



PROJECT STOP FOUNDATION POLICY

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Overview

Introduction

The Project STOP Foundation (the **Foundation**) has a clear mission to protect nature and the environment, in particular to take action to permanently stop (plastic) waste pollution by providing affordable waste collection to all citizens, thereby reducing the impact of mismanaged waste on public health, creating new jobs in collection and material sorting and transforming inadequate linear systems into lasting, sustainable, circular ones.

Achieving this requires trustful partnerships and collaboration with a very diverse group of stakeholders, non-governmental and governmental organizations and institutions, local and national authorities, community members, stakeholders along the entire plastic value chain and, last but not least, funders and grantees.

This is a high ambition and a demanding task that requires persistence and a commitment to ethical business conduct.

Scope and responsibilities

This Policy outlines the minimum ethical standards of the Foundation. It was adopted by the Foundation's Board of Directors (referred as Board in this document) and can only be amended by this Board.

The Foundation's Board has the overall responsibility for ensuring compliance with and implementation of this policy as well as ensuring that appropriate processes are in place to inform and train Project STOP staff member accordingly about the requirements laid down in this policy.

It is applicable to all Foundation employees¹ and non-employees². In addition, the Foundation requires that all of its direct business partners³ adhere to the principles outlined in this policy and to inform and train their own employees accordingly and expects its indirect business partners⁴ to do the same.

Breaches of the policy

Failure to comply applicable laws and this code of conduct will be monitored and – in case of serious and/or deliberate contraventions – may result in termination of the employment or business contract or relationship. For remedial purposes, the Foundation may require business partners to fully cooperate with the Foundation to develop and implement, either solely or jointly, an action plan to end and resolve the relevant issue and prevent any further issues.

¹ The term employees relates to persons directly employed (via employment contract) by the Foundation, including part-time workers, students and trainees.

² The term non-employees relates to persons not directly but indirectly employed by the Foundation, ie, performing services for the Foundation without having a direct contractual relationship with the Foundation, like eg. seconded staff or temporary workers whose primary employer is someone else.

³ The term direct business partner relates to third-parties that have a contractual relationship with the Foundation, including funders, sub-contractors, implementation agents, suppliers and collaboration partners.

⁴ The term indirect business partner relates to third-parties without contractual relationship with the Foundation but who are providing services or goods to the Foundation or whose business is related to the Foundation.



Reporting concerns

The Foundation has safe, appropriate and accessible reporting procedures in place that allow all persons potentially exposed to breaches of this policy, either by the Foundation or its business partners, to raise concerns without fear of reprisal. The Foundation requires all of its direct business partners to make similar means available and expects its indirect business partners to do likewise.

Potentially affected persons may report concerns of potential exposure to non-compliance with applicable laws or this code of conduct to a Foundation board member or to the Ethics Hotline of Borealis (available via www.borealisgroup.com). The Foundation guarantees full confidentiality at all stages of the process when receiving, evaluating, responding and resolving safeguarding concerns received and puts measures in place aiming to protect whistleblowers from any sort of-retaliation.

ACTING WITH INTEGRITY

Fair and honest relations with all business partners

- The way we deal with our business partners shall be characterised by honesty, respect, fairness and integrity.
- We carefully evaluate our direct business partners before we engage with them, and we expect themselves to equally act in an ethical and compliant manner and in accordance with all applicable laws and regulations.
- We select our direct business partners fairly and without a conflict of interest that might compromise the selection process.
- We expect our direct business partners to treat their employees fairly, to provide safe and healthy workplaces, and to impose the same requirements on their business partners.
- All our contractual agreements will require our direct business partners' commitment to conduct their business in an ethical manner and consistent with this policy.
- Anyone who has access to confidential information must be subject to confidentiality agreements.

Zero tolerance towards corruption, bribery and money laundering

- Trust, respect, integrity, and honesty are essential to the Foundation. Any type of corruption, bribery or money laundering contradicts the objectives of our work and our activities and damages the trust of our funders. We therefore have zero tolerance towards any kind of bribery, kickback-payments, corruption, extortion, fraud, money laundering, embezzlement, or deception.
- We comply with all applicable anti-bribery and corruption laws and regulations and expect all our business partners to fully comply with respective applicable laws and regulations and our Zero-Tolerance policy. We expect our direct business partners to implement adequate anti-corruption and bribery procedures in place to prevent its employees and persons associated with its business from committing offences of bribery or corruption.



Gifts, benefits, reimbursements, and entertainment

- Accepting and offering gifts is only allowed if it is in strict accordance with international anti-bribery laws and comes along with related documentation and transparency (such as the Gift & Hospitality Register of the respective employer).
- We acknowledge that the practice of giving and accepting gifts varies between countries and regions and what may be acceptable in one region may not be allowed in another. The test for being ethically correct or not to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable.
- We must not accept gifts, meals or entertainment or any other favour if doing so might compromise, or appear to compromise, our ability to make objective business decisions in the interest of fulfilling the mission and objective of the Foundation. Similarly, we do not offer such hospitality if it is likely to create a perception of an obligation on the receiving party.
- The Foundation Board reports to the Gift & Hospitality Register of their respective employer and expects all its employees and business partners to do so as well. All gifts and hospitality offered or accepted from a value of EUR 100 or higher need to be registered.

Avoiding conflicts of interest

- Decisions shall never be based on personal considerations or relationships. To this end, we must be mindful of potential conflicts of interest involving a family member or close friend and avoid such situations at any time.
- We must undertake to avoid any activity that creates even the remote appearance of a conflict between personal interests and the interests of the Foundation.

Political and religious neutrality

- The Foundation observes neutrality regarding political parties and candidates. Neither the name nor the assets of the Foundation or our projects shall be used to promote or discredit the interests of political parties or candidates.
- We observe neutrality regarding religious opinions and beliefs. Neither the name of the Foundation nor its projects shall be used to promote or advance a religious standpoint.



HUMAN RIGHTS AND WORKING ENVIRONMENT

The Foundation recognizes its responsibility to respect and promote both human rights and the environment. Taking this responsibility seriously, it requires its business partners to likewise respect human rights and adhere to environmental standards and expects its indirect business partners to do the same.

Good working environment

- We provide the conditions for a safe and healthy working environment.
- We treat everyone with respect regardless of race, cultural background, religion, gender, sexual orientation, maternity, marital or family status, disability, age, or national origin.
- We do not tolerate alcohol abuse or the use or distribution of illegal drugs in the office premises and when at work. No one may work under the influence of alcohol or any substance that prevents him or her from performing work duties safely and effectively.
- We expect our business partners to do likewise and to follow stringent safeguarding procedures when recruiting, managing, and deploying working personnel.

Equal opportunities

- We are treating everyone with respect and dignity. We are championing diversity and inclusion – promoting fair responsible employment and wage & working time practices – and are providing fair and competitive wages.

Zero tolerance for harassment or sexual abuse

- We do not tolerate any form of unfair treatment or harassment. This includes, but is not limited to, sexual, physical or mental harassment, abusive language or offensive gestures, bullying, discrimination or racism, in any shape or form.

Right of association

- We respect the right to freedom of association. All workers have the right to form work councils and join trade unions of their own choosing and to bargain collectively without fear of reprisal, interference, intimidation or harassment.

Freedom of employment and protection of children

- We do not tolerate any form of forced or compulsory labour, human trafficking, or modern slavery.
- We do not accept any form of child labour and we ensure compliance with the minimum working age regulations under ILO Conventions and applicable national law.
- We expect business partners to develop policies and employ measures to protect children, specifically sexual, physical, emotional, psychological abuse as well as commercial exploitation including child labour and /or human trafficking



PROTECTION OF ASSETS AND INFORMATION MANAGEMENT

Legal compliance

- We are committed to a culture of ethics and compliance in which we conduct our activities with integrity and in accordance with all applicable laws and regulations.

Proper use of funds

- The Foundation undertakes to ensure that funds are not misused. It commits itself to using funds efficiently, effectively, responsibly, and prudently and to documenting their use transparently.

Record keeping

- The Foundation keeps all relevant financial records and has appropriate internal controls in place monitoring the receiving and making payments from/to third parties.
- The Foundation prepares and maintains all accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers, and business contacts, with strict accuracy and completeness.