

Code of Conduct of Heinz Nesper GmbH

With the Code of Conduct (CoC), the company communicates its guidelines to all stakeholders. These also apply to suppliers of Heinz Nesper GmbH. The Code of Conduct forms the interface between the company's own sustainability values and goals and the desired behaviour of suppliers.

Content: The Code of Conduct contains the following elements:

I. Introduction/preamble

II. Requirements for the company and its suppliers:

1. Social responsibility

2. Ecological responsibility

3. Ethical business conduct

III Implementation of the requirements

IV. Acknowledgement and consent of the supplier

I. Introduction/Preamble

Heinz Nesper GmbH is committed to ecologically and socially responsible corporate management. We expect the same behavior from all our suppliers. We also expect our employees to observe our principles of ecological, social and ethical behavior and to integrate them into the corporate culture. Furthermore, we strive to continuously optimize our business activities and our products [or services] in terms of sustainability and ask our suppliers to contribute to this in the sense of a holistic approach.

Heinz Nesper GmbH undertakes for future cooperation to comply with the principles and requirements of the Code of Conduct and to endeavor to contractually oblige its subcontractors to comply with the standards and regulations set out in this document. This agreement comes into force upon signing. A breach of this Code of Conduct may ultimately be cause and reason for the company to terminate the business relationship, including all associated supply contracts.

The Code of Conduct is based on national laws and regulations such as the Lieferkettensorgfaltspflichtengesetz (LkSG) as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on the Rights of the Child and Business Conduct, the United Nations Guiding Principles on Business and Human Rights, the International Labour Standards of the International Labour Organization and the United Nations Global Compact.

II Requirements for our own company and suppliers

1. Social responsibility

- **Exclusion of forced labour**

In all (business) activities of Heinz Nesper GmbH and its contractual partners, no forced labor, slave labor or comparable work may be used. All work shall be voluntary and without threat of punishment. Employees may terminate their work or employment relationship at any time. Furthermore, there shall be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment and humiliation. The hiring or use of security personnel is prohibited if persons are treated in an inhumane or degrading manner or are injured during their deployment or if freedom of association is impaired.

- **Prohibition of child labour**

Child labour may not be used in any phase of production. Heinz Nesper GmbH undertakes to comply with the recommendation of the ILO conventions on the minimum age for the employment of children. Accordi

ngly, 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 any case not less than 15 years. The rights of young workers under the age of 18 will not be used for work that is harmful to the health, safety or morals of children. Special protection regulations are observed.

- **Fair pay**

Remuneration for regular working hours and overtime corresponds to the national statutory minimum wage or the industry minimum standard, whichever is higher.

Employees are granted all legally prescribed benefits. Deductions from wages as a punitive measure are not permitted. We ensure that employees receive clear, detailed and regular written information on the composition of their remuneration.

- **Fair working hours**

Working hours comply with applicable laws or industry standards. Overtime is only permitted if it is voluntary and does not exceed 12 hours per week, while employees are granted at least one day off after six consecutive working days. The weekly working time should not exceed 48 hours.

- **Freedom of association**

Employees of all contracting parties should have the right to form and join organizations of their choice or to bargain collectively. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative possibilities for independent and free association of employees for the purpose of collective bargaining should be granted. Employee representatives are protected from discrimination. Employees shall not be discriminated against on the basis of their founding, joining or membership of such an organization.

- **Prohibition of discrimination**

Discrimination Unequal treatment of employees in any form is prohibited unless it is justified by the requirements of employment. This applies, for example, to discrimination based on gender, race, caste, ethnic or social origin, skin color, disability, health status, political conviction, origin, ideology, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

- **Health protection, safety in the workplace**

Heinz Nesper GmbH is responsible for a safe and healthy working environment and demands the same from its suppliers. By setting up and applying appropriate occupational safety systems, necessary precautionary measures are taken against accidents and damage to health that may arise in connection with the work. Appropriate measures are taken to prevent excessive physical or mental fatigue. In addition, employees are regularly informed and trained on applicable health and safety standards and measures. Employees are given access to sufficient quantities of drinking water and access to clean sanitary facilities.

- **Preservation of the natural basis of life**

Heinz Nesper GmbH undertakes not to deprive people of their livelihoods by using land, forests or bodies of water in violation of their legitimate rights. We also demand this from our suppliers. Harmful soil changes, water and air pollution, noise emissions and excessive water consumption will be avoided if this harms people's health, significantly impairs the natural basis for food production or prevents people's access to clean drinking water or sanitary facilities.

- **Complaint mechanisms**

Heinz Nesper GmbH undertakes to pass on to its employees any information received regarding accessibility, responsibility and the implementation of a complaints procedure in an appropriate manner. The complaints procedure is accessible to employees at all times while maintaining confidentiality of identity and effective protection against discrimination. Suppliers of Heinz Nesper GmbH are also responsible for establishing an effective grievance mechanism at company level for individuals and communities that may be affected by adverse impacts.

- **Dealing with conflict minerals**

For the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt, processes must be established in accordance with the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and expects the same from its suppliers. Smelters and refineries without appropriate, audited due diligence processes are avoided.

- **Physical abuse**

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

2. Environmental responsibility

- **Treatment and discharge of industrial wastewater**

Wastewater from operations, manufacturing processes and sanitary facilities is typified, monitored, checked and treated as necessary before discharge or disposal. In addition, measures have been introduced to reduce the generation of waste water.

- **Dealing with air emissions**

General emissions from operations (air and noise emissions) and greenhouse gas emissions must be typified, routinely monitored, checked and, if necessary, treated before they are released.

- **Handling of waste and hazardous substances**

Heinz Nesper GmbH follows a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste. We expect the same from our suppliers. The bans on the export of hazardous waste in the Basel Convention of March 22, 1989, as amended, are observed. Chemicals or other materials that pose a risk 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 shall be used in accordance with the prohibitions of the Minimata Convention of October 10, 2013 and persistent organic pollutants in accordance with the Stockholm Convention of May 23, 2001, as amended.

- **Reduce consumption of raw materials and natural resources**

The use and consumption of resources during production and the generation of all types of waste, including water and energy, are reduced or avoided. This is done either directly at the point of origin or through procedures and measures, e.g. by changing production and maintenance processes or procedures within the company, by using alternative materials, by making savings, by recycling or by reusing materials.

- **Dealing with energy consumption/efficiency**

Energy consumption is monitored and documented. Economic solutions are found to improve energy efficiency and minimize energy consumption.

3. Ethical business conduct

- **Fair competition**

The standards of fair business, fair advertising and fair competition are observed at all times. In addition, the applicable antitrust laws are applied, which in particular prohibit agreements and other activities that influence prices or conditions when dealing with competitors. These regulations also prohibit agreements between customers and suppliers that are intended to restrict customers in their freedom to determine their own prices and other conditions for resale.

- **Confidentiality/Data Protection**

It is obligatory to meet the reasonable expectations of its client, suppliers, customers, consumers and employees with regard to the protection of private information. It must comply with data protection and information security laws and government regulations when collecting, storing, processing, transferring and disclosing personal information.

- **Intellectual property**

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

- **Integrity/bribery, taking advantage**

The highest standards of integrity are applied to all business activities. Procedures are in place to monitor and enforce standards to ensure compliance with anti-corruption laws.

- **Compliance with the UN Guiding Principles**

The UN Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" (UNGPs) framework is the first human rights corporate responsibility initiative endorsed by the United Nations.

They are the result of a six-year research and consultation process consisting of 47 multi-stakeholder consultations and contributions from 120 countries. The then UN Special Representative on Business and Human Rights, Professor John Ruggie, led the consultation process. As a result, the UN Guiding Principles are also known as the "Ruggie Principles". The Guiding Principles are based on the 2005 "Protect, Respect and Remedy" framework developed by Ruggie and adopted by the Human Rights Council in 2008.

The 31 Guiding Principles refer to the International Bill of Human Rights and the Declaration of Principles of the International Labour Organization (ILO) and substantiate the "Protect, Respect and Remedy" approach. Accordingly, the guidelines are based on three pillars:

Protect as the state's legal obligation to protect human rights;

Respect as the responsibility of companies to respect human rights;

Remedy as the duty of both the state and companies to provide access to remedial mechanisms and redress.

These guidelines are recognised by Heinz Nesper GmbH and compliance with them is continuously monitored internally.

III Implementation of the requirements

With regard to our supply chains, Heinz Nesper GmbH ensures that risks within these are identified and appropriate measures are taken. In the event of suspected violations and to safeguard supply chains with increased risks, suppliers of Heinz Nesper GmbH are required to inform us promptly and, if necessary, regularly about the identified violations and risks as well as the measures taken.

VI Awareness and consent of the supplier

By signing this document, Heinz Nesper GmbH undertakes to act responsibly and to comply with the principles/requirements listed. Heinz Nesper GmbH undertakes to communicate the content of this Code to employees, representatives and suppliers in a way that is understandable to them and to take all necessary precautions to implement the requirements.

Pforzheim in April 2024

Frank Nesper