

CODE OF CONDUCT – RECSER OY

At Recser, we aim to be the best choice for implementing collection and recycling services in accordance with producer responsibility for batteries. We provide services professionally, safely and efficiently, guided by our core values of responsibility, fairness, expertise and transparency. Our ethical principles, or Code of Conduct, describe the practices and commitments that enable operations aligned with our values, vision and ethically sustainable practices.

To ensure the sustainability of our operations, it is crucial that not only our own staff but also all our supplier partners commit to the ethical guidelines and principles outlined in this document. The obligations concerning suppliers are detailed further in our Supplier Code of Conduct, which is based on this document.

Legal and environmentally sustainable operations

Compliance with legislation

At the core of our operations is the implementation of producers' statutory collection and recycling responsibilities. Our activities are subject to extensive regulation, and adhering to all legal obligations is a fundamental principle of our sustainable operations. When providing collection and recycling services, we comply with all legislation related to batteries, as well as waste management and recycling associated with them.

Environmental responsibility

Recser plays a significant role in bearing the environmental responsibility that belongs to battery producers in the final stage of the product life cycle. In our operations, we adhere to all applicable environmental legislation and also require our partners to bear environmental responsibility. We expect our partners to be aware of the environmental impacts of their operations and conscientiously reduce all environmentally harmful effects. We continuously develop our collaboration with partners to ensure the most efficient and environmentally sustainable practices.

Openness and transparency

Transparent collaboration with our business partners

Openness and transparency towards our producers and suppliers are essential prerequisites for our operations. We communicate openly and transparently with our producer network and partners while always respecting confidentiality obligations. We manage our collaborative relationships transparently and treat our business partners equally. When distributing costs among our producers, we operate according to the Polluter Pays Principle and communicate transparently about fees and cost distribution for producers.

Transparent communication with consumers

Recser also has a crucial role in communicating with and providing guidance to consumers. We share up-to-date and accurate information with consumers, advising them on the importance and benefits of battery recycling, as well as the risks associated with careless storage and disposal.

Confidentiality of information and security

Confidential information and non-disclosure

Our network of producers entrusts us with sensitive information, and we are committed to handling it appropriately while adhering to confidentiality obligations. We are dedicated to safeguarding all confidential information provided to us by producers, taking into account the requirements of prevailing competition legislation.

Data privacy and information security

We prioritise information security by complying with information security legislation and internal security guidelines. We take good care of both our own and the information entrusted to us by producers and suppliers, and we expect the same from all subcontractors we engage. We protect the personal data of our own personnel and other business partners with particular care. We handle personal data with the utmost care, always for legal and business purposes, in accordance with our Privacy Policy.

Work well-being and safety

Employee well-being and competence

We foster a healthy and supportive working culture within our own team. A healthy team and effective collaboration enable the continuity of our operations. We take care of our staff's health and well-being through comprehensive occupational health services and appropriate insurance coverage. We continuously strive to improve our operations and expertise through team training and keeping our personal skills up to date.

Improved safety

We take care of occupational safety and adhere to the Occupational Safety and Health Act, as well as our internal safety guidelines. We use appropriate protective equipment e.g. when working at waste disposal sites. We also expect our suppliers to commit to safety legislation and ensure the safety of their employees and subcontractors in an appropriate manner.

Fair treatment of colleagues and partners

We treat each other, our suppliers and producers fairly and respectfully. We collaborate professionally and in good spirits, rejecting any form of bullying or harassment. We treat each other and our business partners equally, and we do not tolerate any discrimination in our own or

our partners' activities based on factors such as a person's ethnic origin, gender, age, or any other personal reason.

Anti-corruption measures

Gifts and treats

We maintain a zero-tolerance policy for engaging in or participating in corrupt practices. We never give, offer, or accept gifts or hospitality that may influence or appear to influence our decision-making.

Political neutrality

Recser is a politically neutral organisation, and we do not support political activities in any form, financially or otherwise. We expect transparency from both our employees and board members in potential conflicts of interest related to political actors.

Avoiding conflicts of interest

Transparency in all our operations also prevents the emergence of conflicts of interest. Conflicts of interest arise when the interests of Recser and its producer network conflict with the personal interests of an employee or board member. In such situations, we act transparently by disclosing conflicts of interest and recusing ourselves from all decision-making related to the situation.

Sponsorship and donations

As a non-profit organisation, we do not seek profit, and our resources are used solely for the purposes outlined in our articles of association. We do not sponsor, make donations or otherwise financially engage in activities outside the scope of our organisation's purpose.

Responsible financial management

We operate in compliance with applicable regulations to combat money laundering, identify suspicious transactions, and report such activities. We maintain our finances responsibly according to relevant regulations and prevent misconduct by keeping our financial documentation up to date. We encourage honesty and responsibility among our employees and uphold operational processes that support transparent reporting and reporting of suspicious activities.

Labour rights

We adhere to the human rights defined in the Universal Declaration of Human Rights by the United Nations and the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work. We respect the rights of workers, comply with all labour legislation, and do not accept forced labour or child labour in any part of our supply chain. We expect our suppliers and their subcontractors to also adhere to labour rights. We require our suppliers to ensure compliance with labour legislation from their partners.

Reporting of misconduct

Reporting misconduct is an integral part of collaboration based on openness and transparency. Our employees can contact their immediate supervisor with concerns or observations of misconduct, or alternatively, the Chairman of the Board. For suppliers and producers, the primary method for raising concerns and reporting misconduct is through direct contact with Recser's designated representative. If this is not feasible, the Chairman of the Board is also available.

We handle and assess all concerns received confidentially and independently. If necessary, we engage an external partner to ensure independence.