Supplier Code of Conduct

Principles for fulfilling corporate responsibility

We are committed to value-oriented social responsibility in the context of our corporate activities (usually referred to internationally as "CSR "1) and see sustainability as an integral part of our business processes. This binding code of conduct (hereinafter referred to as "Code of Conduct" or "CoC") serves as a guide to what this means, particularly with regard to legality, working conditions, social and environmental compatibility, transparency, trust-based cooperation and dialog. The contents of this CoC, are an expression of our values, as defined and recorded in our corporate policy. The CoC is designed as a voluntary commitment.

1 Basic understanding of socially responsible corporate governance

Supfina Grieshaber GmbH & Co. KG. is committed to ecologically and socially responsible corporate management. We expect the same behavior from all our suppliers.
We also expect our employees to observe the principles of ecological, social and ethical behavior and to integrate them into the corporate culture.
We also strive to continuously optimize our business activities and our products and services in terms of sustainability and encourage our suppliers to do the same, to contribute to this in the sense of a holistic approach. For future cooperation, the contractual partners agree to apply the following regulations for a joint code of conduct. This agreement shall form the basis for all future deliveries.
The contracting parties undertake to comply with the principles and requirements of the Code of Conduct and to endeavor to contractually oblige their subcontractors to comply with the standards and regulations set out in this document. This agreement comes into force upon signing. A breach of this Code of Conduct may ultimately be cause for the company to terminate the business relationship, including all associated supply contracts.
The Code of Conduct is based on national laws and regulations such as the Supply Chain Due Diligence Act (LkSG) as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on the Rights of the Child and Business Conduct, the United Nations Guiding Principles on Business and Human Rights, the international labor standards of the International Labor Organization and the United Nations Global Compact.

2 Requirements for suppliers

2.1 Social responsibility

- Exclusion of forced labor

  No forced labor, slave labor or comparable work may be used.
  All work must be voluntary and without threat of punishment. Employees must be able to terminate their work or employment relationship at any time. Furthermore, there must be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment and humiliation. The hiring or use of security personnel must be prohibited if persons are treated in an inhumane or degrading manner or are injured during their deployment or if freedom of association is impaired.

- Ban on child labor

Child labor may not be used at any stage of production. Suppliers are requested to comply with the recommendation from the ILO conventions on the minimum age for the employment of children. Accordingly, the age should not be lower than the age at which compulsory education ends according to the law of the place of employment and in any case not under 15 years of age. If children are found at work, the supplier must document the measures to be taken to remedy the situation and enable the children to attend school. The rights of young workers under the age of 18 shall not be used for work that is harmful to the health, safety or morals of children. Special protective regulations must be observed.

- Fair remuneration

  The remuneration for regular working hours and overtime must correspond to the national statutory minimum wage or the minimum standards customary in the industry, whichever is higher. The remuneration for overtime must in any case exceed the remuneration for regular hours. If the remuneration is not sufficient to cover the costs of normal living expenses and to build up a minimum level of reserves, the supplier is obliged to increase the remuneration accordingly. Employees shall be granted all legally prescribed benefits. Deductions from wages as a punitive measure are not permitted.
  The supplier must ensure that employees receive clear, detailed and regular written information on the composition of their remuneration.

- Fair working hours

  Working hours must comply with applicable laws or industry standards. Overtime is only permitted if it is voluntary and does not exceed 12 hours per week, while employees must be granted at least one day off after six consecutive working days. The weekly working time may not regularly exceed 48 hours.

- Freedom of association

  The right of employees to form organizations of their choice, to join them, to engage in collective bargaining and to strike must be respected, organizations of their choice, to join them, to bargain collectively and to strike must be respected.
  In cases where freedom of association and the right to collective bargaining are restricted by law, alternative possibilities for independent and free association of employees for the purpose of collective bargaining must be provided. Employees must not be discriminated against on the basis of founding, joining or being a member of such an organization. Employee representatives must be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner.

- Prohibition of discrimination

  Unequal treatment of employees in any form is not permitted unless it is justified by the requirements of employment. This applies, for example, to discrimination based on gender, national, ethnic or social origin, skin color, disability, health status, political conviction, ideology, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

- Rights of minorities and indigenous peoples

  Suppliers respect the rights of local communities and indigenous peoples who may be affected by business activities at our sites and take into account the local impact of our business activities. Where local legal systems are deficient, we are guided by the recognized minimum standards with regard to illegality.

- Diversity, equality and inclusion

  Inclusion and diversity are critical to the global success of suppliers. Recognizing the personal and cultural experiences of our employees strengthens our innovation and development as a company and as a community of colleagues. We want to be sure that everyone feels valued and supported to reach their potential.

- Health protection

  Safety in the workplace The supplier is responsible for a safe and healthy working environment. By setting up and applying appropriate occupational safety systems, the necessary precautionary measures are taken to prevent accidents and damage to health,
  that may arise in connection with the activity. Appropriate measures must be taken to prevent excessive physical or mental fatigue. In addition, employees are regularly informed and trained on applicable health and safety standards and safety measures. Employees are provided with access to drinking water in sufficient quantities and access to clean sanitary facilities.

- Biodiversity, land use, deforestation and soil quality

  The supplier may not, in violation of legitimate rights, withdraw land, forests or waters whose use secures the livelihood of people. The supplier must refrain from harmful soil changes, water and air pollution, noise emissions and excessive water consumption if this harms the health of people, significantly impairs the natural basis for food production or prevents people from having access to safe drinking water or sanitary facilities.

- Complaints mechanisms

  The supplier must pass on information received from Supfina Grieshaber GmbH & Co. KG. regarding accessibility, responsibility and the implementation of a complaints procedure in an appropriate manner to its employees. The complaints procedure must be accessible to employees while maintaining confidentiality of identity and effective protection against discrimination. If no notice is given, the supplier itself is responsible for setting up an effective grievance mechanism at company level for individuals and communities who may be affected by adverse impacts.

- Dealing with conflict minerals

  For the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt, the company establishes processes in accordance with the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and expects its suppliers to do the same. Smelters and refineries without appropriate, audited due diligence processes should be avoided.

2.2 Ecological responsibility

Treatment and discharge of industrial wastewater from operations, manufacturing processes and sanitary facilities must be typified, monitored, checked and, if necessary, treated prior to discharge or disposal. In addition, measures should be introduced to reduce the generation of wastewater. Dealing with air emissions General emissions from operations
(air and noise emissions) and greenhouse gas emissions must be typified, routinely monitored, checked and, if necessary, treated before they are released. The supplier is also responsible for monitoring its emission control systems and is required to find cost-effective solutions to minimize any emissions. Dealing with waste and hazardous substances The Supplier shall follow a systematic approach to identify, manage, reduce and responsibly dispose of solid waste,

reduce and responsibly dispose of or recycle solid waste. The prohibitions on the export of hazardous waste in the Basel Convention of March 22, 1989, as amended, shall be observed. Chemicals or other materials that pose a risk when released into the environment
must be identified and handled in such a way that when handling these substances, transportation, storage, use, recycling or reuse and disposal. Mercury shall be used in accordance with the prohibitions of the Minimata Convention of October 10, 2013 and persistent organic pollutants in accordance with the Stockholm Convention of May 23, 2001, as amended. Reduce consumption of raw materials and natural resources The use and consumption of resources during production and the generation of all types of waste, including water and energy, must be reduced or avoided. This is done either directly at the point of origin or through procedures and measures, e.g. by changing production and maintenance processes or procedures within the company, by using alternative materials, by making savings, by recycling or by reusing materials. Dealing with energy consumption/efficiency Energy consumption must be monitored and documented. Economic solutions must be found, to improve energy efficiency and minimize energy consumption.

2.3 Ethical business conduct and Compliance

Fair competition: The standards of fair business activity, 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 when dealing with competitors. Furthermore, these regulations prohibit agreements between customers and suppliers that are intended to restrict customers in their freedom to determine their own prices and other conditions for resale.
Confidentiality/Privacy: Supplier agrees to meet the reasonable expectations of its Principal, suppliers, customers, consumers and employees regarding the protection of private information. The Supplier shall comply with data protection and information security laws and governmental regulations when collecting, storing, processing, transmitting and sharing personal information. Intellectual property Intellectual property rights must be respected; technology and know-how transfer must be carried out in such a way that intellectual property rights and customer information are protected. Integrity/bribery and avoidance of conflicts of interest The highest standards of integrity must be applied to all business activities. The supplier must have a zero-tolerance policy on the prohibition of all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing standards shall be implemented to ensure compliance with anti-corruption laws.

3 Implementation of the requirement

We expect our suppliers to identify risks within their supply chains and to take appropriate measures. In the event of suspected violations and to safeguard supply chains with increased risks, the supplier will inform the company promptly and, if necessary, regularly about the violations and risks identified and the measures taken. The company checks compliance with the standards and regulations listed in this document using a self-assessment questionnaire and risk-based audits at the supplier's production sites. The supplier agrees to this, that the Client will carry out such audits once a year or for a specific reason to verify compliance with the Code at the Supplier's production sites during normal business hours after reasonable advance notice by persons appointed by the Client. The Supplier may object to individual audit measures if these would violate mandatory data protection regulations. If a breach of the provisions of this Code of Conduct is identified, the Company shall notify the Supplier in writing without delay and set a reasonable grace period for the Supplier to bring its conduct into compliance with these provisions.
If a remedy is not possible in the foreseeable future, the Supplier must notify the Company immediately and, together with the Company, draw up a concept with a timetable for ending or minimizing the violation. If the grace period expires fruitlessly or if the implementation of the

measures contained in the plan does not remedy the situation after the expiry of the timetable and no milder means are available, the Company may break off the business relationship and terminate all contracts. A statutory right to extraordinary termination without setting a grace period, in particular in the case of breaches that are deemed to be very serious, remains unaffected, as does the right to compensation for damages.

Wolfach in January 2025

Florian Berger
Managing Director