



KLINGELNBERG GROUP

CODE OF CONDUCT FOR SUPPLIERS OF THE KLINGELNBERG GROUP

AS OF 01 MAY 2026

KLINGELNBERG AG

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Code of Conduct for Suppliers of the Klingelberg Group

Preamble

As a globally operating group of companies with far-reaching international ties, Klingelberg AG and all its affiliated companies believe to have a special responsibility to work towards improving the human rights situation and the protection of the environment worldwide and are therefore committed to ecologically and socially responsible corporate governance. Accordingly, we also expect our suppliers and service providers to observe the principles of good ecological, social and ethical conduct.

The following sets forth the minimum requirements we expect our suppliers and service providers ("Suppliers") to meet with respect to compliance with nationally and internationally applicable environmental, social and ethical legislation and standards. In order to ensure that these standards are maintained, we actively communicate with you as our supplier, expect your support in the downstream supply chain, and rely on an appropriate review of your compliance.

The Supplier hereby declares as follows:

Compliance with laws, regulations and internationally recognized standards

The Supplier declares to comply with all applicable international and in particular national laws and recognized standards.

Corporate ethics

The supplier maintains a zero-tolerance policy with regard to bribery and corruption. All business activities must always be conducted in an honest, fair and lawful manner. Offering and accepting bribes and other illegal payments undermines competition and the moral sense of all parties involved. Such activities are neither approved nor tolerated.

Accordingly, the supplier undertakes to comply with the following principles and to sanction employees violating these principles:

- No form of corruption or bribery, whether as a direct or indirect involvement, will be tolerated.
- No gratuities are offered, given or promised to government officials or private sector counterparties for the purpose of influencing official actions or irregularly obtaining an advantage.
- All business activities are conducted in accordance with international and, in particular, national competition laws. There is no involvement in price fixing, allocation of markets or customers, market collusion or bid rigging.
- The intellectual property rights of third parties are respected.
- There is no promotion of money laundering or terrorist financing, neither indirectly nor directly.
- Export control and customs regulations are complied with.

- Personal data is processed confidentially and responsibly and effectively protected as required by the General Data Protection Regulation (GDPR).

Social requirements and working conditions

The Supplier guarantees compliance with all internationally proclaimed human rights, such as the United Nations Universal Declaration of Human Rights and the International Labor Organization's conventions and recommendations on labor and social standards, by fundamentally avoiding and preventing the infliction of and participation in human rights abuses. In this context, the focus should be especially on respecting the human rights of particularly vulnerable groups of society, such as women, children, migrant workers or (indigenous) communities.

This explicitly includes:

- Not to make use of or contribute to forced labor, slavery, servitude, or human trafficking.
- To ensure protection from child labor by hiring workers with a minimum age of 15 years. In countries that fall under the exception to ILO Convention 138 for developing countries, a minimum age of 14 years applies.
- To hire employees for risky work who are at least 18 years of age in accordance with ILO Convention 182.
- To promote equal opportunity and treatment for its employees regardless of color, race, national origin, ethnicity, political affiliation, social origin, disability, sexual identity and orientation, religious beliefs, gender or age. Not to tolerate inappropriate treatment of workers, such as mental hardship, sexual harassment or discrimination, including gestures, language and physical contact that is sexual, coercive, threatening, abusive or exploitative.
- To recognize the right of employees to form and join existing unions and to engage in collective bargaining; to neither favor nor disfavor members in employee organizations or unions.
- To comply with applicable working time regulations worldwide.
- To pay appropriate compensation and comply with all applicable pay and compensation regulations worldwide.
- In the case of cross-border deployment of personnel, to comply with all applicable legal provisions, in particular with regard to minimum wages.
- To provide employees with access to a protected procedure to report possible violations of the principles of this Code of Conduct.

Due diligence obligations in relation to conflict minerals

The Supplier undertakes to take reasonable measures to avoid the use of raw materials in its products originating from areas of conflict and risk areas and contributing to human rights abuse, corruption, the financing of armed groups or similar negative impacts.

Environmental protection obligations

With regard to environmental protection, Suppliers are required to comply with the following obligations from three international environmental conventions in their supply chains:

- with regard to the use and treatment of mercury – the obligations under the Minamata Convention on Mercury;

- with regard to the production, use and treatment of certain chemicals and their waste products – the obligations under the Stockholm Convention on Persistent Organic Pollutants;
- with regard to the import and export of hazardous substances – the obligations under the Basel Convention.

Furthermore, Suppliers are obligated to prevent or mitigate environmental degradation if human rights are otherwise violated. This means, for example, that Suppliers should prevent or mitigate harmful changes to soil, water pollution, or excessive water use that significantly affect the natural basis for sustaining and producing food, deny a person access to safe drinking water, or harm a person's health.

The supplier undertakes to use energy responsibly and to continuously implement measures to improve energy efficiency in its processes. For products and services that have a significant impact on our company's energy balance, energy performance assessment is a key criterion in the procurement process. The supplier is required to provide relevant information and appropriate technical documentation upon request.

Protection of tangible and intangible assets

Suppliers are required to keep third party business, financial and technical data and business correspondence confidential. The aim is to prevent the unauthorized use of physical or intellectual property.

Trade controls

Suppliers shall ensure that any applicable export regulations are complied with and that orders not to pass on goods or disclose information of third parties subject to export restrictions are strongly supported without exception. All foreign trade data must be correctly and individually listed by Suppliers and indicated in all trade documents (country of origin, customs tariff number, classifications according to export regulations).

Consideration of the supply chain

Suppliers undertake to apply the principles of this Code of Conduct for Suppliers of the Klingelberg Group when selecting sub-suppliers and also to monitor this in an appropriate form.

By signing this document, the Supplier confirms to comply with the above-mentioned principles:

Place, date

Signature

Company name & seal

Name in block letters, function



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