



Code of conduct

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1. Objectives of the Ethics Code and Scope

The Endrich Group, consisting of the company Endrich Bauelemente Vertriebs GmbH and its subsidiaries (hereinafter "Endrich") undertakes to conduct its business activities at all times in compliance with

- all applicable national and transnational laws and regulations of the countries in which Endrich does business,
- the specific provisions Endrich has set forth in this Ethics Code and its corporate rules and policies. to be carried out.

The purpose of this Code is to ensure Endrich's continued development in compliance with national and transnational laws and ethical standards.

This Code is not intended to supersede other Endrich policies, rules and regulations that apply internally.

Employees at all levels within the Endrich Group are committed to complying with this Ethics Code.

Endrich also expects all business partners and service providers to comply with this Ethics Code or to have established an equivalent Ethics Code of their own.

2. Recognition of Fundamental Rights

By recognising the 10 principles of the UN Global Compact and the principles of the ILO (International Labour Organisation), Endrich has committed itself to recognising and promoting fundamental rights in accordance with the Universal Declaration of Human Rights: The inviolability of human dignity, the private lives of employees and equal rights for men and women. Endrich attaches particular importance to the recognition of the following principles laid down in the Global Compact in connection with human rights, labour standards and environmental protection:

2.1 Child labour

Endrich complies with all national child labour laws and regulations and:

- strictly rejects the employment of children under the age of 16 in all cases,
- adheres in all cases to the provisions of the ILO Convention regarding the employment of children between the ages of 15 and 18.

Endrich takes care to ensure that all business partners and service providers make the same above-mentioned commitments.

2.2 Discrimination

Endrich undertakes to comply with all national legal provisions to prevent discrimination. Origin, wealth, gender, sexual orientation, age, marital status, genetic characteristics, actual or alleged membership or non-membership of an ethnic group, nationality, race, political opinion, trade union activity, religious or philosophical belief, physical appearance, actual or potential health problems or physical disability, pregnancy or surname must not be a reason to deny an applicant the opportunity of a job, internship or training offered by the company or to dismiss an employee. to warn, dismiss or directly or indirectly discriminate against an employee, in particular with regard to remuneration, training, employment or qualification programmes, promotion, transfer or contract extension.



Employees shall not be admonished, dismissed or discriminated against for making a bona fide statement or reporting such conduct in relation to any of the above.

2.3 Sexual harassment or bullying

All employees have the right to work in a positive environment free from harassment prohibited by law, in accordance with the laws and policies of the country in which Endrich operates.

In particular, Endrich prohibits any unlawful conduct that constitutes sexual harassment or bullying, even if there is no supervisor/subordinate relationship between the parties.

Any conduct that constitutes sexual harassment or bullying is unlawful and illegal, in particular where

- acceptance of such conduct is implied or expressly set out as a condition of a person's employment,
- a decision regarding a person's job is based on the acceptance or rejection of such conduct; or
- such conduct has the purpose or effect of substantially interfering with an individual's person's work performance or create an intimidating, hostile or unpleasant work environment.

All complaints of harassment or bullying will be treated in the strictest confidence. Any employee who believes he or she has been harassed shall immediately report such suspected conduct either to his or her supervisor or directly to the Endrich Group Human Resources Manager or to management. Immediate action will be taken to investigate and process complaints of conduct contrary to this policy. If a complaint is justified, appropriate disciplinary action will be taken against offending parties.

2.4 Health and safety at the workplace

Every workplace must meet health, safety and ergonomic requirements. All employees are regularly instructed in occupational safety and the safety of the working environment is checked. In addition, occupational health care is ensured.

3. Contribution to sustainable development

3.1 Environmental protection

Respect for the environment and continuous improvement of environmental protection measures are priorities of Endrich.

Endrich's goal is to achieve excellence in environmental protection through the implementation of an Environmental Management System (EMS) in accordance with ISO 14001. This is done by reducing the consumption of raw materials and energy, making optimal use of natural resources and taking measures to avoid waste. The sale of products that pose an unacceptable risk to human health and the environment, especially products containing asbestos, is completely prohibited.

Detailed information on the procedures for implementing and verifying compliance with these environmental regulations can be found in the legal guidelines.



3.2 Human resources

3.2.1 Right to freedom of expression/dialogue between company and employees

Endrich strives to create an atmosphere of trust at all levels of the company and to encourage employees to freely express their opinions with a view to improving their working environment.

Endrich strives to promote responsible dialogue between the company and its employees. In this sense, Endrich keeps its employees or their representatives informed of its business activities and complies with legal requirements regarding the disclosure of information to employees.

3.2.2 Developing the potential of each employee

Endrich contributes to the development of its employees' potential as follows:

- Conducting special training programmes and providing opportunities to acquire multiple skills,
- Assigning responsibility and empowerment,
- Encouraging continuous development at all levels,
- offering career opportunities and fair pay.

These principles link the development of Endrich to the well-being of all its employees, regardless of their place of work and local laws.

3.3 Conflict minerals

Endrich responsibly checks its products to ensure that they do not contain any conflict minerals whose source minerals or derivatives originate from a conflict region that contributes to the financing or support of armed groups or to human rights violations.

3.4 Social contribution

3.4.1 Endrich's involvement in vocational training

Endrich strives to actively contribute to vocational training and trains apprentices, students and interns in the company.

3.4.2 Employment programmes

If optimisation reasons require the closure of an Endrich site, the company makes every effort to minimise and mitigate as far as possible the possible effects of restructuring measures on its workforce. Endrich therefore attaches great importance to future-oriented strategies for its workplace and resource policy and uses all the options available to it to find new jobs for its employees: Transfer within the group of companies, programmes for the external employment of individual or several employees, finding new owners for a site, restructuring within job pools and promoting the development of local business locations.



4. Management

4.1 Corruption, bribery, accounting

4.1.1 Principle Rule

The use of Endrich funds, services or assets for any unlawful or improper purpose is strictly prohibited. No person or company may acquire privileges in the form of purchasing advantages or special benefits on behalf of Endrich by means of bribes, gifts or other favours in cash or in any other form. Likewise, no company or person (at home or abroad) may accept funds or benefits in kind in contravention of statutory provisions or other regulations.

4.1.2 Contributions to political parties or representatives

Endrich does not pay any money or provide any services to political parties, elected representatives or candidates for political office, regardless of the legality of such contributions under the laws of those countries in which such contributions may be made.

4.1.3 Unauthorised payments to governmental or administrative authorities or their employees

Payments for the purpose of obtaining favourable treatment from a governmental or administrative authority are prohibited. Gifts, services or lavish hospitality or entertainment offered to government or administrative employees are prohibited as they could be construed as an attempt to influence decisions affecting Endrich's affairs.

4.1.4 Accuracy and correctness of accounts, books and records

All assets, liabilities, expenses and other transactions carried out by the Endrich Group Companies must be reflected in the books and accounts of the Companies, which must be kept in a true and accurate manner in accordance with applicable accounting principles, rules and laws.

No undisclosed funds or unrecognised assets of Endrich entities or subsidiaries may exist or be managed for any reason. Documents relating to business or financial transactions must accurately reflect those transactions.

No payment may be authorised or made with the intention or assumption that all or any part of such payment will be used for any purpose other than that stated in the document accompanying such payment. No false or falsified entries may be made in the books and records of Endrich or its affiliates for any reason.

4.2 Dealing with customers, suppliers and service providers

4.2.1 Gifts, entertainment and hospitality

(i) Acceptance of gifts

According to the Endrich Directive, the acceptance of gifts and favours of any kind (including but not limited to monetary amounts, goods, services, entertainment or travel) from customers, service providers or suppliers is prohibited if the nominal value of the gift exceeds the symbolic value.

If gifts or favours have already been accepted, they must be returned to the giver. In cases where it would be impolite not to accept or return the gift, the employee must inform management, who will



then decide how to proceed with the gift in accordance with this Code. The employee must ask the customer or supplier to refrain from making such gifts in the future.

(ii) Making gifts

Gifts in cash, in kind or in any other form (e.g. bribes) made directly or indirectly to a representative of a customer or supplier for the purpose of obtaining the award of a contract or other business or financial advantage are prohibited.

In any case, gifts or favours whose nominal value exceeds symbolic value to potential or existing customers or suppliers are strictly prohibited.

4.2.2 Selection of suppliers or service providers

The selection of suppliers or service providers for Endrich must be based on the criteria of quality, need, performance and cost. When negotiating with suppliers and service providers, all Endrich employees are required to act solely in the interests of Endrich, within the limits of the law, to take advantage of the most favourable opportunities and to negotiate the most advantageous terms without favouring or disadvantaging anyone - contrary to the provisions of this Code - for friendly or discriminatory reasons.

4.2.3 Consultants and other service providers

Agreements between Endrich and its agents, representatives and consultants or other service providers must clearly state the actual services to be provided, the basis for calculating fees or charges and any other terms and conditions. All payments must be determined and paid by reference to the services actually performed. Agents, representatives and consultants may not act on behalf of Endrich unless they have express written authority to do so from duly authorised Endrich representatives.

4.2.4 Investment in suppliers

Employees are not authorised to invest in or lend money, directly or indirectly, to a supplier working with Endrich or to a supplier's parent company or subsidiary, except for the purchase of securities available on the regular market within the framework of the applicable legal provisions and the Code of Conduct.

4.2.5 Purchase of goods or acceptance of services from suppliers for private benefit.

Employees are not authorised to use their connection with Endrich to make private purchases on the same terms as those offered by the supplier to Endrich.

4.3 Fair competition

Endrich seeks to comply strictly with the applicable competition laws of the European Union and all countries in which Endrich operates. According to the rules and regulations on fair competition, all written or non-written agreements, contracts, plans, arrangements or schemes between competitors concerning prices, territories, market shares or customers are prohibited. As a result, Endrich employees are not permitted to enter into such contracts or agreements with Endrich competitors. Furthermore, joining a professional association of which competitors are members is subject to the approval of Endrich's management.



4.4 Industrial property rights

Endrich hereby expressly prohibits the intentional interference with the industrial property rights of third parties, irrespective of the reason stated (risk of loss of market share, opportunity to conclude new business, award of a product contract, etc.).

5. Conduct of employees

5.1 Confidentiality

5.1.1 Protection of employees' personal data

Information about employees' personal lives, performance evaluations, promotions and salaries shall be kept confidential. Access to such information shall be limited to duly authorised persons.

Consequently, each employee is required to protect personal information about him or herself and is not authorised to obtain such information about other employees unless authorised to do so in connection with his or her duties. Employees who are not duly authorised shall only have access to information concerning them personally.

5.1.2 Confidentiality of Endrich documents and data

(i) Policy

For the entire time an employee works for the Endrich Group and after leaving Endrich, he or she is not authorised to use or disclose Endrich's confidential information to a third party, regardless of where the information originated or how it came into his or her possession. Any breach of this provision may result in prosecution under applicable employment, civil or criminal law.

In particular, the following information is considered confidential: information on the existence and terms of Endrich's business projects or contracts, Endrich's financial data and other information that must be kept secret, such as information on turnover, intellectual property rights, technological information, information on the hardware and software used to carry out normal business activities.

Disclosure of any of this information without the prior consent of management is prohibited.

Persons whose employment contract has ended or who are no longer bound to Endrich by an employment contract are also obliged to treat all such information confidentially.

5.2 Protection of Endrich property

Endrich employees are required to make proper use of Endrich's property and assets, including intellectual property, technology data, hardware, software and backup media, real property, equipment, machinery and tools, components and cash (the "Assets").

In particular, all employees of Endrich are required to

- use the Assets in accordance with the rules and guidelines in force at Endrich,
- take all precautions to prevent the Assets from being used by unauthorised third parties (including family members),



- to use the assets only in permitted areas or, if at home, exclusively for professional tasks,
- to keep all passwords and codes secret in order to prevent unauthorised access to Endrich data stored in the computer,
- not to reproduce any software - procedures, codes, manuals, brochures, training courses or other programs - developed at Endrich, unless the management has given its consent to do so or an explicit order has been issued by a member of the management,
- generally use Endrich's new IT and communication technologies in accordance with the provisions of the Charter on the proper use of new IT and communication technologies; and
- upon leaving Endrich for any reason (retirement, expiry of employment contract or any other reason), to return to the relevant Human Resources Department, without retaining copies thereof, all documents containing confidential information referred to above within the meaning of Section V, as well as all assets in their possession.

5.3 Loyalty

All Endrich employees have a duty of loyalty in the performance of their duties and responsibilities.

A position on Endrich's board of directors or management is an absolute full-time commitment, and therefore managers are not authorised to hold another position or own or operate a business that requires an active commitment and time unrelated to the duties expressly agreed to in the employment contract.

This provision is not intended to prohibit temporary engagement outside working hours in a business owned or operated by a spouse or other family member that does not compete with Endrich.

As a result, no duties may be performed that could create a conflict of interest between the employee and Endrich.

5.4 Conflict of interest

A conflict of interest exists when an employee or a close relative may have personal benefits from a transaction involving an Endrich Group company, or when an employee seeks to select or have selected a company or person for a transaction when he/she or the close relative has a financial interest in doing so.

In case of doubt, the employee must consult his/her superior to decide whether or not the proposed transaction constitutes a conflict of interest.

5.5 Alcohol, drugs and tobacco

Endrich prohibits any distribution, sale, purchase, exchange, possession or consumption of illegal drugs in the workplace. The same prohibition applies to alcohol, unless its consumption is expressly permitted by applicable company regulations. Smoking in the workplace is prohibited except in designated areas.



6. Confidentiality and Data Protection

Protecting personal data and ensuring cybersecurity is a priority for Endrich. We are committed to always complying with applicable data protection laws and regulations when collecting, storing, processing, transmitting, and sharing personal information. We adhere to the principles of lawfulness, transparency, and proportionality. All employees of Endrich are obliged to protect sensitive data through appropriate technical and organizational measures to ensure the security and protection of this data.

7. Compliance with the Ethics Code

1. All Endrich employees are required to read, know and comply with this Ethics Code and, where appropriate, to communicate its provisions and policies to others in connection with their job responsibilities. Management shall take particular care to present this Code to Endrich employees and ensure that they comply with it.

2. violations: If an Endrich employee is in doubt as to whether his or her actions violate this Code, it is strongly recommended that he or she discuss this with his or her supervisor or management to obtain more specific information about the area and conditions of application of the Ethics Code.

3. interpretation: Any questions regarding the interpretation, scope and application of the Ethics Code should be directed to management, who will consult with Endrich attorneys for decision-making.

4. Sanctions: Any violation of this Ethics Code may be sanctioned by Endrich. Depending on the severity of the violation of this Code and applicable national legal requirements, various sanctioning measures are possible, including a warning or dismissal of the employee.

8. Internal reporting channel

If an employee discovers a violation of this Code of Ethics or a violation of the law, the employee can report this at any time to the external Compliance Reporting Office by telephone (phone +49 (0)761/4567-444), by e-mail to hinweis@wvib.com or by post to the Wirtschaftsverband Industrieller Unternehmen Baden e.V., keyword: HINWEIS, Merzhauser Straße 118, 79100 Freiburg.

If an external partner discovers that an employee of Endrich or a person commissioned by Endrich is in breach of this Code of Ethics, they are encouraged to report this immediately to the internal compliance reporting office by e-mail at report@endrich.com.

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