

Code of Conduct

1. Introduction

Euscher GmbH & Co. KG (hereinafter referred to as “Euscher”) places great importance on sustainable corporate development as a family-owned business that takes responsibility. Our business partners and employees can rely on all decisions and actions being based on the corporate values of honesty, courage, and helping one another.

In our business decisions, particularly when selecting and evaluating new and existing suppliers and business relationships, we consider not only economic criteria but also, in particular, respect for human rights, environmental protection, labor and social standards, and anti-corruption and anti-discrimination requirements.

This Code of Conduct (hereinafter referred to as the “CoC”) serves as a binding guide for all employees on responsible conduct regarding working conditions, social and environmental compatibility, sustainability, and trusted cooperation.

Euscher expects all employees to act responsibly and commit to the fundamental principles and values set out in this CoC. If other provisions or laws impose stricter requirements, those requirements take precedence over this CoC.

2. Scope

This CoC applies to all locations, business units, and employees of Euscher GmbH & Co. KG worldwide. All employees are required to know, implement within their respective areas of responsibility, and comply with the fundamental principles and values set out in this CoC.

Within their respective roles and scope of influence, employees help ensure that the principles of this CoC are also considered and observed by suppliers, service providers, other business partners, and throughout the wider value chain. The following principles and requirements are an essential part of internal collaboration and business relationships between Euscher and its business partners.

All employees are required to align their professional conduct with the minimum standards below and comply with them. All applicable laws and regulations must be observed. Euscher expects all employees to commit to the principles of this CoC and act in accordance with them at all times.

3. Human and Labor Rights

Euscher expects all employees to respect the United Nations International Bill of Human Rights, taking into account applicable country-specific and site-specific laws. The fundamental labor rights established by applicable national legislation and the core labor standards of the International Labour Organization (ILO) are also recognized and upheld. Regulatory requirements relating to due diligence in the supply chain must additionally be observed and implemented within each employee's area of responsibility. All employees must respect the rights of third parties in accordance with international standards, help remedy any adverse impacts, and minimize such impacts while they persist.

In addition, the following human rights principles are binding on all employees:

3.1 Occupational Health, Safety, and Fire Safety

All employees are required to contribute to a safe work environment and humane working conditions. Effective preventive measures must be taken to prevent, to the greatest extent possible, potential health and safety incidents and work-related illnesses that may arise in the course of work.

Euscher complies with occupational health and safety obligations applicable at each place of employment, based on the requirements of ISO 45001. All employees must comply with the relevant internal requirements and observe and implement appropriate fire prevention measures and precautions. Compliance with national occupational health, safety, and fire safety laws is mandatory for all employees.

3.2 Ethical Recruitment

Employees are recruited lawfully, in accordance with international labor standards, and in a fair and transparent manner that respects human rights. All employees involved in recruitment and hiring processes must observe these principles.

Recruitment is considered unethical in particular when it involves:

- misleading or deceiving prospective employees about the nature of the work;
- requiring payment of recruitment fees; and/or
- confiscating, destroying, concealing, and/or denying access to passports or other government-issued identification documents.

At the start of their employment, employees must receive a written contract in a language they understand that truthfully and clearly sets out their rights and obligations.

3.3 Prohibition of Forced Labor and Modern Slavery

All employees must reject and must not support any form of slavery, slavery-like practices, servitude, or other forms of domination or oppression.

The principle of freely chosen employment and work must be upheld. This excludes any work or service demanded from a person under threat of penalty when that person has not offered themselves voluntarily. Exemptions apply to work or services consistent with Article 2(2) of ILO Convention No. 29 or Article 8(3)(b) and (c) of the International Covenant on Civil and Political Rights.

3.4 Prohibition of Child Labor and Protection of Young Employees

Euscher strictly prohibits all forms of child labor. All employees must uphold this prohibition within their own areas of responsibility and take it into account when selecting and working with business partners.

A child is defined as any person under the age of 15, unless local law sets a higher minimum age for employment or compulsory schooling. In that case, the higher age applicable at that location applies. Exceptions are permitted only as provided for in ILO Recommendation No. 146 and Articles 2(4) and 4 through 8 of ILO Convention No. 138. ILO Convention No. 182 on the elimination of the worst forms of child labor must be fully observed.

Special protection must be provided to employees under 18 years of age. They may not perform work that endangers their physical or mental development. It must be ensured that young employees do not work overtime or night shifts.

3.5 Equal Opportunity and Prohibition of Discrimination

Euscher strictly rejects all forms of discrimination in the workplace. All employees must treat others respectfully and equally and ensure that no one is disadvantaged, favored, or harassed on the basis of sex, age, skin color, sexual identity, religion, beliefs, political opinion, social origin, national or ethnic origin, membership of a national minority, citizenship, health status, disability, membership in employee organizations (including unions), pregnancy, veteran status, other legally protected characteristics, or other personal characteristics under ILO Convention No. 111.

3.6 Reasonable Working Hours

Euscher ensures compliance with applicable laws, collective bargaining agreements (where applicable), and industry standards concerning working hours, breaks, and public holidays. All employees, and managers in particular, must comply with the applicable rules and ensure compliance within their areas of responsibility.

3.7 Fair Compensation and Benefits

Euscher guarantees all employees the right to a minimum wage. Pay must be at least equal to the applicable national or local statutory minimum wage and must provide a living wage.

A living wage is fair compensation that enables employees and their families to achieve an adequate standard of living. This includes the costs of food, housing, clothing, health care, education, transportation, and other basic needs. Pay should also allow for unexpected expenses and modest savings within regular working hours, without requiring ongoing overtime.

Wages must be paid on time, in full, and regularly, in a transparent manner and in legal tender. All employees involved in setting, calculating, or paying compensation must observe these principles.

3.8 Protection Against Forced Eviction and Land Grabbing

Euscher and its agents must not carry out unlawful forced evictions or unlawfully deprive people of land, forests, or bodies of water on which their livelihoods depend. All employees must observe these principles in their activities and decisions.

3.9 Use of Private and Public Security Forces

Security forces must not be engaged or used if, due to inadequate instruction or oversight by Euscher, their deployment creates a risk of torture, cruel, inhuman, or degrading treatment, injury to life or limb, or impairment of freedom of association and collective bargaining.

All employees responsible for engaging, selecting, or monitoring security forces must ensure that these principles are taken into account.

4. Environmental Protection

As a responsible family-owned business with international value chains, Euscher attaches particular importance to the global challenge of environmental protection. All employees are therefore encouraged to promote environmental responsibility through responsible conduct, prevent and reduce pollution, and support the development and dissemination of environmentally friendly and innovative technologies.

Euscher requires compliance with applicable national energy and environmental laws, regulations, and standards, as well as the requirements of ISO 14001 and ISO 50001. All employees must implement and comply with the relevant internal requirements within their areas of responsibility.

The following environmental obligations must be observed:

4.1 Protection of Natural Resources and Ecosystems

Euscher is committed to sustainable resource management. All employees must help prevent harmful soil changes caused by land use or deforestation, water pollution, air pollution, harmful noise emissions, or excessive water consumption that destroy the natural resources essential to life.

This includes situations in which natural resources essential to biodiversity and food production are significantly impaired, a person is denied access to safe drinking water, access to sanitation facilities is obstructed or destroyed, or health is harmed.

4.2 Animal Welfare

Euscher is committed to respecting the protection and welfare of animals in its business operations and supply chains. All employees must take these principles into account within their respective roles and responsibilities.

Animals must be kept and treated in accordance with internationally recognized animal welfare principles to ensure their well-being at all times. This includes, in particular, adequate nutrition, species-appropriate housing, protection from pain, suffering, injury, and fear, and the opportunity to engage in species-typical behaviors.

Where animal-derived raw materials, auxiliary materials, or other materials are used, all applicable legal animal welfare requirements must be observed. Employees involved in procurement decisions must promote responsible and ethically acceptable procurement practices.

Euscher establishes appropriate measures to prevent violations of recognized animal welfare standards within its supply chain and to adequately address risks related to animal welfare and biodiversity.

4.3 Prohibition of Substances of Concern

Euscher is committed to complying with all applicable national and international conventions, regulations, directives, and laws concerning substance prohibitions, restrictions, and declaration requirements, as well as applicable standards governing substance bans and declarations.

Employees whose activities are affected must stay informed of relevant changes and new requirements and ensure that they are implemented on time.

4.4 Climate Protection and CO₂ Management

In line with Euscher's corporate strategy, the goal is to manufacture the best products and provide the best services with the lowest possible environmental impact, with the aim of making them fully CO₂-neutral.

All employees must use energy efficiently and, within their respective roles, implement effective measures to reduce direct and indirect CO₂ emissions in line with the Paris Agreement, while promoting the use of renewable energy sources.

Euscher promotes transparency regarding its own emissions and emissions associated with upstream activities. Employees responsible for this support the collection and provision of the necessary information.

4.5 Circular Economy

Euscher expects measures to be established to develop circular processes and products. All employees are encouraged to contribute to implementing these measures within their roles.

Negative environmental and climate impacts must be minimized or eliminated through measures such as modifications to production processes, material substitution, preservation, and recovery.

The practices used should follow circular economy principles. These include material reduction and substitution, as well as return, sharing, maintenance, reuse, resale, remanufacturing, refurbishment, and recycling.

4.6 Waste Management

Euscher ensures that effective mechanisms are in place to reduce waste in the production process and that waste is handled, collected, stored, and disposed of in an environmentally sound and proper manner. The same applies to chemicals used and wastewater.

All employees must comply with applicable waste management requirements and contribute to waste reduction and proper disposal within their roles.

All applicable national and international conventions, regulations, directives, and laws must be observed. This also includes the prohibition on importing and exporting hazardous waste.

4.7 Environmentally Friendly Production and Products

Euscher expects resources such as energy, water, and raw materials to be used efficiently and responsibly throughout the production process.

All employees must take into account the environmental standards of the relevant market segment when developing, manufacturing, procuring, and supplying products. This applies to the entire product life cycle and includes all materials and assemblies used in the production process.

4.8 Product Safety and Quality

All products manufactured and delivered, and all services provided, must meet the quality and safety criteria required by law, established by the published state of the art, and specified in contracts.

All employees must comply with the quality and safety requirements applicable to their areas of responsibility and address any identified deviations through the established processes.

During the use phase, products and services must be safe to use for their intended purpose.

5. Ethical Business Conduct and Corporate Integrity

Ethical business conduct is an essential part of Euscher's responsible business practices in an international context. All employees must act in accordance with the fundamental principles of ethical business conduct.

Euscher's business activities must take into account the OECD Guidelines for Multinational Enterprises. In addition, all applicable laws, directives, and regulations must be observed in the countries where Euscher operates or is established. Appropriate measures must be taken to ensure compliance with these laws, directives, and regulations.

5.1 Prohibition of Corruption and Bribery

Euscher is committed to complying with United Nations (UN) conventions and supports the OECD guidance on combating corruption, as well as relevant anti-corruption laws.

All employees must reject every form of corruption, bribery, facilitation payments, theft, embezzlement, fraud, or extortion.

Illegal payments or the granting of other benefits to individuals, companies, customers, public officials, or other third parties with the aim of influencing decision-making are likewise not tolerated.

5.2 Prevention of Money Laundering

All employees must ensure compliance with applicable legal provisions on preventing money laundering and terrorist financing. Money laundering refers to the process of introducing illegally obtained funds and assets into the legitimate economy.

5.3 Financial Responsibility and Accurate Records

Euscher is committed to properly, completely, and transparently documenting its business processes and maintaining books and records in accordance with applicable legal requirements and generally accepted accounting principles.

This includes, in particular, financial records, quality documentation, time records, expense reports, and other business- and compliance-related documents.

All employees must accurately record, document, and retain business transactions in accordance with applicable requirements to ensure transparency, traceability, and integrity at all times.

Appropriate measures must be followed and supported to prevent falsification, misleading statements, fraud, or intentional manipulation of records.

5.4 Disclosure of Information

Euscher ensures appropriate transparency regarding its business activities and the implementation of legal, regulatory, and sustainability-related requirements.

All employees responsible for providing or disclosing such information must disclose financial and non-financial information accurately, completely, and on time, in accordance with applicable legal requirements and industry standards.

This particularly concerns information about working conditions, occupational health and safety, environmental and climate protection measures, business ethics, supply chain practices, and the company's financial position and performance, where disclosure is required by law or necessary for the business relationship.

5.5 Fair Competition

All employees must comply with all applicable laws designed to promote and protect competition, particularly antitrust laws.

Euscher and its employees respect free and fair competition. No anti-competitive agreements may be entered into with third parties, and no dominant market position may be abused.

5.6 Import and Export Controls

Euscher ensures strict compliance with all applicable laws governing the import and export of goods, services, and information.

All employees involved in such activities must observe applicable national and international regulations and nationally and internationally established sanctions lists.

5.7 Avoidance of Conflicts of Interest

All employees must make decisions related to their business activities solely on the basis of objective criteria.

Conflicts of interest involving personal matters or other economic or non-economic activities—including those of family members, close associates, or organizations—must be avoided from the outset.

5.8 Protection of Confidential Information and Intellectual Property

All employees must treat as confidential all non-public commercial and technical information they learn through their work or business relationships.

Confidential information may not be published, disclosed to third parties, or otherwise made available without authorization.

With respect to protected data, employees must ensure that it is properly collected, processed, stored, or deleted.

5.9 Prevention of Plagiarism and Counterfeit Materials

Euscher establishes appropriate measures and processes to minimize the risk of using or passing on plagiarized works, counterfeit products, or counterfeit materials within its supply and value chains.

All employees involved in procurement, production, quality inspection, or the transfer of materials and products must follow the established procedures and processes. These include, in particular, appropriate supplier evaluation, material inspection, and traceability procedures, as well as measures to ensure the authenticity and conformity of products, materials, and components used.

Effective processes for identifying, isolating, and reporting suspicious or counterfeit materials must be followed. If plagiarized or counterfeit materials are identified, appropriate corrective action must be taken immediately and, where necessary, affected business partners, manufacturers, or competent authorities must be informed.

Products and materials must also be distributed, used, or transferred only in accordance with applicable laws, regulatory requirements, and contractual agreements.

5.10 Data Protection and Information Security

Euscher attaches particular importance to protecting the personal data of employees, customers, and other suppliers. All employees must comply with all applicable data protection laws.

Personal data may not be processed unless legally permitted. This applies to any form of processing, including the collection, storage, compilation, use, and provision of data.

All employees must ensure that Euscher information systems containing confidential information or data are properly managed and protected against unauthorized access by appropriate technical safeguards.

In addition, applicable information and cybersecurity obligations based on the requirements of ISO 27001 and ISO 27032 must be observed.

5.11 Whistleblowing and Protection Against Retaliation

Euscher has an effective whistleblowing system that enables employees and external stakeholders to confidentially report potential violations of laws, this Code of Conduct, or internal policies, anonymously if they wish.

All employees must use the designated reporting channels and maintain the confidentiality of reports.

Euscher ensures that whistleblowers who report in good faith or participate in investigations into reported matters are protected against any form of disadvantage, discrimination, or retaliation. This includes, in particular, direct or indirect adverse measures such as termination, formal warnings, reassignment, intimidation, or other unjustified disadvantages.

Retaliation of any kind is strictly prohibited. All employees must help ensure through their conduct that reports are treated confidentially and that all reports are handled fairly, impartially, and confidentially.

6. Conflict Minerals and High-Risk Raw Materials

If a Euscher product contains one or more of the conflict minerals or high-risk raw materials listed below, Euscher ensures that appropriate measures to comply with applicable national and international conventions, regulations, directives, and laws are incorporated into its requirements for direct suppliers.

All employees involved in procurement, supplier management, or product-related decisions must take these requirements into account within their areas of responsibility and support their implementation.

Conflict minerals and high-risk raw materials include, in particular, ores and concentrates derived from tin, tantalum, tungsten, gold, and cobalt.

7. Implementation and Compliance with the Supplier Code of Conduct

All employees must appropriately integrate the requirements of this Code of Conduct into their workflows and business processes and ensure compliance. The measures, processes, and responsibilities established within the company must be observed and implemented.

7.1 Training, Documentation, and Implementation

Euscher ensures that relevant employees receive regular awareness training on the contents of this Code of Conduct.

All employees must attend the training provided for them, familiarize themselves with the relevant requirements, and implement them in their daily work.

In addition, the prescribed documentation and control mechanisms must be followed to demonstrate compliance with the requirements.

7.2 Corrective Action and Risk Mitigation

If violations of human rights, environmental, or ethical obligations are identified, or if corresponding risks exist, appropriate measures must be initiated without delay to prevent, end, or minimize the impacts.

All employees must report identified violations and risks through the designated internal reporting channels and participate in appropriate corrective measures.

Upon request, appropriate information about measures initiated must be provided to the responsible internal departments. Where necessary, corresponding information must also be made available to Euscher's business partners in accordance with applicable requirements.

7.3 Communicating Requirements Throughout the Supply Chain

Euscher ensures that the principles and requirements of this Code of Conduct are appropriately communicated to its own suppliers and service providers and that compliance is encouraged to the extent possible.

All employees responsible for selecting, evaluating, and managing suppliers and service providers must take the principles and requirements of this Code of Conduct into account in their work.

This applies in particular to suppliers and business partners directly or indirectly involved in manufacturing or supplying products and services for Euscher.

7.4 Information and Cooperation Obligations

All employees must, upon request, provide the responsible internal departments with appropriate information on social, ethical, environmental, and sustainability-related matters where necessary to assess the supply chain or meet legal and customer requirements.

The required information must be provided accurately, completely, and on time.

8. Reporting Violations

Euscher has established a grievance procedure through which suspected violations of this Code of Conduct can be reported confidentially and, if desired, anonymously.

All employees are informed about the availability of this grievance mechanism and are encouraged to use the designated reporting channels if they become aware of violations or have reasonable grounds for suspicion.

The internal reporting office can be reached at:

<https://euscher.wbri.eu/>

9. Consequences of Violations

Compliance with this Code of Conduct is an essential part of working at Euscher. All employees are required to comply with the requirements set out herein.

If violations of the requirements set out herein are identified, appropriate corrective measures must be initiated without delay, and evidence of their implementation must be provided.

In the event of serious or ongoing violations, Euscher reserves the right to take appropriate employment-related measures in accordance with applicable laws and contractual provisions. If violations involve business partners, Euscher reserves the right to suspend or terminate the relevant business relationship.