



Code of Conduct (CoC) of the Vogelsang Group

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Foreword

As an international company, Vogelsang GmbH & Co KG is aware of its responsibility within the value chain. By complying with the Code of Conduct (CoC), the company aims to achieve business success in harmony with legislation, people and the environment.

The Code of Conduct is based on a fundamental understanding of socially responsible corporate governance. These basic rules apply equally to all of us: the Executive Board, managers and employees. In addition, this CoC also sets out our standards for our business partners. Care is taken to ensure that compliance with these directives does not result in any disadvantages, neither for employees nor for business partners.

The Executive Board and managers are aware of their role model function, which is why their actions are measured against the CoC to a particular extent. They are also responsible for ensuring that their employees are aware of the content and comply with its conditions. The Executive Board and managers are contact persons for these issues and take measures to avoid breaches of the rules.

Our actions are in accordance with legal regulations. We are guided by ethical values and principles, in particular integrity and honesty as well as respect for human dignity, as set out in the principles of the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the core labor standards of the International Labor Organization (ILO) and the United Nations Guiding Principles on Business and Human Rights.

For data protection reasons, no information can be provided on the nature, scope and timing of corrective measures.



I. Human rights and working conditions

Vogelsang expected:

Attention to the personal dignity, privacy and personal rights of each individual, not to employ or force anyone to work against their will and to prohibit behavior, including gestures, innuendo or touching, that is in any form sexual, violent, threatening, abusive or exploitative.

a) Freedom of association and collective bargaining

Employees' rights to freedom of association, freedom of organization, collective bargaining and collective bargaining are accepted and respected to the extent that this is legally permissible and possible in the country in which the company operates. If this is not permissible, appropriate compromises are created for the employees.

Without any threat, intimidation or discrimination, employees are free to choose whether or not to belong to a trade union and/or employee representative body. Furthermore, any working conditions, such as informal or short-term employment contracts, must not be an obstacle to unionization.

b) Ban on forced labor

Prison labor and forced labor of any kind must be prevented and work of any kind must be performed voluntarily. All employees must be granted the freedom to terminate their employment themselves, subject to reasonable notice.

c) Ban on child labor and protection of young people

Child labor is not tolerated. In order to make a contribution to combating the abusive exploitation of the labor of children and young people, no employees may be adjusted who cannot prove that they are at least 15 years old. Proof of age must be presented. In countries that fall under the exception for developing countries in accordance with ILO Convention No. 138, the minimum age may be reduced to 14 years.

In addition, children and young people must be protected from economic exploitation, the type of work that could impair their education and endanger their health, physical, mental, spiritual, moral or social development. No employees are adjusted for hazardous work who are not at least 18 years of age in accordance with ILO Convention No. 182.

d) Promoting diversity and equal opportunities

Equal treatment of all employees regarding social or ethnic origin / affiliation, skin color, religion, gender, sexual orientation, age, physical ability, health status, political views, nationality, union membership, marital status or other personal characteristics must be guaranteed and all applicable laws to prevent discrimination in the workplace must be followed. Diversity and equal opportunities are promoted within the company.

e) Remuneration and working hours

All employees receive a fair wage and all legally prescribed social benefits. Remuneration is based on the applicable laws and any existing binding collective agreements and is supplemented by the relevant national minimum wage laws. Payments must be made to employees on time. Employees must be informed clearly and comprehensibly about the basis and legal framework for payment. Transparency of wage and salary statements must be guaranteed. Deductions from wages in the form of disciplinary measures are not permitted without exception. This applies to the entire workforce.

Employment conditions, including wages, working hours, breaks, vacation days, time off and public holidays are subject to applicable laws, regulations and mandatory industry standards of the country in which the business is conducted. Compliance with international labor standards regarding maximum permissible working hours must be observed to ensure the following:

- the weekly working time, including overtime, does not exceed 60 hours, even in exceptional cases, in the absence of such provisions;
- employees have at least one full day off per week.

f) Fair treatment

Employees must be protected from coarse or inhumane treatment in the workplace. This includes, for example, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion and verbal abuse of employees. Such treatment may also not be threatened.

II. Health and safety

The health of employees must be safeguarded by taking appropriate health and safety measures. Orientation towards international standards is essential here.

a) Occupational safety

Work-related illnesses, personal injury and accidents must be avoided wherever possible. In addition to the application of technically safe systems, ensuring safety at work requires exemplary, safe behavior on the part of managers and employees.

The ultimate goal is to prevent fatal and serious accidents. Hazardous work and activities involving hazardous substances may only be carried out in accordance with legally prescribed inspection measures, risk assessments and instruction measures. Preventive controls, emergency measures and an accident reporting system must be implemented and continuous improvement must be striven for. Suitable workplace design, compliance with safety regulations and the provision of suitable personal protective equipment must be ensured.

b) Health

Healthy and committed employees increase the success and performance of companies. For this reason, occupational health and safety measures are continuously improved in order to increase the health rate, minimize malfunctions in operations and constantly improve employee job satisfaction and motivation. In addition, access to drinking water in sufficient quantities and access to clean sanitary facilities must be made possible.

III. Environment, energy and climate protection

This includes the areas of bottom, water, air, climate, biodiversity and the interactions between these areas. Environmental protection includes, in particular, compliance with all applicable regulations, the environmentally friendly development and manufacture of products and their transport, use and disposal, the protection of resources through the application of energy-efficient, environmentally friendly and circular technologies and materials, the avoidance of (particularly) hazardous substances, the reduction of waste and emissions to air, bottom and water, and the minimization of environmental risks.

All negative impacts on the environment and climate resulting from the operating process and company should be kept to a minimum and continuous improvement in terms of holistic sustainability should be strived for.

IV. Business integrity and compliance

a) Compliance with legal regulations

The applicable laws, rules and regulations of the countries in which business activities are carried out are complied with.

b) Fighting corruption

Corruption, bribery, extortion or embezzlement in any form are unacceptable and will neither be practiced nor tolerated.

Advantages or resources may not be offered or accepted in order to obtain unfair or improper benefits. Impermissible advantages may include, for example, cash payments, gifts in kind, pleasure trips or services. In principle, benefits may only be granted within a framework that is customary and appropriate. This is the case if the benefits are in line with social and customary business practices.

c) Export control and compliance with the embargo regulation

The Vogelsang Group and its suppliers undertake to comply with the relevant legal standards for export control - in particular licensing requirements, export and assistance bans - in the context of the transfer and export of our goods.

This includes compliance with the European Embargo Regulation. The embargoes on foreign trade with certain countries (see embargo countries BAFA) are fully complied with.

d) Avoidance of conflicts of interest

Conflicts of interest that affect the credibility of the company, a third party or the trust of external parties must be ruled out. Illegitimate business relationships must be avoided. If this is not possible, these conflicts must be disclosed.

e) Free and fair competition

Compliance with antitrust and competition laws is mandatory, which guarantees free competition. This means that no business activities may be carried out that could be classified as distorting or restricting competition. Such business acts can be, for example, price or submission agreements between several companies that lead to excessive prices for the end customer, or a division of purchasing or sales markets as well as bid rigging.

f) Money laundering prevention

Money laundering activities are prohibited in every respect. The company does not engage in transactions that serve to conceal or integrate criminal or illegally acquired assets. All applicable anti-money laundering laws and regulations must be complied with and complete financial records must be kept. If money laundering activities are suspected, action must be taken and a review by the responsible finance or legal department must follow.

g) Protection of information and company property

Material company property must be handled appropriately and with care. It is protected against loss, theft or misuse. The company's material resources are used exclusively for operational and not for personal purposes.

In addition to the company's intellectual property, confidential company information such as trade secrets and non-public information, business documents and customer information must be protected. Data and information security and respect for intellectual property rights are guaranteed by preventing misuse, theft, fraud or unauthorized disclosure.

h) Data protection

Personal data must be protected so that no personal data may be collected, processed or stored without legal permissibility or the consent of the data subject. Personal data shall only be processed if appropriate technical and organizational measures have been taken against loss, alteration and unauthorized use or disclosure. The statutory regulations on data protection must be complied with, such as the General Data Protection Regulation (GDPR).

V. Dealing with conflict minerals

The use of conflict minerals is avoided in the manufacture of the products in order to prevent human rights violations, corruption and the financing of armed groups or similar. Appropriate measures are implemented with the necessary care. If these components are nevertheless



processed, information on high-risk production sites must be obtained and complete transparency ensured, e.g. with the help of the list of Conflict-Affected and High-Risk Areas (CARAHs) of the Responsible Minerals Initiative (RMI), so that raw material extraction within conflict zones is excluded.

VI. Supply chain

Compliance with the principles of this CoC is expected. Vogelsang encourages Suppliers to enforce the contents of this CoC in their own supply chains. Vogelsang expects its Suppliers to obtain confirmation from each of its sub-suppliers who directly or indirectly provide products or services to Vogelsang that these sub-suppliers act in accordance with this CoC.

VII. Consumer interests

The legal conditions for consumer protection and other associated consumer interests must be guaranteed, such as warranty conditions, information practices, appropriate sales practices as well as understandable and honest marketing practices and product information. Greenwashing / green claims and misleading advertising in any form will not be tolerated.

VIII. Commitments

Appropriate measures are implemented to continuously comply with, document and apply the principles and values described in this CoC. The sensitization and training of employees on the thematic aspects of this CoC are essential.

a) Communication

Honest and transparent communication about the requirements of this CoC and its implementation to stakeholders is elementary.

b) Monitoring processes

Necessary and appropriate processes and controls are lead-through to ensure compliance with the principles described. These processes and controls also apply to suppliers and subcontractors as well as their suppliers.

Ideally, proof should be provided via certified management systems such as DIN EN ISO 9001, DIN EN ISO 14001 or EMAS III - EC 1221/2009 and DIN EN 27001, DIN EN ISO 50001.



c) Notice of violations

We provide a protected mechanism for our employees to confidentially report possible violations of the principles of this CoC: [Internal Reporting Office](#) (in accordance with HinSCHG).

We would also like to ask our business partners to contact the Vogelsang Group anonymously in the event of suspected cases or notices and to inform us confidentially of possible violations.

Whistleblowers are protected and of course there will be no disadvantages and/or retaliation.

d) Measures in the event of violations

If violations of these standards are identified, appropriate steps are actively initiated. Depending on the severity of the violation, this may be a request for corrective action or a general review of the business relationship.



**Confirmation of the supplier to the Supplier Code of Conduct , Code of Conduct (CoC)
of the Vogelsang Group, version dated 06.2024**

We, the undersigned, hereby confirm that:

- we have received and taken note of the above-mentioned CoC,
- we are familiar with all relevant laws and regulations in the countries in which our company operates,
- we report to Vogelsang all material suspected cases of violations of the above-mentioned COC,
- we comply with the principles of the above-mentioned CoC,
- we inform all our employees / suppliers / subcontractors and their suppliers of the content of the above-mentioned CoC and ensure that they also comply with the provisions contained therein.

Name of the company

Contact person

Name (and title) of the undersigned

Date and place

Signature

This document must be signed by authorized representatives and returned to the requesting Vogelsang purchasing organization.