Foreword

Graepel is committed to economic, ecological and social responsibility, fostering a healthy and harmonious relationship between company and its employees, society, and the environment. Collaboration within supply chains is essential to implementating standards for business integrity and social and environmental performance. Given the high complexity of supply chains, Graepel advocates for a unified approach and a consistent message.

This Code of Conduct (the “Code”) for business partners estabilishes standards for business ethics, working conditions, human rights, health and safety, as well as environmental leadership and due diligence throughout our shared supply chain. Graepel expects business partners to comply with these standards and to take a risk-based approach to cascading them through their own supply chains. This includes striving to achieve the objectives of the Code and implementing appropriate measures to reach these goals.

The Code is based on national and international laws, the UN Universal Declaration of Human Rights, the UN Guiding Principles on the Rights on Business and Human Rights (including those regarding the Rights of the Child) and the ILO Core Labor Standards.

1. Ethical business conduct

Business partners are expected to uphold integrity, act with honesty and fairness, and adhere to the following principles:

- **Anti-corruption, Money Laundering, and Terrorist Financing:** Business partners must not engage in or endorse any form of corruption, including bribes, kickbacks, or excessive gifts or hospitality. They must comply with all applicable anti-money laundering laws, take active measures to prevent the financing of terrorism, and remain alert to suspicious transactions.

- **Confidentiality / Data protection:** Business partners shall meet the reasonable expectations of clients, suppliers, customers, consumers, and employees regarding the protection of personal information. Graepel expects its suppliers and business partners to comply with all applicable laws and regulations governing the collection, storage, processing, transmission, and disclosure of confidential, and personal data.

- **Financial Responsibility and Accurate Record-Keeping:** Business partners shall disclose business data and reports truthfully and in accordance with applicable laws.

- **Product Safety and Counterfeit Components:** Business partners must comply with all legal requirements regarding product safety, labeling, packaging and the use of hazardous substances. They shall prevent counterfeit or altered materials from entering the supply chain and adhere to technical regulations during product design.

- **Intellectual Property:** Partners shall respect the know-how, patents and trade secrets of Graepel and third parties. Unauthorized disclosure without prior written consent or in any other unauthorized manner is prohibited. Furthermore, they undertake not to use or offer any plagiarized, imitated, or counterfeit products in the manufacture and delivery of goods and services.

- **Export controls and economic sanctions:** Business partners must comply with all laws governing the import and export of goods, services, and information, respecting international embargoes and sanctions.

- **Grievance Mechanisms**: Business partners should establish effective, operational-level complaint mechanism that allow for prompt and independent investigations. Whistleblowers must be protected from retaliation. Appropriate feedback should be ensured.

- **Fair Competition and Advertising:** Business partners must comply with antitrust laws, avoiding anti-competitive agreements or the abuse of a dominant market position. Communication and documentation must be truthful, complete and transparent throughout the entire supply chain.

- **Conflicts of Interest:** Employees of business partners should avoid and disclose situations where personal interests conflict with professional duties or create the appearance of misconduct.

- **Handling of Company Assets:** Business partners shall respect Graepel's tangible and intangible assets and shall not use them for improper or non-business purposes, ensuring they are not damaged, misused, or used for non-business purposes, neither by their employees nor by any third parties (such as subcontractors or agents).

- **Supply Chain Security:** Business partners must ensure that facilities (production, storage, transport) are protected from unauthorized access and that personnel are trustworthy.

- **Remediation**: If business activities case negative social or environmental impacts, partners should take remedial action or cooperate with lawful remediation procedures.

- **Prohibition of Retaliation:** Partners must refrain from threats, intimidation, or legal attacks against stakeholders exercising their rights to freedom of expression, association, or peaceful protest.

- **Cybersecurity:** Business partners should implement robust cybersecurity measures. A strategy based on best practices and modern technologies - such as automation, digitalization, advanced analytics, artificial intelligence (AI), and machine learning - is essential to protect sensitive information and respond to digital attacks.

- **Artificial Intelligence (AI):** Where appropriate, partners should develop and implement a reliable AI governance framework consisting of processes, methods, controls, and supporting tools to ensure transparency and traceability throughout the AI lifecycle.

- **Data Integrity:** Business partners must ensure that data is accurate, reliable and complete, as data, integrity is fundamental to quality management and ensuring products are fit for use.

2. Environment

Graepel's business partners are expected to develop, implement, and support a proactive strategy to environmental responsibility by adopting environmental protection measures, conserving natural resources, and reducing the overall environmental footprint of production, goods, and services throughout their lifecycle. Their environmental management system should include the following points:

- **Climate neutrality:** Business partners should strive to set science-based and time-bound targets for emissions reduction and renewable energy that are in line with the Paris Agreement. They should take measures to push ahead the decarbonization of the entire value chain.

- **Water quality, consumption and management:** Business partners should minimize water consumption, effectively reuse and recycle water, treat wastewater responsibly, and prevent potential impacts of flooding caused by stormwater runoff, at least as required by current laws.

- **Air quality:** Business partners should routinely monitor and disclose emissions that contribute to air pollution, and should appropriately control, minimize, and, where possible, eliminate such emissions, at a minimum as required by law and in accordance with applicable regulations. Business partners should assess the cumulative impact of pollution sources at their sites and reduce pollution levels accordingly.

- **Responsible Management of Chemicals:** Business partners should identify and minimize or eliminate the use of restricted substances in manufacturing processes and finished products to ensure regulatory compliance. Business partners should also stay informed about the use of restricted substances in processes and final products and actively seek suitable alternatives to maintain product and environmental responsibility. Chemicals, waste, and other materials that pose a hazard to people or the environment should be identified, labelled, and managed to ensure their safe handling, transport, storage, use, recycling or reuse, and disposal.

- **Circular economy, sustainable resources, waste reduction, reuse, and recycling:** Business partners should promote closed-loop circular systems by supporting the use of sustainable, renewable natural resources. Business partners should implement a systematic approach to

identifying, managing, reducing, reusing, recycling, and—as a last option—responsibly disposing of waste. Design for repair and reuse should always be considered.

- **Animal welfare:** Business partners adhere to the Five Freedoms for animals established by the World Organisation for Animal Health (WOAH) regarding animal welfare. No animal should be raised and killed solely for the purpose of being used in a product.

- **Biodiversity, Land Use, and Deforestation:** The protection of natural ecosystems—particularly the protection of endangered wildlife habitats—and the sustainable use of natural resources must be ensured. Business partners must strive to establish supply chains that - in accordance with applicable laws - do not contribute to deforestation, and international regulations on biodiversity.

- **Soil quality:** Where necessary, business partners should monitor and control their impact on soil quality to prevent soil erosion, nutrient depletion, land subsidence, and contamination.

- **Noise emissions:** Where necessary, business partners should monitor and control their industrial noise levels to prevent or reduce noise pollution.

- **Environmental permits and reporting:** Business partners must comply with, maintain, and keep up to date all required environmental permits (e.g. emissions monitoring), approvals, and registrations, and comply with their operational and reporting obligations.

3. Human rights and working conditions

Business partners must respect the human rights of employees, local communities, and other relevant stakeholders. This means they must prevent and address adverse human rights impacts associated with their business activities in accordance with the ILO Core Conventions and the UN Guiding Principles on Business and Human Rights. Business partners guarantee compliance with the following principles:

- **Child labor and young workers:** Graepel's suppliers and business partners do not tolerate child labor at any stage of production. We expect them to comply with applicable local laws and to employ only workers who have reached the locally applicable minimum age. If applicable local laws do not contain corresponding provisions, suppliers and business partners undertake not to employ children under the age of 14. In the event of non-compliance, the measures required to remedy the situation and enable the children to attend school must be documented. The rights of young workers must be protected, and special protective regulations must be observed.

- **Modern slavery:** Business partners must prohibit all forms of forced, bonded, or compulsory labor, including human trafficking. This also includes a ban on corporal punishment. Employees who are housed on the factory premises should be able to leave at any time without having to provide a reason.

- **Ethical recruitment:** Business partners must not mislead or deceive potential employees about the nature of the work, nor charge them recruitment fees, and/or confiscate, destroy, conceal, and/or deny access to employees' passports and other government-issued identification documents. Upon recruitment employees must receive a written contract or employment notice in a language they understand well, which truthfully and clearly sets forth their rights and obligations.

- **Fair compensation:** Business partners are required to pay their employees a fair wage directly, in full, and on time. A fair wage is at least the minimum wage established by applicable law and is determined in accordance with the laws of the place of employment. This wage should cover at least the basic needs of employees and enable them and their families to maintain a decent standard of living (living wage).

- **Working Hours:** Business partners must ensure that working hours comply with applicable national, state, and local laws and/or industry-specific national requirements, including adequate breaks and rest periods. In all cases, working hours must comply with ILO standards regarding working hours.

- **Freedom of association and works councils:** Business partners are required to recognize the fundamental right of all employees to form and join trade unions and works councils. Where this right is restricted by local laws, alternative, legally compliant forms of employee representation should be promoted. Workers' representatives must be protected from discrimination. They must be granted free access to their colleagues' workplaces.

- **Non-discrimination, harassment, and women's rights:** Discrimination and harrassment against employees are prohibited. Graepel's business partners shall not discriminate against anyone based on ethnic, national, or social origin, skin color, gender, religion, ideology, age, disability, sexual orientation, political views, or any other legally protected characteristics. Business partners must respect the personal dignity, privacy, and personal rights of every individual. They shall ensure equal opportunities in employment and commit to equal pay for equal work.

- **Diversity, Equity, and Inclusion:** Business partners must ensure equal opportunities for all employees in all aspects of recruitment, training, and development. In addition, inclusion should be promoted in all workplaces. The recruitment process shall be conducted without any form of discrimination and free from bias.

- **Rights of minorities and indigenous peoples:** Business partners should respect the rights of local communities to adequate living conditions, education, employment, and social activities. They must respect the right to free, prior, and informed consent (FPIC) regarding projects that affect these communities and the land on which they live, with particular attention to the presence of vulnerable groups.

- **Land, forest, and water rights, as well as evictions:** Business partners commit to protecting land, forests, and water bodies whose use provides a livelihood for local communities and recognize the right of local populations to use land, forests, and water bodies as a means of livelihood. Business partners must refrain from any form of expropriation or eviction.

- **Use of private or public security forces:** Business partners should not hire or deploy private or public security forces to protect the business if the use of such forces could lead to human rights violations due to a lack of training or oversight.

4. Health and Safety

Occupational health and safety: Business partners shall establish and implement appropriate occupational safety systems to ensure a safe working environment that meets or exceeds applicable local laws and industry standards for occupational health and safety. The management system for a safe and healthy working environment should include the following elements:

- **Working Environment:** Business partners should provide a working environment that meets or exceeds local and national safety, occupational health, and fire safety regulations, and encourage contractors and third-party personnel to understand and apply best practices.

- **Personal protective equipment:** When necessary, business partners should provide their employees with the appropriate personal protective equipment (PPE) and ensure that they know how and when to use it.

- **Emergency preparedness:** Business partners should minimize occupational risks and develop a plan for preparing for and responding to emergencies, including evacuation and emergency response plans.

- **Incident and accident management:** Business partners should implement hazard and risk analysis systems to minimize the potential for incidents or accidents in the workplace. An investigation system should aim to identify the root cause, and a corrective action system should ensure that all necessary measures are taken to minimize the likelihood of a recurrence.

- **Contractors:** Business partners should appropriately manage the health and safety of contractors as part of their extended supply chain. Business partners shall coordinate their procurement processes to identify hazards as well as assess and control risks arising from the contractor's activities and from operations that affect the contractor's employees.

- **Road Safety:** Business partners should adopt a systematic approach to road safety. They should ensure commitment at all levels of their organization by establishing a road safety policy with clear objectives for addressing road safety issues under their direct control and within their sphere of influence. Business partners should work to track, understand, and manage their road safety footprint – specifically road traffic-related injuries within their operations and supply chain - and systematically work to improve road safety both internally and with their supply chain partners.

- **Health and safety training**: Business partners should train their employees to behave appropriately to prevent health and safety risks and incidents at their workplaces.

5. Responsible Supply Chain Management

Business partners should select their own business partners who adhere to the responsible business conduct defined in this Code and make every effort to promote these practices throughout the supply chain. Business partners should implement a supplier management system appropriate to their size and circumstances, which includes the following:

- **Due diligence and responsible procurement:** Business partners should carefully assess their direct suppliers and subcontractors in accordance with the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, considering their size and circumstances. They should promote transparency and traceability; and make every effort to communicate the Code throughout their supply chain. Business partners should develop and implement responsible procurement practices in accordance with applicable law, adopting a risk-based approach that is appropriate to their respective capabilities.

- **Responsible sourcing of raw materials and minerals:** Business partners should source the raw materials and minerals used in their products responsibly by developing a management system appropriate to their size and circumstances that promotes traceability and transparency. In doing so, they should implement due diligence measures in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

6. Cooperation and Implementation

By working together, business partners have a greater influence on identifying, preventing, mitigating, and avoiding negative environmental or social impacts within their operations and supply chains. Business partners commit to acting and responding constructively, cooperatively, and with due diligence in accordance with the principle of cooperation. They commit to collaborating on the development and use of standardized tools and common solutions required to implement of this Code. This collaboration aims to reduce or eliminate redundancies and minimize the administrative burden on suppliers, including (i) risk assessment and risk mapping, (ii) self-assessment questionnaires, and (iii) risk-based assessments and on-site audits.

Upon request, suppliers must provide materials and information and accept on-site audits to verify compliance with this Code if there are indications of an increased risk of violation. Business partners shall cooperate and, unless stricter binding legal standards apply, shall make all reasonable and risk-based efforts to ensure that operations within their supply chain comply with the requirements of this Code, tracing back to the source of origin if necessary.

In the event of violations of the standards defined in this Code, business partners may take appropriate action, depending on the legal nature of the regulation. This also applies if business partners fail to cooperate adequately or do not implement necessary or agreed measures.

Business partners undertake to accept the most current version of the Code, which can be found on our website.