

STATUS June 14, 2024

CODE OF CONDUCT FOR BUSINESS PARTNERS OF HOLTMANN GMBH & CO.KG

INTRODUCTION

Holtmann GmbH & Co. KG (hereinafter: Holtmann+) is committed to a value-oriented, environmentally and socially responsible corporate governance. We expect our employees to consistently adhere to the principles and norms of ethical and sustainable behavior and to make them an integral part of our corporate culture. For this reason, in 2021 we established a Code of Conduct, which is mandatory for all our employees.

As our understanding of responsible conduct extends throughout our entire value chain, we also consistently involve our business partners.¹ Believing that we can achieve more through a partnership approach, this Code of Conduct serves as the foundation for the joint, effective implementation of social, environmental, and ethical principles. Inspired by the United Nations Global Compact, the Sustainable Development Goals, the United Nations Guiding Principles on Business and Human Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, it represents the basis for an integral, fair, and responsible business relationship for us.

Our contractors are committed to adhering to the principles and requirements of our Code of Conduct and to making efforts to ensure that their subcontractors also commit to complying with the values and standards outlined in this document.

In the event of a breach of this Code of Conduct, Holtmann+ and the contractor will agree to take corrective actions within a reasonable period of time.

A serious breach of this Code of Conduct may ultimately provide Holtmann+ with grounds to question the business relationship, including all associated contracts.

We look forward to building and expanding our business relationships with you based on the following principles of responsible corporate governance as well as social and environmental sustainability.

¹ By business partners, we refer to all parties engaged in a business relationship with Holtmann+, particularly suppliers and service providers.

1. RESPONSIBLE INTERACTION WITH EACH OTHER

As a business partner of Holtmann+, we commit to the following principles to strengthen a fair, inclusive, and fear-free work environment where employees can develop based on their diverse skills, knowledge, perspectives, experiences, and qualities.

Non-Discrimination and Respect for Workers' Rights

- We promote equal opportunity and fair treatment for all employees, regardless of ethnicity, skin color, age, gender identity, abilities, sexual orientation, religion, or other characteristics.
- We prohibit and sanction all forms of sexual harassment or discrimination.

Working Hours, Wages, and Employee Benefits

- We recognize the legal right of employees to form or join trade unions and to engage in collective bargaining.
- We do not discriminate against members of employee organizations or trade unions in any way.
- We comply with all relevant working time regulations in the countries and industries in which we operate.
- We pay fair wages and comply with all applicable wage and compensation laws.

2. SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

As a business partner of Holtmann+, we commit to the following principles of social and environmental sustainability. Regarding social aspects, we place particular emphasis on respecting the human rights of especially vulnerable rights holders or groups of rights holders, such as women, children, migrant workers, and indigenous groups. In terms of environmental aspects, the protection of our climate and the careful use of natural resources are of central importance to us.

Prohibition of Forced Labor

- We do not engage in or support any form of slavery, servitude, forced or compulsory labor, or human trafficking.

Prohibition of Child Labor

- We do not employ workers under the age of 15 in any form that could harm their physical or psychological development.

- We do not employ workers under the age of 18 for hazardous work in accordance with ILO Convention No. 182.

Health and Safety of Employees

- We act in accordance with applicable legal and international as well as industry-specific standards regarding occupational safety and health protection, ensuring safe working conditions.
- We provide instructions and training to ensure that employees are trained in matters of health and safety.
- We implement an appropriate occupational health and safety management system according to our capabilities.

Grievance Mechanism for Employees

- We provide, to the best of our ability, a protected mechanism ("whistleblowing system") for our employees to report any potential violations of the principles of this Code of Conduct.
- To the extent that we are subject to relevant legal provisions, we guarantee the existence of such a system.

Compliance with Applicable Environmental Standards

- We comply with all applicable environmental protection regulations.
- In doing so, we consider the environmentally responsible development, production, transportation, use, and disposal of our products.

Resource use

- We use resources efficiently, employ energy-efficient and environmentally friendly technologies, and reduce our waste volumes.
- We actively participate in the development and use of circular economy concepts to keep valuable materials in cycles.
- We take appropriate organizational and technical precautions to use water as a resource sparingly, wherever possible and economically viable, and to prevent the contamination of surface or groundwater in our own manufacturing processes or during product procurement.

Climate and species protection

- We are reducing our negative impacts on climate change and biodiversity to protect people's livelihoods.

3. RESPONSIBLE BUSINESS CONDUCT

As a business partner of Holtmann+, we are committed to the following principles of responsible business conduct.

Compliance

- We comply with all laws and regulations of the jurisdictions applicable to us.

Fair business practices

- Combating Corruption and Bribery
 - We do not tolerate any form of corruption or bribery and do not participate in it, either directly or indirectly.
 - We do not grant, offer, or promise anything of value to government officials or private sector representatives in order to influence official actions or obtain an improper advantage.
- Fair Competition, Antitrust Law, and Intellectual Property
 - We act in accordance with national and international competition laws and do not engage in price, market, or bid-fixing with competitors.
 - We respect all intellectual property rights of others.
- Conflicts of Interest
 - We avoid conflicts of interest that could negatively impact our business relationships with Holtmann+.
 - We disclose potential conflicts to Holtmann+.
- Money Laundering
 - We do not directly or indirectly participate in or facilitate any form of money laundering.

Data protection

- We process personal data confidentially and responsibly.
- We respect the privacy of each individual and ensure that personal data is effectively protected and used only for lawful purposes.

Export control and customs matters

- We comply with all applicable export control and customs regulations.

Responsible supply chain

- We will make reasonable efforts to communicate the principles of this Code of Conduct to our suppliers and ensure their compliance.
- We will make reasonable efforts to avoid the use of raw materials in our products that originate from conflict-affected and high-risk areas and contribute to human rights violations, corruption, or the financing of armed groups.

4. TRANSPARENCY AND REPORTING OF VIOLATIONS

As a business partner of Holtmann+, we are committed to principles of transparency and openness towards you.

Transparency

- We act transparently towards our stakeholders and do not withhold any information relevant to the respective stakeholder group, especially if legal or regulatory requirements require disclosure.

Reporting of violations

- If we become aware of violations of this Code of Conduct, we will immediately notify Holtmann+, our business partner.
- We offer our employees the opportunity to report potential or actual violations of this Code of Conduct to us in a secure, confidential, and, if necessary, anonymous manner.
- We encourage our business partners to also establish a complaint channel and promote appropriate reporting options along their supply chain.

5. REVIEW AND EVALUATION

We acknowledge that Holtmann+ reserves the right, either itself or through third parties, to conduct audits or assessments to ensure our compliance with laws, regulations, and the principles set forth in this Code of Conduct.

We further acknowledge that in the event of potential or actual violations of this Code of Conduct by us, Holtmann+ reserves the right to take appropriate action with respect to our existing business relationship with Holtmann+.

If a violation is discovered, Holtmann+ will notify us immediately and

set a reasonable grace period to align our conduct with these regulations.

If remediation is not possible within the foreseeable future, we must notify Holtmann+ immediately and, together with Holtmann+, develop a plan with a timeline to end or minimize the violation.

If such a violation was culpable, the grace period expires without result, or the implementation of the measures contained in the plan does not result in a remedy after the expiration of the timeline and makes a continuation of the contract until ordinary termination unreasonable for Holtmann+, this shall be deemed good cause entitling Holtmann+ to extraordinary termination.

Further contractual obligations remain unaffected by this Code of Conduct and take precedence over the provisions described in this document.

We have acknowledged the content of the Code of Conduct for Business Partners and hereby undertake to comply with it in addition to our other contractual obligations.