



## MAPAL Code of Conduct for Suppliers

MAPAL is committed to compliance with the Ten Principles of the UN Global Compact.

In this Code of Conduct for Suppliers, MAPAL Dr. Kress KG and the group of companies (can be viewed at [www.mapal.com](http://www.mapal.com)), hereinafter referred to as "MAPAL" for short, has set out its requirements and principles for cooperation with its business partners, in particular for compliance with ethical standards, applicable law and integrity. MAPAL expects its suppliers to comply in their activities with the applicable national laws, the principles of the UN Global Compact and this MAPAL Code of Conduct for Suppliers. Furthermore, they are expected to implement suitable processes that support compliance with the applicable laws in their companies and promote continuous improvement with regard to the principles and requirements of the MAPAL Code of Conduct for Suppliers. Furthermore, MAPAL expects its suppliers to ensure that both their affiliated companies and their direct and indirect business partners also comply with and recognize all the principles and requirements described here.

### General Liability Disclaimer

This code of conduct for suppliers must never contradict the provisions of an existing agreement or change these. In the case of a contraction, the suppliers are obliged to observe the agreement provisions unless otherwise stipulated in such an agreement.



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### Social responsibility of our business partners

We expect our business partners to align their actions with the following principles:

#### Compliance with laws

Suppliers are required to comply with all applicable laws and regulations of the countries in which business activities are conducted or services are provided.

#### Human Rights

The suppliers are expected to treat others with respect and dignity, promote diversity, protect the rights of minorities and indigenous peoples, accept differing opinions, support equal opportunity for all, and foster an ethical corporate culture. Land, forestry and water laws must be complied with. Illegal evictions and seizures of lands, forests or waterbodies are prohibited. In case private or public security personnel are commissioned or employed, the supplier ensures that sufficient training and supervision takes place to make sure that no human rights are disregarded during their deployment.

#### Child Labor

Suppliers strictly reject child labor and comply with applicable regulations prohibiting child labor.

#### Equal opportunities

The supplier promote diversity in its company, does not tolerate any discrimination during hiring and employment of staff, and sustainably promotes and supports diversity, equal opportunity, inclusion, the protection of girl and women's rights.

#### Freedom of association

Suppliers shall respect the rights of workers to freedom of association and to communicate with management regarding working conditions without fear of persecution, intimidation, punishment, interference or reprisal.

In addition, suppliers are expected to respect all labor rights to freedom of association, including the right to join an association of their choice.

#### Harassment in the workplace

Suppliers must ensure that their employees are not subjected to physical, psychological and verbal harassment or other abusive behavior in the workplace.

#### Non-discrimination

Suppliers shall provide equal employment opportunities to all employees and applicants for employment without discrimination. In accordance with ethical recruitment, the highest principles of recruiting ethics, equity, integrity of professional decorum and fair practice are upheld in dealing with all parties.

#### Working hours and wages

Suppliers will comply with applicable national laws regarding working hours. Suppliers' employees are also expected to receive compensation that is consistent with applicable national laws.



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### Animal welfare

Third parties must observe the relevant local laws and international codes of conduct. Animals are to be treated humanely. Animal testing is kept to the absolute minimum.

### Fighting corruption

MAPAL does not tolerate any form of corruption or other unfair business practices.

#### Anti-corruption laws

Suppliers do not tolerate any form of corruption or white-collar crime by their own employees or employees in the supply chain.

Suppliers are prohibited from offering or providing improper monetary payments or benefits of monetary value to government officials, political parties, candidates for public office, or any other person. In addition, payments to expedite or ensure the performance of routine government activities such as obtaining a visa or clearing customs are prohibited even in locations where such activity does not violate applicable local law.

Suppliers are expected to exercise due diligence in preventing and detecting corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the engagement of intermediaries such as agents or consultants.

#### Conflicts of Interest

Suppliers are expected to avoid any conflicts of interest or situations that create the appearance of a potential conflict of interest. Suppliers are expected to notify all affected parties in the event of an actual or potential conflict of interest. This includes a conflict between MAPAL's interests and their own interests or those of family members, friends or acquaintances.

#### Illegal payments

Suppliers must not offer or accept illegal payments from their customers, suppliers, agents, representatives or other persons. It is not permitted to accept, give and/or hold out the prospect of receiving money or monetary benefits, whether directly or indirectly, for the purpose of exerting undue influence or obtaining an improper advantage.

#### Fraud and deceit

Suppliers shall not obtain any advantage by fraudulent act, deception or false pretenses, or permit any other person to do so. This includes fraud or theft from companies, customers or third parties, and any misappropriation of property.

#### Competition and antitrust law

Suppliers are not allowed to collude with their competitors on prices or tender offers. They are not permitted to exchange existing, current or future price information with competitors. Suppliers are prohibited from participating in any cartel.

#### Gifts/Business Courtesies

Suppliers are expected not to misuse invitations and gifts to influence. Invitations and gifts to MAPAL employees or persons close to them are only granted if the occasion and scope are appropriate, i.e.



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they are of low value and can be regarded as an expression of locally generally accepted business practice. Similarly, suppliers do not demand unreasonable benefits from MAPAL employees.

### Maintaining accurate records

Suppliers are expected to maintain accurate records and not alter any entry to conceal or misrepresent the underlying transaction. All records, regardless of format, made or received to evidence a business transaction must fully and accurately document the transaction or process. Records shall be retained based on applicable record retention requirements.

### Protection of Information

#### Confidential/Proprietary Information.

Suppliers agree to properly handle sensitive information, including confidential, proprietary and personal information.

Information shall not be used for any purpose (e.g., advertising, publicity, etc.) other than the original business purpose unless prior permission has been granted by the owner of the information.

#### Plagiarism and intellectual property

The supplier must observe all applicable laws protecting intellectual property. This includes patents, copyrights and trademarks as well as the protection against disclosure. Plagiarism and counterfeits must not be utilised.

#### Information Security

Suppliers shall protect third party confidential and proprietary information and their personal data from unauthorized access, destruction, use, modification and disclosure through appropriate physical and electronic security procedures. Suppliers shall comply with applicable data protection laws.

### Occupational safety, environmental protection and health protection

Suppliers shall comply with the environmental standards applicable to them and are committed to the principles of sustainable business and to environmental protection as a corporate value. You employ effective methods to minimise emissions in the air, water and ground, increase energy efficiency, utilise renewable energy sources for the purpose of decarbonisation, minimise energy consumption, and report on your greenhouse gas reductions. You promote biodiversity, oppose deforestation and in this way support sustainable land use. Routine monitoring and auditing of your impact on soil quality takes place to prevent soil erosion, soil nutrient degradation, earth subsidence and pollution. The supplier must routinely monitor the volume of industrial noise to decrease noise pollution and prevent noise disturbance.

#### Occupational health and safety

Suppliers shall protect the health, safety and welfare of their employees, business partners, visitors and those who may be affected by their activities.



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### Waste and resource management

The development, manufacture, use and subsequent recovery of products shall take into account the avoidance of waste, reuse, recycling, environmentally friendly disposal of residual waste, chemicals and wastewater, and the economical use of resources (water, raw materials, electricity).

### Compliance in global trade

#### Import

Suppliers must ensure that their business practices comply with all applicable laws, instructions and regulations governing the import of parts, components and technical data.

#### Export

Suppliers shall ensure that their business practices comply with all applicable laws, instructions and regulations governing the export of parts, components and technical data. Suppliers agree to provide truthful and accurate information and obtain any required export licenses or permits.

### Responsible sourcing of mineral raw materials

Suppliers are required to perform their due diligence with respect to relevant raw materials - particularly tin, tantalum, tungsten, gold, and cobalt.

### Counterfeit components

Suppliers are expected to develop, implement and maintain effective methods and processes appropriate to their products to avoid the risk of counterfeit components and materials being introduced into their products to be supplied. In addition, suppliers agree to notify recipients of counterfeit components when warranted and to exclude such components from the deliverable.

## Ethics Program- Expectations

### Whistleblower Protection

Suppliers are expected to allow their employees to raise legal or ethical issues and concerns without fear of retaliation. In addition, suppliers are expected to take steps to prevent, detect and remedy retaliation.

### Consequences for Violations of the Code

In the event of non-compliance with these Code provisions, the business relationship may be reviewed and corrective action may be taken in accordance with the terms of the applicable contract(s).

### Principles of Ethics

In accordance with the size and nature of the business, suppliers shall establish management systems to support compliance with laws and regulations and the expectations described in this Supplier Code of Conduct. Suppliers are encouraged to establish their own rules of conduct in writing and to pass on their principles to the companies supplying them with goods and services. MAPAL expects its suppliers to implement effective programs that - beyond compliance with laws, regulations and contractual terms - motivate employees to act in an ethical, value-oriented business manner.