

COMPLIANCE

**MURTFELDT
SUPPLIER CODE
OF CONDUCT**

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Introduction

As an internationally active company, MURTFELDT strives to achieve the highest quality standards in the production and distribution of its products. Quality includes product safety, environmental responsibility, and legally and ethically sound behaviour on the part of ourselves and our business partners. A group-wide compliance management system has been set up for this purpose.

We rely on deliveries and services from suppliers, service providers, subcontractors, and other parties (hereafter collectively referred to as "suppliers") and expect the same above-mentioned quality standards from the suppliers we work with. Our Supplier Code of Conduct is based on this understanding. It sets out terms that are to be observed and complied with as a matter of course and specifies our expectations, which we ourselves are prepared to fulfil.

Treating all people with respect, regardless of their gender or sexual orientation in particular, is standard practice at MURTFELDT. Therefore, we would like to clarify that we only use the masculine form in this Supplier Code of Conduct for better readability. This form encompasses all genders equally.

We expect all suppliers to MURTFELDT to incorporate the shared principles of respecting human rights, complying with the law and protecting the environment into their contractual relationship and to apply these principles consistently in practice. With this in mind, we aim to regularly review

compliance with this legal, sustainability and ethical framework together with our suppliers and introduce improvements as needed. In the unlikely event of a serious violation or lack of cooperation, however, termination of a business relationship will also be considered.

The following requirements constitute the minimum conditions for our cooperation. We encourage our suppliers to adopt more extensive conduct guidelines with greater requirements for ethical and sustainable practices for both themselves and their employees where appropriate, taking into account their specific needs.

Where this Supplier Code of Conduct refers to MURTFELDT for the sake of simplicity, but MURTFELDT is not itself a contracting party, the following positions and claims of MURTFELDT are also deemed to be those of the respective company acting as the contractual partner of the supplier. Where a supplier provides services to MURTFELDT with the assistance of upstream suppliers, subcontractors or other third parties, it is the supplier's responsibility to agree on the following principles and obligations with these upstream suppliers, subcontractors or third parties, or to ensure them in some other way. Only by consistently incorporating these principles and obligations throughout the supply chain can we ensure that fundamental human rights, fair labour conditions, occupational safety and environmental protection are consistently upheld throughout the supply chain.

OUR STANDARDS AND EXPECTATIONS

01

A Legality and integrity

We expect our suppliers to:

- comply with the laws and other relevant regulations applicable at the locations where they operate. If a delivery or service is intended for export, the delivery or service must also comply with the legal provisions of the destination country. Where international regulations applicable to our suppliers stipulate more extensive or stricter requirements, these must be observed.
- neither actively participate in nor tolerate corruption, but to have preventive measures in place, and to consistently take action against any corruption that is identified. This also applies to actions or arrangements which serve to conceal corruption or to sidestep anti-bribery and corruption policies, or which lend themselves to doing so.
- deal responsibly with the interests of MURTFELDT, its suppliers, and involved employees, and separate these from each other appropriately.
- behave with integrity, make business decisions exclusively on the basis of objective criteria and, in particular, to not allow themselves to be influenced by gifts or benefits offered by business partners or third parties.
- not accept inappropriate monetary or other gifts, or personal benefits, from business partners and public officials nor to offer these. In no case may gifts or benefits be offered, promised or granted in return for a sovereign or business decision, or in the expectation of preferential treatment. Gifts and benefits may only be offered or granted by way of exception if they are appropriate, socially acceptable, customary in business, and of low value. The applicable statutory provisions under criminal law and tax law must be observed.
- act fairly with regard to competition and refrain from unfair practices.
- observe the applicable national and international antitrust laws and other laws regulating competition. Unlawful agreements restricting competition or the abuse of a dominant market position are not permitted, nor is the unlawful exchange of information relevant to competition.
- observe all applicable national and international provisions of the German Foreign Trade and Payments Act when importing and exporting, to refrain from engaging in any violations, evasions or deceptions, and to conduct and document imports and exports in a transparent manner.
- observe national and international money laundering laws in all transactions and other services arising from, or in connection with, business relationships.
- respect the trade or company secrets and property rights of third parties and treat any shared documents, data, offers and prices confidentially.
- handle confidential company-related and personal data and information that is not in the public domain with care and in accordance with national and international regulations on the protection of trade secrets, and to comply with the applicable laws on data protection.

B Human rights and working conditions

We, MURTFELDT, expect our suppliers to respect universal human rights and fundamental freedoms in the workplace. We regard compliance with the principles of the International Labour Organization of the United Nations (ILO) as well as the contents of the UN International Covenant on Economic Social and Cultural Rights and the International Covenant on Civil and Political Rights as a minimum global standard.

We expect our suppliers to:

- respect their employees' right to freedom of expression and freedom of association within the framework of the laws applicable at the respective seat of business and place where work is performed. Employees must not be discriminated against for forming or participating in trade unions or advocacy groups, or for advocating for their rights or improvements in their situation or working conditions.
- comply with the laws and collective agreements in force at the seat of business and locations where work is performed concerning working hours, in particular the maximum number of hours per day/week.
- pay their employees appropriately and fairly, and comply with applicable regulations on minimum wage and compensation, including overtime.
- observe the United Nations' regulations on human and children's rights. MURTFELDT rejects all forms of child labour. The employment of school-age children and children under the age of 16 must be refrained from under all circumstances. Where more stringent national regulations concerning child labour and the minimum age for employment exist, these must be observed as a matter of priority.
- not engage in, benefit from or accept slavery, slavery-like conditions or forced labour. Forced labour refers to any involuntary work or service required of a person under threat of punishment, including prisoners and detainees. It also includes any retraining, training or schooling of certain individuals or groups of people ordered or arranged by the state or a local ruler, which essentially consists of involuntary work performed under the threat of punishment, in conditions similar to imprisonment or residence in a secure mental or correctional institution or camp.
- treat all people, and in particular their employees, with respect, in a manner that is free from prejudice and, above all, discrimination. Any form of discrimination or disadvantage, in particular on the grounds of national and ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or ideology must be refrained from.
- respect and protect essential natural resources. Harmful pollution of soil, water, and air must be avoided. Any inappropriate use of own security forces or the commissioning of external security forces for the unlawful enforcement of own interests by force is unacceptable.
- implement processes for the conflict minerals tin, tungsten, tantalum, cobalt, and gold in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Processing operations without appropriately audited due diligence processes must not take place.

Unlawful forced eviction

The unlawful forced eviction and the unlawful taking of land, forests and waters in the acquisition, development or other use of land, forests and waters, the use of which secures a person's livelihood, shall be prohibited.

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C Occupational health and safety

We expect our suppliers to:

- provide a healthy and safe working environment for employees.
- recognise risks to physical wellbeing, especially with regard to their employees, and to minimise these risks. Occupational health and safety regulations must be complied with.
- organise working, the design of products, and the provision of services in such a way that accidents are prevented from occurring as far as practicable and that the consequences of accidents are minimised as much as possible.

D Sustainability

At MURTFELDT, we expect our suppliers to have as little negative impact on the environment as possible and to be proactive in protecting the environment and preserving natural resources. More specifically, MURTFELDT expects compliance with the provisions set out in the Minamata Convention, the Stockholm Convention (POPs Convention) and the Basel Convention as a global minimum requirement.

We expect our suppliers to:

- behave responsibly in terms of protecting the environment and conserving limited natural resources, and to fully comply with environmental protection laws.
- support us in possible further environmental protection measures, including beyond the scope of legal requirements, and to put forward proposals for more environmentally friendly products or production processes, packaging, and services.
- use existing natural resources in such a way that future generations are not forced to pay for present consumption. We expect our suppliers to consistently follow our sustainability principles and to act in an environmentally conscious manner. The use of non-renewable resources in particular is to be continually reduced in favour of renewable resources.
- work on reducing energy consumption on an ongoing basis and to use CO₂-neutral energies to the greatest possible extent.
- be guided by the Sustainable Development Goals in production and development, and the services they provide for MURTFELDT.
- pursue the development and implementation of a climate protection strategy aimed at CO₂ neutrality and provide us with information on the CO₂ footprint of their deliveries and services.

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E Pollution prevention and waste minimisation

Suppliers must follow a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste.

The provisions regarding hazardous waste set out in the Basel Convention (22 March 1989), as they currently stand, are to be observed. Chemicals and other materials that pose a hazard if released into the environment must be identified and handled in a manner that ensures safety during their handling, transport, storage, use, recycling or reuse, and disposal.

VERIFICATION OF COMPLIANCE WITH OUR STANDARDS AND EXPECTATIONS

02

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MURTFELDT engages in internal and external audits to ensure and improve the long-term sustainability of our supply chain.

We expect our suppliers to make relevant contributions to this process. We encourage suppliers to have their management systems certified and to provide evidence of this to MURTFELDT.

We expect our suppliers to support the risk analyses we carry out. The results of such analyses influence our supplier evaluations and, in turn, decisions on awarding procurement contracts.

We expect our suppliers to take appropriate steps to ensure that their employees, suppliers, and subcontractors are required to comply with the contents of this Supplier Code of Conduct and that they receive relevant training as necessary. Suppliers and subcontractors are expected to pass on the contents of this Supplier Code of Conduct in an appropriate form to their suppliers or subcontractors in the supply chain.

MURTFELDT will consider any violation of the principles listed in this Supplier Code of Conduct as a significant breach of the contractual relationship on the part of the supplier. Should there be any indication of non-compliance with the principles of this Supplier Code (e.g. through media reports), MURTFELDT reserves the right, without prejudice to any other rights, to request information on the relevant matter.

We, MURTFELDT, reserve the right to carry out spot checks and audits of suppliers in order to verify compliance with this Supplier Code of Conduct.

In the event of serious or continuous violations, the contractual relationship may be terminated. We provide our suppliers with a reasonable period of time to address any violations or complaints with appropriate measures that will prevent their recurrence.

WHO TO CONTACT

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The primary points of contact for our suppliers and their employees are the business contacts already in place.

In addition, suppliers and employees of suppliers, as well as downstream suppliers and their employees, and other affected parties, also have the option of confidentially contacting the Compliance Hotline or the ombudsman of MURTFELDT in order to report legal infringements or circumstances that violate this Supplier Code of Conduct.

MURTFELDT COMPLIANCE HOTLINE

Compliance Manager
Heßlingsweg 14–16, 44309 Dortmund
compliance@murtfeldt.de

OMBUDSMAN FOR MURTFELDT

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