

Code of Conduct of
the
EMKA Group

for Business Partners
(Version of Oct. 18th 2023)

Preamble

As a traditional family business since 1932, we are guided by the values and principles of the honourable businessman. Trusting cooperation with our customers and partners, a consistently high level of innovation as well as long-term thinking and action in all our endeavours have made us a globally leading and recognised system supplier of hardware parts in a large number of markets and countries. Our goal is to maintain this position in the long term.

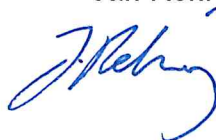
We, the EMKA Group ("EMKA"), acknowledge our social responsibility in an open and fair world trade and commit ourselves to comply with ethical and legal standards. As an internationally operating company, we have the claim to do business in a socially, economically and ecologically balanced and sustainable manner and recognise the standards defined in this Code of Conduct as binding for us. In doing so, we take into account our responsibility towards our business partners, our employees, the shareholders, the state and society.

Our business partners play an important role in achieving these goals. We therefore consider a shared understanding of ethical values and sustainable action to be an essential basis for such relationships. Close cooperation based on mutual trust with our customers, suppliers and service providers is a priority for us and includes a common understanding of ethical and sustainable action. Thus, we expect our business partners to also assume responsibility and to comply with the standards defined in this Code of Conduct for business relationships with the EMKA Group. This Code of Conduct applies to customers, suppliers and service providers of EMKA with whom a direct business relationship exists (hereinafter referred to as "**business partners**"), it defines the principles and requirements regarding our responsibility for people and the environment.

Friedhelm Runge



Jan Rehnig



Code of Conduct

I. General rules of conduct

1. Compliance with laws, recognised standards and guidelines

1. EMKA strictly observes the principle of legality and also applies this in all Group activities and expects the same from its business partners. We expect our business partners to comply with the applicable national laws, regulations and ordinances and to support the relevant internationally recognised standards, guidelines and principles, in particular the principles of the UN Global Compact, UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, the United Nations (UN) conventions as well as the core labour standards of the International Labour Organisation (ILO), "Declaration on Fundamental Principles and Rights at Work" (Geneva, 06/98) of the International Labour Organisation (ILO). Compliance with this Code of Conduct and the above standards may not be circumvented by collateral agreements, such as contractual arrangements or comparable measures.

2. Business documents, records or reports, such as annual or final reports, audit reports and any other business documents must be accurate, complete and truthful.

2. Prevention of corruption and conflicts of interest

1. The highest level of integrity is expected in all business activities and relationships. Business partners are committed to complying with international and local anti-corruption and bribery laws.

2. Business partners must reject and prevent any form of corruption, including "facility payments", in the course of business. They must ensure that employees, subcontractors or representatives do not grant, offer or accept bribes, kickbacks or other improper payments or benefits. This also applies to any kind of criminal offences, such as fraud, embezzlement or offences against competition.

3. We expect our business partner to act within the framework of the legal regulations for the prevention of money laundering and not to use any illegal financial means. Suspicious circumstances that indicate money laundering must be reported immediately.

4. EMKA does not tolerate any conflicts of interest, e.g. in the form of personal benefits from positions or activities. We expect the same from our business partners. Suspicious cases in connection with business activities must be reported (see item 24).

3. Donations and sponsorship

EMKA sees itself as a responsible member of society. That is why we are committed to social issues in various ways,

e.g. through donations and other forms of social engagement in the areas of education, science, art, culture, sports and social welfare.

Sponsorship and donations shall be made in accordance with applicable laws and the above rules to avoid corruption and conflicts of interest.

4. Antitrust and competition law

The business partners shall observe all applicable national and international antitrust laws as well as the laws against unfair competition. Price or condition agreements with competitors are therefore to be refrained from, as are other agreements restricting competition, which include in particular agreements with competitors for the purpose of market or customer sharing.

5. Export control and trade restrictions

Applicable trade regulations and restrictions as well as licensing requirements must always be complied with. This applies in particular to counter-terrorism regulations, compliance with embargoes as well as prohibitions and licensing requirements related to the movement of goods, the use of technologies and the procurement of services.

The current customs regulations must be complied with both when exporting and importing goods.

6. Product responsibility and quality

All products and services must meet the contractually specified quality and safety criteria upon delivery and be safe to use for their intended purpose. To ensure the health and safety of the end customers, the relevant national and international regulations on product responsibility (e.g. product liability, take-back obligations, product labelling, warranty provisions) must be observed by the business partner and coordinated with EMKA.

7. Environmental and climate protection

1. The aim is to reduce the environmental impact through the careful use of all resources (energy, input materials, etc.) as well as the reduction of emissions and energy consumption and the increase of energy efficiency.

2. Measures must be taken for a responsible approach to the environment. We expect our business partners to observe environmental and climate protection with regard to applicable international standards and legal requirements and to minimise the environmental impact of processes as well as products. This means: to use resources efficiently (energy, water, raw materials and supplies), to use environmentally friendly materials wherever possible, to avoid or reduce emissions and waste, or to reduce them to a minimum.

The aim is to recycle waste, make logistics processes environmentally friendly and generally work towards the development and dissemination of environmentally friendly technologies.

Chemicals and other materials that pose a risk to the environment must be handled responsibly and safely during processing, storage, transport or disposal. Impacts on the environment and the health of employees are avoided or kept as low as possible in all activities.

3. To this end, suitable and traceable measures should be taken and systems (based on ISO 14001, ISO 50001 or comparable systems) should be operated in order to continuously improve the protection of the environment and the climate. Employees of the business partners should be motivated, informed and trained according to their tasks in environmental protection. With regard to the environmentally relevant requirements for deliveries and services, the general terms and conditions of purchase also apply.

4. The business partners are obliged to inform us immediately in writing about all environmental risks and to disclose the results of investigations required by the legislator or authorities to EMKA. They have to answer and comply with all relevant enquiries and notified regulations / restrictions of EMKA regarding the use of hazardous substances without delay. An active involvement with the topic of environmental protection is required. The aim is the installation of an environmental protection management at the business partners.

8. Refrain from minerals from conflict and risk areas

1. The business partners assure that no conflict minerals, in particular tin, tantalum, tungsten, gold and their derivatives, from conflict and risk areas are used. Conflict minerals are, according to the Dodd Frank Act Section 1502, minerals whose proceeds directly or indirectly financially support non-state armed groups.

2. We expect our business partner to prove that they source or process DRC conflict-free raw materials.

3. Upon EMKA's request, business partners shall immediately provide an overview of measures they have taken to ensure that their products are free of conflict minerals. For this purpose they use the standardised reporting format of the Conflict-Free Sourcing Initiative (CFS), the Conflict Minerals Reporting Template (CMRT).

9. Dealing with substance bans

Substances that are subject to legal restrictions or prohibitions may only be present in the delivered parts, materials or in the products contained therein in accordance with these regulations (e.g. Chemicals Prohibition Ordinance, REACH Regulation (EC) No.1907/2006 as amended).

10. Human rights

Business partners are obliged to observe and respect internationally recognised human rights in accordance with the United Nations Declaration of Human Rights. It must be ensured that they are not complicit in human rights violations. No form of human trafficking or slavery will be tolerated.

11. Prohibition of child labour

1. Any exploitation of children and young people is not tolerated. Child labour as defined by ILO conventions and national regulations is prohibited. Compliance with the minimum age of workers in accordance with the ILO convention for admission to employment as well as the prohibition of child labour must always be observed by the business partners.

2. Children and young people must not be exposed to dangerous, unsafe or unhealthy situations.

12. Occupational safety and health protection

1. The physical integrity of staff and visitors has the highest priority. The national standards for occupational health and safety must be complied with.

2. Furthermore, within this framework, appropriate measures shall be taken for a hygienic and safe workplace and for the preservation of health and safety by the business partners.

3. Business partners will also take appropriate measures and implement or further develop systems to identify and prevent potential health hazards from accidents, injuries and work-related illnesses of their employees. Where possible, the business partner will use the best available technology.

13. Working hours

Working hours shall comply with the relevant ILO conventions, but at least with the applicable national laws and regulations.

14. Remuneration and benefits

The business partner ensures that the wage paid to employees, including social benefits, is at least equal to the legal minimum wage or the minimum wage prescribed in the industry sector.

15. Freedom of association and right to collective bargaining

Business partners shall respect the fundamental right to freedom of association and the right to collective bargaining within the framework of national laws and ensure that it is not impaired. In the event that national standards restrict the right to organise and collective bargaining, business partners should work to ensure that the free and independent exercise of the right to organise and collective bargaining is respected.

association of workers for the purpose of bargaining is enabled and permitted.

16. Prohibition of forced labour

Business partners shall refrain from all forms of forced and compulsory labour, as well as human rights violating involuntary prison labour.

17. Disciplinary measures

We advocate that all workers be treated with dignity and respect. Sanctions, fines, other penalties or disciplinary measures may only be taken in accordance with applicable national and international standards and internationally recognised human rights. Arbitrary sanctions, fines, other penalties or disciplinary measures shall be avoided. Business partners shall ensure that no employee is subjected to verbal, psychological, sexual and/or physical violence, coercion or harassment.

18. Equal opportunities

Business partners shall refrain from any form of discrimination based on:

- ethnic affiliation
- National or social origin
- Skin colour
- Gender
- Age
- Religion and world view
- political activity
- Membership of a trade union
- Disability
- sexual orientation
- or other personal characteristics.

The respective statutory provisions shall apply.

19. Information security, data protection and copyright

1. Information, whether physical or digital, is a particularly important asset for us. We therefore protect sensitive information of our group of companies in particular to ensure integrity, availability and confidentiality. Our business partners respect EMKA's know-how, patents, trade and business secrets as well as all other information provided by us. They shall not pass these on to third parties without our prior express written consent or in any other inadmissible manner. In any case, disclosure is only permitted for contractual purposes.

2. In any case, the business partners assure to comply with the Secrecy Directive (EU) 2016/943 and to implement a minimum standard of protective measures for EMKA's operational and transferred know-how. Business partners based outside the European Union undertake to comply with the principles of this directive as well.

3. In addition, our business partners, like us, comply with all applicable laws on the protection of personal data of employees, customers, suppliers and other data subjects and apply the requirements of the GDPR accordingly.

4. Third party rights shall be protected accordingly.

II. Final provisions

20. Implementation

We expect our business partners to comply with the above principles. EMKA recommends to enable a continuous improvement with the help of a suitable system (definition and documentation of responsibilities, procedures, targets and measures). We expect our business partners to work towards a consistent dissemination of these standards in the supply chain.

21. Information and communication

This Code of Conduct can be viewed on the Internet at www.emka.com and printed out from there. It shall be made available to the relevant employees by the business partners.

22. Monitoring

We reserve the right to verify compliance with the above requirements either by EMKA itself or by independent third parties.

23. Sanctions and remedies

1. It is the business partner's responsibility to ensure that its subcontractors also act in accordance with these regulations.

Furthermore, in the event of a suspected breach of the above requirements, the business partner shall immediately clarify possible breaches and keep us informed. If the suspicion proves to be justified, we expect our business partner to inform us within a reasonable period of time of the measures it has taken to prevent future violations. A violation that has already occurred must be terminated immediately, or at least minimised

2. Any material breach of the above obligations will be considered by EMKA as a breach of contract by the business partners. If possible, we will give the business partners the opportunity to implement appropriate remedial measures.

3. EMKA reserves the right to terminate all existing legal transactions with the business partners by an extraordinary notice in case of violation. It is in our decision-making power to forego such consequences and to take alternative measures instead, if immediate countermeasures are taken.

be shown and proven. We shall be indemnified against any damages resulting from violations of the above requirements.

24. Dealing with queries and comments

Unethical behaviour and violations of the law or operational regulations can lead to major economic damage as well as consequences under criminal law and fines for EMKA as a company and for our employees. Therefore, we work together to avoid violations or at least to detect them in time to minimise risks and avert damage.

Please do not hesitate to make a note if you observe a rule violation or if you have a reasonable suspicion that a rule violation may have occurred.

EMKA's Compliance Manager is available as the first neutral and responsible contact for tips. You can also report possible violations anonymously at any time via our whistleblower system, which can be accessed at coc.emka.de. Anonymous reports should be detailed enough so that they can be followed up in a targeted manner. Your report will be treated confidentially.

We would like to point out that in individual cases and/or insofar as there is a legal obligation to do so, the information, which is to be treated confidentially as a matter of principle, must be passed on to third parties (e.g. for the opening of an investigation).

We hereby confirm:

We have received the Code of Conduct of the EMKA Group and hereby undertake, in addition to our obligations arising from our contractual obligations with EMKA and/or the companies belonging to the EMKA Group, to comply with the principles and requirements of this Code of Conduct and to carry them into the supply chain.

We also agree that this declaration is governed by the laws of the Federal Republic of Germany (or the law of the country for which it is relevant), excluding the UN Convention on Contracts for the International Sale of Goods.

Place, Date

Signature Name

Function

Company stamp

**Contact details Compliance Officer of the EMKA Group:
Dr. Thomas Koliwer, DW -432, Email: T.Koliwer@EMKA.de**