



EGELHOF BUSINESS PARTNER CODE OF CONDUCT

2025

FAIR AND SUSTAINABLE BUSINESS AS A KEY DRIVER OF FUTURE GLOBAL DEVELOPMENT

I. INTRODUCTION

All companies within the EGELHOF Group (hereinafter referred to as “EGELHOF”), both in Germany and abroad, are committed to conducting business in an ecologically and socially responsible manner. Compliance with all applicable local laws and regulations in every country where we operate is a fundamental principle for us.

EGELHOF expects its suppliers, subcontractors, distributors, and other providers of goods or services (hereinafter collectively referred to as “Partners”) to adhere to the same principles of social and environmental responsibility that guide EGELHOF’s own business practices. Compliance with this Code of Conduct forms an integral and essential part of the business relationship between EGELHOF and its Partners. It establishes the minimum standards for respectful treatment of employees and business partners, as well as for ethical and environmentally responsible business conduct. Partners are expected to continuously and transparently pursue the sustainable development of their business activities.

This Code of Conduct is based on the values and principles of EGELHOF, as set out in the EGELHOF Code of Conduct, as well as on international conventions. These include the United Nations «Universal Declaration of Human Rights», the «Guidelines on Children’s Rights and Business Principles», the OECD Guidelines for Multinational Enterprises, and the International Labour Organization’s (ILO) conventions.

II. LEGAL COMPLIANCE AND BUSINESS ETHICS

FAIR COMPETITION

We conduct business with integrity and fairness, supporting open and honest competition in full compliance with all applicable antitrust and competition laws. Any form of price fixing, market or customer allocation, or other anti-competitive agreements is strictly prohibited.

ANTI-CORRUPTION

The Partner shall refrain from any conduct that could be construed as corruption or bribery. The Partner must not make, offer, or authorize any improper payments, gifts, or other benefits to business partners or public officials in order to gain an unfair advantage or secure business.

ANTI-MONEY LAUNDERING

The Partner commits to complying with all applicable laws and regulations relating to money laundering and the financing of terrorism. The Partner shall ensure that all transactions and business relationships are transparent, traceable, and properly documented.

TAX, CUSTOMS AND EXPORT CONTROL

The Partner shall maintain accurate and transparent accounting and financial reporting in accordance with legal, regulatory, and official requirements. The Partner undertakes to comply with all national and

international tax, customs, import, and export control laws, including applicable economic sanctions and embargoes.

CONFLICTS OF INTEREST

EGELHOF is committed to maintaining a strict separation between personal and business interests and expects its business partners to do the same. Any potential or actual conflicts of interest must be disclosed without delay. Business relationships between an EDELHOF business partner and any EDELHOF employee or their relatives must be reported.

INTELLECTUAL PROPERTY AND COUNTERFEIT PARTS

The Partner shall develop, implement, and maintain appropriate processes to prevent the use or distribution of counterfeit or unauthorized products. The Partner must ensure that all goods and services supplied are free from third-party intellectual property rights and that no counterfeit parts are used in production.

CONFIDENTIALITY

The Partner shall treat as confidential all trade secrets and other legally protected information disclosed by EDELHOF, in accordance with applicable laws. In addition, the Partner shall maintain the confidentiality of all business information—including, but not limited to, financial data and contractual terms—in line with any confidentiality agreements or clauses agreed upon with EDELHOF.

CONFLICT MINERALS

The Partner shall exercise due diligence in sourcing raw materials and minerals to ensure that they do not originate from illegal sources or conflict-affected regions. The use of such materials must be avoided, and EDELHOF must be notified immediately if any conflict minerals are identified.

Partners who process conflict minerals are required to comply with all due diligence obligations and must provide EDELHOF annually, without request, with a Conflict Minerals Reporting Template (CMRT) and an Extended Minerals Reporting Template (EMRT).

DATA PRIVACY AND INFORMATION PROTECTION

All documents and information related to business operations must be treated as confidential. The Partner undertakes to ensure that any processing (e.g. collection, storage, transmission or deletion) of personal data of employees, customers or business partners complies with all applicable data protection and data security laws and regulations.

III. SOCIAL RESPONSIBILITY

RESPECT FOR HUMAN RIGHTS

We expect our business partners to respect and support the UN «Universal Declaration of Human Rights» and to ensure that they are not complicit in human rights abuses.

NON-DISCRIMINATION AND HARASSMENT

The Partner shall treat all employees with respect and dignity. Ethical recruitment, equal opportunities and fair treatment must be provided regardless of color, race, nationality, ethnic origin, gender, political views, religious beliefs, or age.

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The dignity, privacy, and personal rights of every individual shall be respected. Sexual or personal harassment, discrimination, or any degrading behavior in the workplace will not be tolerated.

PROHIBITION OF CHILD AND FORCED LABOUR

The employment of children by EGELHOF business partners is strictly prohibited. We support the long-term elimination of child labor in accordance with the United Nations Convention on the Rights of the Child. Partners must ensure that child labor is not used in any part of their operations and that they do not engage with persons or organizations that employ children.

The Partner shall also prevent all forms of forced labor, including modern slavery, in line with international labor standards and applicable laws.

DIVERSITY, EQUALITY AND INCLUSION

The Partner is committed to recognizing and valuing the diverse skills, experiences, and perspectives of all employees worldwide, regardless of their differences or similarities.

The Partner shall provide a work environment that fosters equality, fairness, and respect for social and cultural diversity, and is free from discrimination, harassment, or degradation, as defined by applicable laws.

FAIR WORKING CONDITIONS

The Partner shall ensure fair working conditions in accordance with national and international labor and social standards, including ILO conventions. This includes, but is not limited to, fair remuneration, compliance with statutory working hours, and provision of social benefits.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

The Partner shall respect and support the right of its employees to freedom of association and collective bargaining in accordance with applicable laws and regulations. This shall not be a reason for discrimination or retaliation.

OCCUPATIONAL HEALTH AND SAFETY

The Partner is responsible for protecting the health and safety of its employees. Hazards must be identified and controlled, and all reasonable measures taken to prevent accidents and occupational illnesses. We require our business partners to work continuously to improve their health and safety performance.

USE OF PRIVATE OR PUBLIC SECURITY FORCES

The Partner undertakes to strictly observe human rights, such as the prohibition of torture, cruel, inhuman or degrading treatment, when engaging private or security personnel.

PROTECTION OF LAND RIGHTS AND THE RIGHTS OF MINORITIES AND INDIGENOUS PEOPLES

The Partner respects all applicable local, national and international laws and traditional rights regarding land, water and resource rights. Business operations must protect, support, and respect the rights of minorities and indigenous peoples in accordance with the United Nations Declaration on the Rights of Indigenous Peoples.

IV. ENVIRONMENTAL PROTECTION

ENVIRONMENTAL MANAGEMENT SYSTEM

We are committed to promoting and implementing environmental protection across all our sites worldwide and have established an Environmental Management System in accordance with ISO 14001.

As a processor and manufacturer of various materials, EDELHOF is dedicated to safeguarding the health, safety, and well-being of people, animals, and the environment.

PROTECTING THE BIODIVERSITY

The Partner shall actively contribute to the conservation of ecosystems, particularly with regard to land protection, reforestation, and land use management, in order to protect biodiversity. The Partner shall ensure that its operations are carried out in accordance with air, water and soil protection regulations.

We expect our partners to minimize their consumption of natural resources, including raw materials, water, energy and fuels, and to reduce their environmental impact, including emissions, greenhouse gases, waste, wastewater and noise.

HAZARDOUS MATERIALS AND WASTE MANAGEMENT

In compliance with applicable laws and regulations, the Partner shall identify, label and manage chemicals, waste and other materials that are hazardous to human health or the environment. The safe handling, circulation, storage, use, recycling, reuse and disposal of these substances must be ensured at all times.

DECARBONISATION

The Partner is committed to aligning its business processes with decarbonisation objectives. This involves evaluating and monitoring its carbon footprint in accordance with the EDELHOF Group Guidelines for Suppliers and implementing measures to reduce greenhouse gas emissions throughout the supply chain by investing continuously in renewable energy.

We expect our business partners to adopt these principles and actively support our sustainability initiatives.

V. APPLICATION

EDELHOF expects the Partner to comply with the minimum requirements of this Code of Conduct in all of its business activities and to extend these standards to its own business partners. The Partner shall make reasonable efforts to implement the Code throughout its supply chain.

EDELHOF may verify compliance through measures such as self-assessments, presentation of certificates, or audits. Should the Partner fail to meet the minimum requirements of this Code, EDELHOF reserves the right to terminate the contractual relationship.

TRAINING

The Partner undertakes to ensure that its employees as well as those of its suppliers are informed of human rights, labor, and environmental requirements and have received the necessary training to implement the provisions of this Code of Conduct effectively.



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RISK ANALYSIS

EGELHOF is committed to minimizing human rights and environmental risks not only within its own operations but also throughout its direct business relationships. In this respect, the business partner is obliged to cooperate and to provide information upon request of EDELHOF, as far as this can be legally required.

REPORTING OF VIOLATIONS / WHISTLEBLOWER SYSTEM

Violations of law, human rights, environmental requirements, or other breaches arising from the Partner's business activities may be reported through the [EGELHOF Whistleblowing Portal](#), which is accessible worldwide at any time. All reports will be followed up through a structured internal complaint and investigation procedure, ensuring appropriate handling and resolution.

ACKNOWLEDGEMENT AND COMMITMENT

By signing this Code of Conduct, the Business Partner confirms its compliance with the provisions herein and commits to implementing and maintaining a social and environmental policy across its corporation that is aligned with the standards set out in this Code.

BUSINESS PARTNER:

Company name/Company Stamp (if available):

Address:

Contact Person:

Place, Date, Signature