

Code of conduct for business partners of the Erdrich Group

The Erdrich Group (hereinafter referred to as "Erdrich") – as a globally positioned group of companies - is active in numerous markets and is thus confronted with a wide range of requirements and challenges. Erdrich's corporate activities are based on principles such as 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 and the requirements of generally valid standards and Erdrich standards as well as this Code of Conduct. Erdrich also expects its employees to comply with the Code of Conduct for Employees. Furthermore, Erdrich strives to continuously optimize its corporate activity, its products and services in terms of sustainability. Erdrich asks its business partners to contribute to this endeavor as part of a holistic approach.

For future collaboration, Erdrich and the business partner agree to the application of the following regulations for a mutual Code of Conduct. This Code of Conduct shall be the basis for all future business relations. Erdrich and the business partner agree to comply with the principles and requirements stipulated in the Code of Conduct. The business partner is required to 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 for 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 personage of each individual and rejects any discrimination of persons in employment and occupation. Erdrich is committed to complying with the international minimum standards, as outlined in the ILO's core labor standards (www.ilo.org) and the Supply Chain Due Diligence Law. 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 labor is prohibited and may not take place in any phase of production. The business partners are required to comply with the recommendation from the 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 interns.

The currently valid work safety regulations must be followed!

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1.2 Ban on illegal employment and forced labor

Erdrich opposes all forms of illegal employment and forced labor. Forced labor, slavery and any comparable forms of labor 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 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.

1.4 Fair work hours

Work hours must comply with applicable laws or industry-specific standards. Overtime is only permitted if it is worked on a voluntary basis and does not exceed the number of hours per week permitted by law.

1.5 Freedom of association

Business partners respect the right of employees to freedom of association, to join trade unions, to call for labor representatives or to join works councils in accordance with local laws. Workers must be able to communicate openly with management without fear of reprisal or harassment.

1.6 Freedom from discrimination

Discrimination against employees, in particular with regard to race, ethnic and social origin and position, gender, skin color, religion or ideology, disability, age, sexual orientation, genetic characteristics or assets, is inadmissible in any form and will not be tolerated. The personal dignity, privacy and personal rights of each individual are respected.

1.7 Occupational health and safety at the work place

Business partners are responsible for ensuring a safe and healthy working environment. By establishing and applying appropriate work safety systems, the necessary precautionary measures are taken 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 minimize the risk of injury. Employees are provided access to drinking water in sufficient quantities and the access to clean sanitary facilities.

1.8 Grievance mechanisms

Business partners are responsible at the operational level for ensuring an effective grievance mechanism ("whistleblower system") for individuals and communities that may be affected by adverse impacts.

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

Erdrich respects the relevant legal, environmental standards. In particular, it is committed to the sustainability of its production and products, uses resources sparingly, and minimizes its impact on the environment to improve environmental protection continuously. Therefore, Erdrich requires its business partners to comply, in particular, with the following principles.

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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 fulfill its obligation of due diligence to promote responsible supply chains of 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 should be avoided.

1.2 Treatment and discharge of industrial wastewater

Wastewater from operational and manufacturing processes and sanitary installations must be categorized, monitored and checked, and if necessary, treated before discharge or disposal. Furthermore, measures should be introduced to reduce the generation of wastewater.

1.3 Handling air emissions

General emissions from operational processes (air and noise emissions) and greenhouse gas emissions must be categorized, routinely monitored, checked and, if necessary, treated prior to their release. Business partners are also required to monitor their emission control systems. Furthermore, they are required to find economical solutions to minimize any emissions.

1.4 Handling waste and hazardous substances

Business partners shall follow a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste. Chemicals or other materials that pose a hazard when released into the environment shall be identified and handled in a manner that ensures safety when handling, transporting, storing, using, recycling or reusing, and disposing of these substances.

1.5 Reducing the consumption of raw materials and natural resources

The use and consumption of resources during production and the generation of waste of any kind, including water and energy, should be reduced and, where possible, avoided. This is achieved either directly at the point of origin or through processes and measures, e.g., through modification of production and maintenance processes or procedures within the company, using alternative materials, generating savings, recycling, or reusing materials. In terms of sustainability, business partners ensure that, in addition to production development, the products themselves also use raw materials and natural resources sparingly and are as reusable as possible.

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III. Ethical business conduct

1.1 Fair competition, compliance with the competition and antitrust law

Erdrich complies 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 deprecates such practices and expects the same of its business partners.

1.2 Combating all forms of corruption, including extortion and bribery

Erdrich combats against all forms of criminal or unethical influence on decisions of customers and other business partners and takes action against bribery in the Erdrich Group as well as against any form of personal gain at the expense of the corporate group.

Erdrich tolerates hospitality for its employees in the context of business meetings only within the scope of the applicable limit recognized for tax purposes in a country in which the employees or their relatives have their residence or center 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 are to be applied in all business activities. Business partners shall adopt a zero tolerance policy in prohibiting all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing standards shall be applied to ensure compliance with anti-corruption laws.

1.3 Confidentiality/Data protection

In regards to the protection of confidential information, business partners agree to meet the reasonable expectations of Erdrich and its employees. Business partners shall work with Erdrich to conclude appropriate confidentiality agreements and to ensure adequate protection of confidential information received. Business partners shall comply with data privacy and information security laws and government regulations when collecting, storing, processing, transmitting and disclosing confidential information.

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

Erdrich regards the provisions of this Code of Conduct as essential to the business relationship between Erdrich and its business partners. Therefore, compliance with the provisions contained herein is vital to the business relationship between Erdrich and its business partners.

Erdrich expects its business partners concerning its supply chain to identify risks therein and take reasonable steps to mitigate those risks. In the event of suspected violations, and to safeguard a supply chain with increased risks, Erdrich expects disclosure from the affected suppliers. In particular, the business partners shall assure Erdrich that the human rights-related and environmental requirements addressed by Erdrich in terms of the German Supply Chain Due Diligence Act (LkSG) are complied with and adequately addressed along the supply chain. Furthermore, the undersigned business partner shall train and provide advanced training to its personnel accordingly so that the human rights-related and environmental requirements can be enforced along the supply chain.

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

Erdrich reserves the right to take appropriate measures against business partners that do not meet these requirements, which as a last resort may result in the suspension or termination of a supply 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 suspected case or violation can be reported to compliance@erdrich.de.

VI. Modifications

Erdrich is entitled to modify this Code of Conduct at any time.

VII. Designation of the social gender

For better readability, this Code of Conduct does not use feminine and masculine forms of language simultaneously. The generic masculine is used, also for title designations, whereby all genders are meant equally.

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VIII. Acknowledgment and consent of the business partner

By signing this Code of Conduct, the business partner agrees to act responsibly and to comply with the outlined principles/requirements. The Business partner confirms that it communicates the contents of this Code of Conduct in a binding manner to its employees, agents, subcontractors and suppliers and ensures that the outlined principles/requirements, in particular with regard to the German Supply Chain Due Diligence Law (LkSG), are also observed there.

Compliance with these principles is hereby expressly confirmed:

Place, date

First name, last name

Company stamp

Signature

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