



Compliance Guideline / Code of Conduct (CoC)

In addition to economic success, environmental and social responsibility have traditionally been of great importance to Hermann Bantleon GmbH. Treating our customers, employees, investors, suppliers and the public with respect, fairness and cooperation is an essential part of responsible corporate conduct.

Compliance with applicable laws and regulations is an integral part of our corporate values. This includes fair competition, integrity and the consistent rejection of breaches of trust, corruption and any unlawful activities. Internal policies, voluntary commitments and ethical principles form the foundation of our actions and shape our company's values.

We expect all employees, stakeholders and business partners within the direct sphere of influence of Hermann Bantleon GmbH to uphold these principles. If violations of these principles are identified, we reserve the right to take appropriate measures. These may include criminal proceedings, civil claims for damages, other sanctions or, as a last resort, termination of the business relationship.

These commitments form the basis of the principles set out in the following Code of Conduct, which applies to us and our business partners. The Code of Conduct is based on national laws and regulations as well as internationally recognised conventions and standards. These include, in particular, the United Nations Universal Declaration of Human Rights, the Children's Rights and Business Principles, the United Nations Guiding Principles on Business and Human Rights, the international labour standards of the International Labour Organization (ILO) and the United Nations Global Compact.

Social Responsibility

In the area of social responsibility, we are committed to the ILO Core Labour Standards and the general protection of human rights. We therefore undertake to comply with the following principles:

Working Conditions

Freedom of Association and Protection of the Right to Organise

We respect employees' right to freedom of association, to join trade unions, to seek representation by employee representatives or to become members of works councils in accordance with applicable local laws. Employees must be able to communicate openly with company management without fear of retaliation or harassment. Right to Collective Bargaining, Equal Pay, Fair Remuneration

Compensation paid to employees must comply with all applicable wage legislation, including minimum wage and overtime regulations. If the statutory minimum wage is insufficient to cover the cost of living, the business partner is required to pay wages that meet basic needs. Wage deductions as a disciplinary measure are not permitted. Employees must be regularly informed of the basis of their remuneration through payslips.

Fair Working Hours

Working hours must comply with applicable laws or industry standards. Overtime is permitted only if performed voluntarily and must not exceed 12 hours per week. Employees must be granted at least one day off after six consecutive working days. Regular weekly working hours must not exceed 48 hours.

Elimination of Discrimination in Employment and Occupation. Discrimination against employees in any form is prohibited. This includes discrimination based on gender, race,

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caste, skin colour, disability, political beliefs, origin, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and individual rights of every person must be respected. Proactive Health Protection and Occupational Safety, Establishment of Secure Grievance Mechanisms, Respectful Treatment of Others.

Human Rights

Prohibition and Immediate Elimination of Child Labour. Child labour must not be used at any stage of production. Suppliers are required to comply with the recommendations of the ILO Conventions concerning the minimum age for employment. Accordingly, the minimum age must not be lower than the age at which compulsory schooling ends and, in any case, must not be below 15 years. Prohibition of All Forms of Forced Labour

Responsible Sourcing of Conflict Minerals

For the conflict minerals tin, tungsten, tantalum and gold, as well as other raw materials such as cobalt, the company establishes processes in accordance with the due diligence guidelines of the Organisation for Economic Co-operation and Development (OECD) for promoting responsible mineral supply chains from conflict-affected and high-risk areas. The company expects its suppliers to implement equivalent processes. Smelters and refineries without adequate, audited due diligence procedures should be avoided.

Anti-Corruption Mechanisms

Discrimination, harassment, disrespectful or unprofessional behaviour will not be tolerated. Decisions must be made solely on objective grounds, based on criteria such as qualifications, performance and other relevant factors. Respect for the Human Rights Charter Due Diligence Throughout the Supply Chain. We do not conduct business at any cost. We refrain from business activities that conflict with our principles in any way.

Environmental Responsibility

Sustainability is of great importance to Hermann Bantleon GmbH and is therefore respected in all its dimensions. This commitment is also reflected in environmentally responsible business practices. We obtained key certifications at an early stage and consider it essential to continuously meet their requirements.

Based on this commitment, we have identified the following key areas:

- Emissions into the atmosphere
- Discharges into water bodies
- Soil contamination
- Responsible consumption of raw materials and natural resources
- Responsible management of financial resources
- Responsible handling of chemicals (regulated by designated responsible officers)
- Responsible use of water
- Air quality
- Energy consumption and efficiency
- Release of energy (in the form of heat, radiation, light and noise)
- Waste generation
- Land use and biodiversity

These aspects are taken into account in all decisions, with the aim of identifying the best possible solution. We combine economic growth and the resulting business success with responsibility for the environment and society. This includes minimising environmental impact by conserving resources and using energy efficiently.

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Every Bantleon employee is responsible for protecting people and the environment within their area of work. Customers and suppliers are responsible for ensuring an appropriate working environment within their own companies and those of any subcontractors, in compliance with applicable legal requirements. This also includes responsible and legally compliant conduct towards the environment and surrounding communities.

Ethical Business Conduct - Fair Competition

The principles of fair business practices, fair advertising and fair competition must be observed. Applicable antitrust and competition laws must also be complied with. In particular, these laws prohibit agreements and other activities between competitors that influence prices or commercial terms. Furthermore, these regulations prohibit agreements between customers and suppliers that restrict customers' freedom to independently determine their resale prices and other terms and conditions.

Confidentiality and Data Protection

Hermann Bantleon GmbH protects the personal data of employees, customers, suppliers and other data subjects. We collect, process, use and store personal data only where required by law or necessary for the proper operation of our business. Particular importance is attached to obtaining consent from the individuals concerned.

Intellectual Property

Intellectual property rights must be respected. Technology and know-how must be transferred in a manner that protects intellectual property rights and customer information. Integrity / Bribery, Fraud and Improper Benefits. The highest standards of integrity must be maintained in all business activities. Suppliers must adopt a zero-tolerance policy towards all forms of bribery, corruption, extortion and embezzlement. Appropriate monitoring and enforcement procedures must be implemented to ensure compliance with anti-corruption and anti-money laundering laws.

Gifts and Invitations

Gifts, invitations and other benefits provided by suppliers or their representatives to employees of Hermann Bantleon GmbH must remain within socially customary, reasonable and transparent limits. Suppliers must not offer, promise or grant employees of Hermann Bantleon GmbH any personal benefits that could objectively be considered likely to improperly influence their business conduct. This principle also applies to employees of Hermann Bantleon GmbH in their dealings with customers. In particular, customer-specific compliance requirements must be observed.

Whistleblowers

Whistleblowers must be protected against retaliation.

Organisation of Designated Responsible Officers

The responsibilities and authorities of designated responsible officers are defined in a responsibility matrix.

Protection of the Constitution and Democracy

Any suspicious behaviour, statements or slogans among colleagues that indicate discriminatory, extremist, anti-constitutional or Reichsbürger (anti-state movement) ideology must be reported immediately. Reports can be submitted to the Compliance Reporting Office or anonymously via the contact form on the Bantleon website.

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**BANTLEON**

Ideen. Systeme. Lösungen.

Guidance for Employees

If you are uncertain how to act in a particular situation, the following questions may help:

- Does my behaviour, or that of my colleagues, align with Bantleon's corporate values and policies, my own ethical principles, and the principles of the constitution and democracy?
- Is my behaviour lawful and free from any conflicts of interest?
- Can I take responsibility for my actions with a clear conscience?
- How would my behaviour be perceived if it were reported in a newspaper? Would it pass the "public scrutiny test"?
- Do I feel safe and adequately supported in all my tasks and responsibilities?

Management fulfils its role as a model of ethical conduct and is responsible for ensuring that all employees are familiar with the Code of Conduct and actively apply its principles in their daily work.

All BANTLEON employees are required to report violations immediately to their supervisors and/or the Compliance Reporting Office.

All reports received will be treated confidentially and handled with due care. We welcome suggestions for improvement and feedback at any time.

Reporting Channels:

Compliance@bantleon.de

Datenschutz@bantleon.de

Anonymous reporting via the contact form on the Bantleon website.

Hermann Bantleon GmbH

July 2026

Dr. Alexander German, Roland Schmid
Managing Directors

Participating Bodies: Compliance Board / Reporting Office

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