



Code of Conduct

and Policy Statement on the
Respect for Human Rights

at **HAIDRO** GmbH



Preface

The trust our customers, suppliers, employees and other stakeholders place in our company and products is our most valuable asset.

Honesty, trustworthiness and openness dictate how we work. We respect human rights and the interests of our employees, as well as the legitimate interests of those with whom we do business. Only by acting fairly and honestly can we protect and reinforce the trust placed in us.

We are committed to respecting and promoting human rights in our own business processes, in the extended supply chain and in the product life cycle. We expect all of our employees and business partners to share our commitment to respecting human rights.

We respect the government regulations in the countries in which we operate. We adhere to our own policies or to local laws, whichever imposes the higher standards. Where local laws restrict the implementation of international standards, we seek to develop solutions within the respective legal framework that comply with the principles enshrined in the international standards.

This Group standard brings together our basic rules and principles for all of our companies. It is intended as a guide for all of us – management, executives, employees. It represents the standards we embrace for ourselves – and a promise we make to our customers, suppliers and the public.

Our Group standard expresses what we stand for together today and in the future.

Freilassing, October 1, 2025



Michael Herbeck



**Connections to
rely on.**

1. General information

Every employee must take the interests of the company into account in their actions. Reliability, honesty, credibility and integrity are key corporate values. Moreover, our cooperation is characterized by openness and mutual respect.

The HAIDRO Group is guided above all by the values of integrity and fairness, regardless of whether its operations take place in Germany or abroad.

Companies within HAIDRO are required to promote and pursue their legitimate business interests. We work with governments and other organizations, both directly and through associations such as trade associations, to develop legislative proposals and other regulations that affect legitimate business interests. We do not support political parties nor do we contribute to the funding of groups whose activities are focused on advancing party interests.

We respect the right to the freedom of expression and the protection of personal rights and privacy. Nevertheless, every employee may also be seen as a part of our company and a representative in their private lives as well. Each employee is therefore obliged to protect the image and reputation of the company through his or her conduct and public behaviour, especially when dealing with the media. Where employees express their personal opinions, they must take care to ensure that their words are not presented as the company's opinion.

2. Standards of conduct and requirements for business partners

Compliance with laws and regulations is the starting point for economically responsible actions. Every business partner is obliged, in all their business activities and decisions, to observe the applicable national laws and the relevant internationally recognized standards, guidelines and principles, even if doing so leads to short-term economic disadvantages or difficulties for a company or individual. The principles set out in the United Nations Global Compact, the Universal Declaration of Human Rights, the conventions of the United Nations Organization, the core labour standards of the International Labour Organization (ILO), the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights must be observed in particular. No ancillary agreements such as deviating contractual provisions or other comparable measures may undermine compliance with this Code of Conduct and the applicable norms and standards. Where there are differences between national and international regulations, the standard that provides greater protection for those affected shall apply.

All employees who acquire new business partners and/or work with current business partners must ensure that all business partners are aware of and comply with this Code of Conduct.

2.1 Social responsibility

a) Prohibition of forced labour

No forced, bonded, slave, or similar labour shall be used. All work must be voluntary and without threat of punishment. Employees must be able to terminate their work or employment relationship at any time. Moreover, there must be no unacceptable treatment of workers, such as mental coercion, sexual harassment and humiliation. It is prohibited to contract or use security services if their deployment leads to the inhumane or degrading treatment of persons, their injury or a curtailment of their freedoms.

b) Prohibition of child labour

There must be no child labour. Business partners shall ensure their compliance with the recommendation set out in the ILO conventions on the minimum age for the employment of children. Accordingly, the age shall be not less than the age at which compulsory schooling ends under the law at the place of employment and in any case not less than 15 years. Measures taken to remedy the situation and enable the children to attend school must be documented if children are found at work. Young workers under the age of 18 must not be assigned to work that is harmful to the health, safety or morals of children. Particular safety regulations must be observed. National law regulating child labour or the minimum age for admission to employment that prescribes stricter criteria shall take precedence.

c) Fair pay

Payment for regular working hours and overtime must correspond to the national statutory minimum wage or the minimum standards customary in the industry, whichever is higher. In addition, employees must be granted social benefits that comply with the applicable national or local standards. In any case, wages should always be sufficient to meet basic needs and provide a certain amount of disposable income.

Wage deductions as a punitive measure are prohibited. Measures must be taken to ensure that employees receive clear, detailed and regular written information on the composition of their remuneration.

d) Fair working hours

Working hours must comply in each case with applicable laws or industry standards. Overtime is only permitted if it is voluntary and does not exceed 12 hours per week. Employees must be granted at least one day off after six consecutive working days. Weekly working hours must not regularly exceed 48 hours.

e) Freedom of association and the right to collective bargaining

The right of employees to establish and join organizations of their choice, to engage in collective bargaining and to strike must be respected. Alternative options for the independent and free association of employees for the purpose of collective bargaining must be granted in cases where freedom of association and the right to collective bargaining are restricted by law. Employees must not experience discrimination in the event that they establish, join or become a member of such an organization. Measures must be taken to ensure that employee representatives are able to exercise their rights without restriction.

f) Prohibition of discrimination

Unequal treatment of employees in any form is prohibited unless justified by the requirements of employment. This applies but is not limited to discrimination based on gender, national, ethnic or social origin, skin colour, disability, health status, political conviction, ideology, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual shall be respected. Equal treatment also includes equal pay in return for equivalent work.

g) Health and safety at the workplace

Appropriate occupational safety systems must be established to ensure the necessary precautionary measures are taken to prevent accidents and health impairments that may occur in connection with the work. Moreover, employees shall receive regular information and training on applicable health and safety standards and measures. Employees shall have access to sufficient quantities of drinking water and clean sanitary facilities. Compliance with internationally recognized occupational safety standards is mandatory. Where there are differences between national and international regulations, the standard that provides greater protection for those affected shall apply.

h) Conservation of natural resources

The deprivation of land, forests or waters – in violation of legitimate rights – whose use secures personal livelihoods is prohibited. Harmful changes to the soil, water and air pollution, noise emissions and excessive water consumption must be prevented if this harms the health of people, significantly impairs the natural basis for food production or prevents access to safe drinking water or sanitary facilities.

i) Handling of conflict minerals

All business partners are expected to ensure that no products are supplied to the HAIDRO Group that contain metallic elements whose ores and/or derivatives originate from a conflict region where they may contribute to the direct or indirect financing or support of armed groups and/or contribute to human rights violations. Business partners are expected to comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD DDG) and other applicable regulations, such as the EU Conflict Minerals Regulation.

2.2 Environmental responsibility and protection

The protection of people and the climate is a cornerstone of the HAIDRO Group's policy. Therefore, the HAIDRO Group expects its business partners to implement appropriate measures to reduce the climate-relevant impact of their business activities, to actively protect the climate and the environment in accordance with internationally applicable standards and legal provisions and to continuously improve the effectiveness of their efforts in this regard.

a) Treatment and discharge of industrial wastewater

Wastewater from operations, manufacturing processes and sanitary facilities must be classified, monitored, analysed and treated if necessary – prior to discharge or disposal. Furthermore, measures must be implemented to reduce the generation of wastewater.

b) Handling of air emissions

General emissions from operations (air and noise emissions) and greenhouse gas emissions must be classified, routinely monitored, analysed and, if necessary, treated prior to release. Emissions must be minimized as far as possible.

c) Handling of waste and hazardous substances

Business partners shall apply appropriate procedures and implement appropriate systems to ensure the safe handling, transport, storage, recycling, reuse and management of raw materials, other business materials and waste. The bans on the export of hazardous waste enshrined in the Basel Convention as amended must be observed. Chemicals or other materials that present hazards if released into the environment must be identified and handled in such a way that safety is ensured when handling, transporting, storing, using, recycling or reusing and disposing of these substances. Mercury must be used in accordance with the prohibitions of the Minamata Convention, while persistent organic pollutants must be used in accordance with the Stockholm Convention as amended.

d) 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, must be reduced or prevented. This shall take place, for example, by changing production and maintenance processes or procedures within the company, using alternative materials, saving money or by recycling or reusing materials.

e) Handling of energy consumption

Economical solutions must be identified to improve energy efficiency and minimize energy consumption.

2.3 Responsible business practices

a) Fair competition

Compliance with the laws against unfair competition must be ensured. Applicable antitrust laws must also be applied, which prohibit in particular agreements and other activities that influence prices or conditions when dealing with competitors. Furthermore, these regulations prohibit agreements between customers and suppliers that are intended to restrict customers' freedom to determine their own prices and other resale conditions.

b) Confidentiality/data protection

The protection of personal data, including but not limited to data concerning employees, customers and suppliers, is of the utmost importance to HAIDRO. Applicable laws on data protection and information security and the official regulations must be observed when collecting, storing, processing, transmitting and disclosing personal data. No personal data may be collected or processed without legal authorization or the consent of the data subject.

We expect our business partners to respect the right to privacy.

c) Intellectual property

Intellectual property rights must be respected; technology and know-how must be transferred in such a way that intellectual property rights and customer information are protected.

d) Prevention of corruption

The highest standards of integrity shall be upheld in all business activities. The business partner must pursue a zero-tolerance policy with regard to the prohibition of all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing standards shall be implemented to ensure compliance with anti-corruption laws.

e) Product safety and responsibility

The business partner must comply with all laws and applicable requirements concerning product safety and quality. Products must also be properly labelled. Where required, any information on hazardous substances in the respective products must be made available.



3. Implementation of the requirements

3.1 General information

We have introduced various processes to identify, prevent and mitigate human rights and environmental risks in compliance with the UN Guiding Principles and the German Supply Chain Due Diligence Act (LkSG). These processes are continuously monitored, refined and integrated into our business relationships.

We expect our business partners also to identify risks in the supply chains and implement appropriate measures to prevent or eliminate violations. In the event of suspected violations and to safeguard supply chains with increased risks, the business partner will provide prompt and, if necessary, regular information about the violations and risks identified and the measures taken.

The business partner must actively inform its direct suppliers about the requirements set out in this Code of Conduct and ensure compliance.

The business partner is expected to organize appropriate training and further education measures that actively promote and develop the professional skills of its employees at all levels.

The business partner must introduce and maintain effective grievance mechanisms for its employees.

Companies within the HAIDRO Group reserve the right to verify the business partner's compliance with all of the above requirements.

The HAIDRO Group regards any serious breach of the obligations and requirements set out in this Code of Conduct as a material breach of contract by the business partner and will therefore consider appropriate legal action on a case-by-case basis.

3.2 Responsibilities

The HAIDRO Group applies an enterprise-wide approach to ensuring compliance with human rights. Responsibility for compliance with due diligence obligations rests with the Group Executive Board and the management of the individual companies.

Each company within the HAIDRO Group is responsible for its own implementation. Compliance with this Code of Conduct must be ensured and monitored in all business areas. Responsibility in this regard rests with the management of the individual companies.

The entire Supervisory Board is regularly informed by management, in particular about the status of compliance with the Code of Conduct, ad hoc relevant human rights issues, and current sustainability issues. Management will not be faulted for lost business opportunities as a result of compliance with these standards and other regulations and directives.

3.3 Risk analysis

We have established processes to identify human rights and environmental risks in our Group of companies and at our direct suppliers. We apply a two-pronged approach in this regard, which involves both abstract risk analysis and downstream specific risk analysis.

Our first step in the abstract risk analysis is to define country and sectoral risks. We draw on both internal solutions and data from external databases for this purpose. The second step of specific risk analysis involves the examination and prioritization of risk areas resulting from the abstract risk analysis, taking into account the assessment of the negative impacts (severity, number of people affected, probability of occurrence and irreversibility) and the development of remedial and preventive measures.

Our regular risk analysis is performed at least once a year and on an ad hoc basis as required.

We work with rights holders and vulnerable groups within and outside the Group that may potentially be affected in order to consider their perspectives when assessing risks and infringements and developing prevention and remedial measures.

4. Violations and complaints procedures

All teams and individuals involved in our own business area work together to take immediate and long-term action to end violations and prevent their recurrence. Where violations occur in the supply chain, we engage in collaborative dialogue with our suppliers and business partners and exert influence to bring the violations to an end. We reserve the right to suspend or terminate the business relationship as a last resort if we do not see any improvement.

Violations of the Code of Conduct must be reported to HAIDRO GmbH. (Compliance Office). Confidential reports are permitted. No employee will incur any disadvantages as a result of reporting violations or suspected violations.

The whistleblower system is open to all employees, business partners and third parties who wish to report breaches of rules involving a high risk for the company and our employees. Appropriate action will be taken to properly resolve reports of violations. Corrective action will be taken and civil and criminal consequences will be investigated.

Violations of Group-wide standards and systems, as well as violations of directives, will be sanctioned. (e.g. by dismissing the person).

The individual companies must ensure that the Code of Conduct is implemented and that no employee incurs any disadvantage as a result of complying with it.

Information about possible violations of laws or guidelines that affect individuals and companies of the HAIDRO Group can be reported anonymously via the central whistleblower system. There is a link to the whistleblower system on the website.

<https://Hawle.rimiksx.com/#!/account/anonymous-login>

In addition, information can also be reported directly to the group's central contact point at compliance@haidro.com.

All information will be treated as strictly confidential.

Freilassing, October 1, 2025

HAIDRO GmbH

