

## Foreward from the Board of Management

The reputation of our group of companies with our customers and within society and the trust placed in us by our stakeholders depend not only on the continuous achievement of our performance and service promises, but also, to a large degree, on the extent to which our employees and our suppliers, whose performance feeds into our value chain, take responsibility at all times for conduct that is focused not solely on compliance with national and international laws and regulations, but also recognizes and takes into account ethical, social and environmental values.

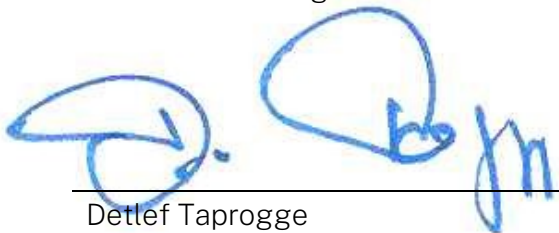
The positive expectations that our stakeholders have built up over many years and that are associated with the TAPROGGE brand can only be reaffirmed time and again if the values that TAPROGGE and its supply chain stand for, are visible and tangible for our partners at all times. These values and corresponding standards of behaviour are the subject of this Code of Conduct.

It defines standards of conduct that are binding as guidelines for every employee of the TAPROGGE Group and for each of our suppliers worldwide. It is intended to help both our employees and our suppliers to recognize legal, ethical, social and environmental issues and challenges in their daily work and to provide guidance on how to deal with them.

Every employee can approach their line manager with questions and comments. Wherever possible and to the best of our ability, we motivate and support our suppliers and business partners to introduce and implement similar principles in their companies.

Wetter (Ruhr, Germany), July 2024

TAPROGGE Management Board



Dettlef Taprogge  
Managing Director



Dr. Oliver Fröhling  
Managing Director

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## **1. Ethical Responsibility**

### **1.1 Fair Competition**

The standards of fair business activity and fair competition must be observed. In addition, the applicable antitrust laws must be applied, which, in particular, prohibit agreements and other activities that influence prices or conditions when dealing with competitors. These regulations also prohibit agreements between customers and suppliers that are intended to restrict customers' freedom to determine autonomously their own prices and other conditions when reselling.

### **1.2 Confidentiality and Data Protection**

Employees and suppliers undertake to meet the reasonable expectations of the client and employees with regard to the protection of private information. We and our suppliers must comply with data protection and information security laws and regulatory requirements when collecting, storing, processing, transmitting and sharing personal information.

Trade and business secrets, such as patents and inventions, must be treated confidentially. This also applies to other information that TAPROGGE, its contractual partners and customers have an interest in keeping confidential. Such information may not be passed on to unauthorized persons without permission. This obligation continues to apply to our employees after termination of the employment relationship. Every employee and supplier must respect the effective property rights of third parties; their unauthorized use must be avoided.

Personal data may only be collected, processed or used insofar as this is necessary for clearly defined and legitimate purposes. The use of data must be transparent for the data subjects, and their rights to information and rectification and, where applicable, rights to object, to restrict processing and to erasure, must be safeguarded.

### **1.3 Intellectual Property**

Intellectual property rights must be respected; technology and know-how transfer must be carried out in such a way that intellectual property rights and customer information are protected.

### **1.4 Integrity and Advantage**

In connection with business activities of any kind, no employee may provide business partners, their employees or other third parties with improper advantages. This also applies to our suppliers in their dealings with employees of our company. This is to be assumed, in particular, if the type and scope of this advantage lends itself to improperly influencing the actions and decisions of the respective recipient.

Third parties, such as consultants, brokers, agents or other intermediaries, may not be used to circumvent this regulation. In cases of suspicion, the Group will do everything necessary to clarify these matters and cooperate in a proactive manner with the relevant authorities. This also includes the voluntary provision of account information from the Managing Directors of all TAPROGGE Group companies as required.

The highest standards of integrity must be applied to all business activities. We and our suppliers have a zero-tolerance policy against all forms of bribery, corruption, blackmail and embezzlement. Procedures for monitoring and enforcing standards are in place to ensure compliance with anti-corruption laws.

## **2. Social Responsibility**

### **2.1 Legal compliance**

National and international laws and regulations govern how the TAPROGGE Group may sell its products and technologies or exchange information with customers, competitors and suppliers. The respective regulations are binding for our group of companies and its supply chain. Every employee and supplier is obliged to comply with them.

### **2.2 Social Acceptance**

Every employee respects and upholds the reputation of the TAPROGGE Group in society and is guided by this principle in the execution of their duties. Employees shall ensure that their public image does not damage the reputation of TAPROGGE. When expressing private opinions, employees must refrain from referring to their own role or activity within the company.

### **2.3 Human Dignity**

We and our suppliers are part of society and promote its positive development to the best of our ability. We respect the personal dignity of every individual and do not tolerate any form of discrimination. This applies both to internal cooperation and to our conduct towards employees and external partners. The culture of our company is committed to this principle.

### **2.4 Sustainability**

We are guided by the principles of sustainability because we are aware of the scarcity of resources and our responsibility towards future generations. We therefore ensure that our products and manufacturing processes meet the requirements of sustainable development in terms of the three building blocks of environment, economy and social responsibility. Every employee acts with this in mind at their workplace.

### **2.5 Donations and Sponsorship**

Companies and organizational units of the TAPROGGE Group do not make any direct or indirect donations to political organizations, parties or individual politicians. Any exception to this rule must be clarified in advance with the Business Administration department.

Sponsoring and donations to other, non-political recipients may not be used to circumvent the provisions of this Code of Conduct. As a general rule, every donation must always be transparent, i.e. the recipient of the donation and the specific use must be known and traceable.

### **3. Employee-related and Social Responsibility**

#### **3.1 Management Culture**

Every manager bears responsibility for the employees assigned to them. They must earn the recognition of their employees through exemplary personal behavior, performance, openness and social competence. The manager places trust in the employees and agrees clear and realistic goals, giving the employees as much personal responsibility and freedom as possible. The employees of the TAPROGGE Group think and act independently and with an entrepreneurial mindset within the scope of their respective responsibilities.

#### **3.2 Employee Progression and Development**

The success of the TAPROGGE Group is based on the knowledge, experience and commitment of each individual employee. The TAPROGGE Group invests in the qualifications and skills of its employees; commitment and performance are encouraged. This is how we ensure the future viability of the TAPROGGE Group. In order to maintain our quality standards, we also expect our suppliers to continuously develop their skills and capabilities.

#### **3.3 Fairness and Equal Opportunities**

Our recognition and development opportunities are the same for all employees - irrespective of nationality, culture, religion, ethnic origin, gender, sexual orientation or age. As a globally-active group of companies, we treat our employees fairly and openly, with understanding and tolerance. The Group expects every employee to deal with other employees and external partners in a professional, friendly and fair manner.

#### **3.4 Health and Safety**

All Group companies and employees must ensure a safe and healthy working environment. Strict compliance with our safety regulations and practices is an essential prerequisite. Employees are obliged to report violations of these principles immediately to the relevant departments within the company. Any irregularities must be rectified immediately.

#### **3.5 Avoiding Conflicts of Interest**

TAPROGGE expects its employees to be loyal to the company. All employees must avoid situations in which their personal or financial interests conflict with those of the TAPROGGE Group. In particular, it is prohibited to acquire an interest in the companies of competitors, suppliers or customers or to enter into business relationships with them in a private capacity, if this could lead to a conflict of interest. This is always the case if the nature and scope of a participation is in any way likely to influence actions in the exercise of activities at TAPROGGE.

Secondary employment that can be proven to have no influence on the work at TAPROGGE is not affected by this. Any existing regulations in the companies regarding the disclosure of secondary employment remain unaffected by this. No employee may accept benefits of any kind that could reasonably be expected to influence business decisions. Invitations must remain within the limits of customary business hospitality.

### **3.6 Elimination of Forced Labor**

In the same way as for our company, we expect our suppliers to prohibit forced labor, slave labor or comparable work. All work must be voluntary and without threat of punishment. Employees must be able to terminate their work or employment relationship at any time. There must also be no unacceptable treatment of workers, such as physical or psychological hardship, sexual harassment or humiliation.

### **3.7 Prohibition of Child Labor**

Child labor may not be used at any stage of our production. Our suppliers are required to comply with the recommendation of the ILO conventions on the minimum age for the employment of children. Accordingly, the age should not be lower than the age at which compulsory education ends according to the law of the place of employment and in any case, not below 15 years of age.

### **3.8 Fair Remuneration**

Remuneration for regular working hours and overtime must comply with the national, statutory, minimum wage or the minimum standards customary in the industry, whichever is higher. Remuneration for overtime must always exceed the remuneration for regular hours. Employees must be granted all benefits prescribed by law and/or collective agreements.

### **3.9 Fair Working Hours**

Working hours must comply with applicable laws or industry standards. Overtime is only permitted if it is voluntary and does not exceed 12 hours per week, while employees must be granted at least one day off after six consecutive working days. The weekly working time may not regularly exceed 48 hours. There must be compliance with the relevant working time legislation.

### **3.10 Freedom of Association**

The right of employees to form and join organizations of their choice, to engage in collective bargaining and to strike must be respected. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative possibilities for independent and free association of employees for the purpose of collective bargaining must be granted.

Employees must not be discriminated against on the basis of founding, joining or being a member of such an organization. Employee representatives must be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful manner.

### **3.11 Prohibition of Discrimination**

The unequal treatment of employees in any form is not permitted unless it is justified by the requirements of the employment. This applies, for example, to discrimination on the basis of gender, national, ethnic or social origin, skin color, disability, health status, political conviction, ideology, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

### **3.12 Occupational Health and Safety**

We and our suppliers are responsible for ensuring a safe and healthy working environment. The necessary preventive measures against accidents and damage to health that may arise in connection with the work are taken by establishing and implementing appropriate occupational safety systems. Suitable measures must be taken to prevent excessive physical or mental fatigue. In addition, employees are regularly informed and trained on applicable health and safety standards and corresponding measures.

## **4. Environmental Responsibility**

### **4.1 Conservation of Natural Resources**

We and our suppliers will not exploit land, forests or bodies of water whose use safeguards the livelihoods of people in violation of legitimate rights. Harmful soil changes, water and air pollution, noise emissions and excessive water consumption must be avoided if this harms people's health, significantly impairs the natural basis for food production or prevents people from having access to clean drinking water or sanitary facilities.

### **4.2 Treatment and Discharge of Industrial Waste Water**

Waste water from operations and manufacturing processes must be classified, monitored, checked and, if necessary, treated prior to discharge or disposal. In addition, measures should be introduced to reduce the generation of waste water.

### **4.3 Atmospheric Emissions**

General emissions from operations (air and noise emissions) and greenhouse gas emissions must be classified, routinely monitored, checked and, if necessary, treated before they are released. We and our suppliers monitor our respective waste gas purification systems and seek efficient solutions to minimize emissions as far as possible.

### **4.4 Waste and Hazardous Substances**

We and our suppliers follow a systematic approach to identify, handle, reduce and dispose of or recycle solid waste in a responsible manner. The prohibitions on the export of hazardous waste in the latest amendment to the Basel Convention of March 22, 1989, must be observed. Chemicals or other materials that pose a risk when released into the environment shall be identified and managed in a manner that ensures their safe handling, transportation, storage, use, recycling or reuse and disposal. Mercury shall be used in compliance with the prohibitions of the Minamata Convention of October 10, 2013 and persistent organic pollutants in compliance with the Stockholm Convention of May 23, 2001 as amended.

### **4.5 Raw Materials and Natural Resources**

The use and consumption of resources during production and generation of all types of waste, including water and energy, must be reduced or avoided wherever possible. This is done either directly at the point of origin or through procedures or measures, e.g. by changing production and maintenance processes or other operations in the company, by using alternative materials, by saving, by recycling or by reusing materials.

#### **4.6 Energy Consumption**

Energy consumption must be monitored and documented. Cost-effective solutions must be found to improve energy efficiency and minimize energy consumption at our company and our suppliers.

#### **4.7 Conflict Minerals**

For the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt, on a use-case basis, we and our suppliers establish processes for the fulfillment of due diligence to promote responsible supply chains for minerals from conflict and high-risk areas. Smelting plants and refineries without appropriate, audited due diligence processes should be avoided.

### **5. Compliance Monitoring**

The rules contained in this guideline form a core component of our corporate culture. Group-wide, consistent compliance with the standards of conduct is essential; each employee is jointly responsible for this within the scope of their respective workplace and environment. However, this should not restrict their scope for acting on their own responsibility within the permissible and possible framework.

The Management Board of TAPROGGE Gesellschaft mbH has instructed the Business Administration department to introduce the Code of Conduct within the TAPROGGE Group and to monitor compliance with the principles. The Management Board will be informed promptly in the event of any identified infringements, otherwise once a year.