

Code of Conduct for Business Partners

PREAMBLE

Konvekta AG and its sister companies and subsidiaries have developed values and principles throughout the course of their respective company histories that form the basis of our business practices. The contractors and suppliers of the Konvekta Group play a significant role in our success. We regard a common understanding of ethical and sustainable practices as the cornerstone of our business relationships. For us, the requirements and principles outlined in this code of conduct play a key role in Konvekta's cooperation with its suppliers and other contractors.

PRINCIPLE OF STRICT LEGALITY

Konvekta upholds the principle of strict legality for all actions, measures, contracts and other processes of the Konvekta Group. Accordingly, we expect our business partners to comply with the applicable laws, the basic principles of the United Nations Global Compact and this Code of Conduct in the context of their business activities with Konvekta and to work towards ensuring that this Code of Conduct is complied with by third parties (including, in particular, all subcontractors/contractors) who are directly or indirectly involved in the fulfillment of contracts with Konvekta.

CODE OF CONDUCT AND LABOUR CONDITIONS

TREATMENT OF STAFF

Our business partners comply with basic employee rights on the basis of the applicable national legislation. The following principles are based on the fundamental principles of the International Labor Organization (ILO).

PERSONAL RIGHTS / HARASSMENT

Our business partners are required to respect the personal rights of their employees. Human dignity must be respected. Any form of discrimination, harassment or bullying should be prevented wherever possible and systems to support affected employees should be maintained. The aim should be to create a fair, tolerant, respectful and cooperative working environment.

WHISTLEBLOWING

All forms of retaliation against anyone who reports potential violations of this Code in good faith are prohibited. If someone retaliates directly or indirectly against an employee for reporting potential or actual violations in good faith, we reserve the right,

Code of Conduct for Business Partners

after an objective review and confirmation, to take action against the violator(s) and/or to restrict or terminate the business relationship as such. Suspected cases should be reported immediately upon becoming aware of them and, if possible, in writing via the reporting facilities provided for this purpose (see “WHISTLEBLOWER AND COMPLAINTS SYSTEM”).

HUMAN RIGHTS

Our business partners respect internationally recognized human rights and ensure that these are upheld.

CHILD LABOR / SLAVERY

Our business partners only employ employees who have reached the minimum age required to perform work in accordance with the applicable national legislation. Our business partners will observe and respect the rights of children. Furthermore, our business partners undertake not to permit any form of forced labor. This includes any work or service that is required of a person under threat of punishment and for which they have not volunteered. Slavery and similar practices of domination and oppression in the workplace environment are prohibited.

FORCED LABOR

Our business partners reject all forms of forced labor and respect the principle of freely chosen employment.

FREEDOM OF ASSOCIATION

Our business partners respect the freedom of association and the right to form interest groups. They grant their employees the right to defend their interests on the basis of national legislation.

EQUAL OPPORTUNITIES

Our business partners do not tolerate discrimination against employees on the basis of skin color, ethnic origin, gender, age, nationality, social background, disability, sexual orientation, religious affiliation or world view.

FAIR WORKING CONDITIONS

Our business partners pay remuneration and social benefits that at least comply with national and local legal standards, regulations or agreements and comply with the applicable regulations on working hours and vacation.

Code of Conduct for Business Partners

OCCUPATIONAL HEALTH AND SAFETY

As a minimum, our business partners comply with the respective national standards for a safe and hygienic working environment and take appropriate measures to ensure health and safety in the workplace in order to guarantee healthy working conditions.

Our business partners are also expected to work on the continuous improvement of their processes and products relevant to occupational health and safety, ideally with proof of suitable management systems (e.g. in accordance with DIN EN ISO 45001).

ENVIRONMENTAL PROTECTION AND ENERGY EFFICIENCY

ENVIRONMENTAL PROTECTION

Our business partners avoid hazards to people and the environment, minimize their impact on the environment and use resources sparingly. Our business partners' processes, operating facilities and resources comply with the applicable legal requirements and standards for fire and environmental protection. As part of their social and corporate responsibility, our business partners strive in particular to take measures to reduce energy consumption and greenhouse gas emissions, improve water quality, improve air quality, reduce waste, manage chemicals and manage natural resources.

Our business partners are also expected to work on the continuous improvement of their energy and environmentally relevant processes and products, ideally by providing evidence of suitable management systems for environmental protection and energy management (e.g. in accordance with DIN EN ISO 14001 or EMAS and/or ISO 50001).

The products and services provided by our business partners fulfill the requirements for environmental protection, energy efficiency, quality and safety agreed in the underlying contracts, which in any case must not be lower than the applicable general laws, standards and guidelines.

SUSTAINABILITY AND MATERIAL COMPLIANCE

Konvekta does not source its raw materials directly and is therefore itself a downstream customer. Accordingly, we expect our business partners to ensure sustainability and compliance with environmental, labor and safety standards throughout the entire supply chain of the raw materials used. We also expect our business partners to fully comply with all applicable standards in terms of material conformity for the sales markets in question. For the EU, these include, in particular but not exclusively (and in the versions and annexes valid at the time of delivery), the EU chemicals regulation

Code of Conduct for Business Partners

REACH Regulation (EC) No. 1907/2006, the Stockholm Convention Regulation (EC) 2006/507C on persistent organic pollutants, Regulation (EC) No. 1005/2009 on substances that deplete the ozone layer, the Global Automotive Declarable Substance List (GADSL), Directive 2002/95/EC on the restriction of the use of certain hazardous substances in electrical and electronic equipment and Regulation (EU) 2017/821 laying down supply chain due diligence obligations for Union importers of tin, tantalum, tungsten, their ores and gold originating from conflict-affected and high-risk areas.

LIVELIHOODS

Our business partners will avoid soil, water and air pollution as well as noise emissions and excessive water consumption if this impairs people's health, their natural basis for food production or their access to safe drinking water and sanitary facilities. Forced evictions and the unlawful seizure or conversion of land, forests or bodies of water whose use secures people's livelihoods must be avoided.

BUSINESS RELATIONSHIPS

AVOIDING CONFLICTS OF INTEREST

Our business partners make decisions on the basis of objective considerations and are not unduly guided by personal interests.

FREE COMPETITION / FAIR MARKET BEHAVIOUR

Our business partners behave fairly in competition and comply with the applicable legal regulations that protect free competition. Our business partners do not enter into any agreements or concerted practices with other companies that have the purpose or effect of preventing, restricting or distorting competition in accordance with the applicable antitrust regulations and do not illegally exploit any dominant market position.

CORRUPTION/CONFLICTS OF INTEREST

Our business partners ensure compliance with the applicable anti-corruption laws.

Our business partners strictly separate the interests of the company and the private interests of employees on both sides. Actions and (purchasing) decisions are made free of extraneous considerations and personal interests. Consequently, employees should not enter into any financial or other relationship with a business partner that affects the employee's obligation (to act in the interests of Konvekta). The responsibility for disclosing the private relationship lies with the business partner.

Code of Conduct for Business Partners

In business dealings, no personal benefits of monetary value, gifts, payments, invitations or services are offered or promised with the intention of improperly influencing a business relationship. This is generally not the case with gifts and invitations that are within the scope of customary business hospitality and courtesy. Cash and cash equivalents, such as vouchers, are generally not accepted. The rules described above also apply to gifts or courtesies sent to an employee's private address.

TRADE SECRETS

Our business partners ensure that Konvekta's confidential information is kept secret. This also applies after termination of the business relationship.

DATA PROTECTION

Our business partners ensure that transmitted data is secure with them. In particular, they are responsible for ensuring that personal data is protected against unauthorized access by third parties and that the necessary precautions are taken to prevent unauthorized use. They also oblige their employees to do this and ensure compliance with the relevant applicable statutory data protection provisions.

MONEY LAUNDERING

Our business partners comply with the relevant statutory provisions on the prevention of money laundering and combating the financing of terrorism.

DISCLOSURE OF INFORMATION

Our business partners have a responsibility to disclose financial and non-financial information in accordance with applicable laws and industry practice, including, but not limited to, information about their record keeping, health and safety practices, environmental practices, business activities, financial position and performance.

FINANCIAL RESPONSIBILITY

Our business partners fulfill their financial responsibilities by maintaining books and records in accordance with applicable law and generally accepted accounting principles. Transactions such as financial statements, quality reports, time records, expense reports, submissions to customers or regulatory authorities must be accurately recorded, maintained and, where appropriate, reported in accordance with the duties of a prudent businessman.

Code of Conduct for Business Partners

EXPORT AND IMPORT CONTROL / FOREIGN TRADE LAW

Our business partners comply with all applicable legal regulations for the import and export of goods, services and information. Our business partners monitor the foreign trade regulations applicable to them and their products worldwide and comply with them accordingly. This applies to goods as well as intangible goods and services. These include, in particular, regulations regarding military goods and civilian products that can also be used for military purposes (DUAL-USE) and restrictions for certain countries (such as arms or luxury goods embargoes).

INTELLECTUAL PROPERTY

COUNTERFEIT PRODUCTS

Our business partners shall develop, implement and maintain appropriate methods and processes for their products and services to minimize the risk of introducing counterfeit and pirated materials into deliverable products. In addition, our business partners shall establish effective procedures to detect counterfeit and pirated materials. Upon detection, the materials should be isolated and Konvekta and/or law enforcement authorities notified immediately. When selling products to Konvekta, it must be ensured that the products comply with the law and can be used by Konvekta and its customers in accordance with the law.

KNOW-HOW/PROPERTY RIGHTS/TECHNOLOGICAL DEVELOPMENT

Our business partners are obliged to treat information received from Konvekta on technology and/or know-how as confidential at all times, to respect Konvekta's industrial property rights and not to apply for any industrial property rights based on information shared with the business partner on technology and/or know-how without prior written consent. Our business partners undertake to support Konvekta at all times in the further development of the state of the art and the protection of intellectual property.

COMPLIANCE WITH THE CODE OF CONDUCT AND AUDIT

Compliance with this Code of Conduct can be verified at our business partner by means of an audit. For this purpose, Konvekta will coordinate with the business partner on the scope, time period and location. In the event of a suspected serious breach of this Code of Conduct, an audit may also be carried out unannounced under certain circumstances.

Code of Conduct for Business Partners

A breach of this Code of Conduct constitutes an impairment of the business relationship between Konvekta and the business partner. Without prejudice to further rights, Konvekta reserves the right in this case to demand that its business partner clarify the facts and take countermeasures. If the business partner demonstrably fails to initiate suitable remedial measures within a reasonable period of time or if the breach is so serious that Konvekta cannot reasonably be expected to continue the business relationship, Konvekta reserves the right, without prejudice to further rights, to terminate the contractual relationship concerned without notice or to withdraw from the contract concerned and/or to claim damages.

WHISTLEBLOWER AND COMPLAINTS SYSTEM

Konvekta enables not only its employees, but also its business partners and their employees and sub-suppliers/contractors, to confidentially report information on criminal offenses or serious misconduct that may have an impact on Konvekta, as well as information on environmental or human rights-related obligations arising from the business activities of Konvekta AG or its business partners, to a web-based whistleblower system at <https://konvekta-ag-661e36c8.portal.tacto.ai/en> also anonymously. Our business partners must inform their employees and sub-suppliers/contractors of this possibility.

Furthermore, KONVEKTA expects its business partners to create suitable whistleblower and complaint systems within their organizational structure. The business partners must carry out investigations on the basis of the information received there and, if necessary, take measures to remedy the situation.

Neither KONVEKTA AG nor its business partners accept any form of discrimination against persons who, to the best of their knowledge and belief, have addressed a justified tip-off or complaint to KONVEKTA or the respective business partner.

Questions or comments regarding compliance at KONVEKTA AG should be addressed to the following company compliance address:

compliance@konvekta.com

Schwalmstadt, 3rd June 2024