

#BusinessPartnersCodeOfConduct



CODE OF CONDUCT FOR BUSINESS PARTNERS OF THE GROB GROUP



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1. PREAMBLE

2. SCOPE OF APPLICATION

3. WHAT COMPREHENSIVE MEASURES, PROCESSES AND REGULATIONS DO WE EXPECT FROM OUR BUSINESS PARTNERS?

- 3.1 The Code of Conduct and compliance with the law
- 3.2 The Code of Conduct for Business Partners
- 3.3 Sustainability management
- 3.4 Whistleblower system

4. WHAT CONDUCT TOWARD EMPLOYEES AND FELLOW HUMAN BEINGS DO WE EXPECT FROM OUR BUSINESS PARTNERS?

- 4.1 Prohibition against child labor and the protection of young workers
- 4.2 Prohibition against modern slavery, human trafficking and corporal punishment
- 4.3 Indigenous peoples
- 4.4 Occupational health and safety
- 4.5 Appropriate compensation and observance of statutory working hours
- 4.6 Diversity, inclusion and non-discrimination
- 4.7 No unethical recruitment
- 4.8 Security personnel employment
- 4.9 No support for armed groups
- 4.10 Prohibition against unlawful forced eviction
- 4.11 Conflict minerals
- 4.12 Freedom of association and collective bargaining
- 4.13 Interactions with defenders of human rights

5. WHAT CONDUCT DO WE EXPECT FROM OUR BUSINESS PARTNERS WITH REGARD TO THE ENVIRONMENT?

- 5.1 International agreements on environmental protection and environmental responsibility
- 5.2 Reduction of energy consumption and greenhouse gas emissions
- 5.3 Economic use of resources and support for recycling
- 5.4 Biodiversity, wildlife protection and resource-saving land usage
- 5.5 No environmental consequences harmful to human health
- 5.6 Environmental management system

6. WHAT ARE OUR EXPECTATIONS FOR THE BUSINESS INTEGRITY OF OUR BUSINESS PARTNERS?

- 6.1 Prohibition against corruption
- 6.2 Prohibition against money laundering
- 6.3 Prevention of conflicts of interest
- 6.4 Compliance with import and export provisions and sanctions
- 6.5 Compliance with statutory and generally accepted ethical standards for free and fair market competition
- 6.6 Protection of intellectual property and trade secrets
- 6.7 Data protection and information security
- 6.8 Use of artificial intelligence
- 6.9 Financial responsibility, proper accounting, and disclosure of information

7. HOW DO WE APPLY THE CODE OF CONDUCT FOR BUSINESS PARTNERS?

- 7.1 The Code of Conduct for Business Partners as an elementary part of an agreement
- 7.2 What monitoring instruments can GROB employ?
- 7.3 What happens in the event of violations by our business partners?
- 7.4 What happens in the event of violations in our business partners' supply chains?
- 7.5 Reporting misconduct

8. CONTACT PARTNERS

1. PREAMBLE

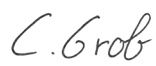
Dear business partners,

our guiding values – innovation, quality, efficiency and responsibility – are not just buzzwords for us, but the benchmark for our past and future actions. They are the foundation of all our business activities and describe how we want to work with others. Compliance with applicable law in all its business activities is a matter of course for GROB in this sense. Additionally, we expect our business partners to live up to their social, ecological and economic responsibilities and to align their business processes accordingly. This also implies that our business partners monitor and actively promote these basic principles at all locations and in all activities. GROB relies on close cooperation with its business partners for this. Against this background, this Code of Conduct for Business Partners ("CoC4BP") forms the basis for trustworthy cooperation between GROB-WERKE GmbH & Co. KG, including all other production sites belonging to the GROB Group, as well as service companies abroad ("GROB" or "GROB Group") and its business partners. In our CoC4BP, we not only communicate the GROB Group's foundation of values to our business partners, which we had already set out in writing in 2018 in the form of a compliance guideline and have developed over the years into an internal Group Code of Conduct ("CoC"), but also the requirements for the implementation of sustainability standards in international supply chains. We see sustainability as both respect for human rights and environmental protections, as well as ethically and legally impeccable business practices and the responsible acquisition of raw materials. In particular, we look to the ten principles of the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the core labor standards of the International Labor Organization (ILO) and the OECD Guidelines for Multinational Enterprises. These internationally recognized frameworks provide companies with a framework for action that enables them to operate sustainably and incorporate human rights concerns into their business activities to the required extent. If the following sustainability requirements go beyond the requirements of the applicable law, these must also be observed. The order of the following provisions has nothing to do with their importance. This Code of Conduct for Business Partners is supplemented by the declaration of principles on the GROB Group's human rights strategy. In it, we refer to the requirements of the Supply Chain Due Diligence Act, which has been in force in Germany since January 1, 2023, and specifically document our commitment to respecting internationally recognized human and environmental rights, our expectations of our employees and suppliers based on this, and the processes we have established to implement our human rights and environmental due diligence obligations. Like our CoC4BP, this declaration of principles is also freely accessible on the GROB website <https://www.grobgroup.com/unternehmen/compliance/>.

Mindelheim, May 1, 2024



Wolfram Weber
Vice Chairman of the
Board & CFO



Christian Grob
Chairman of the
Supervisory Board



Florian Grob



German Wankmiller
Chairman of the
Board & CEO



Christian Müller
Member of the
Board & CSO

GROB attaches great importance to diversity and equality. To improve readability, we have not used the different language forms for male, female, and diverse (m/f/d).



2. SCOPE OF APPLICATION

The term "business partners" refers to all business partners of the GROB Group, in particular our suppliers, service providers, sales representatives, authorized dealers and consultants, but also our customers and investors as well as the media, society, non-governmental organizations ("NGOs") and politics. In this context, the term "employees" always includes all employees, including management, executives and other persons who work for or on behalf of our business partners.

The CoC4BP and its requirements apply directly between GROB and its business partners. However, we expect our business partners' commitment to ensuring that

the values and sustainability standards addressed by our CoC4BP even beyond this business relationship, including all legal requirements, are complied with by their business partners and along their own supply chain in an appropriate and comparable manner.

This CoC4BP replaces the GROB Supplier Sustainability Standards previously applicable to our business partners. The CoC4BP applies in its current version - available at <https://www.grobgroup.com/unternehmen/compliance/>. GROB reserves the right to amend the CoC4BP from time to time. We will inform our business partners separately of any significant changes.

3. WHAT COMPREHENSIVE MEASURES, PROCESSES AND REGULATIONS DO WE EXPECT FROM OUR BUSINESS PARTNERS?

3.1 THE CODE OF CONDUCT AND COMPLIANCE WITH THE LAW

An internal Group Code of Conduct is a valuable tool for establishing fundamental and necessary rules for conduct in the company and creating a

value-oriented corporate culture. It is the foundation for ensuring that employees are aware of human rights, ethical and ecological standards as well as mandatory legal requirements, and can operate within these guidelines in their day-to-day work.

WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

You are aware of and comply with both generally binding legislation and the legislation relevant to your industry. This also means that you respect the local laws, values and ethical concepts of your respective location. You are responsible for ensuring that your employees are aware of the key values of your company and the relevant legal framework, and that they act accordingly. We welcome the implementation of an internal Code of Conduct with sufficient language coverage appropriate to the size of the company.



3.2 THE CODE OF CONDUCT FOR BUSINESS PARTNERS

We are certain that long-term entrepreneurial success cannot be achieved without the trust of our own employees, but also not without that of a large number of external stakeholders such as customers, suppliers, authorities and the public in our company and our products. Acting with integrity and responsibility, and mutual respect are just as important as excellent and future-oriented technologies.

For this reason, we rely on a clear and binding Code of Conduct in all our business activities that expresses our values. We expect the same things from our business partners that we set out internally in our Code of Conduct, and communicate our expectations in this regard with our CoC4BP. In particular, we expect our suppliers and sub-contractors to share our values and to commit to shaping their business relationships and supply chains responsibly.

WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?



You are familiar with the legal standards for the consideration of human rights and environmental standards in international supply chains, in particular the UN Guiding Principles on Business and Human Rights and the contents of the UN Global Compact, as well as with the national and international laws relevant to you and your business activities, such as those relating to the prevention of corruption, competition and sanctions law and product safety. Based on all these frameworks and binding regulations, you define your expectations and requirements for your own business partners, which you usually set out in writing in a Code of Conduct for Business Partners. We recommend that our business partners use this document to communicate clear expectations in the areas of business integrity, human rights and the environment.

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3.3 SUSTAINABILITY MANAGEMENT

As an internationally active company, we take responsibility in making our business practices as sustainable as possible. Over several generations, we have implemented sustainability by never focusing solely on maintaining and expanding economic success, but by also always taking the effects of our own actions on our employees, on the environment, and on

society into account. Appointing sustainability managers or comparable persons and establishing appropriate sustainability management, as well as developing the awareness of employees, particularly in the form of training on the various aspects of sustainability is crucial to ensure that the constantly growing human rights, ethical and environmental concerns are properly taken into account in the business practices of our partners.

WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

You establish a comprehensive sustainability management system that enables you to take sustainability considerations into account in all business decisions. We welcome the appointment of a sustainability manager or a comparable responsible person who is in charge of establishing and implementing a sustainability strategy.



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3.4 WHISTLEBLOWER SYSTEM

Setting up a whistleblower system (and - if legally relevant for you - a complaints procedure within the meaning of the German Supply Chain Due Diligence Act) allows individuals to report human rights and environmental risks, and violations of human rights-related or environmental obligations. The same applies to potential violations of business ethics such as corruption, competition law or accounting. Only those aware of potential weaknesses in their organization are able to independently remedy any occurring misconduct and optimize processes for the future. With this in mind, it is important to provide every whistleblower the opportunity to address their concerns as easily as possible. The protection of whistleblowers is of paramount importance. A whistleblower must not be disadvantaged or penalized for information provided in good faith.

We at GROB have also set up a whistleblower system to facilitate reporting misconduct. This provides a safe way for all parties involved to express concerns or report (potential) misconduct. GROB takes care to consistently follow up on all reports received and to take appropriate action. We would like to encourage every potential whistleblower to use our whistleblower system.

The GROB whistleblower system can be accessed in the following manners:

- Internet (reports can also be submitted anonymously here on request): https://sicher-melden.de/whistle/#/mainpage/icm53606/grob_werke_gmbh_co_kg



- E-mail: compliance@grobgroup.com
- Postal address: Compliance, GROB-WERKE GmbH & Co. KG, Industriestraße 4, 87719 Mindelheim, Germany
- Telephone: Dr. Korbinian Feller, +49 (8261) 996-1903; Dr. Monika Glogger, +49 (8261) 996-1904

WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

You are familiar with all relevant legal requirements for the implementation of whistleblower systems for your company and consistently implement the resulting obligations. You communicate your whistleblowing system and the GROB whistleblowing system to your employees and along your supply chain. You guarantee easy access to your system, for example via a barrier-free online solution and sufficient language coverage that reflects your company's business activities. Even if there is no legal obligation for your company to set up a whistleblowing system, you are committed to a culture of openly addressing faults within your organization and make your employees aware of existing whistleblowing systems of your business partners, in particular the GROB whistleblowing system.

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4. WHAT CONDUCT TOWARD EMPLOYEES AND FELLOW HUMAN BEINGS DO WE EXPECT FROM OUR BUSINESS PARTNERS?

GROB is committed to fully respecting and promoting human rights in accordance with internationally recognized standards. We expect this not only of ourselves, but also of our business partners. We therefore ask our business partners to join us in this commitment and to incorporate internationally recognized human rights principles in their business practices. We expect our business partners to be familiar with the relevant national and international regulations on the protection of human rights and to be aware of the resulting obligations for companies.

4.1 PROHIBITION AGAINST CHILD LABOR AND THE PROTECTION OF YOUNG WORKERS

We reject child labor in any form. This applies to both our own activities and to the supply chain of our business partners.

WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

You are required to implement the legal provisions for the protection of young workers and the minimum age for employees in accordance with the standards of the International Labor Organization (ILO) in your company and to ensure that the working conditions promote the health, safety and development of young people.



4.2 PROHIBITION AGAINST MODERN SLAVERY, HUMAN TRAFFICKING AND CORPORAL PUNISHMENT

We condemn modern slavery, debt bondage, human trafficking and any form of corporal punishment. The dignity and privacy of employees must be respected. This also applies to practices that interfere with the privacy of individuals and the right to sexual self-determination.

WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

You ensure for your company, but also for your supply chain, that no form of forced labor, bonded labor, slavery or human trafficking is associated with your activities. We expect you to implement appropriate policies and measures to ensure that these principles are adhered to in your company and that a respectful and safe working environment is guaranteed. In the event of infringements and documented violations, you will respond with a clear response and, if necessary, sanctions.



4.3 INDIGENOUS PEOPLES

We recognize the rights of indigenous peoples and respect their cultural identity, land rights and opportunities for participation. Our business partners are required to consider and protect the rights of local communities in their activities.

WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

You will comply with the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) if and to the extent that your business activities affect the interests of local communities. We expect you to exercise particular caution when planning new production sites, for example, if these could be built in a region where indigenous peoples are known to live.



4.4 OCCUPATIONAL HEALTH AND SAFETY

Ensuring a safe and healthy working environment for the benefit of all employees is fundamental to sustainable business management. Basic working conditions, including access to clean sanitary facilities and adequate break rooms, must be ensured. The dignity and privacy

of employees must be respected. Occupational health and safety and fire safety measures must be implemented effectively. Evacuation plans and training are mandatory to ensure the safety of all employees in the event of an emergency. Occupational health and safety measures must not be associated with costs for employees.

WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

As an employer, we expect you to actively promote a safe and healthy working environment for your employees, at the least within the framework of applicable national regulations, and to encourage continuous development to improve working conditions. In particular, you take suitable protective measures for your employees to avoid exposure to chemical, physical or biological substances. Furthermore, you ensure that your employees receive all necessary instructions so that they can carry out the tasks assigned to them safely and correctly. We recommend that our business partners set up an occupational health and safety management system, including certification if necessary (e.g., in accordance with ISO 45001). For companies with more than 1,000 employees, we usually require appropriate certification. In any case, GROB will give preference to suppliers who actively operate an occupational health and safety management system, thereby expressing their commitment to occupational health and safety.



4.5 APPROPRIATE COMPENSATION AND OBSERVANCE OF STATUTORY WORKING HOURS

The payment of fair, living wages is of central importance for the creation of stable labor relations and the promotion

of equal opportunities. This includes ensuring that wages are always paid directly, in full and on time.

Working hours must comply with legal requirements and must not be excessive. Employees have the right to appropriate rest periods and time off.

WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

In your role as an employer, you undertake to pay fair and appropriate wages, at least at the level stipulated by local law (minimum wage) and to comply with statutory provisions on working hours and rest periods. At locations where there is no statutory minimum wage, you must at least comply with the standards of the International Labor Organization (ILO). You also promote compliance with international standards on working hours and wages along your supply chain, especially with your suppliers.



4.6 DIVERSITY, INCLUSION AND NON-DISCRIMINATION

We are committed to diversity and condemn any form of discrimination, be it on the basis of national or ethnic origin, skin color, social background, marital status, health status, disability, sexual orientation, age, gender, political opinion,

religion or ideology. For us, unequal treatment in this context also includes, in particular, the payment of unequal remuneration for work of equal value. We always strive to promote the strategic value of diversity and work to ensure that our workforce reflects the diversity of our global society.

WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

In your role as an employer, you are committed to taking active measures to promote diversity, equality and inclusion within your workforce and to prevent discriminatory behavior and bullying among employees. This includes implementing awareness-raising programs, training and corporate culture initiatives to create a diverse and inclusive working environment. Secondly, you ensure that your employees are not discriminated against or otherwise disadvantaged on the basis of national or ethnic origin, skin color, age, gender, sexual orientation, disability, religion, political affiliation, trade union membership, origin or marital status, both in the context of recruitment procedures and applications and in everyday working life in connection with promotions, other benefits, access to training, work assignments, wages, social benefits, termination or retirement. Finally, we also encourage you to committedly support these standards within your own supply chain.



4.7 NO UNETHICAL RECRUITMENT

We reject any form of unethical recruitment, including misleading practices and exploitation of job seekers. Unethical recruitment is understood

as, for example, practices such as the publication of false and unobjective job advertisements that deliberately falsify the requirements and conditions of the job with the intent to deceive job seekers.



WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

In your role as an employer, you adhere to ethical standards when recruiting labor. You ensure that potential employees are not misled about the nature and scope of the work and that no fees are charged for taking up employment.



4.8 SECURITY PERSONNEL EMPLOYMENT

The hiring and deployment of security personnel to protect company premises must be in accordance

with internationally recognized human rights standards. We reject any form of intimidation, including the inappropriate use of force or torture.



WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

As part of your business activities, you ensure that security forces, in particular factory security, are aware of and respect human rights standards. You ensure that the employees and persons responsible do not use disproportionate force, even in extreme situations, and that discrimination is prevented. We welcome the provision of needs-based training courses.



4.9 NO SUPPORT FOR ARMED GROUPS

Beyond the appropriate deployment of security forces to protect the company premises, we reject any form of direct or indirect support for armed

groups, whether in the form of financial means, resources or other assistance. This includes any actions that could contribute to the promotion of violence, conflict or human rights violations.



WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

You do not provide direct or indirect support to armed groups, organized crime or terrorist organizations. You clearly reject any cooperation with parties that violate human rights standards.



4.10 PROHIBITION AGAINST UNLAWFUL FORCED EVICTION

We respect the ban on unlawful forced evictions and the seizure of land, forests and waters in connection with the acquisition, development or other use of land, forests and waters.

WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

You undertake to not carry out, support or tolerate any unlawful forced evictions as part of your business activities.



4.11 CONFLICT MINERALS

As part of our business activities, it is important to us that all minerals and raw materials, including tungsten, tantalum, gold, silver, tin, cobalt, rare earths and ores such as coltan, do not originate from civil war or conflict regions and are not extracted in an exploitative manner.

WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

You are familiar with the internationally recognized standards of the OECD Guidelines for Responsible Supply Chains of Mineral Companies from Conflict-Affected or High-Risk Areas. You take all the necessary steps to ensure that your supply chains are free of conflict minerals. At our request, you are prepared to provide appropriate certificates of origin for the minerals and raw materials used.





4.12 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Freedom of association and the right of employees to strike are fully respected. This also means that no measures are taken to actively prevent the formation of trade unions and employee representatives. The formation, joining and membership of a trade union must also not be used as a reason for unjustified discrimination or retaliation. Instead, fair collective bargaining must be made possible.

WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

You respect the freedom of association and the right to strike of your employees and are committed to an environment of fair collective bargaining and social dialogue. In the event of national legal restrictions on these rights, you endeavor to find alternative, legally permissible opportunities for participation and involvement.

4.13 INTERACTIONS WITH DEFENDERS OF HUMAN RIGHTS

We firmly reject any form of threat, intimidation or discrimination against people who actively campaign for the observance of human rights (human rights activists).

WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

You ensure that people who campaign for human rights at your company's production sites, or criticize the situation in your company are not threatened or discriminated against. You do not permit employees to act "on their own initiative" in suppressing critical voices in order to prevent damage to their company's reputation or the exposure of grievances. You ensure that people who wish to exercise their right to express their opinions have access to your whistleblowing channels and can use them free from the threat of retaliation.

5. WHAT CONDUCT DO WE EXPECT FROM OUR BUSINESS PARTNERS WITH REGARD TO THE ENVIRONMENT?

In addition to our clear commitment to respecting human rights, our commitment to sustainable business practices also includes treating nature and its resources with respect. This understanding characterizes not only our own actions, but also our cooperation with our business partners.



5.1 INTERNATIONAL AGREEMENTS ON ENVIRONMENTAL PROTECTION AND ENVIRONMENTAL RESPONSIBILITY

As part of our environmental responsibility, we not only rely on self-regulation, but also demand compliance with all relevant national environmental legislation and international regulations such as the Basel Convention on the Transboundary Movement of Hazardous Wastes and their Disposal, the Minamata

Convention (mercury) and the Stockholm Convention (POPs Convention) in order to ensure the highest standards in environmental and human rights issues.

5.2 REDUCTION OF ENERGY CONSUMPTION AND GREENHOUSE GAS EMISSIONS

We not only work on reducing the greenhouse gases we emit ourselves, but also expect our business partners to make an appropriate contribution in the context of this global challenge. Concrete measures to reduce greenhouse gases must be an integral part of our shared commitment to a future worth living. Energy savings, the expansion of renewable energies and measures to increase energy efficiency are cornerstones of

these endeavors. With responsible energy consumption and the continuous promotion of the development of energy-efficient products and production processes, we set not only economic standards, but also ecological ones.

WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

You are obligated to ensure that your company's activities comply with national and international legal requirements relating to the environment and sustainability. The precautionary principle is taken into account in your actions. This also includes checking your supply chains in an appropriate manner to ensure that your suppliers comply with these requirements and take appropriate measures to counteract potential or actual violations.



WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

We are in favor of including climate targets in our business strategy, which ideally should include a concept for achieving climate neutrality in accordance with the Paris Climate Agreement, at least by 2050. In addition to the reporting of climate-relevant key figures in accordance with legal requirements, we focus on continuous improvement of the respective data basis with our business partners and communication of information on total energy consumption and CO2 emissions at the product level. In this manner, you make a valuable contribution to ensuring that GROB can also continuously improve its key CO2 figures.



5.3 ECONOMIC USE OF RESOURCES AND SUPPORT FOR RECYCLING

The economic use of water and other natural resources such as air and soil is a primary goal of our environmental efforts. By using these resources efficiently, we demonstrate

our responsible use of these vital elements and make an essential contribution to sustainable resource management. In addition to economic use, we also focus on clear recycling measures and preventing or reducing waste.



WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

We expect our business partners to have individualized company guidelines that explicitly address the responsible use of resources and are aimed at reducing the impact on water, air and soil quality to the absolute minimum. We also value a transparent strategy for reducing resource consumption, which includes recycling as well as other sustainable practices and is geared towards taking environmental concerns into account. This includes, among other things, the continuous development of environmentally friendly packaging for your products.



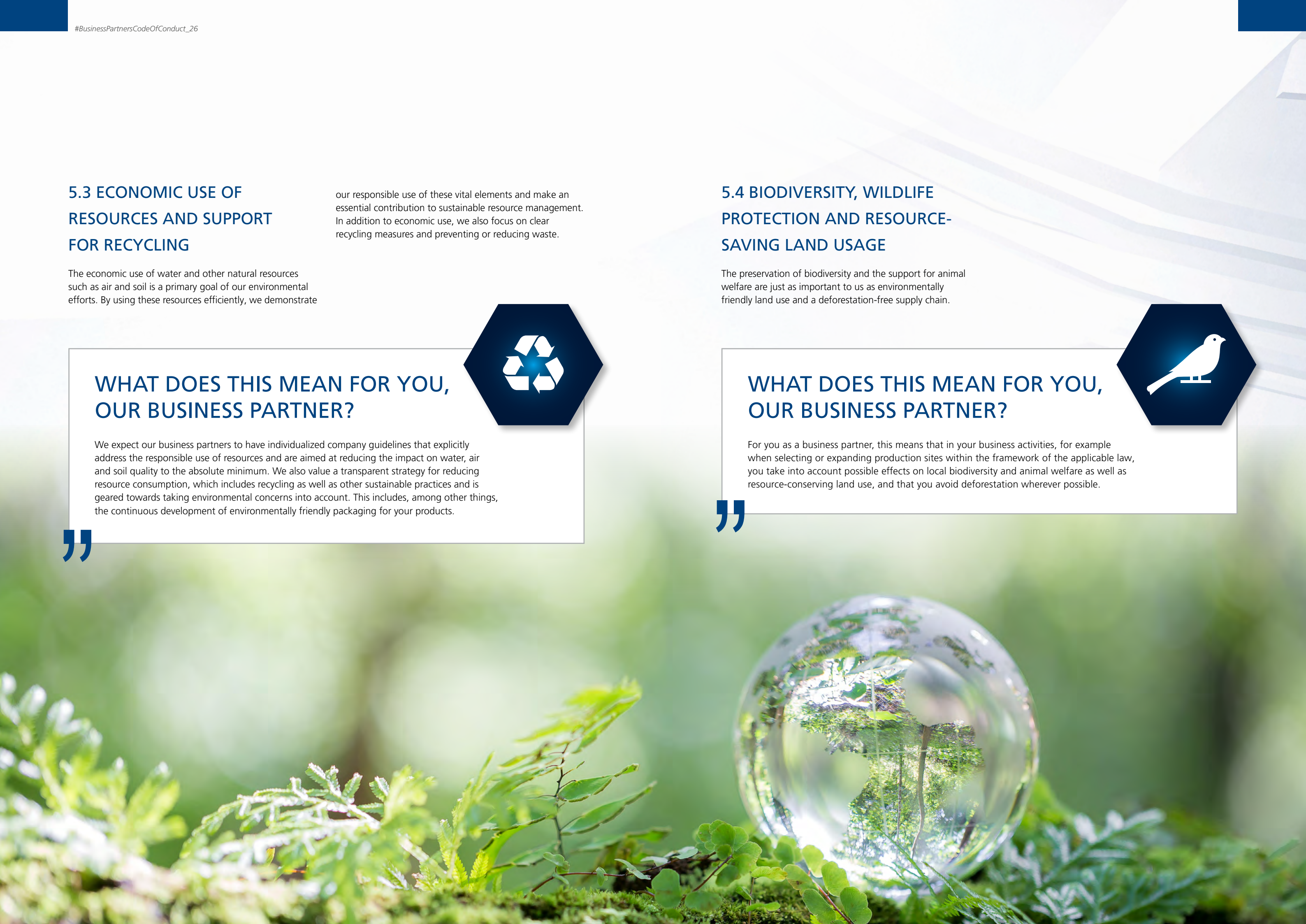
5.4 BIODIVERSITY, WILDLIFE PROTECTION AND RESOURCE-SAVING LAND USAGE

The preservation of biodiversity and the support for animal welfare are just as important to us as environmentally friendly land use and a deforestation-free supply chain.



WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

For you as a business partner, this means that in your business activities, for example when selecting or expanding production sites within the framework of the applicable law, you take into account possible effects on local biodiversity and animal welfare as well as resource-conserving land use, and that you avoid deforestation wherever possible.



5.5 NO ENVIRONMENTAL CONSEQUENCES HARMFUL TO HUMAN HEALTH

In this context, we also take sustainable corporate management to mean that operational activities must

not cause any harmful soil changes, water pollution, air pollution, noise emissions or excessive water consumption that could lead to a significant impairment of the natural basis for food and drinking water or human health.

WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

For you as a business partner, this means that, with the help of targeted measures and established processes, you prevent impairment of the natural basis for food and drinking water and prevent health risks to people.



5.6 ENVIRONMENTAL MANAGEMENT SYSTEM

Management systems help with compliance with the diverse and constantly updated regulatory requirements in the field of environmental law. Certifications in accordance with international standards and norms ensure transparency and reliability.

WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

We expect our business partners to align their existing processes in this area on the basis of the globally recognized ISO 14001 (environmental management) and ISO 50001 (energy management) standards as well as corresponding industry standards, and to continuously work on improving their performance in this area. For companies with more than 1,000 employees, we usually require appropriate certification. In any case, GROB will give preference to suppliers who actively operate appropriate management systems, thereby demonstrating their commitment to environmental protection.



6. WHAT ARE OUR EXPECTATIONS FOR THE BUSINESS INTEGRITY OF OUR BUSINESS PARTNERS?

The cornerstones of our business relationships are based on the highest ethical standards, setting our clear stance against any form of dishonesty and illegal practices. A comprehensive understanding of and strict compliance with all relevant laws and regulations are essential for us. Compliance is not just a legal obligation, but a central component of our corporate responsibility, and everyone has a contribution to make.

6.1 PROHIBITION AGAINST CORRUPTION

There is no place for any form of corruption in our business relationships. Bribery, undue advantage or other corrupt behavior is unacceptable and is contrary to our core values as well as a number of national and international regulations and laws. Our clear stance is not just a legal obligation, but a cornerstone of our corporate culture.

WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

You undertake to take a strict stance against all forms of corruption, for example by incorporating clear guidelines on corruption prevention in your own Code of Conduct and corresponding internal processes, e.g., for onboarding business partners before entering into business relationships. We expect our business partners to carry out regular risk analyses that help to identify potential weaknesses and take appropriate measures to prevent cases of corruption. We also presume that employees of our business partners receive an appropriate level of training to be able to detect relevant corruption risks and to be able to make legally sound decisions.



6.2 PROHIBITION AGAINST MONEY LAUNDERING

We also pursue a zero-tolerance policy with regard to money laundering and the financing of terrorism. Implementing control mechanisms is essential to ensure that business practices are not used to conceal illegal activities.

WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

We require that you review your customer relationships with regard to money laundering risks in accordance with current standards. This includes implementing effective approval processes to ensure that financial transactions are appropriately monitored and suspicious activities are detected promptly.



6.3 PREVENTION OF CONFLICTS OF INTEREST

The prevention of conflicts of interest is another important building block for stable and resilient business relationships. For this reason, personal relationships and private interests must not influence business decisions. Potential conflict situations can arise in particular when

financial, personal or family relationships exist with a supplier, customer or business partner. To prevent the risk of inappropriate influence from arising in the first place, established processes are needed to identify, disclose and resolve potential conflict situations, as well as ongoing awareness efforts for employees.



WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

We expect you to address potential conflicts of interest directly when working with us, but also with other partners. We recommend that you include the topic of conflicts of interest in the Code of Conduct and other company guidelines and effectively monitor compliance with these requirements.

6.4 COMPLIANCE WITH IMPORT AND EXPORT PROVISIONS AND SANCTIONS

Compliance with all relevant import and export regulations as well as national and international customs regulations is essential for all globally active companies.



WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

As our business partner, you undertake to comply with all legal regulations and requirements relating to international trade. In this context, we in particular expect of you the implementation of a thorough risk evaluation of all business relationships and orders. This includes a careful examination prior to the conclusion of contracts, but also of ongoing business relationships, to ensure that there are no violations of applicable import and export regulations.



6.5 COMPLIANCE WITH STATUTORY AND GENERALLY ACCEPTED ETHICAL STANDARDS FOR FREE AND FAIR MARKET COMPETITION

We promote fair and open competition. This includes the consistent rejection by all market participants of practices that can hinder, manipulate or distort competition. All rules of competition and antitrust law must be complied with.



WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

As our business partner, you are committed to fair competition in all your business relationships. In particular, this means that you will not enter into any price agreements or divide up territories with other economic players - be they competitors, customers or suppliers - and that you will make your decisions without exchanging sensitive, competition-relevant information. If your company has a dominant market position in an area, do not exploit this position in a way that violates antitrust law, for example by discriminating against other companies or hindering their competitive opportunities. With the help of suitable training concepts, you create the basis for ensuring that your employees are sufficiently aware of the situations and issues of competition law relevant to them, that they know the legal framework conditions and ethical standards in this area, and that they can also implement these in practice.



6.6 PROTECTION OF INTELLECTUAL PROPERTY AND TRADE SECRETS

of plagiarism in the business world. The same strict standard of care applies to the handling of business secrets of business partners and third parties.

Contractual and legal provisions must be complied with.

Respect for and protection of intellectual property is the basis of a trusting working relationship. For this reason, there is no room for the acquisition and use

WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

We expect our business partners to respect the intellectual property rights of GROB and their other business partners, and to protect the relevant data and information from unauthorized use. This also includes checking and ensuring that there are no infringements of patents, copyrights, trademarks or other intellectual property rights.



6.7 DATA PROTECTION AND INFORMATION SECURITY

Data protection and information security are fundamental to an increasingly digitalized day-to-day business - on the one hand to protect the right to informational self-determination

of current or former employees, business partners and other data subjects whose personal data is collected and processed in connection with business activities, on the other hand to ensure the functionality and security of business processes.

WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

We require that our business partners collect, process, secure and delete all personal data with the greatest possible care in accordance with the applicable national and international regulations, in particular the General Data Protection Regulation (GDPR), and protect it from unauthorized access. Data breaches relating to GROB detected by our business partners must be reported to GROB immediately (datenschutz@grob.de). We also expect our business partners to secure their IT systems against internal and external attacks in accordance with current standards and legal requirements and to comply with both contractual and statutory information and reporting obligations. All security-relevant events affecting GROB must be reported to GROB immediately (security@grob.de).

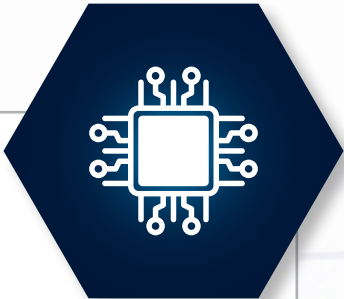




6.8 USE OF ARTIFICIAL INTELLIGENCE

The increased use of artificial intelligence ("AI") offers great potential for all sectors of the economy. However, it is also the responsibility of companies to be aware of the legal implications and possible consequences associated with the use of AI in the business environ-

ment and, building on this, to create clear framework conditions for the legally secure, transparent and ethical use of AI for their own employees, but also in the context of their business partners, and to adapt these to the constantly evolving circumstances.



WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

We call on our business partners to use suitable processes and measures to ensure that the AI applications used comply with ethical standards and do not violate legal regulations.



6.9 FINANCIAL RESPONSIBILITY, PROPER ACCOUNTING, AND DISCLOSURE OF INFORMATION

Financial responsibility is based on legally compliant and complete accounting, and continues in the transparent publication of financial results in accordance with generally recognized

accounting principles. Information is provided transparently, accurately, on an ongoing and timely basis and communicated in accordance with applicable laws and other guidelines.



WHAT DOES THIS MEAN FOR YOU, OUR BUSINESS PARTNER?

We expect our business partners to keep complete, legally compliant and transparent accounts. Each business partner is responsible for ensuring that all financial transactions and reports comply with existing regulations and international standards.



7. HOW DO WE APPLY THE CODE OF CONDUCT FOR BUSINESS PARTNERS?

Transparency and fairness are core values of our business relationships. We strive to communicate clearly and openly with our business partners to establish a partnership based on trust and understanding.

7.1 THE CODE OF CONDUCT FOR BUSINESS PARTNERS AS AN ELEMENTARY PART OF AN AGREEMENT

This CoC4BP is an integral part of all contracts and GROB's General Terms and Conditions. Irrespective of this, it is the fundamental basis of any cooperation between GROB and its business partners, regardless of whether the business relationship for GROB is on the purchasing or sales side.

The business partner accepts that compliance with the CoC4BP is an essential prerequisite for GROB for any type of business relationship.

7.2 WHAT MONITORING INSTRUMENTS CAN GROB EMPLOY?

In order to ensure that our business partners fulfil our ethical standards, GROB reserves the right to conduct audits. These audits serve not only to ensure compliance with our CoC4BP, but the continuous improvement of our cooperation. Further details on this are set out in the individual contractual provisions between GROB and the business partner or in the General Terms and Conditions.

7.3 WHAT HAPPENS IN THE EVENT OF VIOLATIONS BY OUR BUSINESS PARTNERS?

We take decisive action in the event of violations of our CoC4BP. This can range from immediate corrective measures to contract cancellation and compensation for damages incurred, depending on the severity of the violation. Further details on this are set out in the individual contractual provisions between GROB and the business partner or in the General Terms and Conditions. We expect our partners to work together with us to avoid possible violations to the best of their knowledge and belief and to remedy any occurring violations immediately.

7.4 WHAT HAPPENS IN THE EVENT OF VIOLATIONS IN OUR BUSINESS PARTNERS' SUPPLY CHAINS?

GROB requires that its business partners also endeavor to comply with human rights and environmental due diligence obligations and ethical standards within their supply chain. In the event of violations within this supply chain, we require our direct business partners to take immediate action to remedy and rectify the irregularities. In the event of repeated or serious violations, such circumstances may also lead to a review and, in exceptional cases, to the termination of the business relationship with our direct business partner.

7.5 REPORTING MISCONDUCT

We encourage all employees, business partners and other stakeholders to report misconduct. GROB is committed to fostering a culture of open communication where all concerns are taken seriously. All reports are treated confidentially and investigated thoroughly.

With the belief that integrity and compliance are the cornerstones of a successful and sustainable business relationship, we thank our business partners for their co-operation and commitment. Together, we are committed to the highest standards and create a business environment based on trust, respect and responsibility.



8. CONTACT PERSONS

If you have any questions about this document and its application, please contact the Legal & Compliance organizational unit of the GROB Group:

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