Code of Conduct for GOTEC Suppliers, Business Partners with intermediary function

This Code of Conduct defines the principles and requirements of GOTEC Gorschlüter GmbH and its affiliated companies (each separately) "GOTEC" to its suppliers and business partners with a mediator function regarding their responsibility to humans and the environment. With our corporate policy and our entrepreneurial actions in the sense of continuous improvement, we strive for a system of values and goals that is recognized by all employees and accepted as an obligation, with which we want to jointly realize investment in future-proof workplaces.

The GOTEC Group or its affiliates are committed to the ten principles of the UN Global Compact and expect the same from their contractors.

Environmental protection is more than just the fulfillment of legal requirements. It is a collaborative task in which each employee participates according to his / her responsibility, commitment, knowledge and abilities.

The main goals of our management policy are the avoidance or continuous reduction of environmental pollution as well as the energy and resource consumption in the production, use and disposal of the products. The impact of products on natural livelihoods is incorporated into business decisions. Nevertheless, the aspects of quality management are taken into account.

GOTEC reserves the right to change the requirements of this Code of Conduct in case of reasonable changes in the GOTEC Compliance Program. In this case, GOTEC expects its suppliers to accept such reasonable changes.

The supplier, service provider and / or business partner with intermediary function hereby declares:

Artikel I. Compliance with laws and regulations

- to comply with the laws and regulations of applicable jurisdictions, regardless of the resulting economic disadvantages;
- not to contravene legally enforceable regulatory requirements.

Artikel II. Prohibition of corruption, bribery or taking advantage

- not to tolerate in any way corruption, bribery or taking advantage of benefits in any way whatsoever, whether directly or indirectly, nor to offer, grant or promise benefits to public officials or private sector counterparties in order to influence actions or to gain an unfair advantage;
- to require employees and themselves and the Company's corporate bodies, as well as third parties (consultants, agents, etc.), to refrain from taking any advantage of doing business or
starting a business relationship that, under ordinary circumstances, is likely to influence business decisions;

- always to donate\(^1\) transparently as a social commitment and on a voluntary basis, without granting the expectation of a return and to document donations, recipients and donation confirmations accordingly.

**Artikel III. Fair competition, antitrust and intellectual property rights**

- to act in accordance with national and international competition rules and not to participate in pricing agreements, market or customer divisions, market arrangements or bid rigging;
- to respect the intellectual property rights of others;
- not to engage in any espionage, theft and other illegal methods of gathering information about competitors or their business activities, directly or indirectly;
- to treat Confidential Information entrusted by Customers, Suppliers and other third parties in the same way as his / her own information.

**Artikel IV. Conflicts of Interest**

- to avoid and, if necessary, immediately notify any conflicts of interest that may adversely affect business relations;
- not to discriminate against employees who report abuses or conflicts of interest.

**Artikel V. Respect for human rights and fundamental freedoms of workers**

- to promote equal opportunities and equal treatment of workers, regardless of their skin color, race, nationality, social origin, disability, sexual orientation, political or religious beliefs, gender or age;
- to respect the personal dignity, privacy and personal rights of each individual;
- not employing anyone against his will or forcing him to work;
- not to tolerate unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment or discrimination;
- not to tolerate behavior (including gestures, language and physical contacts) that is sexual, coercive, threatening, abusive or exploitative;
- to ensure adequate remuneration and ensure the statutory national minimum wage;
- to adhere to the maximum working hours laid down by law in each state;
- to the extent that it is legally permissible to recognize the freedom of association of employees and to neither favor nor discriminate against members of workers' organizations or trade unions.

\(^1\) see explanations
Artikel VI. Ban on child labor
- not to hire people who cannot show a minimum age of 15 years. In countries covered by the exception for developing countries under ILO Convention 138, the minimum age may be reduced to 14 years.

Artikel VII. Health and safety of employees
- to take responsibility for health and safety towards its employees;
- to contain risks and ensure the best possible precautionary measures against accidents and occupational diseases;
- to provide training and ensure that all employees are knowledgeable about occupational safety;
- to establish and apply an appropriate occupational safety management system.

Artikel VIII. Environmental protection
- to respect environmental protection with regard to legal standards and international standards;
- to minimize environmental impact and continuously improve environmental protection;
- to establish and apply an appropriate environmental management system;
- to handle resources (materials, air, water, energy, soil) with care;
- to consider the effects of our products on the environment right from the development stage;
- to possess environmentally relevant permits or certificates necessary to carry out the purchased activity.

Artikel IX. Data Protection
- to collect, store or process the personal data of employees, customers and business partners only if this is necessary for specified, unambiguous and legally permitted purposes;
- to support the security of data and processing through appropriate technical and organizational measures;
- to establish procedural inventories and fire extinguishing concepts in order to be compliant at all times with the EU General Data Protection Regulation (2016/679).

Artikel X. Supply Chain
- to adequately promote compliance with the contents of this Code of Conduct with its suppliers;
- to adhere to the principles of non-discrimination in supplier selection and supplier practices.
Artikel XI. Money Laundering

- to take all necessary measures to prevent money laundering within its sphere of influence

Artikel XII. Conflictminerals

- to take appropriate measures to prevent the use of raw materials in its products, which directly or indirectly finance armed groups that violate human rights.

If a court or other competent authority declares that one or more provisions of the Rules are invalid, void, invalid or unenforceable in whole or in part, this shall not affect the validity, validity or performance of any remaining provisions or the remainder of this Rule. In lieu of the invalid, invalid, void or unenforceable provision, any provision in the economic result that results is as close as possible to the effective, valid and enforceable provision.

Name of supplier

Name (block letters)

hereby confirms that she / he read, understood and implemented the above conditions.

Place, date

Signature
Company stamp
**Explanations**

1. The term "public official" must be interpreted broadly and, irrespective of the definition of the respective national legal system, always includes officials and employees of public authorities, public bodies, state-owned enterprises and international organizations, as well as deputies and candidates, representatives and employees of political parties.

2. In contrast to donations, the sponsoring provides a return service, for example in the form of communication or marketing activities, for the GOTE Group or individual companies. All sponsorship activities must be based on written contracts and must be proportionate to the sponsorship services. Sponsorship must by no means be used to circumvent the provisions governing donations.

3. An appropriate environmental management system includes:
   - an environmental policy (environmental policy);
   - Definition of responsibilities and tasks in environmental protection;
   - Ensuring that employees and managers with responsibilities in environmental protection or their activities have an impact on the environment, are qualified and know the environmental impact;
   - Assessing the environmental aspects of the activities, products and services;
   - Assessment of legal requirements, the obligation to comply with them;
   - Definition and implementation of procedures to meet environmental and environmental objectives and in relation to significant environmental aspects;
   - Internal requirements for environmentally friendly product design;
   - setting goals and programs to achieve the goals;
   - records of training on environmental protection;
   - emergency preparedness and security;
   - Regular monitoring of processes with a significant impact on the environment;
   - records of regular audits;
   - Assessments of the environmental management system.