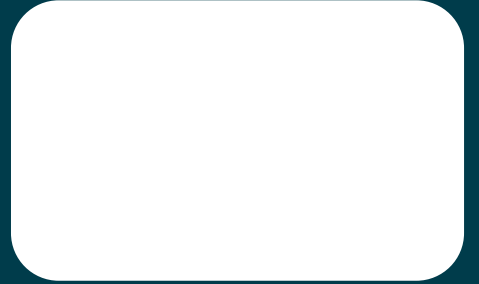


# ocono



## Code of Conduct

April 2026



Dear Business Partner, Dear Stakeholder,  
Dear Interested Person,

to us the way we do business is a result of something that is much bigger and that goes way beyond any words in a document: It is the shared believe of a vision and a set of values that we all want to live to.

We believe in integrity and respect as foundation of any fruitful long-term relation. Coming from this irrefutable core values as a root, over decades our business has built a natural value DNA of how we work.

We are more than proud to give you some insights of our work ethics on the following pages: First we explain to you the idea of our business ethics tree. You will learn about our core values, how these evolved to value DNA and finally how this defines the way that we work with each other and our partners in specific value principles.

As we are well aware that we are part of and want to positively contribute to our society as a whole we are dependent on each other. We thus would be more than happy to learn about your feedback and how you think that we can improve: Please send your thoughts and comments to [info@ocono.com](mailto:info@ocono.com).

  
Managing Director  
Managing Director  
Managing Director

Mülheim-Ruhr, 1st April 2026

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## About Our Code of Conduct

### Why Do We Have a Code of Conduct?

Our Code of Conduct is designed to guide everyone at Ocono in making the right decisions in their professional lives. It outlines the essential principles and expectations for behavior, ensuring that all individuals conduct themselves ethically and responsibly in their daily work. Ocono includes Ocono Holding GmbH and all of its operating subsidiaries, namely Ocono APD Schlauchtechnik GmbH, Ocono Ruhrkunststoff GmbH, Ocono VACUFLEX GmbH, Ocono France SARL, Ocono Italy S.r.l., Ocono Romania S.R.L..

### Who Does the Code of Conduct Apply to?

The Code of Conduct applies to everyone at Ocono, regardless of their role or location. Managers are also responsible for supporting and advising their teams, ensuring that all employees can act lawfully and align with the company's values.

## Our Principles of Conduct

When it comes to the question of how a business can be conducted in a good manner, we have always believed that very few general values define what can be considered good action and behavior. When you have a set of very general values, these automatically spread into more detail as you ask yourself in a specific question how you should act. It is like a tree which has its deep roots, which everything that you can look at from the outside is linked to. The tree trunk is visible and connects the branches with the roots.

nization. Our approach thus is to start with the fundamental values which we believe to build the best foundation for a business that lives up to the responsibilities it has towards all stakeholders. We call Respect and Integrity our **CORE VALUES** which form the roots of our value tree. Build on these we have developed **VALUE DNA** in our company, which is less general than the CORE VALUES and more an organizational value set, but still not single and specific **VALUE PRINCIPLES**.

The value principles are what you expect to be a typical Code of Conduct – but from our point of view is just a straightforward result of the values that we have built our company on.

While you can think of the branches being the single principles of value that we live up to, the trunk is the value DNA that you create from your roots and flow through your orga-

### Core Values

We have two core values building the foundation of our behavior and forming the two deep roots of our business ethics tree.

### Integrity

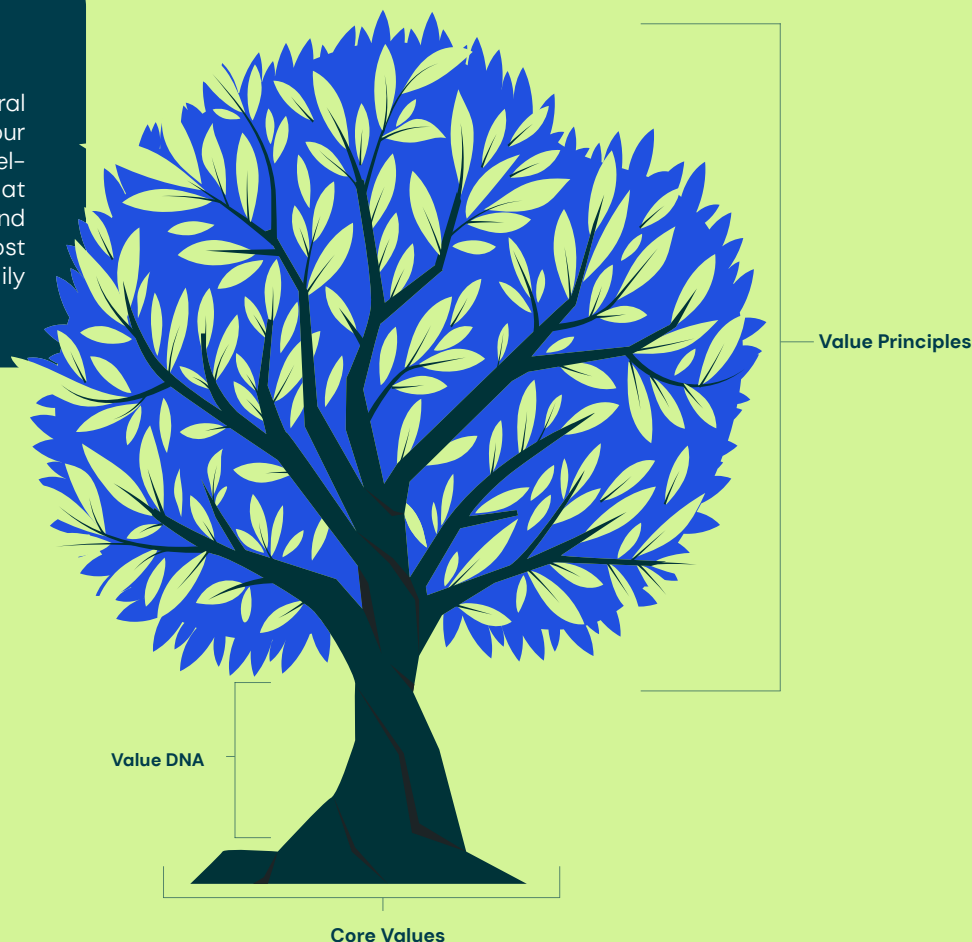
Living in and by a set of ethical believes is important for all parties involved in any kind of organization or social group. These inner values are not subject to discussion – in no matter. We encourage and hold our employees responsible to keep their ethical compass in any situation. And we also do so with our suppliers and customers. These ethics should not be subject to any condition or circumstance in business. A deeply rooted set of values is a constant in an ever changing world and is the safeguard maneuvering through complex decision-making situations. It not only is a must to ensure true partnership in business; it also is part of trustful cooperation between us inside of our companies. Integrity is the general way to good behavior and action and thus our core value number one.

### Respect

If you treat people, nature and things with respect, you are contributing to a good world. Keeping respect in mind as a major guidance in your daily life in all the situations you face, will help making our and others people life better and keep our surrounding of society and nature in a great condition. We believe that we must apply respect to all our actions; every day, every hour – absolutely independent of whom or what we treat. Respect is for us the irrefutable way of treating people or things and is our core value number two.

### Value DNA

Build on the very general roots of **CORE VALUES** our organization has developed a **VALUE DNA** that has evolved over time and is how we live in almost every aspect of our daily work.



### Open Communication

We speak up for what we stand for and bring our opinion into discussion. By doing so we actively foster a decision-making process that lives by diversity of opinions and take as many perspectives into consideration as possible. Good and open communication needs two parts: Actively listening to others and understanding them is as important as sharing the own standpoints.

built over decades with many of our employees being part of this history for a very long time. We are deeply connected to our products and really care for their performance in our customers hand.

Our commitment is to walk the extra mile wherever needed to make our products superior and create better service for our customer. .

We ask if we do not understand and we help others making their point, if they struggle doing it their self. Respect starts with respecting other perspectives and diverse thinking: we are thankful for different thinking as it enriches discussions and supports better decisions. We encourage all employees to discuss and express opinions in respectful talks – no matter in which department and regardless of their management level.

### ONE Team

We are ONE team – in our company, and even in our companies. We understand that it is a team that wins: We thus put the team and not a person first – it is not about what one can gain individually if we all stand together.

We help each other out, instead of pointing out the mistakes of others. We talk to each other and not about each other. We try to make our team better, by helping where we are needed and where we deliver the most value for us. It is all about the support we can give each other to perform the best we can. .

### Passion x Commitment

We love what we do and we perform our tasks with passion and full commitment. Anything we do lives by the target to serve our customers with the best products and service possible. Our aim is to get better in what we do – every day a little more. Our business has been





**Laws, Regulations & Business Ethics**

**Understanding Laws, Regulations & Business Ethics**

Business ethics go beyond legal requirements, representing the values and principles that guide our actions in the workplace and in society.

**Our Commitments to Laws, Regulations & Business Ethics**

We ask our employees and all business partners to follow any law and regulation applicable. It lies within the core value respect to respect rules and thus act according to laws and any form of regulation. Integrity might even go beyond these rules and forms business ethics which we support our employees to adopt in their daily business.

**What this Means for You**

Always ensure your actions comply with applicable laws and regulations in your region or industry. Act with integrity in situations where legal requirements may not provide clear guidance. Report any violations of laws or ethical standards through the appropriate channels.

**Behavior Toward Employees**

**Understanding Behavior Toward Employees**

A positive and respectful work environment is essential for fostering collaboration, trust, and team spirit. How we treat each other reflects the values we uphold as an organization and directly impacts our shared success.

**Our Commitments to Behavior Toward Employees**

Understanding that we are one team we live up to our core value respect in working with each other. Respect is no question of hierarchy, role, gender or beliefs: neither in terms of who should give respect nor whom respect should be given to: We all always treat each other with respect; regardless of the situation. Even though it is self-evident with the aforementioned: We tolerate no forms of discrimination, intolerance or harassment at work.

**What this Means for You**

Treat all colleagues with respect, regardless of their role, background, or beliefs. Speak up and report any behavior that may constitute discrimination, harassment, or intolerance. Support your colleagues by fostering a culture of collaboration, empathy, and mutual understanding.

**Behavior in Society and Sustainability**

**Understanding Behavior in Society and Sustainability**

Organizations and individuals play pivotal roles in shaping society and preserving the environment. A clear understanding of this shared responsibility underpins our commitment to fostering respect in every interaction, whether with people or nature.

**Our Commitments to Behavior in Society and Sustainability**

Both, the company as organization and each individual employee, play a role in society that they have to be well aware about. Applying respect to our society is crucial in every aspect: As a company we take our responsibility of acting with full respect with all stakeholders like government, customers and suppliers, employees and shareholders.

We stay in close contact with each of these stakeholders and try to have as many direct contacts in talks as possible. Learning about their expectations allows us best to develop our companies in the best way possible – which in the end is the result that all stakeholder benefit of.

Already since 1986 the Ocono trust is actively supports scientific projects in the fields of engineering, economics and social sciences. The trust awards sponsorship prizes for trainees, sponsors three scholarships for students of STEM subjects as part of the national scholarship program, and endows the international BIONIC Award.

Respect also extends from organizations and persons to nature. We treat all resources, material and machinery, with a maximum of care and try to produce long lasting, high performing products with the highest efficiency possible.

From our point of view this is the best way to form a solid foundation for real sustainability. But we do not stop there but try to recycle as much as possible of any materials we use in our production if it comes to any kind of waste.

We have invested heavily in machinery and building up broad and deep know how about recycling of any of our plastic scrap – which for instance inevitably comes with any product set up procedure.

All of our production facilities have as much photo voltaic production capacities as they can – and all excess electricity needed is green.

**What this Means for You**

The same level of respect with which we live towards our employees and society is what we ask our employees to live by: We promote social engagement, volunteerism and environmental protection. We foster a healthy and peaceful way of life and tolerate no form of discrimination, intolerance or harassment.

**Dealing with Information and Privacy**

Understanding dealing with information and privacy

Protecting personal and business data is crucial for maintaining trust, safeguarding privacy, and complying with laws such as GDPR. Proper data management also protects against misuse and potential breaches.

**Our Commitments to Dealing with Information and Privacy**

We know about the high level of trust that our business partners put into us. Thus we do our very best to not also meet or even overpass their expectations in product and service, but also protect their data in the best way possible. The same applies to all data and the privacy of our employees. It is self-evident that we protect all of our company data with up to date technology and enforce strict guidelines on IT, data and privacy.

We offer our employees mandatory ongoing training and testing on IT security, data protection and data privacy issues.

**What this Means for You**

Handle sensitive data responsibly and ensure that it is used only for authorized purposes. Report any data breaches or vulnerabilities immediately to the Data Protection Officer or IT Security Team.

**Anti-Corruption**

**Understanding Anti-Corruption**

Ocono is committed to upholding the highest standards of integrity and transparency in all business operations. We do not tolerate any form of bribery, corruption, or unethical behavior. This commitment ensures that we maintain trust with our stakeholders and comply with global anti-corruption laws and regulations.

**Our Commitments to Anti-Corruption**

We prohibit offering, giving, soliciting, or accepting any bribe or corrupt payment to secure or retain business or obtain any improper advantage. This applies to dealings with both private and public entities.

Employees are expected to act in a manner that upholds the company's reputation and integrity.

**What this Means for You**

Do not engage in or tolerate any form of bribery or corruption. If you encounter potential corruption or unethical practices, report it to your manager or Compliance Team.

**Gifts, Invitations and Other Benefits**

**Understanding Gifts, Invitations and Other Benefits**

Exchanging gifts or benefits can create the appearance of improper influence and may lead to conflicts of interest. Ocono is committed to ensuring that all gifts, invitations, or other benefits are handled in accordance with ethical principles and company policies.

**Our Commitments to Gifts, Invitations and Other Benefits**

We allow only modest, lawful, and appropriate gifts and benefits that cannot be misconstrued as bribes or influence. Any gifts or invitations exceeding acceptable thresholds must be reported and approved.

**What this Means for You**

Avoid situations where your personal interests may conflict with your duties. Report potential conflicts of interest to your manager or Compliance Team for assessment.

**Avoiding Conflicts of Interest**

**Understanding Conflicts of Interest**

A conflict of interest arises when personal interests could interfere with your ability to act in the best interests of Ocono.

**Our Commitments to Avoiding Conflicts of Interest**

We strive to prevent and manage conflicts of interest to protect the integrity of our business decisions and maintain stakeholder trust. Employees are required to disclose potential conflicts promptly.

**What this Means for You**

Conduct all business activities in compliance with competition laws. Avoid agreements or behaviors that could restrict Fair Competition.

**Fair Competition**

**Understanding Fair Competition**

Ocono is committed to complying with antitrust and competition laws to ensure fair and ethical business practices in the marketplace.

**Our Commitments to Fair Competition**

We do not engage in anti-competitive practices, including price-fixing, market sharing, or abuse of market dominance. These principles guide our interactions with competitors, customers, and suppliers.

**What this Means for You**

Maintain accurate and honest records in all aspects of your work. Report any inaccuracies or inconsistencies to your manager.

**Correct Record Keeping**

**Understanding Correct Record Keeping**

Accurate and transparent record keeping is critical for maintaining trust with stakeholders and ensuring compliance with legal and regulatory obligations. Every piece of documentation, from financial reports to internal communications, reflects Ocono's commitment to integrity and transparency.

**Our Commitments to Correct Record Keeping**

Ocono is dedicated to maintaining records that are accurate, complete, and consistent with applicable laws and internal policies. We ensure that all financial statements, contracts, and other key documents uphold the highest standards of precision and reliability.

**What this Means for You**

Ensure all transactions comply with tax and customs laws. Consult with the relevant team for guidance on cross-border transactions or tax matters.

**Tax and Customs Regulations**

**Understanding Tax and Customs Regulations**

Tax and customs compliance ensures the lawful and efficient flow of goods, services, and financial transactions across borders. Non-compliance can lead to legal, financial, and reputational risks for the company.

**Our Commitments to Tax and Customs Regulations**

Ocono adheres strictly to all applicable tax and customs laws, ensuring timely and accurate reporting, documentation, and payment of obligations. We take a proactive approach to ensuring compliance with all related regulations.

**What this Means for You**

Ensure that all transactions and records are in full compliance with tax and customs laws and company policies. For cross-border transactions or tax-related questions, consult with the appropriate department to ensure accurate reporting and adherence to legal requirements.

**Foreign Trade Law and Export Control**

**Understanding Foreign Trade Law and Export Control**

Foreign trade laws and export controls regulate the movement of goods, services, and technology across international borders. These laws are critical for preventing unauthorized exports and ensuring compliance with global trade standards.

**Our Commitments to Foreign Trade Law and Export Control**

Ocono strictly follows all foreign trade laws and export control regulations to ensure that our operations meet both national and international requirements. We work diligently to maintain lawful and transparent trade practices in every jurisdiction.

**What this Means for You**

Verify that all imports and exports comply with the relevant trade laws and company policies. If you encounter uncertainties or potential violations, report them to the Compliance Team or the Export Control Officer immediately.

**Prohibition of Money Laundering and Terrorist Financing**

**Understanding the Prohibition of Money Laundering and Terrorist Financing**

Money laundering involves concealing the origins of illicit funds, while terrorist financing channels resources to support illegal activities. Both are serious crimes that undermine financial systems and global security.

**Our Commitments to the Prohibition of Money Laundering & Terrorist Financing**

Ocono implements stringent measures to prevent any involvement in money laundering or terrorist financing. We comply fully with anti-money laundering laws and conduct due diligence to ensure legitimate business practices.

**What this Means for You**

Verify the legitimacy of business partners, transactions, and payments before proceeding. Report any suspicious activities or concerns about potential money laundering to the compliance team without delay.

**Occupational Safety**

**Understanding Occupational Safety**

A safe and healthy work environment is vital to the well-being of employees and the overall success of the company. Occupational safety reduces risks, prevents accidents, and promotes a culture of care and responsibility.

**Our Commitments to Occupational Safety**

Ocono prioritizes Occupational Safety by adhering to regulations, implementing proactive measures, and providing regular training to employees. We are committed to fostering a workplace where safety is a shared responsibility.

**What this Means for You**

Follow all safety protocols and immediately report any hazards, unsafe conditions, or incidents. Participate in mandatory safety training programs to remain informed and prepared to uphold workplace safety standards.

**Product Compliance**

**Understanding Product Compliance**

Ensuring that all products meet safety, quality, and regulatory standards is critical for protecting customers and maintaining trust. Product compliance safeguards not only end users but also the company's reputation.

**Our Commitments to Product Compliance**

Ocono ensures that all products are designed, manufactured, and marketed in accordance with applicable laws, regulations, and internal standards. This commitment extends to safety labeling, quality assurance, and continuous improvement.

**What this Means for You**

Ensure that all products comply with the required standards for safety and quality at every stage. Report any concerns or deviations to your manager or the compliance team to address issues promptly.

**Protection of Confidential Information**

**Understanding Confidential Information**

Confidential information includes trade secrets, business strategies, and other proprietary data that give Ocono a competitive advantage. Protecting this information is essential for the company's success.

**Our Commitments to Confidential Information**

Ocono safeguards confidential information by implementing strict access controls and security measures. We ensure that sensitive data is shared only with authorized individuals and used appropriately.

**What this Means for You**

Do not disclose confidential information without proper authorization, whether internally or externally. Always follow company protocols for handling sensitive data to prevent breaches or unauthorized access.

**Cyber Security**

**Understanding Cyber Security**

Cyber security is critical for protecting digital systems, sensitive data, and business operations from unauthorized access or cyber threats. In an increasingly digital world, it is a top priority.

**Our Commitments to Cyber Security**

Ocono employs advanced cyber security measures and technologies to safeguard IT systems and data. We ensure compliance with all relevant regulations and educate employees about Cyber Security best practices.

**What this Means for You**

Follow company policies for the secure use of IT systems and data. Report any suspicious activity, phishing attempts, or system vulnerabilities to the IT Security Team without delay.

**Company Property**

**Understanding Company Property**

Company property includes physical assets, intellectual property, and resources provided to support employees in their roles. Using these assets responsibly is essential for operational efficiency and sustainability.

**Our Commitments to Company Property**

Ocono ensures that all company property is safeguarded against misuse, loss, or theft. Employees are expected to use company resources responsibly and in alignment with business objectives.

**What this Means for You**

Use company property only for authorized business purposes and ensure it is maintained in good condition. Report any loss, damage, or misuse of assets to the appropriate department promptly.



## How Can Breaches of Conduct be Reported?

### Encouraging Reporting of Misconduct

All employees are encouraged to report any suspected misconduct, particularly violations of applicable laws or the Ocono Code of Conduct. By reporting such concerns, we can address and prevent unethical behavior, safeguarding both individuals and the organization from potential risks and damages.

This platform allows employees and third parties to report suspected breaches of conduct or ask questions, available 24/7 and in multiple languages. The system enables individuals to communicate with the Compliance Team without revealing their identity, ensuring confidentiality and trust.

### Whistleblower System

Ocono provides an anonymous reporting system for compliance-related issues. You can find this on the website at:

The anonymous reporting platform is hosted on a secure, external server and not directly operated by Ocono. All messages sent through the platform are encrypted and cannot be traced. Individuals have the option to disclose their identity if they wish but are not required to do so.

[www.ocono.com/en](http://www.ocono.com/en)



### What Steps Follow After Reporting a Breach of Conduct?

#### Handling Reporting of Misconduct

Ocono carefully reviews all reports of suspected breaches of conduct and takes appropriate actions where necessary. Violations of applicable laws or the Ocono Code of Conduct will not be tolerated and may result in disciplinary measures. We uphold the principle that all accused individuals are presumed innocent until proven otherwise and are committed to protecting whistleblowers from any form of retaliation or disadvantage.

#### Reporting by Third Parties

Third parties, including business partners and external stakeholders, are also encouraged to report potential violations of the Ocono Code of Conduct. The procedures for reporting misconduct are the same for third parties as they are for employees, as far as legal regulations allow.





# Ocono

## Germany

APD Schlauchtechnik  
Ruhrkunststoff  
VACUFLEX

## France

## Italy

## Romania

## China

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