

Code of conduct for business partners of the Erdrich Group

As a globally positioned group of companies, the Erdrich Group (hereinafter referred to as "**Erdrich**") is active in numerous markets and is thus confronted with a wide range of requirements and challenges. Erdrich's corporate activities are based on the principles of ethics, integrity and law abidance. In doing so, Erdrich follows valid worldwide standards, in particular, the 10 principles of the United Nations Global Compact Initiative (www.globalcompact.org). Erdrich expects its business partners to comply with all laws and regulations relevant to their business activities, with the requirements of generally valid standards and Erdrich standards as well as with this Code of Conduct. Erdrich also expects its employees to comply with the Code of Conduct for employees. Furthermore, Erdrich strives to continuously optimise its corporate activity, its products and services in terms of sustainability. Erdrich asks its business partners to contribute to this endeavour as part of a holistic approach.

For future collaboration, Erdrich and the business partner agree to the following regulations for a mutual Code of Conduct. This Code of Conduct shall be the basis for all future business relationships. Erdrich and the business partner, in particular the Erdrich tier-1 supplier, agree to comply with the principles and requirements stipulated in the Code of Conduct. The business partner must contractually obligate its subcontractors to comply with the standards and regulations outlined in this Code of Conduct. The business partner shall demonstrate to Erdrich its willingness to participate in audits.

A breach of this Code of Conduct may be reason and grounds for Erdrich to terminate the business relationship.

I. Requirements posed by Erdrich for itself and the business partner

1. Respect of basic human rights

Erdrich is committed to the principles of a respectful, fair and loyal conduct towards one another, respects the individuality of each and every one and rejects any discrimination of persons in employment and occupation. Erdrich also places particular emphasis on respecting women's rights as well as the rights of minorities and indigenous peoples.

Within the framework of the legal requirements, Erdrich undertakes to comply with occupational health and safety laws and furthermore undertakes to comply with international minimum standards, including but not limited to those set out in the ILO core labour standards (www.ilo.com), the UK Modern Slavery Act 2015 and the German Supply Chain Due Diligence Act. We consider regular employee training in human rights and working conditions to be a natural part of this. Erdrich expects its business partners to also comply with the principles mentioned above and impart these obligations throughout the entire supply chain.

1.1 Ban on child labor

Child labour is prohibited and must not take place in any phase of production. The business partners are required to comply with the recommendation from ILO Convention 138 regarding the minimum age for the employment of children. Under the terms of this Convention, business partners must not employ persons that have not reached the minimum age, with the exception of apprentices/trainees.

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1.2 Ban on illegal employment and forced labor

Erdrich opposes all forms of illegal employment and forced labour. Forced labour, slavery and any comparable forms of labour are therefore prohibited. All work must be voluntary and employees must be able to terminate the work or employment relationship at any time. Furthermore, unacceptable treatment of employees, such as psychological hardship, sexual or personal harassment, is not tolerated.

1.3 Rights of women, minorities and indigenous peoples

Erdrich abides by the equal treatment of all genders in accordance with Article 3(2) of the Basic Law for the Federal Republic of Germany, including the relevant legal and official requirements, and expects the same of its business partners. Erdrich furthermore observes all legal and official requirements for the equal treatment of employees and expects the same of its business partners. The equal treatment and protection of minorities and indigenous peoples is also a criterion for the cooperation between business partners and their customers and suppliers.

1.4 Fair wages

The remuneration paid to employees must comply with all applicable laws on remuneration, which include, for example, laws on minimum wage or overtime. Deductions from wages as a punitive measure are not permitted.

1.5 Fair working hours

Working hours must comply with applicable laws or industry-specific standards. Overtime is only permitted if it is performed on a voluntary basis and does not exceed the number of weekly working hours permitted by law.

1.6 Freedom of association

Erdrich and its business partners respect the right of employees to freedom of association, to join trade unions, to call for labour representatives or to join works councils in accordance with local laws. Employees must be able to communicate openly with management without fear of reprisal or harassment.

1.7 Promoting equality, diversity, inclusion and ethical recruitment

Discrimination against employees, in particular with regard to race, ethnic and social origin and position, gender, skin colour, religion or ideology, disability, age, sexual orientation, genetic characteristics, or assets, is not permitted in any form and will not be tolerated. The personal dignity, privacy and personal rights of each individual are respected. Equality, diversity and inclusion are of great importance to Erdrich. Erdrich and its business partners undertake to create a working environment in which everyone feels respected, accepted, supported and valued and in which everyone feels empowered to participate in decision-making processes and development opportunities within the company to the fullest extent. During the recruitment process, applicants are already evaluated without any discrimination or prejudice.

1.8 Occupational health and safety

Erdrich and its business partners each undertake to create a safe and healthy working environment. By establishing and applying appropriate work safety systems, the necessary precautionary measures are taken

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against risks, accidents, health impairments and occupational illnesses that may arise in conjunction with the activity. In addition, employees are regularly informed and trained on health and safety standards and safety measures to exclude or at least minimise the risk of injury. Employees are provided access to drinking water in sufficient quantities and access to clean sanitary facilities.

1.9 Grievance mechanisms

Both Erdrich and its business partners are each responsible at the operational level of their companies for ensuring an effective grievance mechanism ("reporting system") for individuals and communities that may be affected by adverse impacts. The reporting channels for whistleblowers must be set up in accordance with the law, so that the whistleblower, persons who are the subject of the report or other persons affected by the report are protected, in particular against reprisal or retribution measures such as termination of employment.

II. Requirements for environmental protection and sustainability in the supply chain

In addition to complying with the relevant legal environmental standards, Erdrich particularly promotes the sustainability of its production and products, uses resources sparingly, and minimises its impact on the environment to continuously improve environmental protection. Erdrich also expects this commitment from its business partners and therefore requires its business partners to comply, in particular, with the following principles.

1.1 Handling conflict materials

For the conflict minerals tin, tungsten, tantalum and gold, as well as other commodities such as cobalt, Erdrich establishes processes pursuant to the guidelines outlined by the Organisation for Economic Cooperation and Development (OECD) to fulfil its obligation of due diligence to promote responsible supply chains for minerals from conflict and high-risk areas and expects its business partners to do the same. Smelting plants and refineries without adequate, audited due diligence processes must be avoided.

1.2 Water quality, consumption and management

Erdrich and its business partners undertake to manage their sites in full compliance with all laws, regulations and industry guidelines on water protection, water consumption, water quality and waste water. Waste water from operational and manufacturing processes and sanitary installations must be categorised, monitored, checked and, if necessary, treated before discharge or disposal. Furthermore, measures should be introduced to reduce the generation of waste water. Erdrich and its business partners undertake to implement measures to protect and ensure the long-term water quality at their sites.

1.3 Biodiversity, land use, soil quality, deforestation and animal conservation

Erdrich and its business partners undertake to comply with all relevant legal and official provisions regarding biodiversity, land use, soil quality and deforestation in their business activities. Erdrich undertakes to respect animal welfare.

1.4 Land rights, forest rights, water rights, evictions

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Evictions and the dispossession of land, forests and bodies of water when purchasing, developing or otherwise using land, forests and bodies of water must be avoided. All relevant national and international legal and official requirements in this regard must be observed and implemented.

1.5 Handling air emissions, air quality and decarbonisation

General emissions from operational processes (air and noise emissions) and greenhouse gas emissions must be categorised, routinely monitored, checked and, if necessary, treated prior to their release in order to avoid a long-term impact on the air quality. Exhaust gas treatment systems must be monitored. Erdrich aims to find economical solutions to minimise all types of emission, in order to reduce CO₂ emissions and greenhouse gas emissions from its business activities. Erdrich expects the same of its business partners.

1.6 Handling waste and hazardous substances

Erdrich and its business partners commit to a systematic approach to identifying, handling, reducing and responsibly disposing of or recycling solid waste. Chemicals or other materials that pose a hazard when released into the environment must be identified and handled in a manner that ensures safety when handling, transporting, storing, using, recycling or reusing, and disposing of these substances.

1.7 Reducing the consumption of raw materials and natural resources and using renewable energies

The use and consumption of resources during production and the generation of waste of any kind, including water and energy, must be reduced and, where possible, avoided. This is achieved either directly at the point of origin or through processes and measures, e.g. through modifying production and maintenance processes or procedures within the company, using alternative materials, generating savings, recycling or reusing materials. In terms of sustainability, Erdrich and its business partners undertake to ensure that, in addition to production development, the products themselves also use raw materials and natural resources sparingly and are as reusable as possible. Erdrich and its business partners undertake to monitor and document their energy consumption. They undertake to improve energy efficiency, minimise energy consumption and use renewable energies to reduce greenhouse gas emissions.

III. Ethical business conduct

1.1 Fair competition, compliance with the competition and antitrust law

Erdrich undertakes to comply with the applicable rules of competition and antitrust law as well as the requirement of fair competition and expects the same of its business partners. In dealing with competitors, the applicable antitrust laws prohibit, in particular, agreements and other activities that influence prices or conditions, as well as agreements between customers and suppliers that are intended to restrict customers in their freedom to determine their prices and other conditions autonomously when reselling. Erdrich prohibits and condemns such practices and expects the same of its business partners.

1.2 Combating all forms of corruption, including extortion and bribery

Erdrich undertakes to combat all forms of criminal or unethical influence on decisions of customers and other business partners and to take action against bribery in the Erdrich Group as well as against any form of personal gain at the expense of the corporate group. Erdrich expects the same of its business partners.

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Erdrich tolerates hospitality for its employees in the context of business meetings only within the scope of the applicable limit recognised for tax purposes in the country in which the employees or their relatives have their residence or centre of vital interest. Benefits to the employees or their relatives by business partners are not welcomed, even on a small scale. The obligation explicitly conveyed by Erdrich to its employees to comply with the regulation mentioned above should also be expressed by the business partners to their own employees.

The highest standards of integrity must be applied in all business activities. A zero-tolerance policy prohibiting all forms of bribery, corruption, extortion and embezzlement must be implemented. Procedures for monitoring and enforcing standards must be applied to ensure compliance with anti-corruption laws.

1.3 Export controls and economic sanctions

Export controls and economic sanctions refer to limitations for exporting or re-exporting goods, software, services and technology as well as to existing restrictions on trade with certain countries, regions, companies or organisations and individuals. Erdrich and its business partner undertake to comply with all applicable foreign trade laws, sanctions, embargo directives and guidelines, in particular legal and official provisions for export controls and economic sanctions.

1.4 Avoiding conflicts of interest

Conflicts of interests can arise when the private interests of the acting person influence their judgement or when business decisions are made on the basis of private interests. Conflicts of interests may be unavoidable and are not always problematic. As such, Erdrich places great importance on handling conflicts of interests transparently and correctly.

To avoid adverse consequences for Erdrich, we expect our business partners to avoid all conflicts of interests that could have a negative impact on the business relationship with Erdrich. We therefore also require our business partners to immediately disclose any real or apparent conflicts of interests to us and to resolve these as quickly as possible.

1.5 Confidentiality/data protection and intellectual property

Confidential information and the personal data of employees must be protected. Business partners must work with Erdrich to enter into appropriate confidentiality agreements and to ensure adequate protection of received confidential information. The applicable data protection and information security laws and government regulations must be observed when collecting, storing, processing, transmitting and disclosing confidential information. Intellectual property must be protected and safeguarded against misuse.

1.6 Counterfeit products

Erdrich and its business partner undertake to develop, implement and maintain suitable methods and processes for their products and services to minimise the risk of introducing counterfeit products and materials to supplied products. In addition, methods must be established for identifying counterfeit products and materials (e.g. specific tests/measurements). If counterfeit products are identified, the materials must be isolated and the original equipment manufacturer (OEM) and/or the relevant law enforcement agency, where necessary, must be notified.

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1.7 Financial responsibility

Erdrich and its business partners undertake to fulfil the regulatory responsibilities of their respective companies with regard to finance. Among other aspects, this includes accurately recording, maintaining and reporting on business documents, including but not limited to financial accounts, quality reports, time recordings, expense claims and submissions to customers or regulatory authorities. Books and records are kept in accordance with applicable laws and generally recognised accounting principles.

IV. Implementing the requirements of the German Supply Chain Due Diligence Act and the consequences upon breach thereof

Erdrich regards the provisions of this Code of Conduct as essential to the business relationship with its business partners and commits to implementing the valid legal requirements set out in the German Supply Chain Due Diligence Act insofar as Erdrich is directly subject to this Act. This includes but is not limited to appointing a human rights officer. To ensure that expectations regarding human rights and the environment are fulfilled in the supply chain, compliance with the provisions contained herein is vital to the business relationship between Erdrich and its business partners.

Erdrich also expects its business partners, as part of a suitable risk management, to analyse risks related to human rights and the environment in an appropriate scope in their own operations and at their suppliers, and to define prevention and/or remedial measures to prevent infractions. In particular, the business partners assure Erdrich that the expectations regarding human rights and the environment set out in the applicable German Supply Chain Due Diligence Act are fulfilled and adequately addressed along the supply chain. Erdrich expects its business partner to appropriately train and provide advanced training to its personnel accordingly so that the human rights-related and environmental requirements can be enforced within their own operations and along the supply chain with similar standards.

Compliance with the standards and regulations outlined in this Code of Conduct may be reviewed by Erdrich at any time, including with an audit.

Erdrich reserves the right to take appropriate measures against business partners that do not meet the requirements of this Code of Conduct and in particular the provisions of the valid German Supply Chain Due Diligence Act, which as a last resort may result in the suspension or termination of a business relationship.

V. Notification of legal violations and contacting the compliance organization

Erdrich encourages its business partners to immediately report any legal violations within Erdrich's area of responsibility as soon as they are observed or are highly likely to occur. Business partners need not fear any disadvantages, provided that the respective tip-off was made to the best of their knowledge and with sincere intent.

A suspicion or violation can be reported anonymously at **erdrich.reporting-channel.com** or via the website using the reporting channels at Erdrich detailed on the "Compliance" page.

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VI. Modifications

Erdrich is entitled to modify this Code of Conduct at any time. Business partners shall review modified versions when requested to do so by Erdrich and shall not withhold their agreement without reason.

VII. Forms of address in this document

To improve readability, this Code of Conduct does not use feminine and masculine forms of language simultaneously. Plural pronouns are used instead to include all genders.

VIII. Acknowledgment and consent of the business partner

In signing this Code of Conduct, the business partner commits to acting responsibly in line with the principles set out in this Code of Conduct and in compliance with all laws that apply to the business partner. The business partner confirms that they will in turn agree on the content of this Code of Conduct in a binding manner with their employees, contractors, sub-contractors and suppliers and that they will monitor compliance with this in the supply chain.

Compliance with these principles is hereby expressly confirmed:

Place, date

Signature

Company stamp

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