

Code of Conduct – General | intern

01/2024

1. PREAMBLE

BLÄSSINGER GROUP is committed to its social and environmental responsibility within the scope of its global corporate activities and holds its business dealings to high ethical standards.

BLÄSSINGER GROUP views this responsibility as a crucial component of value-based corporate management. In full awareness of its responsibilities, BLÄSSINGER GROUP has issued its own Code of Conduct, which sets out its expectations of itself and its actions. The key cornerstones of this Code of Conduct are the social and environmental responsibility to humans and nature, as well as ethically irreproachable business dealings.

BLÄSSINGER GROUP will do its utmost to combine the contents of its Code of Conduct within the framework of sustainable corporate development with the medium- and long-term strategic goals and planning, as well as with day-to-day corporate decision-making.

BLÄSSINGER GROUP sees this, along with open and fair global trade, as a crucial prerequisite for sustainable growth. It believes that long-term success can be ensured only through socially and environmentally responsible and ethically irreproachable action.

The binding rules set forth in the Code of Conduct apply to all companies within the BLÄSSINGER GROUP and provide guidance for corporate dealings and strengthen trust in BLÄSSINGER GROUP and its employees and their integrity.

The BLÄSSINGER GROUP expects all executive staff and employees at all levels to comply with the values and principles of the Code of Conduct and that the applicable laws, regulations and other legal rules are observed at all times.

The responsible parties in each case are the company management of the respective companies. Furthermore, BLÄSSINGER GROUP also expects its business partners to comply with these values and principles in all conduct and dealings.

2. VALUES AND PRINCIPLES

The BLÄSSINGER GROUP has defined the following values and principles:

2.1. Social Responsibility (Respect for Human Rights and Fair Working Conditions)

Respect for human rights and complying with fair working conditions are an integral component part of the corporate responsibility of BLÄSSINGER GROUP. BLÄSSINGER GROUP explicitly commits to comply with the United Nations' Declaration of Human Rights, the "UN Guidelines on Business and Human Rights", the ten principles of the "UN Global Compact" and the internationally acknowledged core labour standards of the International Labour Organization (ILO). This also applies if the following points do not specifically make reference to these rules, in particular to the core labour standards of the International Labour Organization (ILO).

2.1.1. Prohibition of Child Labour

BLÄSSINGER GROUP does not at any time employ children. This means that BLÄSSINGER GROUP does not employ any children who, pursuant to the laws of the place of employment, are subject to compulsory school attendance or are below the age of 15 years old (Cf. Convention 138 of the International Labour Organization (ILO) of 1973 on the Minimum Age for Admission to Employment and Convention 182 of the International Labour Organization (ILO) of 1999 on Immediate and Effective Measures to Secure the Prohibition and Elimination of the Worst Forms of Child Labour).

2.1.2. Prohibition of Forced Labour

BLÄSSINGER GROUP condemns any form of forced labour, slave labour or comparable work. All labour is voluntary and free from threat of punishment. Employees of BLÄSSINGER GROUP are free to end their employment and their work observing the applicable statutory notice periods in the place of employment. There is no unacceptable treatment of employees, such as physical hardship, sexual or personal abuse or degradation (Cf. e. g. Convention 105 of the International Labour Organization (ILO) of 1957 on the Prohibition of Forced Labour and Convention 29 of the International Labour Organization (ILO) of 1930 on forced or compulsory labour).

2.1.3. Prohibition of Discrimination and Respect for Workers

BLÄSSINGER GROUP observes the principle of equal opportunities and condemns discrimination and exclusion and supports integration and tolerance not only among its employees, but also between and with executive staff. Different treatment of employees based on gender, skin colour, disability, ethnicity, religion, age or sexual orientation or similar is not permitted. Discriminatory treatment specifically includes the payment of different wages for equivalent work (Cf. e. g. Convention 100 of the International Labour Organization (ILO) of 1951 on Equal Remuneration for Men and Women Workers for Work of Equal Value of 1951 and Convention 111 of the International Labour Organization (ILO) of 1958 on Discrimination in Employment and Occupation). Interaction between the employees and the company management is based on mutual respect, understanding and reciprocal trust in the interests of the attainment of the joint corporate objectives.

2.1.4. Fair Working Conditions (Wages and Working Hours)

BLÄSSINGER GROUP pays all employees an appropriate salary based on the wage agreement for the work concerned applicable at the place of work, but at least the applicable statutory minimum wage at the place of employment. If there is neither a wage agreement nor any statutory minimum wage, BLÄSSINGER GROUP will pay its employees such that their salary allows them to cover the basic costs of living (Cf. Convention 131 of the International Labour Organization (ILO) of 1970 on Minimum Wage Fixing, taking particular account of developing countries). There is not permitted to be any delay to salary payments. Other benefits (social security contributions and similar) must also comply with the basic principle of fairness

Code of Conduct – General | intern

01/2024

and comply at least with the applicable national statutory rules or the standard of the national economic sectors/industries. Furthermore, BLÄSSINGER GROUP will ensure compliance with the applicable national rules on working hours, overtime, breaks and regular paid holidays, as well as leaves of absence. For instance, working hours including overtime are not permitted to exceed the statutory rules and/or provisions of wage agreements at the place of employment.

2.1.5. Workplace Health and Safety

Workplace health and safety are also afforded the highest priority. BLÄSSINGER GROUP ensures that the requirements of the laws, regulations and other legal provisions on workplace health and safety applicable in the place of employment are observed at all times and without limitation, in particular that the workplaces, work processes and general work environment comply with the statutory requirements.

In addition, BLÄSSINGER GROUP will take all necessary measures to avoid accidents and health issues. BLÄSSINGER GROUP regularly educates and trains its employees on the applicable health and safety rules (Cf. Convention 155 der International Labour Organization (ILO) on Occupational Safety and Health of 1981 and Convention 187 of the International Labour Organization (ILO) on the Promotional Framework for Occupational Safety and Work of 2006).

BLÄSSINGER GROUP pays special attention to groups that are particularly worthy of protection, such as young people, pregnant women and those with an incapacity.

2.1.6. Freedom of Association / Right to Collective Bargaining

The employees have the right to set up associations or organisations at their own discretion with the aim of promoting and protecting the interests of the employees, to join and to act on behalf of the same. Employees may not suffer any disadvantage as a result of the exercise of these rights. BLÄSSINGER GROUP accepts the results of collective bargaining carried out on the basis of national rules, that affect BLÄSSINGER GROUP (Cf. Convention 87 of the International Labour Organization (ILO) on Freedom of Association and the Right to Organise Convention of 1948 and Convention 98 of the International Labour Organization (ILO) on the Right to Organise and Collective Bargaining of 1949).

2.1.7. Qualification of Employees

The existing skills and knowledge of employees are of outstanding importance for safeguarding the future of BLÄSSINGER GROUP at all sites across the globe.

Therefore, BLÄSSINGER GROUP supports and promotes measures to qualify the employees that are suitable for expanding and deepening the key professional and expert knowledge required for the work in question. Further education and training will be of vital importance to future development.

2.1.8. Destruction of Natural Habitats, Illegal Land Grabs

BLÄSSINGER GROUP observes the prohibition of causing any detrimental soil changes, water pollution, air pollution, harmful sound pollution or excessive water consumption that significantly impedes the natural resources for the maintenance and production of food, that prevents access to clean water, that impedes or destroys access to sanitary facilities or causes health risks.

BLÄSSINGER GROUP also observes the prohibition of illegal forced clearance and illegal seizure of land, forest and waterways when acquiring, building on or otherwise using land, forests and waterways upon which people rely for their livelihood.

2.1.9. Use of Security Forces

When commissioning private or public security forces to protect their premises BLÄSSINGER GROUP shall ensure that the security services are appropriately trained and supervised to ensure that during their work they at all times comply with the prohibition on the use of torture, cruel, inhumane or degrading treatment, do not cause damage to life or limb and do not restrict the right of association and the right to organise and bargain collectively.

2.2. Environmental Responsibility

BLÄSSINGER GROUP at all times and without restriction complies with all applicable laws, legal regulations and other legal rules on environmental protection, as well as with orders issued by the Environmental Protection Agencies.

2.2.1. Sustainability and Environmental Protection

The selection of products and services of BLÄSSINGER GROUP shall also in the future display environmental compatibility in line with our long term sustainability strategy, BLÄSSINGER GROUP is committed not only to improving the environmental impact of BLÄSSINGER GROUP, but also that of our customers through the products, technologies, and services supplied by us protection of the environment as well as improving living and environmental conditions are key corporate goals of BLÄSSINGER GROUP. To achieve and comply with the applicable international, European, and national environmental rules in practice, the BLÄSSINGER GROUP works closely with the competent local authorities.

2.2.2. Use of Resources

In all of their activities, the employees of BLÄSSINGER GROUP are jointly responsible for the reduction of waste, as well as for the reduction of energy use and water consumption.

2.3. Ethical Business Dealings

BLÄSSINGER GROUP at all times and without restriction complies with all applicable laws, legal regulations and other legal rules.

2.3.1. Integrity, Trust and Cooperation

The business practices of BLÄSSINGER GROUP comply with the values and rules of conduct of BLÄSSINGER GROUP.

The employees of BLÄSSINGER GROUP maintain integrity when dealing with others and also expect this integrity of their business partners.

BLÄSSINGER GROUP and its employees are a fair and reliable

Code of Conduct – General | intern

01/2024

partner. BLÄSSINGER GROUP firmly believes that transparency and trust provide the basis for successful cooperation.

2.3.2. IT-Security and Digitalization as well as Data Protection

BLÄSSINGER GROUP attaches great importance to high IT-security standards and ensures high levels of security in all digital solutions. Information and cyber security has the highest priority within BLÄSSINGER GROUP. To the best of its ability and in line with the applicable legal rules, BLÄSSINGER GROUP protects the data of its employees and the data of its business partners by means of technical and organisational security measures against unauthorised access, alteration, destruction and other misuse. BLÄSSINGER GROUP also complies with the statutory provisions on data protection, in particular the EU General Data Protection Regulation ("GDPR").

2.3.3. Fair Competition

All national and international competition and antitrust laws, legal regulations and other legal rules are observed and complied with by BLÄSSINGER GROUP and its employees. This includes all practices and behaviours that could result in a restraint of competition.

2.3.4. Tackling Corruption and Money Laundering

BLÄSSINGER GROUP refrains from any and all forms of corruption, extortion, embezzlement or bribery and will not at any time become involved with the same. In particular, there will be no prospect, promise, grant or acceptance of advantages in any form whatsoever with the purpose of exerting influence. Invitations and gifts are permissible only if the occasion and form are appropriate, such as if they are made in the course of customary business hospitality or politeness and are of low value. They must furthermore be transparent and in line with the applicable anti-corruption laws and with the internal rules (see the work regulations of BLÄSSINGER GROUP). In addition, BLÄSSINGER GROUP complies with all applicable rules to tackle money laundering and will not participate in such activities in any way.

2.3.5. Trade Sanctions, Export Controls and Customs

BLÄSSINGER GROUP complies with all foreign trade, export control and customs rules applicable in the countries in which it does business. To this end, a comprehensive Internal Compliance Program (ICP) for export controls has been set up. BLÄSSINGER GROUP ensures that business deals and activities both with third parties and within BLÄSSINGER GROUP do not contravene any foreign trade laws, export control laws and sanctions.

2.3.6. REACH, RoHS and Conflict Minerals

BLÄSSINGER GROUP pays special attention to ensuring that its suppliers are aware of the applicable statutory requirements and that the suppliers ensure compliance with those rules, in particular that the suppliers comply with the applicable version of Regulation (EC) No 1907/2006 (REACH) and Directive 2011/65/EU on the Restriction of Hazardous Substances (RoHS) (where applicable) and that the suppliers ensure that no conflict

minerals, that is minerals with respect to which there is a suspicion that the proceeds of their extraction are used to finance armed groups or conflicts, are used in the goods to be delivered to BLÄSSINGER GROUP, in particular tantalum, tin, tungsten, and their derivatives, as well as gold from the Democratic Republic of Congo (DRC) or its neighbouring states.

3. Measures for Compliance with and Implementation of the Values and Principles

BLÄSSINGER GROUP takes the following measures to uphold and implement the values and principles of this Code of Conduct.

3.1. Information within BLÄSSINGER GROUP

This Code of Conduct with its values and basic principles is made available to all company managers, stakeholders and employees across the group in suitable form. The communication and information measures for notification will be agreed accordingly.

3.2. Integration of Business Partners

BLÄSSINGER GROUP integrates its business partners that supply goods to BLÄSSINGER GROUP or provide services for BLÄSSINGER GROUP into the implementation of its values and principles and explicitly expects that its business partners integrate and comply with comparable values and principles with a comparable scope to those set out in this Code of Conduct in their own corporate policies. It views this as a favourable basis for future business dealings.

3.3. Reporting Misconduct of all Kinds – (Whistleblowersystem)

BLÄSSINGER GROUP affords great importance to an open corporate culture based on mutual trust. All employees have the right to talk about topics and problems relating to the values and principles set down in this Code of Conduct to report possible compliance risks (violations of the BLÄSSINGER GROUP Code of Conduct, human rights violations or illegal business practices, etc.) anonymously via the whistleblower system at www.blaessinger.whistleport.de. This also applies to our business partners and all other persons seeking to report potential compliance infringements and abuses at or by BLÄSSINGER GROUP.

3.4. Informing the Corporate Management, Further Development of the Code of Conduct

Within its capabilities, BLÄSSINGER GROUP ensures compliance with the values and principles set down in this Code of Conduct. Information on problems, deviations or necessary changes to these values and principles shall be collected by a central office on an ad hoc basis but at least once per year and discussed with the management of Josef Blässinger GmbH + Co. KG.