

Supplier Code of Conduct

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Preamble

This Supplier Code of Conduct defines the expectations and minimum requirements that Heiniger AG places on its suppliers, their partners and third parties (hereinafter "Suppliers"). Suppliers are expected to comply with international human rights standards, labor regulations, environmental responsibility and fair business practices. Heiniger AG welcomes it when suppliers and business partners go beyond these minimum standards. This Code of Conduct takes precedence over all existing agreements with our company and is available on our website.

1. Introduction

1.1 Our Commitments

Heiniger AG is firmly committed to promoting ethical and responsible business practices in all areas. This determination is deeply rooted in our corporate philosophy and shapes everything we do. Our Supplier Code of Conduct is a key element of this commitment and underlines our commitment to legal compliance, social responsibility, integrity and environmental protection. We believe it is important to respect human rights, protect the environment and promote ethical behavior throughout our supply chain. We are therefore guided by international standards such as the OECD Guidelines for Responsible Business Conduct and the UN Guiding Principles on Business and Human Rights and expect our suppliers to follow these principles as well. We would therefore like to extend these principles to our valued partners with this Supplier Code of Conduct. We believe that our shared commitment to ethical behavior and sustainability is critical to success. Together we can ensure that every action is in line with our shared vision of a responsible and sustainable future.

1.2 Expectations of Our Suppliers

We expect you to share and adhere to these commitments. It is essential that you ensure that your own suppliers and business partners also comply with equivalent standards. This Supplier Code of Conduct applies to all your activities within the scope of our business relationship and defines the minimum standards for your business conduct and practices that we expect from you.

1.3 Compliance and International Standards

Compliance with applicable national and international laws, regulations, and ordinances in the countries where you operate is mandatory. This includes, in particular:

- All applicable anti-corruption laws
- UN Guiding Principles on Business and Human Rights
- ILO Conventions on Fundamental Labor Standards
 - Elimination of all forms of forced labor (ILO Conventions 29 and 105)
 - Abolition of child labor (ILO Conventions 138 and 182)
 - Freedom of association and the right to collective bargaining (ILO Conventions 87 and 98)
 - Elimination of discrimination (ILO Conventions 100 and 111)
 - Creation of a safe and healthy working environment (ILO Conventions 155 and 187)

When interpreting this Code in comparison with applicable laws and regulations, you should always apply the stricter regulation.

1.4 Requests for Information

We reserve the right to inspect or audit your operations to verify compliance with this Code of Conduct. Upon request, provide all relevant records, such as ESG reports, policies, certifications, audit results, as well as information on material composition and origin. Measures to trace materials, minerals, and metals back to their source and processing sites are required. Ensure that your procurement activities are conducted responsibly and do not contribute to armed conflicts or human rights violations. Upon request, provide risk assessments and due diligence measures for high-risk materials, minerals, and metals. In case of violations, corrective actions must be implemented within the agreed deadlines.

1.5 Continuous Improvement

The continuous improvement of your business practices, including compliance with this Supplier Code of Conduct, is a high priority for us. We expect you to regularly review and assess your processes to identify areas for improvement and implement appropriate corrective and preventive measures to ensure ongoing compliance with the Code of Conduct. Upon request, you must disclose your internal program to ensure continuous improvement or compliance with this Code of Conduct or an equivalent one.

2. Specific ESG-Expectations

2.1 Environment

2.1.1 Environmental Responsibility (Sustainable Procurement)

Environmental responsibility is of utmost importance to us. We support measures that contribute to the reduction of biodiversity loss and comply with all applicable laws, including the upcoming EU legislation aimed at preventing deforestation and forest degradation. All activities related to the handling, transportation, storage, reuse, recycling, or disposal of waste and wastewater must be conducted in strict accordance with applicable regulations and standards. We expect you to operate your business in an environmentally responsible manner, which includes the efficient use of natural resources, minimizing waste and emissions, and promoting resource efficiency.

2.1.2 Climate Action and Energy Usage

We strongly encourage you to actively contribute to the reduction of greenhouse gas emissions and support the transition to a low-carbon economy. Furthermore, close collaboration with your partners in the supply chain is essential to establish sustainable practices, promote the use of renewable energy sources, and implement responsible procurement processes that consider environmental, social, and ethical criteria.

2.1.3 Dangerous Substances to Humans and the Environment

We prohibit the use of substances that are hazardous to humans and the environment within our supply chain, in line with the Minamata Convention on Mercury, the Stockholm Convention on Persistent Organic Pollutants, and the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal, to the extent possible.

2.1.4 Compliance and Control

We expect you to obtain and maintain all necessary environmental permits, licenses, and registrations. You must ensure that wastewater, solid waste, air emissions, and hazardous substances are properly monitored and handled. Compliance with specific regulations and labeling laws for the recycling and disposal of hazardous substances is mandatory.

2.2 Human and Labor Rights

2.2.1 Adherence to the ILO Core Labor Standards

With regard to workers' rights, you must ensure that the fundamental labor standards of the ILO are upheld in all your business activities:

- Elimination of all forms of forced or compulsory labor (ILO Conventions 29 and 105)
- Effective abolition of child labor (ILO Conventions 138 and 182)
- Freedom of association and the right to collective bargaining (ILO Conventions 87 and 98)
- Elimination of discrimination (ILO Conventions 100 and 111)
- Creation of a safe and healthy working environment (ILO Conventions 155 and 187)

It is of utmost importance that you take the necessary steps and due diligence measures to ensure these standards in your supply chain.

In particular, the following requirements must be met:

2.2.1.1 Prohibition of Child Labor

In accordance with international labor standards, you must ensure that no person under the age of 15 or under the age required to complete compulsory education, whichever is higher, is employed.

If you or your suppliers employ young workers aged 15 to 18, you must prove that this employment contributes to their personal education and does not expose them to undue physical risks that can harm mental, physical or emotional development. Young workers are especially not allowed to work night shifts or engage in work with hazardous conditions.

2.2.1.2 Protection against Slavery and Forced Labor

You shall prohibit the use of slavery, servitude, and forced or compulsory labor in all areas of your business operations and supply chain. This includes, but is not limited to, human trafficking, debt bondage, and other forms of modern slavery. You must ensure that employees are not required to provide deposits, such as passports, bankbooks, or other personal documents, as a condition of their employment and ensure that workers are free to choose their employment and leave after a reasonable notice period.

You must not impose production targets or performance requirements that encourage forced labor or result in exceeding reasonable working hours and rest days. The use of violence, threats, punishment, confinement, or other forms of intimidation to discipline or control employees is strictly prohibited under any circumstances.

2.2.1.3 The Right to Form Trade Unions and Workers' Representations

You recognize and respect the right of all workers in your operations and supply chain to form, join, or support trade unions of their choice without fear of reprisal, interference, intimidation, or harassment. This includes full respect for freedom of association and recognition of the right to collective bargaining. You must ensure that workers can negotiate their working conditions collectively and that their representatives have access without discrimination to all necessary workplaces to carry out their representative function.

2.2.1.4 Protection of Fair Wages and Working Conditions

You must ensure fair working conditions, including equitable remuneration. Working hours must not exceed the legally permissible limits, overtime should be voluntary, and employee compensation must comply with applicable regulations and standards. You must ensure that wages are paid regularly, punctually, and in full in accordance with the applicable laws. Compensation and other benefits should be fair and equitable, enabling employees and their families to maintain an adequate standard of living. In the case of production or unit-based remuneration, the wage rate must be set so that the employee earns at least the applicable minimum or collectively agreed wage, whichever is higher, during regular working hours.

2.2.1.5 Freedom from Discrimination and Promotion of Diversity, Equality, and Inclusion

You are committed to treating your employees and the employees within your supply chain with dignity, respect, and integrity, and you ensure that:

- All forms of psychological, physical, sexual, or verbal abuse, intimidation, or harassment are not tolerated.
- The privacy rights of your employees are fully respected when collecting personal data or implementing employee monitoring measures.

Furthermore, we strongly encourage you to take concrete steps and implement appropriate measures to actively promote diversity, equality, and inclusion within your workforce.

2.2.1.6 Occupational Health and Safety and Related Health Hazards

You must ensure a safe and healthy working environment for all employees by minimizing risks and ensuring compliance with all applicable health and safety laws as well as international standards. This includes maintaining appropriate hygiene, heating, ventilation, and lighting conditions in all work and living spaces. In addition, you are responsible for regularly identifying, assessing, and minimizing potential health risks associated with your operations. These include exposure to toxic chemicals, excessive noise, mechanical hazards, and unsanitary conditions. Preventive measures should be implemented and regularly reviewed for effectiveness. To respond to emergencies and accidents, clear and effective procedures must be established and regularly practiced. This includes providing easily accessible first aid, emergency exits, fire prevention measures, and evacuation plans. A trained emergency team and the necessary equipment to handle potential crisis situations must also be in place. Furthermore, you are required to conduct regular health monitoring for employees exposed to hazardous working conditions. Personal protective equipment (PPE) must be provided to employees free of charge, and they must be trained in its proper use.

2.2.2 Respecting Universal Human Rights

You respect the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights in all your business activities and take the necessary measures to ensure these standards are upheld throughout your supply chain. All employees, particularly security personnel, must undergo regular and mandatory training on the importance of human rights in your operations. The following requirements must be specifically observed:

2.2.2.1 Protection against Torture and Inhumane Treatment

You strictly prohibit any form of torture, cruel, inhuman, or degrading treatment or punishment in your operations. This includes physical, psychological, and emotional abuse. The dignity and human rights of all individuals, including employees and affected third parties, must be respected and protected under all circumstances. Additionally, you are responsible for ensuring that your security personnel, whether internal or external, uphold the highest standards of professional conduct. This includes comprehensive training in human rights principles, particularly the prohibition of torture and inhuman treatment. Security personnel must be clearly informed that any such behavior is unacceptable and will result in severe consequences.

2.2.2.2 Protection against Unlawful Taking of Land

You must demonstrate that you respect (community) land rights and the free, prior, and informed consent of local communities regarding land use for your operations. Additionally, you must be able to provide

official documentation proving your entitlement to use the land. The unlawful expropriation of land or the forced displacement of individuals or communities is strictly prohibited.

2.2.2.3 Prohibition of Causing any Harmful Soil Change or Water Pollution

Suppliers should take measures to avoid harmful impacts or contamination of soil or water that could compromise food sources, access to clean drinking water, or sanitation facilities, or pose a threat to human health overall.

2.2.3 No Contribution to the Sourcing and Trade of Conflict-Minerals and Metals

You must ensure that the minerals and metals you source or trade do not originate from conflict-affected or high-risk areas where their extraction, trade, handling, or export could finance armed groups or contribute to human rights violations. This applies particularly to tin, tantalum, tungsten, and gold.

You are required to conduct thorough due diligence on your supply chains to document and verify the origin of minerals and metals, ensuring they are conflict-free. This involves maintaining transparent, detailed, and accessible records of your sourcing and supply chain practices.

To achieve this, you must implement and adhere to responsible sourcing practices aligned with internationally recognized frameworks, such as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. This includes collaborating with relevant stakeholders to promote the legitimate and conflict-free trade of minerals.

2.3 Ethical Conduct

2.3.1 Business Ethics and Fair Competition

We expect you and your suppliers to conduct your business according to the highest ethical standards, ensuring fair business practices, honest advertising, and fair competition while strictly complying with national and international antitrust laws.

In particular, we require that you do not engage in unlawful price and bid rigging. Furthermore, you must ensure that all statements, communications, and representations made to our company and our customers are accurate, complete, and truthful. Avoid potential conflicts of interest and inform us in advance should any arise.

2.3.2 Intellectual Property and Confidentiality

You are obliged to respect intellectual property rights and to protect confidential and proprietary information of our company and third parties. Intellectual property rights must also be protected in the event of technology transfers and the exchange of know-how. We expect you to comply with national and international data protection and information security laws and regulations when handling personal data and to ensure that intellectual property is not misused, stolen or disclosed without authorization.

2.3.3 Anti-Corruption

You are prohibited from offering, paying, soliciting or accepting bribes or other illegal inducements in business or government relationships. You must also ensure that your business partners do not use illegal inducements by applying and documenting appropriate and effective due diligence. Compliance with all relevant national and international anti-bribery and anti-money laundering laws is mandatory.

2.3.4 Books and Records

You are required to maintain accurate and reliable financial and business records and ensure that all documents submitted to our company are complete and accurate.

3. Procedural Aspects

3.1 Communication and Collaboration

All employees, business partners, representatives and suppliers must know and understand this Code of Conduct. Effective communication channels and clear instructions on compliance must be ensured. You are required to implement robust mechanisms for compliance with this Code of Conduct both in your operations and in your supply chain. This includes regular audits to prevent and mitigate risks and transparent documentation of the results. You must support your suppliers to understand and comply with the requirements. We expect active cooperation in sharing relevant information and resolving compliance issues. Sharing best practices and continuous collaboration are critical to maintaining high standards.

3.2 Grievance mechanism and protection against retaliation

They are obliged to provide a complaints mechanism that is easily accessible to employees and affected groups and allows anonymous reporting. Complaints must be handled promptly, fairly and confidentially. The mechanism must be communicated in local languages and made available in easily accessible

locations so that all affected parties are aware of its existence and use. A clear policy against retaliation must be in place to ensure the protection of complainants. All complaints must be documented, tracked and resolved through appropriate measures to ensure complainant satisfaction.

3.3 Complaint Channel

Complaints, whistleblowing incidents or compliance violations in connection with this Supplier Code of Conduct can also be reported directly to us if required:

> compliance@heiniger.com

4. Acceptance and Consequences

By accepting our business partnership and continuing to work with us, you agree to comply with this Supplier Code of Conduct. You agree to promote ethical behavior, sustainability and responsible business practices as described in this Code and in applicable laws and regulations governing your operations and supply chains. Non-compliance with the Code of Conduct for Suppliers may result in measures being taken to rectify the violations. In particularly serious cases, this may also result in the end of the business relationship.

This version of the Code of Conduct for Suppliers, Service Providers and Business Partners of Heiniger AG comes into force on January 1st, 2025.

Daniel Heiniger
CEO Heiniger AG