



Supplier Code of Conduct of the Westfalen Group

Preamble

We, the companies of the Westfalen Group, are aware of our social responsibility and are committed to responsible corporate governance. Responsible and ethical behavior towards employees, business partners, society and the environment are integral parts of our value system.

The Westfalen Supplier Code of Conduct is based on national laws and regulations such as the German Supply Chain Sourcing Obligations Act (LkSG) as well as on principles of internationally recognized standards for responsible corporate governance. These include, for example, the principles of the UN Global Compact Initiative, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

All companies in the Westfalen Group act according to the same understanding of values.

In line with our holistic approach, we also expect our suppliers and business partners to comply with the environmental, social and integrity principles that we have defined in more detail below.

1 Requirements for our business partners

1.1 Social responsibility

1.1.1 Prohibition of forced labor, slavery and child labor

We expect you to comply with the laws of the applicable legal system(s). You respect and protect human rights and the fundamental rights of employees. You do not use child labor, forced labor, illegal labor, or other involuntary labor in accordance with ILO conventions at any stage of the value chain, or prevent it as far as possible. Human trafficking of any kind is prevented and the recommendations from the ILO conventions as well as national legal regulations on the minimum age for the employment of children are complied with.

Accordingly, the age shall not be less than the age at which compulsory education ends under the law of the place of employment and in any case not less than 15 years. If children are found at work, you must document the measures to be taken to remedy the situation and enable the children to attend school. Workers under the age of 18 shall not be assigned to work that is harmful to health, safety or morals. Special protective regulations must be observed. They may not be employed, procured, or offered for illicit activities (for the extraction and trafficking of drugs or for prostitution, the production of pornography or pornographic performances).

1.1.2 Respect for workers' rights

You respect your employees' right to freedom of association and collective bargaining in accordance with applicable laws. Workers must be able to communicate openly with management without fear of reprisal or harassment.

1.1.3 Prohibition of disadvantage and discrimination

Sie You do not tolerate any discriminatory behavior towards employees or applicants on the grounds of ethnic origin, nationality, gender, pregnancy or parenthood, marital status, age, disability, religion or ideology, sexual orientation or any other grounds covered by a ban on discrimination.

In addition, you promote equal opportunities in the workplace and equal treatment of your employees regardless of skin color, nationality, social origin, possible disability, sexual orientation, political or religious conviction, gender, or age.

You will treat your employees with respect and dignity, free from harassment, bullying or intimidation. Any behavior that can be considered sexual, threatening, abusive or exploitative will not be tolerated. You have established internal rules for fair dealings with each other and monitor compliance with them.

1.1.4 Adequate working conditions

You provide a safe and healthy work environment for your employees in compliance with applicable laws and regulations. You enable your employees or other stakeholders to report concerns or possible unlawful practices in the workplace. You adhere to minimum wages and working hours in accordance with local laws or ILO international standards and ensure compensation for a living wage in accordance with local living conditions.

Where appropriate and / or necessary, minimize all risks and hazards to ensure the health and well-being of your employees. By establishing and applying appropriate occupational safety systems (such as ISO 45.001), necessary precautionary measures are taken against accidents and damage to health that may arise in connection with the activity. In addition, employees are provided with the protective equipment identified for their activities and are regularly informed and trained on applicable health and safety standards and safety measures.

1.1.5 Deployment of security forces

If third parties (private or public security forces) are employed for the protection of the entrepreneurial project, you must ensure through instruction and control that the elementary rights of the workers inside are protected. This means in particular a prohibition of torture, cruel, inhuman or degrading treatment or injury to life or limb. In addition, the freedom of association and the freedom to organize must be guaranteed.

1.2 Ecological responsibility

1.2.1 Contamination avoidance

You must ensure that your business activities do not cause any harmful soil changes, water pollution, air pollution, harmful noise emissions



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or excessive water consumption that significantly impair the natural basis for the preservation and production of food. In particular, you must ensure that your production and procurement processes do not significantly impair the natural basis for the preservation and production of food, do not impede people's access to safe drinking water and sanitary facilities, and do not endanger people's health.

1.2.2 Optimize resource efficiency, reduce emissions

Land, forests, and waters that serve as a person's livelihood may not be unlawfully taken or forcibly cleared for the purpose of acquisition, construction, or other use. You must therefore ensure that, as part of your production and procurement processes, there is no unlawful acquisition, construction or other use of land, forests, and waters whose use secures the livelihood of people.

They ensure a robust, resilient supply chain and appropriate processes to ensure the delivery and provision of products and services to the best of their ability.

You also use the environment and resources responsibly for the benefit of society and future generations and comply with applicable national energy and environmental laws, regulations, and standards. You comply with applicable environmental, health and safety regulations and enable the safe and environmentally sound manufacture of your products as well as their transportation, use and recycling.

We expect that natural resources are used sparingly and that they are preserved as far as possible. As part of your corporate responsibility, you operate an environmental and energy management system that is appropriate for your industry (e.g., according to ISO 14.001, ISO 50.001) and continuously improve your environmental performance. Thus, a continuous improvement process should be in place that permanently reduces energy and water consumption as well as waste generation and greenhouse gas, air, and water emissions. As far as possible, avoid packaging materials and use environmentally friendly packaging materials.

1.2.3 Prohibition of hazardous substances and waste

To prevent environmental risks, you must comply with the regulations of the *Minamata Convention*. These prohibit the manufacture of mercury-added products, the use of mercury and mercury compounds in manufacturing processes, and the treatment of mercury waste.

In the production and use of chemicals, the prohibitions on persistent organic pollutants ("POPs") set out in the *Stockholm Convention* apply. You must organize the handling, collection, storage, and disposal of waste in an environmentally sound manner in accordance with the requirements of the applicable legal system and the *Stockholm Convention*. In addition, you must comply with the prohibitions on the export and import of hazardous waste as defined in the *Basel Convention*.

1.2.4 Dealing with conflict minerals

For the conflict minerals tin, tungsten, tantalum, and gold, as well as for other minerals or their derivatives that are considered to finance conflict, establish due diligence processes, and promote responsible

supply chains for minerals from conflict and high-risk areas in accordance with the Organization for Economic Cooperation and Development (OECD) Guiding Principles. Upon request, the internal due diligence measures will be made available to Westfalen Group companies.

1.3 Responsibility in the business environment

1.3.1 Business integrity

The standards of fair business, fair advertising and fair competition must be observed. In addition, the applicable antitrust laws must be applied, which in particular prohibit agreements and other activities that influence prices or conditions in dealings with competitors. Furthermore, these regulations prohibit agreements between customers and business partners that are intended to restrict customers' freedom to determine their prices and other conditions autonomously when reselling.

We expect you to maintain business relationships only with partners whose integrity you are convinced of. Furthermore, you make your decisions exclusively based on of factual criteria and do not allow yourself to be influenced by personal interests and relationships.

You will treat all information, samples and documents received by you as confidential information before or after a placed order as confidential and will not at any time, directly or indirectly, disclose or publish them or use them for your own benefit or for the benefit of third parties.

Intellectual property rights must be respected. Technology and know-how transfers must be carried out in such a way that intellectual property rights and customer information are protected.

You also do not tolerate any form of corruption or bribery. You will ensure that your employees, subcontractors, or agents do not offer, accept, or promise bribes, kickbacks, improper donations or other improper payments or benefits to customers, public officials or other third parties. At the same time, you do not offer employees or third parties any improper advantages in the form of gifts, hospitality, or invitations to exert undue influence.

They ensure that the applicable legal provisions against money laundering are not violated and that the EU anti-terror regulations (in particular Regulations (EC) No. 2580/2001; 881/2002 and 753/2011) are complied with.

If a claim is made against or a fine imposed on a Westfalen Group company by a third party in connection with a breach of this obligation committed by you, you shall indemnify the Westfalen Group companies against such claims and/or fines on first demand.

1.3.2 Privacy

You respect the privacy and confidential information of all your employees and business partners and protect the data and intellectual property from misuse. The relevant data protection laws are ensured together with your employees. This includes, in particular, regular awareness training for employees.



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The persons responsible and commissioned processors shall ensure that the principles of the General Data Protection Regulation for the processing of personal data are applied in a legally compliant manner. Data is processed in accordance with the provisions of the Telecommunications Telemedia Data Protection Act and the General Data Protection Regulation.

1.3.3 Quality

They meet generally accepted and legally defined quality standards as well as additional contractually agreed quality requirements to provide only goods and services that perform as warranted and are safe for their intended use.

2 Implementation of the requirements

2.1. Supply chain and due diligence obligations

Our business partners, including employees, agents, and subcontractors, comply with the standards described in this Supplier Code of Conduct when working directly or indirectly for Westfalen Group companies. It is your responsibility to train your employees and subcontractors accordingly. We therefore expect you to promote and demand compliance with this Code of Conduct not only within your own organization, but also among your business partners.

2.2. Support in cases of doubt and consequences of violations

2.2.1 Ensuring the regulations

The company verifies compliance with the standards and regulations listed in this document by means of a self-assessment questionnaire and risk-based audits at the production sites of its business partners.

You agree that Westfalen Group companies may conduct audits or assessments to ensure that you comply with laws, rules, and standards. In addition, appropriate action shall be taken with respect to the business relationship if there is cause for concern.

The companies of the Westfalen Group shall conduct such audits to verify compliance with the Code of Conduct at the operating sites during normal business hours after reasonable advance notice by persons appointed by it. They may object to individual audit measures if these measures violate data protection regulations.

2.2.2 Support

In the event of suspected violations, as well as to safeguard supply chains with increased risks, Westfalen Group companies will inform you promptly and, if necessary, on a regular basis about the identified violations and risks, as well as the measures taken, and will contact us through existing channels. All tips will be treated confidentially and followed up. In doing so, the whistleblower can remain anonymous and is protected from possible emerging negative consequences of his report.

The Westfalen whistleblower system can be accessed via the following website:

<https://westfalen.vispato.com/>

In the event of deviations from the principles of the Code of Conduct, we will clarify with you how corrections can be implemented within an appropriate timeframe. However, this joint clarification does not release you from the responsibility for your own actions, omissions, or the processing thereof.

2.2.3 Consequences of violations

The companies of the Westfalen Group reserve the right to terminate any relationship if the principles designated in this Supplier Code of Conduct are violated, no measures are taken to remedy such violations or systematic violations are evident. We will always comply with our legal obligation to report violations or suspected violations to the relevant authorities.

If a violation of the provisions of this Code of Conduct is detected, the companies of the Westfalen Group will notify you in writing or in text form and set a reasonable grace period to bring the conduct into compliance with these provisions. If such a violation has been culpable and makes it unreasonable for the companies of the Westfalen Group to continue the contract until its proper termination, the respective company of the Westfalen Group reserves the right to terminate the contract after the set period of time has expired. A statutory right to extraordinary termination without setting a grace period shall remain unaffected, as shall the right to claim damages.

You shall fully indemnify the respective company of the Westfalen Group against all claims directed against the company and alleged victims of human rights violations or of violations of environmental concerns and of non-governmental organizations or other claimants if and to the extent that such claim is based on a violation of obligations under No. 2 of this Agreement culpably committed or accepted by you and the violation has been determined by a court or admitted by you. Any contributory negligence on the part of the Company shall be adequately considered.

3 Entry into force and period of validity

For the cooperation, the contractual partners agree on the validity of the above regulations for a joint Supplier Code of Conduct. It describes the principles and thus the foundation of our behavior and actions, which we also expect from our business partners, and which are described in more detail in this Code of Conduct. At the same time, it does not release us from the obligation to comply with rules and regulations that are not mentioned but nevertheless exist, as well as unwritten moral and ethical principles of conduct.

This agreement shall serve as the basis for all future deliveries. You agree to comply with the principles and requirements and to endeavor to contractually obligate your subcontractors to comply with the standards and regulations set forth in this document.

The agreement shall enter into force upon signature and may be terminated by either party in text form with three months' notice to the



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end of any calendar half-year. However, for contracts concluded before the termination takes effect, the Supplier Code of Conduct shall continue to apply until the end of their term, including the warranty period. A breach of this Code of Conduct may ultimately be grounds and cause for the company to terminate the business relationship, including all associated supply contracts.

4 Acknowledgement and consent

By signing this Supplier Code of Conduct, you agree to act responsibly and to comply with the principles and requirements outlined. Furthermore, you will endeavor to work towards the implementation of the requirements of the LkSG throughout your supply chain.

Business partner:in: _____

Address: _____

Place, Date: _____

Signature: _____

The Westfalen Group's Legal & Compliance department is available as a contact for business partners with questions and suggestions regarding the Supplier Code of Conduct.

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