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>> *you will find the „Code of Conduct“ on the further pages of this document*



fairplay on all levels.

sport**group**'s code of conduct

sport**group**  
THE SURFACE SPECIALISTS

# 00 // CONTENTS

01 // Who we are	10 // Documentation
02 // Introduction	11 // Handling of company property
03 // General	12 // Human dignity, child labour, forced labour
04 // Conflict of interest, corruption	13 // Equality, tolerance
05 // Bribery, corruption	14 // Safety, health
06 // Antitrust rules	15 // Protection of the environment
07 // Donations, sponsoring	16 // Responsibilities
08 // In-house knowledge, confidentiality	17 // Conclusion
09 // Privacy	

## THE COMPANIES OF THE SPORT GROUP

### // PRODUCTION

	Polytex Sportbeläge Produktions-GmbH Grefrath, Germany
	Polytex USA Calhoun (GA), USA
	Turfstore.com Inc. Calhoun, (GA), USA
	Melos GmbH Melle, Germany
	Krause Gummigranulate GmbH Melle, Germany
	Unirubber sp. z. o. o Weginieć, Poland
	Adv. Polymer Technology Corp. USA Harmony, (PA), USA
	Adv. Polymer Technology Australasia Pty Dandenong Victoria, Australia
	STR USA Corp. Chatsworth/Dalton, (GA), USA

### // INSTALLATION

	Polytan GmbH Burgheim, Germany
	Polytan UK Ltd. Leicestershire, UK
	Möller GmbH München, Germany
	Polytan France Amiens, France
	Polytan Enterprises SAS Amiens, France
	Polytan Asia Pacific Pty. Ltd. Melbourne, Australia
	Polytan NZ Ltd. Auckland, Australia
	Polytan Asia (HK) Causeway Bay, Hong Kong
	Polytan Scandinavia AB Nacka Strand, Sweden
	AstroTurf Corp. Dalton, (GA), USA
	ProGrass LLC Pittsburgh, (PA), USA



Holdings & Real Estates:

Sport Group Holding GmbH // Sport Group TopCo GmbH // Sport Group America Holding Corp. // Sportfield International Inc. // Sportfield France // SAS GEP Beteiligungs GmbH Gamma // GEP Immobilien GmbH & Co. KG // APT Acquisition Corporation USA // PolyComp Holding GmbH // Melos Grundstücksverwaltungs GmbH // Intercede 1919 Ltd.

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# 01 // WHO WE ARE



// **sportgroup** develops, manufactures, markets and installs innovative sports and recreational surface systems to a broad and global customer base. **sportgroup**'s industry-leading quality standards and technological leadership paired with a unique mix of competences position the Company as the globally leading provider of solutions for synthetic sport surfaces.

**sportgroup** is a highly integrated solution provider. The high level of vertical integration allows the Company to drive the quality of the installed products, both by ensuring the best quality early on in the production of the required raw materials as well as later in the installation of the respective surface. Moreover, the integrated model enables **sportgroup** to unleash significant operating synergies, to realise additive margins along the entire value chain and to materialise on the significant potential stemming from economies of scale. Consequently, **sportgroup** results in being one of the most successful player within the industry."

# 02 // INTRODUCTION



**Frank Dittrich**  
CEO  
sportgroup

## // **Dear business partners and employees**

As the one of the world's leading supplier of outdoor sports surfaces, **sportgroup** has earned an outstanding reputation which needs to be maintained, protected and further strengthened.

For this reason, we consider it very important that the company's success is always related to the adherence of ethical principles. The resulting rules for all our activities are defined in a comprehensive Code of Conduct, which we introduce in detail below.

All employees of **sportgroup** take responsibility for their own actions, so that they comply with the principles stated in this Code of Conduct at all times.

Fair play on all levels – this is the guideline which embodies **sportgroup**'s standards for cooperation in the day to day business. For us, trust, honesty, integrity, reliability and transparency are more than mere words when it comes to competing. Not even the most lucrative contract is worth damaging **sportgroup**'s reputation in any way.

All employees of the **sportgroup** are expected to strictly comply with the law and to always represent the company's interests in a positive way according to the Code of Conduct. Let us pull together and fulfil the high standard set by ourselves. Together we will succeed.

Yours sincerely

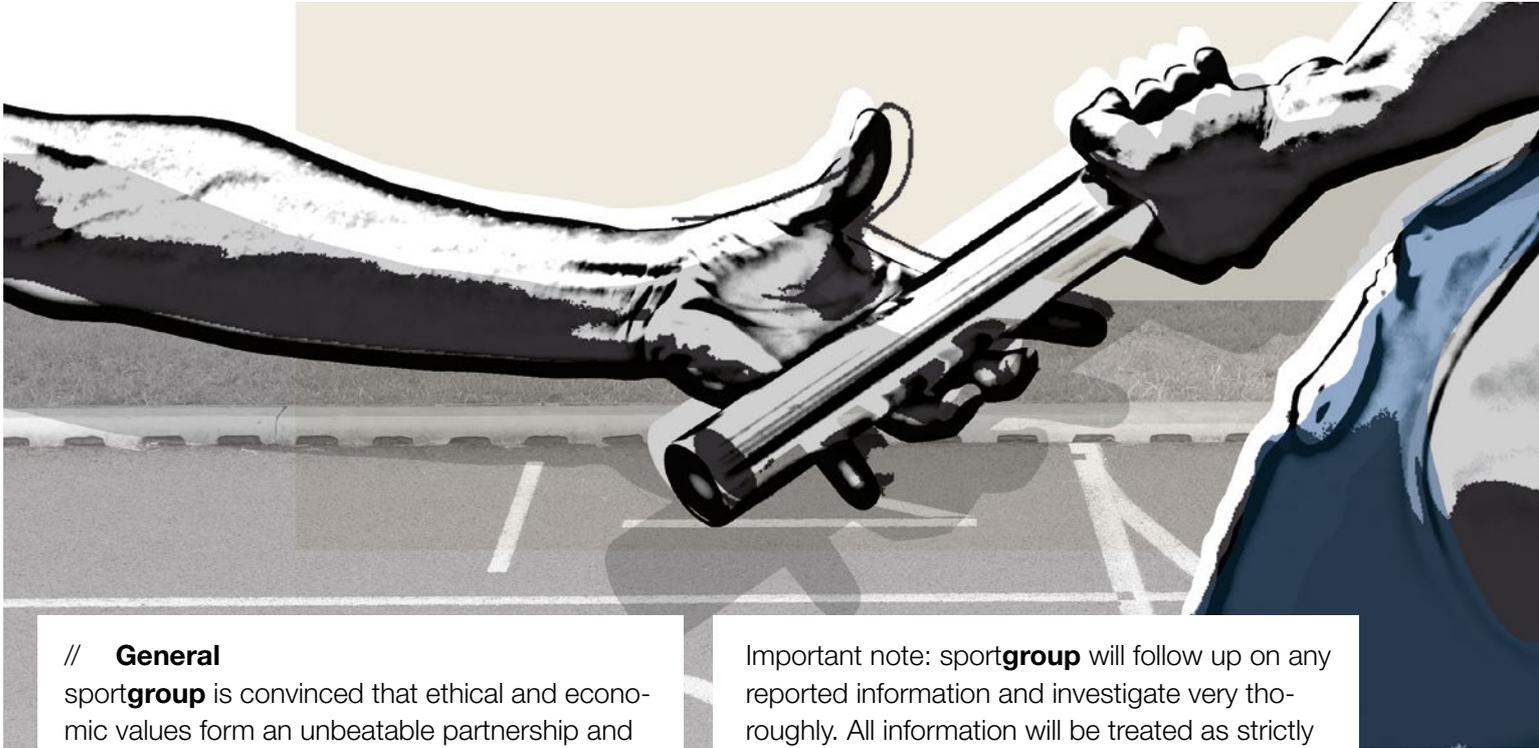
A handwritten signature in blue ink, appearing to read 'Frank D.', written over a light blue horizontal line.

Frank Dittrich

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03 //

## 1,000 AMBASSADORS FOR FAIR PLAY



### // **General**

sport**group** is convinced that ethical and economic values form an unbeatable partnership and lead to sustainable success, no matter whether on their home turf or abroad.

The employees of sport**group**, of which there are more than 1000, are committed to fair play in the business world and all parties involved should act within the defined legal guidelines.

All employees of sport**group** are bound to immediately report any violation of our Code of Conduct or even criminal offences. The first point of contact should always be the relevant immediate superior or level above.

Important note: sport**group** will follow up on any reported information and investigate very thoroughly. All information will be treated as strictly confidential.

Employees do not need to fear that they might suffer disadvantages in the company when following the law and the regulations of this Code of Conduct.

Thanking you in advance for your support and your trust!

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## 04 //

### LOYALTY GOES WITHOUT SAYING

#### // **Conflict of interest, corruption**

Conflict of interest and corruption are unpleasant topics, which is exactly why we address them openly in this document. **sportgroup** expects absolute loyalty from all employees towards „their“ company. Any situations in which personal or financial interest may conflict with the interest of **sportgroup** are to be strictly avoided. It is prohibited to take part in activities of competitors, suppliers or clients, or to enter into personal business relationships with any of them if this might result in a conflict of interest.

Actions in performing work for **sportgroup** may not be influenced by any conflict of interest.

Employees of **sportgroup** may not accept benefits of any kind and no personal gifts which could give rise to the impression that they may influence business decisions or transactions. Invitations must be in line with customary business hospitality. The acceptance of money is always prohibited. Smaller presents and complimentary items to a value of up to 50 Euros may be accepted.

## 05 //

### RED CARD FOR BRIBERY AND CORRUPTION

#### // **Bribery, corruption**

In connection with business activities of any kind, it is forbidden for employees of **sportgroup** to grant any undue benefits to business partners, their employees or third parties. Even the attempt is forbidden. This applies in particular when type and value of the intended benefit may be such that it could influence actions and decisions of the receiver in an improper way. Special restraint should be exercised towards officials and employees in public service. No third parties – such as consultants, agents, sponsors etc. – may be used to circumvent this rule.

Any infringements will result in the employment being terminated.

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06 //

**WE STICK TO THE  
RULES OF THE GAME**

07 //

**HONESTY IS THE  
BEST POLICY**

// **Antitrust rules**

sport**group** is committed to fair and open competition and to complying with antitrust rules. Our decision-makers may not engage in any practices or verbal agreements that are against the law and /or of relevance under criminal law. This includes for example unlawful verbal tender agreements leading to any exclusion, limitation or distortion of competition.

// **Donations, sponsoring**

Donations and sponsoring – a sensitive topic. sport**group** gives no direct or indirect donations to political organisations, political parties or individual politicians. Any exception from this rule must be clarified in advance and requires explicit approval. Donations and sponsoring by sport**group** to political or other receivers may not be used for circumventing the principles of this Code of Conduct.

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08 //

## EVERYTHING STAYS WITHIN THE TEAM

09 //

## TAKING GOOD CARE OF DATA



### // **In-house knowledge, confidentiality**

sport**group** has clear rules for handling internal knowledge. All employees have the obligation of ensuring that the exchange of information within the company runs both quickly and smoothly. Knowledge that is important for the relevant activity may not be withheld, distorted or passed on incompletely. All information must be passed on correctly and comprehensively to appropriate colleagues, unless in exceptional cases – for example where an explicit order for secrecy was issued.

Company and business secrets of any kind must be treated as strictly confidential. The same applies for other information whose secrecy is of interest for sport**group**, its customers and business partners. Such internal information may not be disclosed to any unauthorised persons. This obligation to secrecy, by the way, also remains effective after termination of the employment.

### // **Privacy**

All employees of sport**group** are obliged to comply with the company's principles for protecting the data of employees, customers and business partners. For each task to be performed, the required diligence must be ensured for the protection of personal data.

Nevertheless, if concerns are detected, these should be reported immediately to the superior or level above.

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10 //

**TRANSPARENCY IN  
ALL TRANSACTIONS**

11 //

**TRUST WORKS  
BOTH WAYS**

// **Documentation**

All business events of our company must be documented accurately and without gaps. In doing so, the provisions of the law and also the regulations applicable within **sportgroup** must be observed diligently at all times.

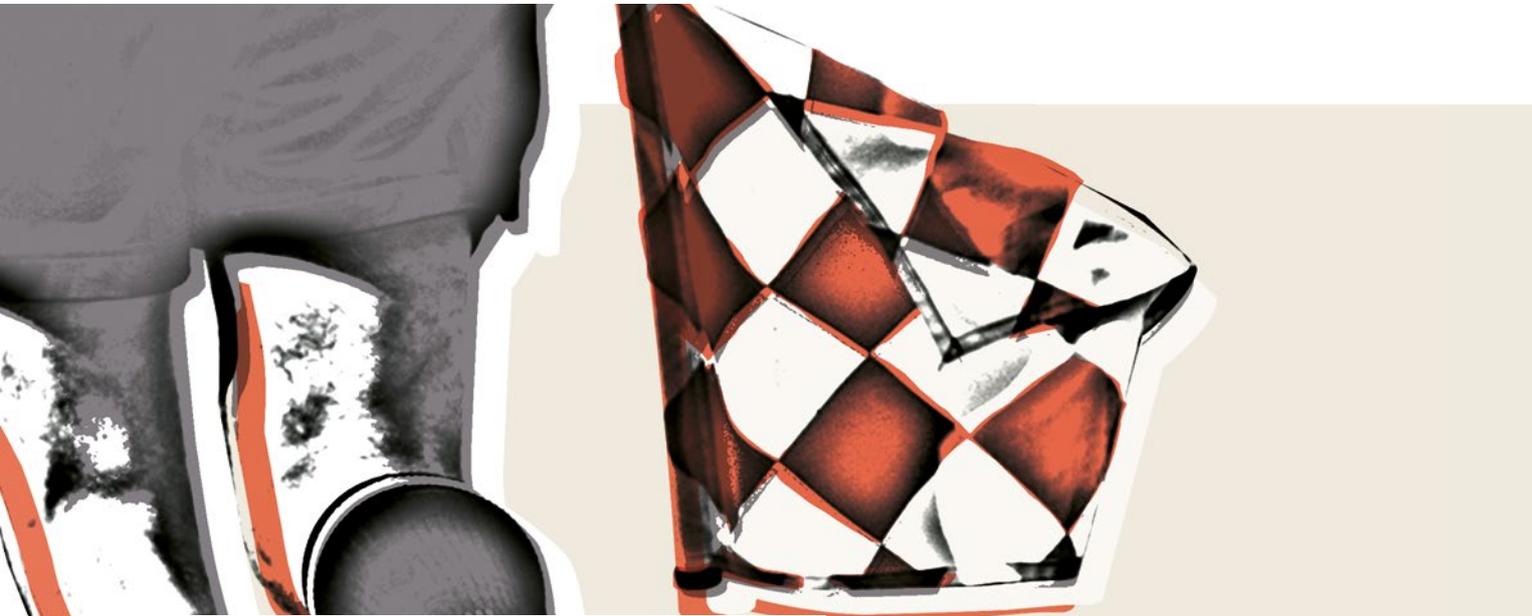
// **Handling of company property**

All employees of **sportgroup** are bound to handle the company's property and assets in an appropriate and responsible manner. No commodities or services of **sportgroup** may be unduly used for private purposes.

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12 //

## FOR HUMAN DIGNITY – AGAINST CHILD LABOUR AND FORCED LABOUR



// **Human dignity, child labour, forced labour**  
sportgroup has committed itself to observe and protect human rights and respects the dignity of human beings! All employees must contribute in maintaining these general basic rights. sportgroup does not tolerate child labour and any form of exploitation of children or youth.

sportgroup also rejects any form of forced labour. Employees may only work for sportgroup if they have made themselves available for the work by their own free will. Nobody may be forced to work by using physical force or other means.



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13 //

## TOLERANCE WITHIN THE TEAM

14 //

## SAFE AND HEALTHY

### // **Equality, tolerance**

Equal opportunities for all employees and the prohibition of any form of discrimination are selfunderstood within **sportgroup**. Our sizeable team is driven by the varied potential of employees with their different origins and background. All employees of **sportgroup** should contribute in creating an atmosphere of mutual fairness and respect. Discriminations of any type may not be tolerated.

### // **Safety, health**

Employees of **sportgroup** are obliged to always ensure a safe and healthy working environment. Therefore all safety regulations must be strictly complied with. Any inadequacies must be rectified immediately in coordination with the responsible entities.

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# 15 //

## GREEN IS BEAUTIFUL

# 16 //

## RESPONSIBILITY ON MANY SHOULDERS



### // **Protection of the environment**

In the interest of our planet, **sportgroup** fulfils stringent requirements for sound and environmentally friendly production. We are aware of all aspects of the impact that our various business activities have on the environment and undertake to protect soil, water, air, biological diversity and cultural heritage in the process of our work. All employees are encouraged to prevent any negative effects on the environment by adopting adequate measures. This involves ensuring sustainable management and careful handling of natural resources. All legal and regulatory requirements regarding protection of the environment must be complied with consistently.

In the event that damage to the environment is caused by the business activity of **sportgroup**, this must be reported immediately to the responsible entities in the company or to the relevant superior.

### // **Responsibilities**

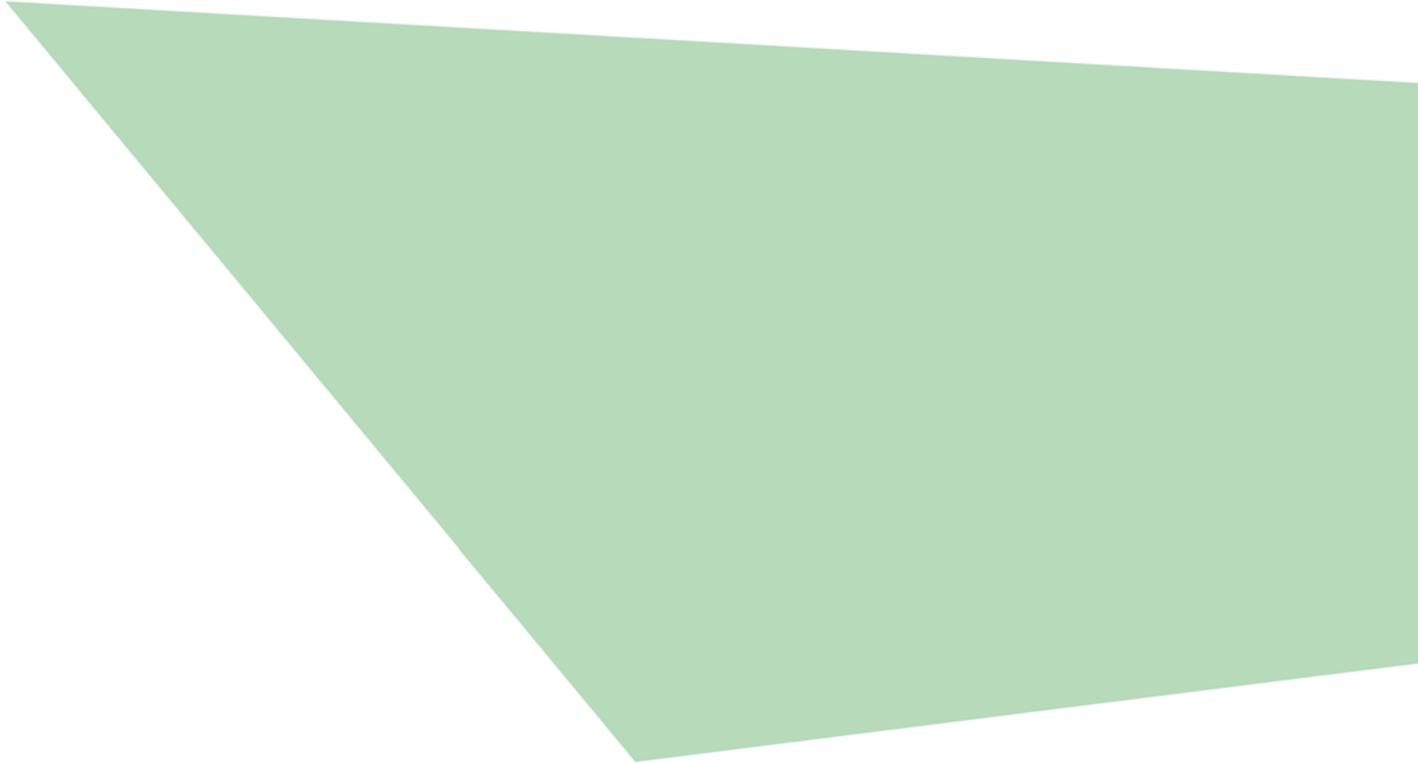
This Code of Conduct, with its ethical principles and policies, forms a key component of our company culture. All employees are responsible for ensuring that these indispensable principles are adhered to. This applies in particular for the leaders of **sportgroup**. They should not only instil the meaning and content of the Code of Conduct among their employees, but also act as an example by adopting those values and support their implementation in day to day business. This, however, should by no means restrict the employees' opportunities for self-responsible action and personal initiatives within the appropriate framework. All superiors are responsible to ensure compliance with the Code of Conduct of **sportgroup** by their employees.

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# 17 // CONCLUSION

// The Code of Conduct forms the basis for all policies and guidelines of sport**group**. In order to accommodate special situations, regionally applicable guidelines may include additional provisions. These, however, may not contravene the Code of Conduct.





**sportgroup**  
THE SURFACE SPECIALISTS

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