

## Code of Conduct for Business Partners of the Mehler Systems Group

### I. Preamble

All managers, employees and representatives of the Mehler Systems Group and its subsidiaries strictly adhere to the applicable laws and regulations in all their business activities. We are uncompromisingly committed to correct and fair business behaviour and to the protection of people and the environment. In particular, the Mehler Systems Group is committed to ensuring that the statutory provisions and internationally recognised standards for regulations on minimum wages, safety and the basic rights of employees are complied with. We demand this of ourselves and also of our business partners. In doing so, we focus on fair, cooperative and, if possible, long-term collaboration with our business partners.

This Code of Conduct for Business Partners of the Mehler Systems Group describes our expectations with regard to correct business behaviour, compliance with human rights and protection of the environment. It forms the basis of the business relationship. The Code of Conduct for Business Partners of the Mehler Systems Group draws upon internationally applicable standards such as the International Bill of Human Rights, the UN Convention on the Rights of the Child, the United Nations Guiding Principles on Business and Human Rights and the applicable conventions of the International Labour Organization (ILO). The Code of Conduct also takes into account national laws and regulations such as the German Supply Chain Due Diligence Act (LkSG) and the European Corporate Sustainability Due Diligence Directive (CSDDD), the full implementation of which is also expected by our customers.

### II. Scope of application

The following requirements apply to all business relationships of the Mehler Systems Group. Every business partner undertakes to implement the requirements and to communicate them to their employees, as well as to ensure compliance with them in their own supply chain.

### III. Requirements for business partners

#### 1) Business behaviour

##### Prohibition of corruption and bribery

We do not tolerate corruption. All business partners undertake to prevent any form of corruption and not to influence competition through corrupt practices. In particular, they will not influence decision-making processes in the business relationship by granting benefits to employees of the Mehler Systems Group or by demanding or accepting bribes or other benefits.

All business partners undertake neither to offer or grant any unauthorised benefits (gifts, donations, invitations, discounts on goods or services, etc.) to employees of Mehler System Group companies, customers or other third parties nor to accept any such benefits from them.

Invitations as part of normal business practice are permitted. Gifts of money are prohibited in all cases.

The acceptance or granting of benefits of any kind from or to public officials is completely prohibited.

##### Prohibition of money laundering and illegal payments

Every business partner undertakes to comply with legal provisions to prevent illegal payments and money laundering and to avoid all activities that could be aimed at money laundering.

##### Fair competition

Each business partner is obliged to comply with the applicable competition and antitrust regulations. In particular, no agreements or arrangements shall be made that influence prices and conditions or otherwise have the effect or purpose of preventing or restricting competition.

### Avoidance of conflicts of interest

The Mehler Systems Group takes great care to ensure that our employees do not fall into conflicts of interest or loyalty. We expect our business partners to ensure that their own employees, subcontractors or other business partners do the same and that all business decisions are made solely on the basis of objective criteria and independent of personal interests or relationships.

### Protection of information and intellectual property

Business partners undertake to treat and protect all information and data owned by the Mehler Systems Group as confidential. All legal provisions for the protection of intellectual property must be complied with. The business partner shall comply with all applicable data protection regulations. The business partner shall comply with the specific regulations as set out in the respective signed framework purchase agreements and confidentiality agreements.

### Compliance with customs laws, trade controls and sanctions

Business partners are obliged to comply with applicable customs laws and regulations on trade controls and sanctions.

## **2) Human rights & working conditions**

### Ban on child labour

Child labour may not be used at any stage of production. Business partners are obliged to comply with the ILO conventions on the minimum age for the direct or indirect employment of children. Accordingly, the age should not be less than the age at which compulsory education ends according to the law of the place of employment and in no case less than 15 years old. Young employees under the age of 18 may not work overtime or at night and may not be employed for work that is harmful to their health, safety or morals. Special protective regulations must be observed.

### Prohibition of forced labour, slavery and human trafficking

The Mehler Systems Group does not tolerate forced labour or comparable compulsory labour or any form of modern slavery or human trafficking in any form. All labour must be voluntary and without threat of punishment. Employees must have employment contracts that fulfil all legal requirements. They must be able to terminate their work or employment relationship at any time. Unacceptable treatment of workers, such as psychological hardship, sexual harassment, humiliation or collective punishment, is prohibited. Business partners undertake to comply with the relevant ILO conventions.

### Commissioning of security staff

When hiring security forces, it must be ensured through instruction and monitoring that they refrain from any form of violence or injury to life and limb. Furthermore, security forces must not interfere with the freedom of association or unionisation.

### Health and safety

Business partners are obliged to ensure a safe and healthy working environment for all employees who work for their company or under their supervision. They shall establish appropriate occupational safety systems and take the necessary precautions against accidents and damage to health that may arise in connection with their activities. This includes the safety of the work premises, of the individual workplace and of work equipment. Employees must be regularly informed of and trained on applicable health and safety standards and safety measures.

All nationally applicable laws, regulations and directives on environmental protection and occupational safety must be complied with.

### Fair remuneration

Business partners must guarantee their employees remuneration for regular working hours and overtime that is at least equal to the national statutory minimum wage. Employees must be granted all legally prescribed benefits and allowances. Wages and benefits are to be granted on time and paid in full. Employees must receive clear, detailed and regular written information on the composition of their remuneration. Overtime is to be paid separately.

### Fair working hours

Working hours must comply with the applicable laws. Overtime is only permitted if it is worked on a voluntary basis. Employees must be granted at least one day off after six consecutive working days. Excessive physical and mental fatigue, in particular due to unsuitable organisation of work in terms of working hours and/or rest breaks, must be prevented.

### Freedom of association

Business partners must grant their employees the right to form and join organisations of their choice, to engage in collective bargaining and to strike. In doing so, they are to comply with the relevant ILO conventions. Joining and being a member of such an organisation, such as a trade union, must not lead to discrimination or retaliation.

### Equal treatment

There must be no discrimination in the recruitment process or during a person's employment. Business partners must ensure that employees are not discriminated against on the basis of e.g. race, nationality, origin, gender, faith or ideology, political views, age, disability or sexual orientation. Unequal treatment includes, in particular, the payment of unequal pay for work of equal value. The relevant ILO conventions apply.

## **3) Environment and climate protection**

Business partners undertake to comply with all laws, regulations and guidelines on environmental and climate protection.

Textile production, the manufacture of protective systems made, for example, of steel, the processing of chemical components, and waste generated during the production process can all have a negative impact on the environment. We therefore require our business partners to continuously and systematically minimise and avoid negative impacts, particularly on soil, water and air. All prescribed safety measures must be complied with. The use and consumption of resources during production and the generation of waste of any kind, including water and energy, must also be reduced or avoided.

If due to their business activities business partners are affected by them, they must also comply with the rules relating to the European Chemicals Regulation REACH, to the ban on mercury, to the handling of persistent organic pollutants (POPs) and to the handling of hazardous waste. The current version and the applicable EU regulation or national legislation apply.

The specific regulations as stipulated in the respective framework purchase agreements also apply.

We expect our business partners to minimise the impact of their business activities on the climate by continuously reducing greenhouse gas emissions (CO<sub>2</sub> emissions). This includes the systematic identification of the causes and quantities of greenhouse gas emissions, the derivation of reduction targets and their fulfilment.

## **IV. Realisation of the requirements**

### **1) Supply chain**

The Mehler Systems Group expects its business partners to promote and demand compliance with the above obligations not only at their own sites, but also from their business partners and subcontractors to the best of their ability. This must be documented in a comprehensible manner. The business partner must also provide information on this upon request. A risk-based approach as part of a due diligence process in accordance with the generally recognised approach of the Organisation for Economic Co-operation and Development (OECD) is recommended.

## 2) Reporting violations

Reports of violations of the Mehler Systems Group's guidelines can be submitted anonymously at any time via the whistleblower system. Access is freely available to all stakeholders via <https://mehler-systems.com>, section "About us" - "Sustainability".

Business partners are obliged to provide their employees and all other persons affected by their business activities with access to this or their own whistleblower system. Employees must not suffer any disadvantages if they lodge a complaint.

## 3) Dealing with infringements

The Mehler Systems Group has the right to monitor and verify compliance with this Code of Conduct. Business partners are obliged to provide information and data on request and to arrange, enable and/or participate in inspections or audits regarding compliance with this Code of Conduct at their work and production facilities. Checks and audits are to be carried out either by the Mehler Systems Group itself or by authorised third parties.

If any violations of the Code of Conduct are identified, the business partner is obliged to immediately initiate appropriate corrective measures documented in a corrective action plan and to communicate these to Mehler. The corrective measures must be completed within a reasonable period of time.

If remedial measures are not implemented, the Mehler Systems Group reserves the right to take measures that may ultimately lead to the suspension or termination of a business relationship.

## V. Acknowledgement and consent

By confirming this document, the business partner undertakes to comply with the principles/requirements listed.

The business partner also undertakes to communicate the content of this Code of Conduct in an appropriate manner to its own employees and the players in its own supply chain and to make all necessary arrangements for the implementation of the requirements.

**This Code of Conduct for Business Partners applies from 01.12.2024**

We hereby confirm that we have taken note of and agree to the provisions of Chapter V:

Company: \_\_\_\_\_

Date: \_\_\_\_\_

Name(s), Position(s): \_\_\_\_\_

Signature(s): \_\_\_\_\_