

CODE OF CONDUCT



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Code of Conduct for Business Partner

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For Business Partner

Content

PURPOSE	4
I. ENVIRONMENTAL PROTECTION	4
1. Sustainable resource management	4
2. Reuse and recycle	4
3. Waste avoidance.....	4
4. Reporting & greenhouse gas emissions, decarbonization.....	5
5. Renewable energy	5
6. Energy efficiency.....	5
7. Air quality.....	6
8. Noise emissions.....	6
9. Responsible chemical management	6
10. Water quality, consumption and management.....	6
11. Soil quality.....	6
12. Biodiversity, land use deforestation	6
13. Deep Sea	7
14. Animal welfare	7
15. Policy & Management System	7
16. Along the supply chain.....	7
17. Comply with all national and international environmental standards and laws	8
II. SOCIAL RESPONSIBILITY	8
1. General requirements.....	8
2. Child Labor and young workers	8
3. Forced Labor and modern slavery	8
4. Working conditions.....	9
5. Working hours.....	9
6. Wages, Benefits and equal Remuneration	9
7. Harassment & Non-Discrimination	10
8. Diversity, equality, women’s rights and inclusion	10
9. Freedom of Association and collective Bargaining	10
10. Use of private or public security forces	11
11. Rights of minorities and indigenous people	11
12. Land, forest, and water rights and forced evictions	11
13. Ethical recruiting practices.....	11
14. Health and Safety.....	12

15. Policy, Management System, Guiding Principles.....	12
16. Along the supply chain.....	12
17. Comply with all national and international standards and laws	12
III. BUSINESS ETHICS	12
1. Fight against corruption, Extortion, Bribery and money laundering.....	12
2. Fair Competition / Anti-Trust.....	13
3. Conflict of Interest	13
4. Export Controls and economic sanctions	13
5. Disclosure of information	14
6. Financial Responsibility (Accurate records).....	14
7. DATA Protection and DATA security.....	14
8. Counterfeit parts & intellectual property.....	14
9. Artificial Intelligence	15
10. Critical raw materials / Conflict Minerals	15
11. Integration of Sustainability.....	15
12. Implementation of Corporate due Diligence	16
13. Verification of Compliance.....	16
14. Reporting channels & Whistleblowing	16
15. Legal consequences of violation	17
VI. CONTACT PERSON	17
VII. LAST UPDATED	18
LIST OF CHANGES.....	19

PURPOSE

Our guideline defines the values that unite us and outlines how we aim to collaborate – both today and in the future. It offers a clear path that must be followed in order to ensure our long-term company success. Guided by the core principle of "every part is a part of us," we can collectively achieve this objective. Trust, adaptability, and responsibility play significant roles in this endeavor. We are dedicated to consistently acting in a lawful, ethical and environmental manner. Our code of conduct encompasses all essential rules and principles in a single document, which is binding for us now and in the future. It serves as a guiding framework applicable to all of us – the Executive Board, leaders, individual employees, and our business partners. It represents our commitment to ourselves and our promise to the outside world to engage in responsible conduct towards our business partners and the public.

I. ENVIRONMENTAL PROTECTION

1. Sustainable resource management

Safeguarding nature's finite resources necessitates sustainable resource management. Embracing the circular economy and practicing resource conservation are imperative. We are committed to consistently minimizing our utilization of resources, including energy, water, raw materials, and/or primary materials, and reducing our environmental footprint. Encouraging the utilization of secondary materials or biomaterials in our products is a priority. We firmly adhere to the precautionary principle and take appropriate measures to prevent or, if demonstrably unfeasible, minimize environmental harm. Our business partners are obligated to identify alternative, environmentally friendly, and long-term effective solutions, and to communicate them to us. Furthermore, our partners must comply with legal requirements in their respective markets by registering, disclosing, and, if necessary, obtaining approval for substances.

2. Reuse and recycle

The circular economy and recycling play a crucial role in environmental preservation. It is expected that our business partners prioritize the use of reusable and recyclable materials whenever feasible. This also entails embracing innovative processes to enhance the development of secondary raw material sources or improve the effectiveness of raw material recycling. We emphasize the importance of maintaining high recycling standards and adhering to the waste hierarchy for our own waste management practices. Whenever possible, we encourage the utilization of recycled and renewable materials, including in packaging. We are committed to waste reduction, resource reuse, recycling, and the safe and environmentally-friendly disposal of residual waste, chemicals, and wastewater. These principles should always guide our decision-making process.

3. Waste avoidance

All waste generated within our organization must be properly disposed of in accordance with applicable laws and regulations. Our business partners are responsible for establishing appropriate waste management systems and procedures to ensure that hazardous waste is carefully classified on-site and

collected, stored, treated, and disposed of correctly. This includes the disposal of hazardous materials, waste treatment, and any other materials that require special handling. By adhering to these measures, we actively contribute to maintaining a safe and environmentally responsible waste management process.

4. Reporting & greenhouse gas emissions, decarbonization

Our shared objective is to align with the climate protection goals outlined in the United Nations Framework Convention, specifically the Paris Climate Agreement. It is our requirement that business partners assess the transparency of their own emissions as well as those within their broader value chain using scientifically recognized methods. Furthermore, business partners should establish appropriate corporate objectives for their Scope 1, 2, and 3 emissions and implement measures to reduce both their direct and indirect CO2 emissions, thereby contributing to the Paris Agreement's targets. The overarching priority is to diminish our CO2 footprint, optimize resource utilization, and minimize pollution and greenhouse gas (GHG) emissions. Business partners are expected to enhance the environmental performance of their products and services by establishing targets and monitoring environmental indicators. Throughout all activities, we must strive to avoid or minimize any adverse effects on the environment and employee health. Regular progress reports regarding the achievement of CO2 reduction goals and associated procedures should be made public.

5. Renewable energy

We encourage our business partners to prioritize the adoption of efficient technologies and materials that facilitate and promote the utilization of renewable energy sources to the greatest extent possible. It is expected that business partners actively pursue increased energy efficiency and the integration of renewable energies into their operations. By embracing these practices, we collectively contribute to a more sustainable energy landscape.

6. Energy efficiency

The efficient utilization of energy and the decarbonization process play a vital role in climate protection. We hold our business partners accountable for responsibly managing energy resources, establishing systems to minimize energy wastage, enhancing energy efficiency, and reducing overall energy consumption. Whenever feasible, business partners are expected to prioritize the use of green electricity. The energy-related performance is an important criterion in our procurement, and we expect our business partners to point out more energy-efficient alternatives to us. Regular reviews of their own energy management system should be conducted to ensure that opportunities, risks, ambitions, and goals are consistently updated and aligned with our shared commitment to sustainable energy practices.

7. Air quality

We expect our suppliers to monitor air emissions and establish an air emission management plan for air quality control with the goal of reducing CO2 emissions. By taking these measures, we actively work towards minimizing our environmental footprint and promoting sustainable practices.

8. Noise emissions

Efforts should be made to minimize harmful noise emissions to the lowest possible level.

9. Responsible chemical management

Business partners utilizing hazardous materials, chemicals, and substances are required to accurately identify and label them. They must establish appropriate storage areas and handling processes to mitigate or eliminate risks associated with these materials. It is crucial to prevent the occurrence of hazards such as air pollution, soil pollution, water pollution, and other detrimental effects stemming from these substances. Whenever possible, it is recommended to avoid the use of potentially hazardous substances that can harm the environment or human health. Instead, alternative environmentally friendly solutions with lower toxicity and long-term effectiveness should be identified. Furthermore, business partners are obligated to comply with legal requirements in their respective markets by registering, declaring, and, if necessary, obtaining approval for the substances they utilize.

10. Water quality, consumption and management

Water protection and maintaining water quality are crucial elements of sustainable resource management. In regions where water scarcity is an issue, it is important for business partners to take precautionary measures to prevent exacerbating water stress and compromising the availability of clean water. This entails implementing strategies for water quality management and consumption reduction, aiming to minimize freshwater usage and promote safe and accessible drinking water both within their manufacturing operations and local communities. Our partners are obligated to employ efficient and technologically innovative solutions for water use in their product sourcing and manufacturing processes. By prioritizing these actions, we contribute to the preservation of water resources and sustainable water management practices.

11. Soil quality

Business partners must refrain from engaging in activities that can cause detrimental changes to soil quality. Additionally, it is crucial to assess the environmental impacts of discharges and potential soil impairment to prevent contamination of surface water and groundwater. By taking these measures, we aim to protect and preserve the integrity of soil resources, as well as safeguard the quality of surrounding water bodies.

12. Biodiversity, land use deforestation

We strictly prohibit business partners from participating in or benefiting from the illegal conversion of natural ecosystems. It is essential that our business partners actively work towards preventing deforestation and land conversion, as these actions significantly contribute to the climate and biodiversity crises. We expect business partners to thoroughly map their supply chains, starting from the origin of raw

materials (such as mines or lands), and prohibit any value chain that involves deforestation or land conversion. The overarching objective is to protect biodiversity and promote deforestation-free supply chains. Business partners should prioritize sustainable land use practices and implement appropriate monitoring and traceability measures to support biodiversity. Furthermore, it is important for business partners to transparently publish these measures on their websites, promoting accountability and fostering a culture of transparency.

13. Deep Sea

We require our partners to refrain from using deep-sea raw materials in their operations. Deep-sea ecosystems are fragile and vulnerable to disturbance, and their extraction can have significant and often irreversible environmental impacts. By excluding the use of deep-sea raw materials, we prioritize the protection and preservation of these unique and delicate ecosystems.

14. Animal welfare

In cases where applicable, it is essential to adhere to national regulations concerning animal welfare and testing, with a particular emphasis on the principles of the Three Rs (Replacement, Reduction, Refinement). This includes compliance with standards set by organizations such as the World Organization for Animal Health (OIE), the Animal Welfare Act (TierSchG), and the EU Directive 2010/63.

The Animal Welfare Committee's (AWC) Five Freedoms are fundamental principles that guide the assessment of animal welfare and the implementation of measures to enhance animal well-being in various contexts. These principles ensure that animals are provided with freedom from hunger and thirst, freedom from discomfort, freedom from pain, injury, or disease and freedom from fear and distress. Adhering to these principles is crucial in promoting and safeguarding animal welfare.

15. Policy & Management System

We encourage our business partners to establish their own environmental policies, develop environmental procedures, and provide regular training to their employees. It is highly recommended to implement an environmental management system based on ISO 14001 or the ECO-Management Audit Scheme (EMAS) for manufacturing processes. The certification process should be conducted by an accredited external registrar.

In addition, logistics management should consider the environmental impact of their operations. It is important to establish communication procedures that effectively convey the environmental performance of business partners to relevant stakeholders and affected parties. By implementing these measures, we collectively promote environmental responsibility and enhance our sustainability practices.

16. Along the supply chain

To ensure full compliance with due diligence obligations, it is necessary for business partners to establish a proactive supply chain management system that encompasses the entire value chain, from the origin of raw materials to the final product for sale. This includes conducting thorough assessments and monitoring practices throughout the supply chain to identify and mitigate potential risks and ensure compliance with relevant regulations and ethical standards.

17. Comply with all national and international environmental standards and laws

Business partners are expected to fully adhere to all relevant national and international environmental standards, regulations, and laws in every country where they operate. This commitment ensures that business activities are conducted in a manner that complies with the legal requirements and upholds environmental responsibilities. By complying with these standards, business partners demonstrate their dedication to environmental stewardship and sustainable practices across all their locations of operation.

II. SOCIAL RESPONSIBILITY

1. General requirements

Business partners are expected to refrain from engaging in or being associated with any human rights violations in any country where they conduct operations. It is your responsibility to ensure the protection of human rights within your organization. Business partners are required to uphold human rights throughout their value chain and support the rights of human rights defenders. Establishing an effective social sustainability committee and providing regular training to employees are important actions that business partners should undertake. Sharing information regarding human rights due diligence processes is essential. Additionally, business partners grant us authorization to conduct inspections or audits of their human rights due diligence processes.

2. Child Labor and young workers

We strictly prohibit all forms of child labor, forced labor, and compulsory labor, and we expect our business partners to adhere to the same principles. It is our expectation that our business partners commit themselves to the agreements outlined in the ILO 182/ILO 138 conventions. It is important to recognize that individuals under the age of 18 are considered minors and are therefore vulnerable (as stated in ILO 182). They should not be engaged in any work that could endanger their safety, health, or moral well-being, such as overtime or night shifts (as mentioned in ILO 138). The minimum age for employment should comply with the national laws of the respective country and should be no less than 15 years (as stated in ILO 138). It is strictly prohibited to employ or engage in any work, even if permitted by local law, with children under the age of 15.

Our business partners are responsible for ensuring that child labor is not tolerated under any circumstances within their own operations or at their direct suppliers. They are expected to collaborate with their direct suppliers to establish requirements that prevent child labor, forced labor, and compulsory labor, and to extend these requirements throughout their supply chain. To actively combat child labor, we strongly recommend participating in cooperative efforts, such as initiatives, and seeking collaboration with non-governmental organizations.

3. Forced Labor and modern slavery

We firmly denounce the use of forced and compulsory labor, as well as all forms of modern slavery and human trafficking. We expect our business partners to actively work towards eliminating modern slavery and forced labor within their sphere of influence. This includes implementing additional measures in line with the International Labor Organization (ILO) Recommendation 203. Forced or compulsory labor is

considered when individuals are coerced through threats, such as the denial of identity papers or food, confiscation of land, non-payment of wages, physical violence, sexual abuse, or involuntary prison labor. We require that labor practices meet, at a minimum, the standards outlined in ILO Conventions 29 on Forced Labor and 105 on the Abolition of Forced Labor.

We strictly prohibit our suppliers from engaging in or supporting human trafficking. Furthermore, we emphasize that employees should not be subjected to any form of physical or psychological cruelty, inhumane treatment, or degrading conditions. By enforcing these guidelines, we aim to ensure the protection of human rights, promote fair and ethical labor practices, and actively combat modern slavery and forced labor throughout our supply chain.

4. Working conditions

Our business partners are responsible for overseeing their own labor and recruitment practices, both within their organization and when collaborating with third parties such as employment agencies and recruiters. It is crucial that they maintain proper documentation in these matters. Clear and written documentation should be employed to outline working conditions and employment contracts. Moreover, our partners are encouraged to engage in collective efforts, such as industry associations, to combat all forms of modern slavery and safeguard the rights of workers. Regular inspections are conducted to ensure continuous improvement in working conditions, with the ultimate goal of reducing accident rates, fatalities, and lost workdays. Progress in this regard should be reported on an annual basis. Additionally, our partners are expected to provide employees with clean restroom facilities, potable water, and sanitary dining areas. In cases where the nature of the work necessitates the provision of dormitories for workers, these facilities must be clean and secure, equipped with appropriate emergency exits, and grant reasonable entry and exit privileges.

5. Working hours

It is essential for our business partners to establish clear guidelines regarding the working hours of their employees, in line with the principles outlined in ILO Conventions 1 and 30. Alternatively, working hours should comply with the relevant national legal requirements at a minimum. Strategies should be developed to actively support the individual circumstances of employees, including the implementation of flexible work environments and schedules, to the extent feasible for each specific role. Overtime must not surpass the limits set by law. In cases of temporary and emergency situations, a maximum of 12 overtime hours per week may be worked. Break times and regular days off should meet at least the minimum requirements prescribed by applicable legislation.

6. Wages, Benefits and equal Remuneration

Our business partners are dedicated to the principle of providing fair compensation to their workers, ensuring that wages are sufficient to meet reasonable and adequate standards of living for workers and their families. This compensation should be at least equal to the minimum amount mandated by applicable laws and regulations, covering the costs of shelter, food, and other essential needs. Wages should be paid in a transparent and traceable manner, adhering to the specified timeframes outlined in accordance with the International Labor Organization (ILO) Convention 95. Unauthorized wage deductions and the withholding of wages as disciplinary measures are strictly prohibited. Information regarding wages and benefits must be accessible to all employees in a language they understand, promoting transparency and

ensuring that workers are aware of their compensation entitlements. The principle of equal pay for work of equal value, particularly between men and women as stated in ILO Convention 100, must be upheld. Furthermore, our business partners are expected to comply with local laws or ILO Conventions (such as 183, 103, and 3) regarding maternity leave, which includes both leave and associated social benefits. Our business partners' compliance with these guidelines demonstrates their commitment to fair and equitable compensation practices, ensuring the well-being of their workforce, and upholding principles of gender equality and maternity protection in the workplace.

7. Harassment & Non-Discrimination

We denounce all forms of discrimination. Our requirements are based on the general prohibition of discrimination stated in Article 2, Paragraph 1 of the International Covenant on Civil and Political Rights of December 19, 1966. We expect our business partners to comply with ILO Convention No. 111 on Discrimination in Employment and Occupation, as well as No. 100 on Equal Remuneration. Our objective is to ensure fair and respectful treatment of all employees.

To prevent discrimination during the hiring and employment process, we require our business partners to uphold the prohibition of workplace harassment, abuse, and punishment. Any form of violence or discrimination is deemed unacceptable. We are dedicated to providing equal opportunities in the workplace. Therefore, we explicitly forbid any type of discrimination based on gender, ethnicity, membership of a certain population group, skin color, disability, union membership, political affiliation, origin, religion, age, pregnancy, or sexual orientation.

To effectively combat discrimination, we expect our business partners to provide appropriate training to managers, enabling them to recognize and prevent discrimination, particularly concerning personnel decisions. Our objective is to eradicate discrimination in employment and occupation. Every employee must be treated fairly and without discrimination. We are committed to equal opportunity and reject any policy that discriminates against individuals on any basis prohibited by law, such as race, gender, sexual orientation, medical condition, disability, age, national origin, or religion. We have a zero-tolerance policy for any form of discrimination or harassment.

Discrimination based on race, color, gender, religion, national origin, sexual orientation, social background, age, physical or mental limitations, marital status, pregnancy, union membership, or political affiliation is strictly prohibited. These provisions are based on democratic principles and promote tolerance towards all individuals.

8. Diversity, equality, women's rights and inclusion

Business partners should prioritize diversity, promote gender equity, and ensure equal opportunity in employment. This includes creating inclusive environments, implementing fair hiring practices, and providing equal access to opportunities. By embracing these principles, business partners contribute to fostering innovation and a more equitable work culture.

9. Freedom of Association and collective Bargaining

Business partners must respect the right of workers to form employee representative bodies and engage in collective bargaining to regulate working conditions. If these rights are not guaranteed by law, it is necessary to establish clear rules and framework conditions for collective bargaining or alternative

procedures. Unions should be allowed to operate freely and be granted the right to strike and engage in fair collective bargaining.

We expect our business partners to acknowledge and uphold the freedom of association of their employees, in accordance with ILO Conventions No. 87 on Freedom of Association and No. 98 on the Right to Organize and Collective Bargaining, without any interference. Business partners should inform their workers about these rights and provide necessary support accordingly. It is important that business partners refrain from engaging in anti-union activities that are inconsistent with local laws. This includes preventing any fear of intimidation, harassment, retaliation, or any other forms of violence.

10. Use of private or public security forces

If a business partner utilizes its own security forces to safeguard its operations or engages private security service providers, it is imperative that they guarantee the respect of internationally recognized human rights. Specifically, this means ensuring that freedom of association is not compromised. The business partner should provide comprehensive training to all contracted security personnel, emphasizing the importance of compliance with human rights standards. This training aims to prevent any conflicts with workers and promote a harmonious working environment.

11. Rights of minorities and indigenous people

The business partner is required to adhere to the principles of free, prior, and informed consent of indigenous peoples in all its activities, in alignment with ILO Convention No. 169 on Indigenous and Tribal Peoples in Independent Countries. The rights of indigenous peoples and local communities must be respected, promoted, and protected throughout the entire supply chain, in accordance with the 'UN Declaration on the Rights of Indigenous People.

12. Land, forest, and water rights and forced evictions

We expect our suppliers to honor the traditional land, forest, and water rights of local communities and indigenous people in all procurement and other business activities. We strongly condemn forced evictions and land displacements carried out without proper compensation or consent from the affected communities. Our suppliers take proactive measures to ensure that the human rights of the affected parties are preserved.

13. Ethical recruiting practices

Ethical recruitment practices are essential to ensure transparency and fairness in the hiring process. Business partners should provide accurate information to potential employees, avoiding any form of deception or misleading statements regarding the nature of the work. This helps to build trust and establish a positive employer-employee relationship based on honesty and integrity.

14. Health and Safety

Ensuring the protection and promotion of the health of all employees is a primary concern. Business partners are expected to establish comprehensive guidelines on occupational health and safety, as well as fire protection at the workplace, and continuously enhance them. Ample employee training should be provided to prevent work-related health disorders, accidents at work, and to educate employees on first aid, chemical management, and fire safety.

Appropriate preventive measures, such as fire detection systems, fire extinguishers, and necessary protective equipment and clothing, should be made available to employees at no cost. Safety should always be a paramount consideration in every decision-making process. Health and safety policies must be based on or exceed applicable laws and regulations. It is essential that all occupational health and safety measures do not impose any financial burden on the employees, as specified in ILO Convention No. 155.

15. Policy, Management System, Guiding Principles

Business partners are expected to establish and maintain a robust health and safety management system to mitigate risks to employees and promote ongoing improvement in working conditions and occupational health. These management systems should be subject to regular monitoring by a competent body.

Risks should be systematically identified and prioritized through regular risk assessments, and appropriate countermeasures must be promptly implemented. We strongly encourage business partners to adopt and operate a recognized and certified occupational health and safety management system, such as ISO 45001, as a means to effectively manage health and safety responsibilities.

16. Along the supply chain

Business partners must ensure compliance with human rights standards across the entire supply chain. This requires establishing robust monitoring and control mechanisms, conducting regular assessments, and taking corrective actions when violations are identified. Collaboration with external organizations and stakeholders is encouraged for independent insights. By implementing effective monitoring systems, human rights risks can be identified and addressed, promoting ethical practices and the well-being of workers.

17. Comply with all national and international standards and laws

Compliance with national and international occupational safety standards, including workplace safety, health protection, and working hours, is mandatory. Employees have the right to receive written information in a language that is easily understandable to them. This ensures that employees are well-informed about their rights and responsibilities, enabling them to work in a safe and healthy environment.

III. BUSINESS ETHICS

(Fair market behavior, transparent business relations, critical raw materials)

1. Fight against corruption, Extortion, Bribery and money laundering

Business partners are required to comply with all applicable anticorruption laws and regulations, including but not limited to the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, and the French Loi Sapin 2.

They should refrain from engaging in any form of commercial bribery and shall not provide, directly or indirectly, anything of value to government officials or employees to influence their official duties.

Partners must avoid practices that could result in penal liability for fraud, embezzlement, money laundering, insolvency crimes, competition violations, bribery, acceptance of bribes, or other corruption-related offenses committed by their employees. Transparency and truthfulness in disclosing taxes, duties, and license fees paid to governments for extraction, trading, handling, transportation, and export are essential.

In transactions involving raw materials, partners should explicitly prohibit the solicitation of bribes aimed at concealing or disguising the origin of minerals. It is important to exercise caution when engaging third-party intermediaries such as sales consultants, agents, brokers, etc. These intermediaries should be selected based on appropriate criteria and undergo due diligence processes to ensure they adhere to anticorruption standards.

2. Fair Competition / Anti-Trust

Business partners are required to adhere to the principles of fair competition and refrain from engaging in any agreements, business practices, or behaviors that would unlawfully restrict competition. This includes compliance with all applicable antitrust laws and regulations.

Fair competition ensures a level playing field for all participants and promotes market efficiency and innovation. Business partners must compete in a manner that is ethical, transparent, and in accordance with the principles of free and open competition. They should not engage in activities such as price-fixing, market allocation, bid-rigging, or other anticompetitive practices.

3. Conflict of Interest

To ensure the integrity of business relationships, it is important for business partners and their employees to avoid conflicts of interest. Business partners should establish processes and guidelines to prevent, detect, and address any conflicts of interest that may arise within their organization.

Employees should be aware of the potential for conflicts of interest and disclose any relationships or interests that could influence their decision-making regarding a business partner. This transparency allows for objective decision-making based on the best interests of the partnership, rather than personal gain.

Business partners should make decisions based on objective information and avoid being influenced by personal interests. They should act in the best interests of the partnership and disclose any potential or actual conflicts of interest to ensure transparency and appropriate actions can be taken to address them.

4. Export Controls and economic sanctions

Business partners are expected to become knowledgeable about and comply with all applicable export control and sanctions laws, including trade sanctions and regulations. They should not violate any export control or sanctions laws, and they should ensure that GEDIA does not violate them either. This includes refraining from transshipping goods through or supplying goods or services from sanctioned countries, or engaging with individuals or entities appearing on export restrictions or sanctions lists.

Business partners should stay updated on changes related to countries, entities, and persons mentioned in export restrictions and sanctions lists. They should take proactive steps to keep themselves informed about these changes.

Direct or indirect commercial activities with sanctioned countries, territories, entities, persons, or sectors should be avoided by business partners. Accurate records of customs activities should be maintained to demonstrate compliance with export control and sanctions regulations.

5. Disclosure of information

Protecting confidential information is paramount in handling trade secrets effectively. Unauthorized publication, disclosure, or accessibility of confidential content to third parties is strictly prohibited without proper authorization. Adequate safeguards must be in place to facilitate secure exchanges of sensitive information and prevent unauthorized disclosure, theft, or misuse.

To ensure information security, it is essential to implement measures aligned with the latest state-of-the-art technologies. This includes employing encryption, secure data storage systems, access controls, and other appropriate security protocols. Business partners should stay updated on emerging security practices and regularly assess and enhance their information security measures to address evolving threats and vulnerabilities.

6. Financial Responsibility (Accurate records)

Business partners are responsible for ensuring the accurate and transparent disclosure of all financial information related to their business activities. This includes complying with applicable national and international provisions, as well as meeting industry expectations regarding taxes, duties, and license fees.

In addition, it is crucial for business partners to maintain accurate and complete records, reports, and invoices, ensuring that they contain no false or misleading information. This involves recording business expenditures accurately and honestly, without concealing the true nature of an expense.

7. DATA Protection and DATA security

Proper handling of personal and sensitive data is essential, encompassing collection, processing, storage, and deletion. Adherence to relevant data protection laws is mandatory when dealing with employee, customer, and business partner information, including its collection, storage, utilization, and disclosure. To ensure the protection of personal data against unauthorized disclosure, theft, or misuse, robust data protection and cybersecurity measures are implemented. It is imperative to fully comply with all applicable laws and regulations pertaining to data protection and data security.

8. Counterfeit parts & intellectual property

Business partners are required to uphold intellectual property rights and employ commercially reasonable practices to safeguard the confidentiality of technology and know-how. Intellectual property encompasses various forms such as registrable intellectual property rights (e.g., patents, trademarks, and designs), domains, and copyrights. Additionally, compliance with competition law requirements that respect the intellectual property rights of other parties is expected. Suppliers must implement methods and processes to minimize the risk of incorporating counterfeit parts into final products. They should actively detect

counterfeit parts and materials, promptly notify recipients of any counterfeit products, and remove counterfeit parts from the final products. All applicable national and international laws pertaining to the protection of intellectual property must be strictly adhered to by our partners.

9. Artificial Intelligence

Partners engaged in the development and/or utilization of artificial intelligence, particularly machine learning and deep learning, are obliged to ensure responsible and accountable use of this technology. This includes the requirement to provide explanations for the utilization of artificial intelligence, safeguard privacy, and ensure its usage is safe, secure, and dependable.

10. Critical raw materials / Conflict Minerals

In order to ensure responsible supply chains of minerals from conflict-affected areas, our partners are required to establish a due diligence process in accordance with the "OECD Due Diligence Guidance." They should promote transparency by communicating with suppliers about the origin of minerals, specifically focusing on conflict-affected and high-risk areas (CAHRAs). This includes, but is not limited to, minerals such as tungsten, tantalum, tin, and gold, commonly referred to as "3TG," as per Regulation (EU) 2017/821 on Conflict Minerals.

Partners are expected to develop a policy that outlines how they systematically identify and prioritize risks and implement necessary countermeasures. They should make efforts to source raw materials responsibly, ensuring they are obtained from verified and audited sources.

Suppliers must provide written documentation that demonstrates compliance with legally applicable standards. This includes disclosing detailed information about the composition of materials used in the manufacturing of supplied goods, any changes in composition, and any information required to comply with relevant legislation such as the Dodd-Frank Act and the EU conflict mineral regulation. The latest version of the Conflict Minerals Reporting Template (CMRT form) should be used for this purpose. Suppliers must also provide information about the smelters from whom they source raw materials, either directly or through subcontractors.

We expect suppliers to exclude smelters or refiners for these raw materials that do not have adequate and audited due diligence processes in place. Additionally, suppliers may be requested on an ad hoc basis to provide information about their supply chain for these materials, as well as other critical raw materials where applicable. This includes details about the origin of the materials, which can be obtained through initiatives such as the Responsible Minerals Assurance Process (RMAP) of the Responsible Minerals Initiative (RMI).

In addition to 3TG, our due diligence procedures also address other raw materials or process materials that have been identified as having environmental and human rights risks in their extraction and processing. These materials include aluminum, leather, nickel, chromium, lithium, platinum group metals, graphite, manganese, rare earth, cobalt, mica, steel/iron, copper, natural rubber, and zinc.

11. Integration of Sustainability

We highly recommend that our business partners establish an internal policy statement, such as a code of conduct, that clearly outlines their commitment to social, ethical, and ecological standards. Furthermore,

suppliers should provide suitable resources to enhance the skills and capabilities of their employees, as well as offer training and support to small and local suppliers. To ensure adherence to regulations and standards, it is imperative to maintain comprehensive records of relevant documents and notes.

Additionally, we advise our business partners to designate a dedicated sustainability officer or a similar role within their organization. This individual should directly report to the management team and be responsible for overseeing sustainability initiatives. Having a designated officer ensures that sustainability practices remain a priority and that necessary actions are taken to achieve our shared objectives. It is vital that all employees, regardless of their positions, are empowered to voice concerns and report any witnessed violations.

12. Implementation of Corporate due Diligence

As part of our commitment to transparency and accountability, we require our partners to publicly disclose a comprehensive sustainability report that encompasses the collective efforts and progress made towards adopting sustainable practices within their organization.

We acknowledge the importance of responsible sourcing, and our partners are either establishing or in the process of implementing a robust due diligence procedure. This process includes necessary measures to ensure that our suppliers and subcontractors meet the required sustainability standards and guidelines. Moreover, our partners have implemented an effective management system that ensures corporate due diligence towards both people and the environment. This system applies not only to their own organization but also to their direct and indirect suppliers.

In the event that a supplier becomes aware of any violations of the Supplier Code of Conduct within their own business area or supply chain, immediate action is expected. The supplier must promptly undertake appropriate remedial measures to address the violation.

13. Verification of Compliance

We retain the right to verify compliance with these requirements through appropriate means, with prior written notice. Verification methods may include the use of questionnaires, audits, or on-site inspections conducted by experts. Upon request, the supplier is obligated to provide complete and truthful responses to inquiries regarding their adherence to the obligations outlined in this Standard. This includes disclosing their actions, any violations, and grievances.

If deviations are identified during these assessments, the supplier must take remedial actions within a reasonable timeframe. The supplier bears the responsibility and cost of rectifying such non-compliance, without additional charges to us. Failure to implement necessary corrective measures in a subsequent review may result in the early termination of the business relationship at our discretion. Any non-compliance with this code of conduct will be considered a significant breach that may warrant early termination of the business agreement.

14. Reporting channels & Whistleblowing

In our company, we place great importance on having a strong whistleblower system that promotes transparency, accountability, and a safe environment for reporting. We have implemented a mechanism for addressing grievances, which allows individuals to report any concerns or instances of misconduct they

may witness within our organization and the organizations of our suppliers. Our website, www.gedia.com, and our email address, compliance-gedia@hep.legal, provide access to our whistleblower system. In the event of any non-compliance with our guidelines, suppliers are obligated to report such cases to GEDIA. We expect our business partners and suppliers to be aware of the available channels for reporting complaints, establish their own whistleblowing system, and communicate this information throughout their supply chains. Partners must make reasonable efforts to ensure that subcontractors include an equivalent reporting obligation in their contracts and require subcontractors to submit corresponding whistleblowing reports to the partner.

If there is a reasonable suspicion of potential misconduct by GEDIA employees or employees of our business partners while collaborating with GEDIA, please report it through the GEDIA Whistleblowing System. You can report suspected wrongdoing and express concerns, including those related to product safety. Whistleblowers have the option to choose whether or not they provide their names when making a report. Additionally, external ombudspersons are available as additional points of contact. With the whistleblower's approval, ombudspersons can forward reports. If GEDIA becomes aware of the reporter's identity, it will be kept confidential to the fullest extent possible.

Retaliation against individuals who make good faith reports of violations is strictly prohibited. If a violation falls within the partner's domain, the partner must take immediate action to remedy the associated risks.

15. Legal consequences of violation

Complying with the requirements outlined in this document is considered essential for maintaining business relations with GEDIA. GEDIA retains the right to pursue appropriate legal measures in cases where a business partner fails to comply with these requirements. However, if specific contractual obligations deviating from the principles stated in this document have been agreed upon with a business partner, those divergent obligations will take precedence.

VI. CONTACT PERSON

All business partners are requested to report suspicious cases they observe.

The early reporting of suspected cases helps GEDIA to recognize possible damage and to minimize it through appropriate countermeasures. All employees are required to protect the whistleblower from possible disadvantages that could arise from a legitimate report. GEDIA will also work to ensure that the reporting person does not suffer any disadvantages.

The report can be sent to the management or to the external whistleblower office that is bound to secrecy towards GEDIA:

Heller Epe und Partner
Partnerschaftsgesellschaft mbB
RA Carsten Sieg
Martinstraße 4, 57462 Olpe
02761 893-21
compliance-gedia@hep.legal

The disclosure of any business secrets from GEDIA or third parties to the whistleblower office is subject to § 5 No. 2 GeschGehG and is permitted if it is carried out to uncover an illegal act or professional or other misconduct.

In principle, the whistleblower office will investigate every suspected case, unless the whistleblower has reported anonymously, contact him and investigate the matter. Anonymous reports are passed on to GEDIA by the whistleblower office without restriction. If the report is not anonymous, the whistleblower office is obliged to maintain secrecy. All information on the suspected case and in particular the whistleblower's personal data may only be passed on to GEDIA or third parties with his or her express consent.

If necessary, the whistleblower office will anonymize, aggregate or generalize information on the suspected case in consultation with the whistleblower so that it is difficult or impossible to draw conclusions about this person. GEDIA has no right for information from the whistleblower office. Information is only given in consultation with the whistleblower and with his express consent.

VII. LAST UPDATED

January 2025

Location, Date

Signature Subcontractor/Business Partner

Print name, Function

LIST OF CHANGES

List of changes			
Index (Date)	Description	Page	Name
01 14.12.2017	Complete revision	All	N.N
02 05.01.2018	Complete revision	All	N.N
03 03.12.2018	Complete revision	All	N.N
04 31.03.2021	Complete revision	All	N.N
05 04.08.2021	Complete revision	All	N.N
06 07.09.2021	Complete revision	All	N.N
07 12.07.2023	Complete revision	All	S.Burghaus
08 26.02.2024	Complete revision	All	S.Burghaus
09 14.01.2025	Point 6. Energy efficiency - Addition	5	S.Burghaus