

Supplier Code of Conduct

Preamble

EUCHNER GmbH + Co. KG and all its companies with management that reports directly or indirectly to EUCHNER (collectively referred to as "EUCHNER" below) have committed themselves to honesty and integrity in all their business processes involving employees, customers, suppliers, competitors and other parties.

EUCHNER obliges all of its suppliers to uphold the principles of fairness, honesty, sustainability and responsibility (referred to as the "Code of Conduct" below) in all their business activities.

Scope

This Code of Conduct applies to all suppliers, consultants, sellers, brokers, merchants, dealers, contractual partners, agents and other product and service providers that cooperate with EUCHNER around the world (referred to as "suppliers" below). EUCHNER intends the Supplier Code of Conduct to be valid for an indefinite period of time, but reserves the right to modify or cancel these guidelines at any time and in any way, for good cause or without cause.

Compliance

All employees, customers, suppliers and other business partners are required to report violations of these guidelines to the external compliance officer. The compliance officer can be contacted by email at

compliance@euchner.info or by mail at

Compliance
c/o EUCHNER GmbH + Co. KG
Postfach 10 01 52
70771 Leinfelden-Echterdingen
Germany

Compliance with the Supplier Code of Conduct

The supplier recognizes and agrees to comply with the Code of Conduct as a key element of the business relationship between the supplier and EUCHNER.

Guidelines

The supplier must follow the guidelines below:

I. Supply chain sustainability

Ethical conduct and sustainability in terms of legal, economic and social responsibility are core values at EUCHNER. These values also include long-term partnerships based on trust and lawful conduct on the part of the suppliers. EUCHNER procures raw materials, products and services from suppliers in order to secure lasting success for itself and its customers with its products. The sustainability guideline applies to all suppliers around the world. EUCHNER expects its suppliers to implement the principles set out in this Code of Conduct in their companies. Suppliers are responsible for checking compliance with the principles listed below in their own supply chains.

The principles listed in the sustainability guideline are based on the content of the following conventions and standards:

- United Nations (UN) Global Compact principles
- International Labor Organization (ILO) conventions
- International Chamber of Commerce (ICC) Business Charter for Sustainable Development
- SA8000 (standard for socially responsible corporate governance)

II. Business ethics

a. Compliance with legal regulations and disclosure of information

We expect our suppliers to comply with the applicable legal regulations, respect human rights and, in particular, preserve human dignity.

The supplier will make all the relevant business documents and records available for this purpose. These include the data, test certificates and other documents required for financial and non-financial reporting according to applicable regulations and for the fulfillment of disclosure obligations.

b. Ban on corruption

EUCHNER does not tolerate any form of corruption, including bribery or the granting or acceptance of unlawful benefits, on the part of its suppliers. In particular, we do not allow gratuities to be given (active bribery, granting of benefits) or accepted (passive bribery, acceptance of benefits) with the aim of gaining an unlawful advantage.

c. Fair competition

EUCHNER expects its suppliers to comply with national and international laws to protect fair competition. These include provisions concerning unfair competition and antitrust laws. Agreements with competitors about prices, terms and conditions of sale, quantity limits, division of territories or bids on public invitations to tender are strictly prohibited.

d. Intellectual property

Suppliers must protect EUCHNER's intellectual property, such as patents, trademarks and copyrights, and respect the intellectual property of third parties. In particular, suppliers must ensure that products delivered to EUCHNER do not violate third-party intellectual property rights.

e. Product safety

Products and services from EUCHNER and products procured from its suppliers do not pose a hazard to people or the environment and meet the agreed or legally prescribed product safety standards. Suppliers are obliged to provide clear information about the safe use of the products.

f. Financial responsibility

EUCHNER obliges its suppliers to communicate truthfully with their employees, customers, business partners, the public and regulatory authorities. The information must be prepared in accordance with applicable laws and generally recognized accounting principles and must be complete, accurate and truthful.

- g. Data protection and data security**
Protecting personal data and privacy is a key concern of EUCHNER. Suppliers must follow and comply with the applicable laws as well.
- h. Conflicts of interest**
EUCHNER is strictly opposed to making business decisions based on personal interests. Suppliers should make decisions in the context of their business activities based on objective criteria. This avoids situations where personal or financial conflicts of interest could arise, such as when giving or accepting gifts.

III. Respect for human rights

- a. Ban on forced labor and child labor**
We do not tolerate forced labor or child labor at EUCHNER or at our suppliers. Suppliers must comply with the minimum age for admission to employment according to the applicable national regulations. The ILO Core Labor Standards apply in the absence of national legal regulations.
- b. Diversity, equality, inclusion, ban on discrimination and harassment**
EUCHNER does not tolerate discrimination and expects its suppliers to ban any form of physical or mental abuse, sexual or personal harassment or discrimination based on gender, marital status, race, skin color, ethnic origin, religion or disability etc. in their organization. This also applies in the context of ethical recruitment with the aim of guaranteeing that applicants are hired based only on their qualifications.

The ILO Core Labor Standards apply in the absence of national legal regulations.
- c. The rights of indigenous peoples and land, forest and water rights**
We expect our suppliers to respect the land, forest and water rights and the culture, customs and religion of indigenous peoples. EUCHNER obliges its suppliers not to deprive anyone illegally of their livelihood either directly or indirectly.
- d. Ban on disciplinary sanctions**
EUCHNER requires its suppliers not to impose any kind of physical or psychological punishments on its employees. This applies in particular if employees, acting in good faith, report company practices that violate national, international or internal regulations. This applies whether or not the compliance case is justified.

IV. Working conditions

- a. Occupational safety and health**
Health in the workplace is EUCHNER's top priority. Suppliers are expected to comply with the occupational safety and health regulations that apply at their locations.
- b. Living wages**
EUCHNER expects its suppliers to understand their social responsibility to their employees and to ensure that employees' remuneration and working times are fair and appropriate. Suppliers must grant their employees the social benefits to which they are legally or contractually entitled.
- c. Working times**
EUCHNER expects its suppliers to comply with the applicable national working time legislation for their employees.
- d. Freedom of association**
EUCHNER expects its suppliers to maintain open, constructive communication with their employees and labor representatives. Employees are entitled to engage in collective bargaining and to organize themselves into labor unions. If labor unions are prohibited in a country for political reasons, the supplier must allow independent associations of another form. Employees working as labor representatives must not

be subject to discrimination.

The ILO Core Labor Standards apply in the absence of national legal regulations.

V. Compliance with environmental standards

a. Environmental legislation

EUCHNER expects its suppliers to comply with the applicable national environmental laws.

b. Avoidance and reduction of environmental impacts

EUCHNER expects its suppliers to make efficient use of the required resources, particularly materials, energy and natural resources, and to minimize the impact on the environment. This includes the ongoing reduction and the professional disposal of waste. Suppliers should use renewable energies whenever possible. Suppliers are expected to report on their greenhouse gas emissions.

Suppliers must also include their logistics and transport processes in their efforts.

c. Responsible procurement of raw materials

EUCHNER's suppliers support activities that ensure the responsible procurement of raw materials. Raw materials obtained through illegal, ethically objectionable or unreasonable means must not be procured or used. Raw materials, such as conflict minerals, that are subject to embargoes or other import restrictions must not be used.

d. Avoidance of hazardous substances

Substances that pose a hazard to people or the environment if they are released must be avoided. EUCHNER's suppliers must maintain a hazardous materials management system that ensures the safe use, transport, storage, reprocessing, reuse and disposal of hazardous substances. Our suppliers manage chemicals responsibly on the basis of the principle of minimal use.

e. Environmentally friendly products

When developing products and services, EUCHNER's suppliers take care to ensure that they use energy and natural resources economically. Whenever possible, the products should be suitable for reuse, recycling or safe disposal. Products supplied to EUCHNER contain no substances of concern that fall under the REACH Regulation. If necessary, suppliers must report affected substances to EUCHNER in advance. If any materials or purchased parts do not comply with the Restriction of Hazardous Substances (RoHS) Directive, the supplier must find substitutes for them in consultation with EUCHNER.

f. Sub-suppliers

EUCHNER's suppliers are required to agree on equivalent regulations with their sub-suppliers.

VI. Implementation

a. Monitoring and burden of proof

On request, the supplier must correctly and comprehensively disclose all necessary information required for an initial appraisal by carrying out a self-assessment.

EUCHNER is entitled to check the implementation of this Code of Conduct during supplier audits/visits.

b. Noncompliance

Violation of the provisions in the aforementioned obligations could result in sanctions up to and including immediate, extraordinary termination of the supplier relationship. Other claims on the part of EUCHNER remain unaffected.

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Leinfelden, 29. September 2023



Stefan Euchner, Managing Partner