

Code of Conduct for Business Partner of Dürkopp Adler GmbH

The following requirements set out the values, principles and courses of action which determine the entrepreneurial actions of Dürkopp Adler GmbH. By adhering to this Code of Conduct the long-term interests of the company are to be promoted in the best possible way.

We expect our business partner to share our values and to comply with statutory regulations and provisions as well as our Code of Conduct for Business Partner of Dürkopp Adler GmbH (hereinafter "**Code of Conduct for Business Partner**").

The requirements of the Code of Conduct for Business Partner form the basis of our business relationship with our business partner. Our business partner undertake to ensure that their business partner along the supply chain also comply with the requirements in an appropriate manner.

Compliance with laws and other regulations at home and abroad

In all business decisions and actions, our business partner comply with the applicable laws and other relevant regulations at home and abroad.

Our business partner have a duty to act in an economically, socially and environmentally responsible manner. They therefore strive to conduct their business competently, ethically and to protect fair competition in all markets in which they operate by complying with applicable laws prohibiting cartels, competition and restraints of competition.

Quality, product safety, sustainability and environmental protection

The satisfaction of our customers is our highest priority. Our claim is to always offer our customers safe and flawless products and services of high quality.

Therefore, all products and services must meet the contractually defined criteria for quality and safety upon delivery and be safe to use for their intended purpose. Our business partner ensure compliance with all applicable product safety regulations and requirements, in particular the legal requirements concerning the safety, labelling and packaging of products and the use of hazardous substances and materials.

Respect for and protection of the rights of people, living beings and nature are a matter of course for us. We systematically optimize environmental protection in our business activities and throughout the entire product life cycle, taking into account economic requirements. We have set ourselves the goal of using natural resources sparingly, minimizing environmental pollution in our production processes and avoiding waste. We are working to reduce our energy consumption in the long term and to continuously improve our energy-related performance.

We expect our business partner to act accordingly. To this end, our business partner comply with all applicable environmental laws and regulations in the countries in which they operate. Our business partner avoid the use of substances and materials that are hazardous to the environment and health and register and declare substances in accordance with legal requirements or have them approved, if necessary.

Respect for human rights

For Dürkopp Adler GmbH, respect for human rights is the basis of all business relationships. Our business partner undertake to respect human rights. This includes in particular that our business

partner do not use forced labour or child labour. Our business partner observe the minimum age for the employment of children according to national laws and, if there is no national legal regulation, according to Convention 138 of the International Labour Organization (ILO).

Fair working conditions, no discrimination

As a socially responsible employer, Dürkopp Adler GmbH considers its employees to be of great value. Business partner also promote a working environment characterized by respect and tolerance. Open exchange of opinions, criticism and ideas are encouraged.

Business partner shall condemn unlawful discrimination or harassment of any kind. Employees shall not be discriminated against on the grounds of ethnic origin, colour, sex, religion, nationality, sexual orientation, social origin, age, physical or mental disability, marital status, pregnancy, trade union membership or political affiliation, insofar as these are based on democratic principles and tolerance of dissent, unless this is contrary to mandatory law.

Minimum wage, working hours and freedom of association

Business partner shall ensure that the remuneration of their employees is at least the legally valid minimum and that working hours comply with the respective national legal requirements. The fundamental right of all employees to form and join trade unions and employee representative bodies is recognized.

Occupational safety, health and fire protection

Business partner shall maintain a safe and healthy environment and comply with national occupational safety, health and fire protection laws.

Conflicts of interest

Dürkopp Adler GmbH expects its employees to avoid situations in which their personal or financial interests conflict with those of Dürkopp Adler GmbH. We also expect our business partner to take decisions based on objective criteria and uninfluenced by financial or personal interests or relationships. Conflicts of interest must be reported to Dürkopp Adler GmbH in text form as soon as they become known, but in particular before any business is initiated.

Prohibition of corruption

Dürkopp Adler GmbH is against corruption and bribery. Activities in which business is conducted by unfair means will not be tolerated.

Business partner shall not offer or grant any benefits to their business partner, including Dürkopp Adler GmbH, or demand or accept such benefits from them, which could lead to an impairment of an objective and fair business decision or even create such an appearance. No benefits of any kind must be offered, granted, demanded or accepted vis-à-vis domestic or foreign public officials. The prohibition of corruption may also not be circumvented through the involvement of third parties.

Import and export controls

Business partner shall strictly observe all applicable laws governing the import and export of goods, services and information and shall comply with sanctions lists.

Money laundering

Our business partner ensure compliance with all applicable anti-money laundering laws.

Due diligence with regard to the supply chain

Business partner fulfil their due diligence obligations with regard to REGULATION (EU) 2017/821 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 17 May 2017 on conflict minerals such as tin, tungsten, tantalum and gold.

Handling assets

Our business partner respect our tangible and intangible assets. They ensure that their employees

or third parties engaged by them do not damage our assets or use them contrary to our interests.

Confidentiality and secrecy

Business partner are obliged to treat operational information about Dürkopp Adler GmbH and the Dürkopp Adler Group, which comes to their knowledge in the course of their activities, as confidential. This includes in particular non-public information about Dürkopp Adler GmbH, its subsidiaries and/or associated companies or about a company with which Dürkopp Adler GmbH does business with.

Our business partner warrant the effective obligation of their employees and third parties employed by them on keeping confidential the operational information about Dürkopp Adler GmbH and Dürkopp Adler Group.

Data protection

The protection of personal data, in particular of employees, customers and business partner, is of particular importance to Dürkopp Adler GmbH. Our business partner comply with all applicable laws on the protection of personal data of employees, customers, suppliers and other data subjects as well as the principles of IT security.

Implementation, monitoring and responsibility

Each business partner is responsible for compliance with the rules contained in this Code of Conduct for Business Partner.

Our business partner will train their employees accordingly to ensure compliance with the requirements of this Code of Conduct for Business Partner.

We expect that business partner employees may report concerns about the items listed in this Code of Conduct for Business Partner or non-compliance with the described requirements to the business partner. There shall be no retaliation for reports made in good faith under this Code of Conduct for Business Partner.

We reserve the right to verify compliance with this Code of Conduct for Business Partner by appropriate means. Verification may be made by, in our discretion, on-site supplier audits or other means. An on-site audit will only be conducted with prior notice and in the presence of representatives of the business partner during regular business hours and in compliance with applicable law, including data protection requirements. Business partner shall be responsible for remedying violations of this Code of Conduct for Business Partner within a reasonable period of time at their own expense.

Compliance with this Code of Conduct for Business Partner is an integral part of our business relationship with our business partner. If a business partner does not comply with these requirements, Dürkopp Adler reserves the right to take appropriate legal steps, which may also lead to termination of the business relationship. Individual agreements concluded with a business partner in text form after the entry into force of this Code of Conduct for Business Partner, which deviate from individual provisions of this Code of Conduct for Business Partner, shall take precedence over this Code of Conduct for Business Partner.

**DÜRKOPP ADLER GmbH
The Management Board**

Status 01/2022