GOLDBECK

Code of Conduct

for Business Partners

Version 05.05.2025

Definition of minimum standards for cooperation between business partners and GOLDBECK

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Foreword by the Management

The GOLDBECK Group attaches great importance to social and ecological sustainability in its co-operation with business partners as well as in the entire supply chain.

Our core values are humanity, responsibility, trust, performance and pioneering spirit. These five core values characterize our company and the way we interact with our customers, business partners, suppliers and employees. The Code of Conduct sets out our principles and values in concrete terms and defines minimum standards for cooperation with business partners (hereinafter referred to as "The Company").

Among other international guiding principles and standards, it is based in particular on the following:

// the United Nations Universal Declaration of Human Rights (UN-UDHR)

// the United Nations Guiding Principles on Business and Human Rights (UNGP)

// the conventions and recommendations of the International Labor Organization (ILO) on labor and social standards

// the United Nations Convention on the Rights of the Child (UN CRC)

// the United Nations Convention on the Elimination of All Forms of Discrimination against Women (UN-CEDAW)

// the Guidelines for Multinational Enterprises of the Organisation for Economic Co-operation and Development (OECD)

We recognize the responsibility of companies to respect all internationally accepted human rights and to prevent human rights violations, while it is the duty of the state to protect and ensure human rights.

This Code of Conduct is valid for any company that develops, produces, executes and/or markets goods or services for companies of the GOLDBECK Group. GOLDBECK obligates its suppliers as well as their sub-suppliers and subcontractors to comply with the following principles. The national and international relevant laws and regulations applicable in the respective countries of business activity as well as the principles contained in this Code of Conduct are to be complied with. Of all applicable regulations, the one best suited for the realization of the protective purpose shall always be complied with. This Code of Conduct has no protective effect for third parties and does not give third parties any claims against GOLDBECK.

Furthermore, the implementation and monitoring of the aforementioned standards shall be ensured by an appropriate in-house procedure. GOLDBECK is entitled to check this.

1 Labour and Human Rights

The company upholds the human rights of its employees and treats them with dignity and respect. This applies to all employees, including temporary and project workers, working students and subcontracted workers.

1.1 Permissible Working Hours

The company undertakes to comply with the statutory working time regulations, including overtime, break, rest and vacation times, as well as paid sick days and parental leave. Overtime is worked voluntarily by employees and is regulated by the employment contract or a company agreement.

1.2 Employment Relationship

The company recruits its employees based on documented employment contracts in accordance with the law.

1.3 Appropriate Compensation

The company respects the right of employees to appropriate compensation. Remuneration shall be paid in accordance with local laws, which include laws on minimum wage, overtime, and legally defined social benefits. In addition, the level of wages shall reflect the qualifications and educational level of employees. Furthermore, remuneration shall be based on regular working hours.

1.4 Occupational Safety and Health

The company ensures a healthy and safe working environment by assessing risks and taking all necessary measures to eliminate or mitigate these risks. It complies with national occupational health and safety regulations or, if national legislation is inadequate or poorly implemented, with international standards.

1.5 Freedom of Association

The company respects the right of employees to form trade unions or other forms of employee associations and to engage in collective bargaining in a free and democratic manner. There shall be no discrimination against employees based on trade union membership.

1.6 Prohibition of Child Labour

The company does not hire employees under the legal minimum age. Business partners comply with this principle by not directly or indirectly employing children under the le-gal minimum age, which may not be less than 15 years, unless the exceptions recognized by the ILO apply.

1.7 Protection of Minors

The company undertakes to comply with the national Youth Employment Protection Act and international standards, such as the United Nations Conventions on the Rights of the Child, if it hires underage employees. Mi-nors are not allowed to work at night. In addi-tion, they may not be exposed to dangerous, unsafe, or unhealthy conditions that jeopard-ize their health and development.

1.8 Free Choice of Employment

The company shall not resort to any form of servitude, forced or compulsory labour, peonage, human trafficking, or involuntary labour, in particular of a physical, psychological or financial nature. The company grants its employees the right to leave the workplace or terminate their employment, subject to compliance with the legal or contractual conditions.

1.9 No Discrimination

The company offers equal opportunities and prevents any form of discrimination against employees. In particular, no one is discriminated against, excluded,

or given preferential treatment based on ethnic origin or affiliation, religion, skin colour, age, gender, disability, nationality, sexual orientation, union membership, political views or marital status. This applies in particular to employee hiring, training, promotions and remuneration.

1.10 Humane Treatment

The company prohibits any activities or threats of human rights violations against employees. This includes sexual harassment, sexual abuse, physical reprimands, mental or physical coercion, and verbal assault and bullying.

2 Health and Safety

The company is committed to maintaining a work atmosphere that ensures the safety and health of their employees in their workplaces.

2.1 Safety at Work

The company respects all relevant regulations to protect the health and safety of their employees. If employees are exposed to potential safety risks, the company ensures that appropriate countermeasures are taken to ensure health and safety again.

2.2 Regulated Emergency Prevention

The company is committed to provide an emergency care that includes an emergency notification system, employee training, adequate fire alarm and extinguishment facilities, as well as appropriate evacuation arrangements.

2.3 Prevention of Industrial Accidents an Occupational Diseases

The company takes effective measures to prevent potential accidents, injuries and illnesses to employees that occur during or are related to their work.

2.4 Hazard Prevention

The company identifies, monitors and controls contact with, for example, biological, chemical, physical or ergonomic risks in order to prevent overexposure to working materials. If hazards cannot be eliminated by suitable control and countermeasures, adequate protective equipment is provided.

2.5 Compensation for Physically Demanding Work

The company identifies, assesses, and monitors potential hazards of physically demanding work. These include, for example, the manual transport of materials, heavy lifting, highly repetitive work, as well as standing for long periods of time or work that requires a high level of force. If hazards cannot be adequately eliminated, suitable countermeasures and protective devices must be installed.

2.6 Machine Safeguarding

The company identifies, evaluates, and monitors any hazards that may arise due to safety risks on machines. If risks cannot be sufficiently eliminated, suitable protective devices and interlocks must be installed and maintained accordingly.

2.7 Employee Information on Health and Safety

The company enables employees to participate in health and safety training. In addition, information related to health and safety issues is communicated to all employees.

3 Environmental and Climate Protection

The company is always aware of its responsibility towards the environment and has the ambition to protect the environment in the long term and thus preserve it for future generations.

3.1 Resource Consumption and Avoidance of Environmental Pollution

The company pursues the goal of avoiding and reducing environmental impacts of its business activities as far as possible. The locally and internationally applicable environmental standards and laws are recognized and complied with. This includes avoiding or continuously reducing harmful environmental impacts from the consumption of resources (including water and energy) and land use, emissions of greenhouse gases and air pollutants, as well as land and water spreading.

3.2 European Deforestation Regulation (EUDR)

The company supports the goal of deforestation-free supply chains. If the company falls under the regulation of the EU Deforestation Regulation (EUDR), it ensures that the raw materials relevant to GOLDBECK come from deforestation-free sources. It also ensures that the raw materials were not produced on land that was deforested after December 31, 2020. For wood and wood products, the company additionally commits to ensuring that these are sourced without damage to existing forests.

3.3 Hazardous Substances

The company shall ensure that substances that pose a health hazard are properly labelled, and their safe handling, movement, storage, reuse, and disposal is guaranteed.

3.4 Animal Welfare and Biodiversity

The company undertakes to fully comply with respective nationally applicable laws on animal welfare and protection and supporting the preservation of biodiversity.

3.5 Product Life Cycle

The company takes care of the entire product life cycle and thus of the environmentally compatible development and manufacture of its products as well as their transport, use and disposal.

3.6 Environmental Permits

The company ensures that all required environmental permits and approvals are in place and followed to in their current versions to always ensure legal compliance.

3.7 Climate Protection

The company actively supports long-term climate protection, for example by increasing energy efficiency or generating or purchasing energy from renewable sources.

3.8 Reduction of Packaging Waste

The company emphasizes the use of environmentally friendly packaging. To this end, packaging must be avoided wherever possible, reduced, or improved regarding its environmental effects. Waste must be avoided, responsibly disposed of and, if possible, recycled.

4 Fair Market Conduct

The company is aware of the following ethical standards and aligns its business activities accordingly.

4.1 Ethical Business

The company complies with national and international laws and behaves ethically. Ethically correct actions are in line with general principles and decent conduct. The company does not tolerate any form of corruption, extortion, embezzlement, or bribery. This includes any kind of illegal, immoral, and dishonest actions. The company also takes strict care not to become involved in money laundering activities.

4.2 Behaviour in Competition

The company is committed to fair competition and complies with applicable antitrust and competition laws. No anti-competitive agreements are made with competitors, suppliers, or customers. The company does not exploit an advantageous market position over other market participants.

4.3 Complaint Mechanism

The company is committed to provide a complaint mechanism for the prevention, investigation, mitigation, and redress of harm to employees. Appropriate remedial action shall be taken upon becoming aware of a violation of the requirements of the Code of Conduct.

In the event of violations by GOLDBECK, the whistleblower system is available to the business partner under the following link. The company must pass on information received from us about the accessibility of the complaint mechanism to its employees.

4.4 Data Protection and Data Security

The company undertakes to comply with the right to informational self-determination, the protection of personal data and the security of all business information in compliance with legal requirements and applicable data protection and information security laws in all business processes.

4.5 Conflict of Interest

The company acts impartially and objectively. It takes great care to ensure a strict separation of personal interests from the interests of the company. Private interests may not be pursued to the loads of the company.

5 Confirmation

The undersigned company and all affiliated companies (if existing) hereby confirm that they have read and understood the content of this Code of Conduct. Furthermore, the undersigned company confirms that it accepts this Code of Conduct and undertakes to fully comply with the aforementioned requirements.

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Company Name

_____ _____

Contact Person Position

_____ _____

Place, Date Signature

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