

CODE OF CONDUCT FOR SUPPLIERS AND SERVICE PROVIDERS TO NAGEL-GROUP

Nagel-Group is committed to business integrity in compliance with applicable laws. We set clear minimum ethical standards in our policy and in our Code of Conduct for Nagel-Group employees, as well as in our Declaration of Principles on Human Rights Strategy, to which we align our conduct. The topics it contains cover the entire spectrum of our daily work. The rules and guidelines derived from this provide the necessary security and guidance in everyday working life. However, the Code of Conduct and the Declaration of Principles also have an external impact. They demonstrate to our customers and supply partners that Nagel-Group is a trustworthy partner. This is an approach firmly anchored in our corporate culture.

We also expect our suppliers (and subcontractors) and service providers to comply with the same minimum ethical standards. Nagel-Group's Code of Conduct for Suppliers and Service Providers also defines Nagel-Group's principles and requirements for its suppliers of goods and services with regard to their responsibility for people and the environment. Nagel-Group reserves the right to change the requirements of this Code of Conduct. In such case, Nagel-Group expects its suppliers (and sub-suppliers) and service providers to accept such reasonable changes.

THE SUPPLIER/SERVICE PROVIDER HEREBY UNDERTAKES:

I. Compliance with laws and ethical principles

- To comply with the laws of the applicable legal system(s) and to be guided by the principles of the United Nations "Global Compact" and the "ETI Base Code" and to respect the principles of the 1998 Declaration on Fundamental Principles and Rights at Work of the International Labour Organisation (ILO) in accordance with national laws and practices.

II. Prohibition of corruption, bribery and money laundering

- To comply with all applicable national and international anti-corruption laws, regulations, rules and standards.
- Not to tolerate or in any way engage in any form of corruption or bribery, including any unlawful offers of payment or similar inducements to government officials to influence decision-making.
- To comply with all applicable anti-money laundering laws and regulations.

III. Fair competition

- To comply with all applicable competition and antitrust laws.

IV. Respecting the fundamental rights of employees and ensuring fair working conditions

- To promote equal opportunities and equal treatment of its employees regardless of their skin colour, race, nationality, social background, any disabilities, sexual orientation, political or religious beliefs, gender or age.
- To respect the personal dignity, privacy and personal rights of each individual.
- Not to employ anyone or force them to work against their will. Employees must always retain control of their identity documents.
- To ensure that employees do not have to pay fees or other payments in order to be employed.
- To be responsible for all payments in respect of legally binding fees and expenses that may be incurred in connection with its employees,
- Not to tolerate unacceptable treatment of workers, such as psychological stress, sexual and personal harassment or discrimination.

- Not to tolerate behaviour (including gestures, language and physical contact) that is sexual, coercive, threatening, abusive or exploitative.
- To ensure appropriate remuneration and to guarantee and contractually define national laws and industry standards on working hours, overtime, wages, salaries and other employer benefits.
- To recognise, to the extent permitted by law, the freedom of association of employees and to neither favour nor discriminate against members of employee organisations or trade unions.

V. Prohibition of child labour

- Not to employ children under the legal minimum employment age in the respective country or jurisdiction. In the absence of a minimum age specified for employment, no workers will be employed who are not at least 15 years old. In countries that fall under the exception for developing countries in ILO Convention 138, the minimum age may be reduced to 14 years.

VI. Employee health and safety

- To take responsibility for the health and safety of its employees in accordance with legal requirements.
- To ensure the best possible preventive measures against accidents and occupational diseases results.
- To offer training and ensure that all employees are knowledgeable about occupational safety.
- To establish and apply an appropriate occupational safety management system.

VII. Rights to buildings and land

- To respect the prohibition of unlawful eviction and the prohibition of unlawful deprivation of land, forests and waters whose use secures a person's livelihood.

VIII. Environmental protection

- To observe environmental protection with regard to legal norms and international standards.
- To minimise environmental pollution and continuously improve environmental protection.
- To avoid human rights violations caused by environmental damage.

IX. Climate protection

- To take measures to protect the climate and reduce greenhouse gas emissions.
- To provide data on greenhouse gas emissions on request.

X. Data protection and confidentiality

- To comply with all data protection and security laws and regulations.
- To adequately protect and not disclose information that is not accessible to the public.

XI. Supply chain and Supply Chain Due Diligence Act

- To appropriately promote and enforce compliance with the contents of the Code of Conduct among its suppliers/service providers.
- To comply with the principles of non-discrimination in the selection of suppliers and in dealings with suppliers.

- To work towards ensuring that all relevant statutory human rights and environmental provisions are complied with in its area of responsibility, in particular also by third parties working in connection with the provision of services.
- To familiarise employees entrusted with the contractually agreed tasks and activities with the relevant regulations, in particular from laws on corporate due diligence obligations in supply chains.

XII. Right to audit compliance

- To undertake to cooperate in regular and ad hoc audits to demonstrate compliance with the requirements of this Code of Conduct at its own premises and in its supply chain. Such audits can be conducted by independent service providers selected by us, among others. The audits may be unannounced, but are usually carried out during the business partner's normal business hours.
- To grant access to all production facilities and information necessary for the audit. The supplier/service provider assures cooperative collaboration with us and the auditors. During the audit, the legitimate interests of the supplier/service provider, in particular with regard to data protection and business and trade secrets, are to be taken into account appropriately.
- To implement remedial measures in a timely manner. An audit report shall be prepared, together with a plan for such corrective actions (e.g. relevant training) where appropriate, and made available to the supplier/service provider.

XIII. Consequences of Violations

- If we discover violations of the minimum requirements of this Code of Conduct or applicable law, or are made aware of this by third parties, the supplier/service provider will be informed of this in writing. They shall be given a reasonable period of grace to remedy the situation.
- If the supplier/service provider becomes aware of violations at its own premises or in its supply chain, it must inform us immediately, agree appropriate remedial measures with us and to implement these in good time.
- If remedial action has not taken place by the deadline set, we shall have the right to terminate the business relationship or individual contracts, either subject to a notice period of three months to the end of the month or without notice. The right to compensation remains unaffected by this.
- Intentional and serious violations of this Code of Conduct constitute material breaches of duty by the supplier/service provider. This shall entitle us to terminate the entire business relationship without notice or to withdraw from individual agreements and contracts or to cancel them without notice. The right to compensation remains unaffected by this.

XIV. Reporting violations

As part of the Supply Chain Due Diligence Act (LkSG), which came into force on 1 January 2023, a whistleblower system and complaints procedure has been set up to which reports can be submitted in order to prevent or end violations of human rights and environmental obligations. Nagel-Group must be informed immediately and without being asked if there are any indications of a violation in the supply chain.

Website [Nagel-Group – Compliance at Nagel-Group](#)

Hotline: The telephone numbers for individual countries can be found on the above-mentioned website. You can contact an external ombudsperson here completely anonymously.

Nagel-Group, as at May 2024