

# Code of Conduct for suppliers

## Introduction and purpose

Our company is committed to the highest ethical standards, sustainable business practices and strives for the highest quality in our products and services. We expect the same from our suppliers. This Code of Conduct sets out clearly and precisely the expectations and requirements we have of our suppliers in terms of ethical behaviour, social responsibility and environmental responsibility.

This code is an integral part of our business relationships and ensures that all partners share our values of integrity, fairness and sustainability. We are convinced that consistent adherence to these standards not only contributes to legal compliance, but also strengthens trust in our partnerships and promotes long-term business success.

## Scope of application

The supplier's management is primarily responsible for compliance with the Code of Conduct. They bear the primary responsibility for ensuring that all employees and processes act in accordance with the defined ethical standards and guidelines.

## Behavioural guidelines

### 1. Compliance with laws and regulations

Suppliers must comply with all relevant local, national and international laws and regulations, including regulations on labour law, environmental protection, health and safety and all industry-specific regulations.

Suppliers must ensure that their business activities are conducted in full compliance with all applicable competition and antitrust laws and regulations in the countries in which they operate.

### 2. Human rights and labour conditions

Suppliers must respect international human rights and ensure that fair labour conditions are observed. This includes protecting the human rights of all workers, regardless of their type of employment, such as temporary workers, migrant workers, students, contract workers, direct employees or others. Discrimination based on race, colour, ethnic or national origin, social origin, disability, health status, gender or gender identity, sexual orientation, age, pregnancy, religion, political affiliation, marital status or other characteristics is prohibited. Child labour, forced labour, discrimination and harassment are also prohibited. Suppliers must ensure that fair wages are paid, appropriate working hours are observed and working conditions are safe.

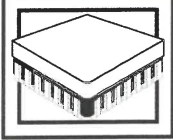
### 3. Environmental, health and safety laws

Commitment to protecting the environment and reducing environmental impact is required. This includes compliance with all environmental regulations, minimisation of waste and emissions, efficient use of resources and promotion of sustainable practices. Supplier agrees to ensure that the maintenance and operation of its manufacturing facilities and processes are in compliance with all local, state and federal environmental, health and safety laws and regulations, regardless of location.

It is strictly prohibited for W. Kolb Fertigungstechnik GmbH employees to be exposed to hazardous materials or unsafe conditions when using the supplier's services, making deliveries to a W. Kolb Fertigungstechnik GmbH location or visiting the supplier's facility. Hazardous items must have clearly visible safety signs and all appropriate safety protocols must be strictly adhered to.

Suppliers are also required to provide documented information on safe handling and protection where necessary.

All required environmental, health and safety permits and registrations must be obtained, maintained and kept up to date and their operational and reporting requirements followed.



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### 4. Health and safety:

Suppliers undertake to train their employees in health and safety issues in the workplace. They must also identify, evaluate and control employee exposure to potential safety hazards. These measures shall be implemented in accordance with applicable laws and regulations through design, engineering and administrative controls, preventive maintenance, safe work practices, ongoing safety training and the provision of appropriate personal protective equipment.

In addition, suppliers must have procedures and systems in place to manage, track and report occupational accidents and illnesses. These include measures to encourage reporting by employees, to classify and document injuries and illnesses, to investigate incidents and to implement measures to eliminate the causes. The systems should also support the return of employees to work.

### 5. Product safety

Suppliers must ensure that the products and services they supply to W. Kolb Fertigungstechnik GmbH are developed, manufactured and delivered with the health and safety of employees and customers in mind. These must fulfil or exceed all quality and safety standards prescribed by law and by W. Kolb Fertigungstechnik GmbH, and meet the quality requirements of W. Kolb Fertigungstechnik GmbH.

For new designs, new systems or applications, both the supplier and W. Kolb Fertigungstechnik GmbH are responsible for ensuring that all performance, durability, maintenance, safety and warning requirements are met.

### 6. Ethics and integrity:

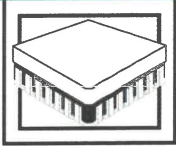
Business activities must be conducted with the highest integrity and ethical behaviour. Suppliers must maintain accurate books and records of all activities related to their work. This includes the strict prohibition of corruption, bribery, fraud and any unethical business practices.

Suppliers must never offer, provide, promise or accept anything of value that could be construed as payment for obtaining an improper business advantage.

Suppliers are obliged to ensure that all gifts, travel and hospitality are authorised in accordance with the W. Kolb Fertigungstechnik GmbH Code of Conduct and all applicable laws. These must be appropriate, properly documented and serve a legitimate purpose. Gifts, travel and entertainment that give the appearance of impropriety or are given illegally, lavishly, frequently, vulgarly and/or in exchange for an improper business advantage are strictly prohibited.

Suppliers are obliged to refrain from any actions that could involve theft, fraud, forgery, embezzlement or misappropriation of assets of W. Kolb Fertigungstechnik GmbH. This includes the theft of funds or property, the misuse of resources for personal purposes, the submission of false information or documents, the falsification of invoices or the creation of fraudulent reports, the misleading representation of transactions and the deliberate submission of false financial documents or statements.

Suppliers must comply with applicable anti-money laundering and anti-terrorism regulations. They must not enable or facilitate money laundering or the financing of criminal activities, including terrorism. It is necessary to take measures to prevent the unintentional use of business funds for these purposes. This includes monitoring and reporting unusual or suspicious activities or transactions, such as attempted cash payments from unusual funding sources, transactions without a clear business purpose, or attempts to circumvent record-keeping or reporting requirements.



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### 7. Conflicts of interests:

Suppliers must conduct their business openly and transparently. Suppliers should avoid and disclose conflicts of interest, such as significant relationships with spouses, romantic relationships and close friends who are employed by W. Kolb Fertigungstechnik GmbH. It is necessary to avoid conflicts of interest and to disclose them if they arise. Employees may not derive any personal benefits from the business relationship and may not take any actions that could lead to conflicts of interest.

### 8. Confidentiality and data protection:

W. Kolb Fertigungstechnik GmbH's suppliers are obliged not to make any changes to products, services, drawings, specifications, standards or other relevant documents without first obtaining written authorisation from W. Kolb Fertigungstechnik GmbH. In addition, they must protect confidential information and comply with all applicable data protection laws by ensuring that such information is used only for its intended purpose and is not disclosed without authorisation. Suppliers must respect the intellectual property and proprietary information of W. Kolb Fertigungstechnik GmbH and may only disclose or use it to third parties with the consent of W. Kolb Fertigungstechnik GmbH, provided that this is done in accordance with the instructions or for the benefit of W. Kolb Fertigungstechnik GmbH.

Suppliers are obliged to protect the personal data of employees of W. Kolb Fertigungstechnik GmbH and other related parties. They must comply with applicable laws, in particular the regulations on the transfer, processing, protection and retention of personal data, including the EU General Data Protection Regulation (GDPR). These requirements set out expectations for compliance with data protection regulations and are not intended to give or imply consent to the use or processing of such personal data. Suppliers are required to ensure that they fulfil the cyber security requirements of W. Kolb Fertigungstechnik GmbH in accordance with evolving industry standards. This includes the implementation of risk management systems and network security processes, as well as the promotion of clear and transparent communication between all parties involved.

### 9. Emergency prevention

Suppliers must identify, evaluate, develop and implement emergency response measures including fire drills, exit and evacuation areas, fire detection and suppression systems and recovery plans to minimise damage to life and property. Preventative measures such as fire alarms must be tested regularly to ensure they are working properly.

Suppliers should have a business continuity plan that allows for the backup, storage and recovery of engineering drawings, electronic media and production tools in the event of damage or loss.

### 10. Management system

It is recommended that suppliers implement a management system that complies with our Code and applicable laws and regulations. This system is designed to reduce operational risks and enable continuous improvement. The main points include:

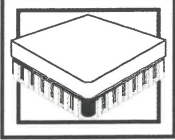
**Company commitment and management accountability:** Suppliers should make policy statements that emphasise their commitment to compliance. In addition, managers should be appointed who are responsible for implementing the management systems and programmes.

**Legal requirements:** Implementation of procedures to identify, monitor and comply with all applicable laws and regulations.

**Risk assessment and risk management procedures:** Establish procedures to identify and assess risks, including legal, environmental, health and safety, and ethical risks. The relative importance of each risk should be determined and appropriate controls put in place to ensure compliance.

**Training programmes:** Provide training for managers and employees to implement continuous improvement policies, procedures and objectives and to fulfil applicable legal and regulatory requirements.





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**Audits and assessments:** Conduct self-evaluations to ensure compliance with legal and regulatory requirements, the Code and contractual obligations.

**Corrective action procedures:** Prompt correction of deficiencies identified during internal or external assessments, inspections, investigations and reviews.

**Documentation and records:** Maintaining documents and records to ensure compliance with legal requirements, the Code and company requirements.

**Communication:** Implementation of procedures to communicate the code requirements and to monitor compliance by suppliers.

### 11. Further laws and directives

**Trade Laws:** Suppliers must comply with all applicable laws, including U.S. and international regulations governing the import, export and re-export of goods, services, software and technology. This includes trade embargoes, economic sanctions, export control regulations, U.S. anti-boycott regulations, tax regulations, and cargo security requirements. Suppliers must obtain a corresponding export licence before supplying controlled products. They are prohibited from supplying products to W. Kolb Fertigungstechnik GmbH in connection with business relationships with countries that are subject to restrictions or sanctions, or to denied or prohibited parties under the export regulations of the USA, the UK, the EU or other applicable regulations, to use, maintain, transfer, ship or re-export these products directly or indirectly. For a complete list of countries subject to such restrictions or sanctions, please refer to W. Kolb Fertigungstechnik GmbH's Export Compliance Letter.

**Conflict Minerals:** No product may contain, at the time it is supplied by suppliers, minerals that directly or indirectly finance an armed group that has been identified as a perpetrator of human rights abuses, including, without limitation, those defined as conflict minerals in regulations promulgated under Section 13(p) of the United States Securities Exchange Act of 1934.

**EU RoHS, EU REACH and IMDS:** The supplier's products must comply with the EU RoHS and REACH directives. At the request of W. Kolb Fertigungstechnik GmbH, suppliers are required to provide the chemical composition of their products to demonstrate compliance with EU RoHS and REACH. If applicable, suppliers must provide IMDS files for their supplied products.

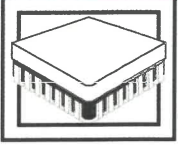
### Reporting

Suppliers are obliged to report violations of this Code of Conduct immediately. All reported violations will be investigated. Suppliers who report violations in good faith are protected from sanctions to ensure the protection of whistleblowers.

### Training and communication

Suppliers are encouraged to conduct regular training for their employees to ensure that they are familiar with the contents of this Code of Conduct. This training is intended to help raise awareness of the requirements and standards that W. Kolb Fertigungstechnik GmbH adheres to.

The Code of Conduct is continuously reviewed, updated and actively communicated to suppliers. This ensures that all partners are always informed about the current guidelines and can adapt their processes accordingly. The Code of Conduct is available on the company website for easy access by suppliers. This ensures that they can access the complete guidelines and standards that they must observe when working with W. Kolb Fertigungstechnik GmbH at any time.



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### Consequences

Violations of the Code of Conduct can have serious consequences. One possible measure is termination of the contract, which can occur in the event of non-compliance with laws and regulations, violations of human rights and working conditions, environmental violations, health and safety deficiencies, unethical behaviour such as corruption and bribery, and conflicts of interest. In addition, legal action may be taken, particularly in the event of unethical behaviour, environmental violations and the misuse of confidential information. Compliance with the Code of Conduct is therefore of the utmost importance to ensure integrity and accountability.

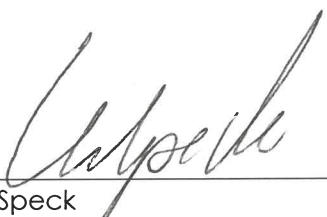
### Concluding remarks

This Code of Conduct is regularly reviewed and adapted to new requirements. It ensures that our suppliers conduct their businesses responsibly and ethically, ultimately contributing to strengthening partnerships and protecting our good reputation.

The current Code of Conduct can be accessed by our business partners on the company website [www.kolb-eld.com](http://www.kolb-eld.com).

### Validity

The Code of Conduct of W. Kolb Fertigungstechnik GmbH has been valid since **January 1, 2024**.



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Udo Speck

Geschäftsführung  
W. Kolb Fertigungstechnik



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Holger Engels

Geschäftsführung  
W. Kolb Fertigungstechnik