



CODE OF CONDUCT FOR SUPPLIERS OF THE HAYER & BOECKER GROUP

1. Preamble

HAYER & BOECKER is committed to socially and ecologically responsible corporate management. We expect our employees to observe the principles of ethical, social and ecological conduct and to integrate them into our corporate culture. We expect the same behavior from all our suppliers. We also strive to continuously optimize our business activities and our products and services in terms of sustainability. We ask our suppliers to contribute to this in the sense of a holistic approach.

For future cooperation, the contractual partners agree on the validity of the following regulations (Code of Conduct). These are the basis for all future deliveries. The contractual partners undertake to comply with the principles and requirements of this Code of Conduct. Suppliers are required to require their subcontractors to comply with the standards and regulations listed in this document.

The Code of Conduct is based on national regulations and laws as well as on international and international labor standards of the International Labor Organization, the Universal Declaration of Human Rights of the United Nations, the guidelines of the United Nations "Business and Human Rights", the guidelines on children's rights as well as the Global Compact of the United Nations.

2. Requirements for suppliers

2.1 Social Responsibility

- Prohibition of child labor

Child labor must not be used at any stage of the value chain. The supplier commits to complying with the recommendations of the ILO Conventions regarding the minimum age for employment. The age must not be lower than the age at which compulsory schooling ends and, in any case, not below 15 years. Furthermore, the rights of young employees must be protected, and special protective regulations must be observed.

- Exclusion of forced labor

No form of slave labor, forced labor, or comparable practices may be used. Unacceptable treatment of workers—such as psychological hardship, sexual or personal harassment—must not occur. All work must be voluntary, and employees must be able to terminate their employment or work at any time.

- Fair working hours

The supplier commits to comply with applicable laws or industry standards regarding working hours. Weekly working hours must not regularly exceed 48 hours. Overtime is permitted only if it is done voluntarily and does not exceed 12 hours per week. After six consecutive working days, employees must be granted at least one day off.

- Fair compensation

Depending on which amount is higher, payment for regular working hours and overtime must comply with either the national statutory minimum wage or the industry-specific minimum standards. The



supplier is obligated to increase compensation if it is insufficient to cover the cost of living and to allow for a minimum level of savings. Overtime pay must not be lower than the regular hourly rate. Employees must be granted all legally mandated benefits. Disciplinary measures in the form of wage deductions are not permitted.

- Prohibition of discrimination

The privacy, personal dignity, and individual rights of every person must be respected. Discrimination against employees in any form is not permitted. This includes, for example, disadvantages based on gender or gender identity, age, ethnic origin or skin color, religion or belief, sexual orientation, disability or chronic illness, social background or social status, language or accent, nationality or citizenship, marital status or parenthood, appearance, or political beliefs.

- Freedom of association

The supplier respects the right of employees to form or join organizations of their choice and to engage in collective bargaining (e.g., joining trade unions). Where freedom of association and the right to collective action are legally restricted, alternative means must be provided to allow employees to form independent associations for the purpose of collective bargaining. The right of workers to freedom of association, to join trade unions, to contact employee representatives, or to be members of works councils in accordance with applicable local laws must be respected.

- Dealing with conflict minerals

In accordance with the OECD guidelines, the supplier shall establish processes for compliance with the duty of care regarding responsible supply chains for minerals from conflict and high-risk areas for the conflict minerals tin, tungsten, tantalum and gold as well as for other raw materials such as cobalt. Haver & Boecker also expects the same from its suppliers. Refineries and smelting without adequate, audited due diligence processes should be avoided.

- Health protection; Safety at work

The supplier is responsible for ensuring a safe and healthy working environment. Preventive measures against accidents and health risks related to work activities are implemented through appropriate occupational safety systems. Training and information on applicable health and safety standards, as well as protective measures, are provided on a regular basis.

2.2 Environmental Responsibility

The supplier is committed to minimizing environmental impact and complying with applicable environmental laws and regulations. This includes:

- Management of air and noise emissions

Emissions from operational processes are analyzed before release, regularly monitored, and treated with appropriate systems if necessary. Exhaust gas purification systems must be maintained in working order and regularly inspected.



- Discharge and treatment of industrial wastewater

Wastewater from operations, manufacturing processes, and sanitary facilities must be characterized, monitored, inspected, and treated, if necessary, before discharge or disposal.

- Resource Conservation

The consumption of energy, water, and raw materials, as well as the generation of waste, is continuously reduced. Energy consumption must be monitored and documented; cost-effective solutions to improve energy efficiency must be implemented.

- Handling of Waste and Hazardous Substances

The supplier follows a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste. Chemicals or other materials that pose a risk to the environment upon release must be identified and handled in a way that ensures safety during transport, storage, use, recycling, reuse, or disposal.

2.3 Ethical business conduct

- Confidentiality/data protection

The supplier must comply with all applicable data protection laws (e.g. GDPR) and information security regulations.

- Fair competition

The supplier respects the principles of fair business practices and complies with all antitrust and competition laws. Price fixing or other anti-competitive behavior is prohibited.

- Intellectual property

Technology and know-how transfers must be carried out in a way that protects customer information and respects intellectual property rights.

- Integrity/Bribery, Taking advantage

All forms of bribery, corruption, extortion, and embezzlement are prohibited. Gifts or invitations may only be offered or accepted in accordance with legal requirements and internal policies.

3. Implementation of the requirements

HAYER & BOECKER expects its suppliers to identify the risks within their supply chains and to take appropriate measures. In cases of suspicion or to secure supply chains with increased risks, the supplier will immediately inform the company and list the identified violations and risks as well as the measures taken.

4. Knowledge and consent of the supplier

By signing a contract with HAYER & BOECKER, the supplier undertakes to act responsibly and to comply with the principles/requirements listed. The supplier ensures that all necessary measures for



implementation are taken and that the contents of the Code are communicated in an understandable manner to its employees, agents, and subcontractors.

5. Reporting Violations

HAYER & BOECKER has implemented a whistleblower system that enables affected individuals as well as other whistleblowers to report potential violations of applicable law or this Supplier Code of Conduct, either directly or anonymously. The supplier is obligated to inform its employees about the availability of this complaint mechanism. The whistleblower system is accessible via the homepage at: <https://www.haverboecker.com/en/company/whistleblower-system/>

Reports of potential violations can also be submitted by mail to:

HAYER & BOECKER OHG
c/o Whistleblower System Reporting Office
Carl-Haver-Platz 3
59302 Oelde
Germany

Reports and the identity of whistleblowers are treated confidentially. Information is only made available to those individuals who are required to process the matter and are also bound to confidentiality. Whistleblowers exercising their right to report will not face any disadvantages and may also report anonymously. However, we recommend not remaining anonymous, as investigations can often be conducted more quickly and effectively when the whistleblower is known.

6. Consequences of Violations of the Code of Conduct

The obligations set forth in this document are an essential part of the business relationship between the supplier and HAYER & BOECKER. HAYER & BOECKER expects the supplier to accept this Supplier Code of Conduct or to provide evidence of an equivalent alternative. In the event of violations of the minimum requirements outlined in this document, the supplier is required to initiate measures to end or minimize the violation and to provide corresponding evidence. In the case of a serious violation, HAYER & BOECKER reserves the right to suspend or terminate the contractual relationship, provided that no milder remedies are available.



SUPPLIER CODE OF CONDUCT ACKNOWLEDGEMENT FORM

On behalf of

(Insert Company-Name of Supplier)

By signing this document, I certify that I have been provided a copy of HAYER & BOECKER's Supplier Code of Conduct. I reviewed it in its entirety and commit my company and any suppliers with whom we work on HAYER & BOECKER business to comply with the principles of the HAYER & BOECKER's Supplier Code of Conduct. By signing this document, I agree to proactively advise HAYER & BOECKER of any noncompliance of the principles stated under the terms of the HAYER & BOECKER's Supplier Code of Conduct.

It is expressly confirmed that I am authorized by my company to accept the HAYER & BOECKER Supplier Code of Conduct on its behalf.

Supplier name and
Company Address:

Signature:

Place/Date:
