

SUPPLIER CODE OF CONDUCT

KLINKMANN GROUP and its affiliates are committed to high ethical standards. Responsible business practices are fundamental to building trust and long-term value for our company and the communities in which we operate. Together we must take into consideration the impact of our activities on people and environment.

This Code of Conduct applies to all suppliers, subcontractors, and their employees who provide goods or services to Klinkmann Group. Compliance with these principles is a condition for doing business with us. Suppliers are responsible for ensuring that their own operations, as well as those of their subcontractors, adhere to the standards outlined in this document.

Klinkmann Group reserves the right to monitor compliance with this Code of Conduct. This may include requesting documentation, conducting on-site audits, or engaging third-party assessments. Suppliers are expected to cooperate fully with such reviews and take prompt corrective action if any non-compliance is identified.

OUR VALUES

Our values serve as the foundation for everything we do at Klinkmann Group. Our commitment to these principles ensures that we build lasting partnerships, foster innovation, and create a workplace where everyone feels valued and empowered to contribute their best. Our core values are:

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| Customers first | <i>Our success is driven by customers. We deliver solutions that exceed customer expectations.</i> |
| Future now | <i>We are energized by continuous improvement of our work throughout our operations. We shape future with next innovations.</i> |
| Winning together | <i>We do business in a responsible manner, encourage cooperation and teamwork throughout our ecosystem.</i> |
| Great place to work | <i>We are passionate about being a great place to work and becoming greater.</i> |

OUR COMMITMENT

We are committed to the fundamental principles of conduct. We expect all stakeholders — including suppliers, distributors, representatives, and partners—to consistently act with integrity, respect the fundamental rights of all individuals, and adhere to all applicable laws and regulations. Ethical behavior is central to our operations, and we strive to foster a culture in which responsible decision-making and business practices are the norm.

SOCIAL RESPONSIBILITY

We are committed to respecting and promoting human rights throughout our supply chain. Every employee must be treated fairly and equally, regardless of background or personal characteristics. The use of child labor, or any form of

modern forced labor is strictly prohibited. Suppliers must ensure that working conditions are safe, healthy, and supportive, and that all employees are treated with dignity and respect.

Compensation must meet or exceed legal wage requirements, and working hours must comply with applicable laws. Freedom of association and the right to collective bargaining must be respected. Harassment, discrimination, or any form of abuse will not be tolerated. Suppliers should promote diversity and inclusion, provide grievance mechanisms for employees, and ensure these principles extend to subcontractors. Suppliers are expected to implement policies and training to uphold these principles and to cascade these requirements to their own subcontractors.

ENVIRONMENT

We actively seek to minimize the environmental impact of our operations and products. Suppliers are expected to adopt sustainable practices, reduce waste, conserve resources, and continually look for ways to improve their environmental footprint. This includes responsible disposal of waste, improving energy efficiency, and efforts to reduce greenhouse gas emissions.

Compliance with all environmental laws is required, and suppliers should set measurable goals for reducing environmental impact. We encourage innovation and collaboration to develop strategies that support biodiversity and promote circular economy principles. Suppliers should also monitor and report their environmental performance when requested.

GOVERNANCE AND ETHICAL LEADERSHIP

We expect suppliers to maintain strong governance frameworks that ensure ethical practices are embedded throughout their organizations. This includes implementing policies and controls to manage risks, comply with laws, and uphold integrity in all operations. Suppliers should demonstrate transparency in decision-making, maintain accurate records, and establish clear accountability for compliance.

Suppliers must cascade these standards to their subcontractors and monitor adherence. They are expected to cooperate fully with audits or assessments and take prompt corrective action when issues arise. Continuous improvement in governance practices is encouraged, including regular reviews of compliance programs and training for employees.

BUSINESS CONDUCT

Responsible conduct in business means prioritizing ethical decision-making throughout all operations. We are committed to upholding human rights, actively preventing corruption and conflicts of interest, and safeguarding confidential information. Suppliers must never offer, give, or accept bribes, kickbacks, or any other improper payments or advantages. All business dealings should be transparent, honest, and compliant with applicable anti-bribery and anti-corruption laws.

Suppliers are also required to protect confidential information and personal data entrusted to them. This includes implementing appropriate measures to prevent unauthorized access, disclosure, or misuse of sensitive information, in line with relevant data protection regulations such as the GDPR. Intellectual property rights must be respected at all times.

We encourage fair competition and strive to align our practices with internationally recognized standards such as the United Nations Global Compact and the OECD Guidelines for Multinational Enterprises. This includes transparent dealings, honest communication, and a commitment to building trust with customers and partners.

INTELLECTUAL PROPERTY RIGHTS AND PUBLICITY

We strictly adhere to all applicable laws and international treaties regarding intellectual property rights. This means respecting and protecting our own intellectual property as well as that of third parties, including patents, trademarks, copyrights, and trade secrets. Unauthorized use or infringement of intellectual property is not tolerated. Furthermore, we ensure that any publicity or communications accurately represent our company and its values, avoiding misleading statements or misrepresentations.

LEGAL COMPLIANCE

Compliance with all relevant local and international laws and regulations is a non-negotiable requirement. This includes, but is not limited to, adhering to export control laws, international trade sanctions, labor regulations, and anti-bribery statutes. Our Code of Conduct establishes the minimum standards for behavior and does not supersede legal obligations. Stakeholders are expected to stay informed of all evolving legal requirements and ensure that their actions always remain within the boundaries of the law.