

GROSSHAUS

Stanz-, Feinstanz-, Stanzbiegetechnik

CODE OF
CONDUCT

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Preamble

Egon Grosshaus GmbH & Co KG is committed to its worldwide social responsibility. In the context of its business activities, it bears particular responsibility towards the company itself, towards customers and suppliers in the value chain and towards the environment and society.

This Code of Conduct serves as a guide to our shared values with regard to social responsibility and fair competition.

As is generally known, soliciting, accepting or being promised benefits in direct or indirect connection with the employment relationship is prohibited. Even the slightest appearance that employees could be open to accepting personal benefits in connection with the fulfilment of their duties must be avoided. Any employee who accepts unauthorised rewards or gifts must therefore expect consequences under employment law.

The aim of this Egon Grosshaus GmbH & Co. KG Code of Conduct is to promote environmental responsibility, fair and healthy working conditions and ethical and sound business relationships (so-called environmental, social, governance – ESG – factors) throughout the Egon Grosshaus GmbH & Co. KG organisation.

By signing this document, Egon Grosshaus GmbH & Co. KG is committing to its compliance with the following principles.

I. General principles

1. Fundamental concept

Egon Grosshaus GmbH & Co KG recognises its social responsibility and is committed to fulfilling that responsibility in all its business activities.

2. Compliance with the law

Egon Grosshaus GmbH & Co KG undertakes to comply with applicable legislation and other relevant provisions of the countries in which it operates in all its business activities and decisions. Business partners must be treated fairly. Contracts are honoured, taking account of any changes in the framework conditions.

3. OEM-specific requirements

Many customers and business partners – especially in regulated or quality-critical industries – have specific requirements in terms of ethical behaviour, transparency and compliance. Egon Grosshaus GmbH & Co KG undertakes to fulfil those requirements insofar as they form part of contractual agreements.

II. Principles in relation to human rights and the provisions of employment law

1. Human rights

Egon Grosshaus GmbH & Co KG respects and supports the observance of internationally recognised human rights. In particular, it recognises human rights as defined by the UN Charter of Human Rights (Universal Declaration of Human Rights, General Assembly Resolution 217 A (III) of 10.12.1948).

2. Prohibition of discrimination

Egon Grosshaus GmbH & Co KG rejects any form of discrimination within the framework of applicable rights and laws. This relates in particular to discrimination against employees on the basis of race, ethnic origin, gender, religion or belief, disability, age or sexual identity.

3. Diversity, equality, and inclusion

Egon Grosshaus GmbH & Co. KG is committed to fostering an environment of mutual respect and inclusivity, where all individuals are valued and free from any form of prejudice, discrimination, intimidation or harassment. All employees are treated equally regardless of age, gender, gender identity, ethnic origin, nationality, religion or belief, disability, or sexual orientation. The importance of diversity within the workforce is recognised and actively supported. The inclusion of people with physical or mental disabilities is encouraged.

4. Ethical recruiting

Egon Grosshaus GmbH & Co. KG is committed to ethical recruitment practices. The use of misleading or fraudulent practices in recruitment is prohibited. Information on working conditions, wages, place of work, accommodation and other benefits is provided transparently and truthfully. Employment contracts are provided in writing and in an easily understandable language. The identity documents of employees are not be retained or manipulated. Any accommodation must meet the legal standards at a minimum. The company also promotes the professional and personal development of its employees, taking their individual skills and interests into account.

5. Occupational health and safety

Egon Grosshaus GmbH & Co KG guarantees occupational health and safety in the workplace within the framework of national regulations. The company supports continuous development to improve the working environment.

All employees are obliged to be familiar and comply with the applicable health and safety regulations.

Employees are expected to set a good example by strictly applying the health and safety regulations themselves and ensuring that others do the same. They are also expected to avoid accidents and/or risks and act promptly to ensure that potential hazards are reported and eliminated immediately.

6. Working conditions, prohibition of forced labour and child labour

Egon Grosshaus GmbH & Co KG respects the right to freedom of association and assembly of its employees within the framework of applicable rights and laws. The company complies with health and safety regulations regarding the maximum permitted working hours and remuneration, in particular the level of remuneration, in accordance with applicable laws and regulations.

Employees must be protected from physical punishment and from physical, sexual, psychological and verbal harassment. The privacy of employees is respected.

The prohibition of forced labour of any kind is observed. In particular, the Forced Labour Convention of 1930 (Convention 29 of the International Labour Organization) and the Abolition of Forced Labour Convention of 1957 (Convention 105 of the International Labour Organization) are observed.

Egon Grosshaus GmbH & Co. KG also complies with the regulations prohibiting child labour, in particular the Minimum Age Convention of 1973 (Convention 138 of the International Labour Organization) and the Worst Forms of Child Labour Convention of 1999 (Convention 182 of the International Labour Organization). If a national regulation concerning child labour provides for stricter standards, these must take precedence.

7. Use of private or public security forces

Egon Grosshaus GmbH & Co. KG may operate in locations or be involved in situations that necessitate the deployment of security personnel. The company ensures that all security personnel deployed adhere to the stipulated requirements for social responsibility and human rights as outlined in this Code of Conduct.

It is of particular importance to ensure that security forces do not permit physically or psychologically cruel, inhuman, or degrading treatment and that they respect the rights of the local population.

III. Principles of our business activities

1. Prohibition of corruption

Egon Grosshaus GmbH & Co. KG rejects corruption and bribery. When dealing with business partners and government institutions, the interests of the company and the private interests of employees are strictly separated on both sides. Decisions are made free of extraneous considerations and personal interests. The applicable criminal legislation on corruption must be observed.

Granting of personal benefits by the company and its employees to domestic or foreign public officials (such as civil servants or employees in the public sector) with the aim of obtaining benefits for the company, themselves or third parties is not permitted.

2. Conduct towards competitors

Egon Grosshaus GmbH & Co KG respects fair competition. It therefore complies with the applicable legislation that protects and promotes competition, in particular the applicable antitrust laws and other laws regulating competition.

When dealing with competitors, these regulations prohibit in particular agreements and other activities that unfairly influence prices or conditions or unduly impede free and open competition.

3. Conflicts of interest

The business activities and decisions of employees must serve the interests of Egon Grosshaus GmbH & Co. KG and must not be influenced by personal interests or relationships with suppliers, customers, competitors, other employees or persons associated with the employee.

A conflict of interest is a situation in which an employee's personal interests, whether private or business-related, may influence their impartial and legitimate business decisions or their pursuit of the interests of Egon Grosshaus GmbH & Co. KG in the best possible way.

Employees of Egon Grosshaus GmbH & Co. KG must avoid conflicts between personal interests and the business activities of Egon Grosshaus GmbH & Co. KG and disclose potential conflicts of interest.

4. Hospitality and gifts

Personal benefits of monetary value in return for preferential treatment in business dealings between companies may not be offered, promised, granted or approved. Similarly, when dealing with business partners, personal advantages of value may not be solicited or accepted in return for preferential treatment in commercial transactions. The management and employees of Egon Grosshaus GmbH & Co. KG may not offer, promise, solicit, grant or accept any gifts, payments, invitations or services in business transactions that are granted with the intention of unfairly influencing a business relationship or in situations where there is a risk of jeopardising the professional independence of the business partner. This is generally not the case for gifts and invitations that are within the scope of normal business hospitality, custom and courtesy. The following rules must be observed:

Private business and financial transactions that conflict with the interests of the company or could influence the decisions of employees and their work for the company must be avoided. In particular, the following provisions on gifts, invitations to meals and events etc. must be observed:

- Employees of Egon Grosshaus GmbH & Co KG may not solicit invitations to meals or events or gifts, other benefits, personal services or favours from business partners.
- As a guest of business partners, employees may only accept invitations to events or business meals if the invitation is voluntary, serves a legitimate business purpose and the meal takes place in the context of normal cooperation (e.g. lunch during a seminar or meeting, a reception following an event or a dinner at events lasting several days). As a rule, employees must inform their supervisors of other invitations and meals paid for by business partners in advance, but if this is not possible for organisational reasons, immediately thereafter (within 2 days at the latest).
- Business partners are not permitted to cover travel and accommodation costs. If a business partner pays for an overnight stay or accommodation is provided on their premises, the standard market price must be determined, paid to the business partner and an internal reimbursement of costs arranged as part of the settlement of travel expenses.
- Attendance at entertainment and sporting events or other events as a guest of any one business partner is permitted no more than twice a year. A representative of the host company must be present. Employees of Egon Grosshaus GmbH & Co. KG must have obtained authorisation from the managing partner (CEO) **before** accepting an invitation of this sort.
- If employees purchase goods or services from suppliers, dealers or customers for private purposes, the standard market price must be paid and the payment documented.
- Requesting or accepting payments, loans or other financial benefits of any kind from suppliers, dealers or customers for personal gain is not permitted.

- Suppliers or customers may not sponsor events organised by Egon Grosshaus GmbH & Co. KG, celebrations to mark the departure of employees, birthday parties or other occasions. In principle, employees may not request or accept support from suppliers for events for charitable or similar purposes, either in their own name or in the name of the company. Otherwise, the possibility that criteria other than price, quality and performance play a role in the selection of suppliers cannot be ruled out.
- Employees may only take advantage of discounts and other benefits offered by suppliers, dealers and customers if these are granted to all employees of Egon Grosshaus GmbH & Co. KG. When purchasing or selling goods or services on behalf of Egon Grosshaus GmbH & Co. KG, discounts or benefits in favour of an individual or a group of employees may neither be demanded nor accepted.
- Employees and their relatives may not solicit or accept gifts or other personal benefits from suppliers, dealers or customers. Promotional material and other gifts that exceed the value of the currently applicable tax-free limit, which is €50.00, may be accepted if they are given voluntarily and if the possibility that they may influence employees' decisions can be ruled out. Such gifts should be collected and passed on to charitable organisations, e.g. for raffles or similar. The contact for this is the Communications department.
- Offering or accepting gifts or hospitality with the aim of influencing a third party in order to obtain (or maintain) a business advantage is prohibited.
- Offering or accepting gifts or hospitality or participating in events that are ethically or socially questionable or that damage the personal assets of a third party, including their reputation, is prohibited.

IV. Principles of environmental responsibility

1. Environmental protection

Egon Grosshaus GmbH & Co KG is committed to the goal of protecting the natural foundations of life for present and future generations. Laws and regulations issued for the protection of the environment must be observed.

Employees are expected to observe and implement responsible use of natural resources, limitation of energy consumption and proper waste management in the performance of their duties, while ensuring that suppliers and other business partners fulfil the requirements of environmental protection.

In addition to general environmental protection, Egon Grosshaus GmbH & Co. KG pursues specific goals to reduce its ecological footprint. This includes the reduction of CO2 emissions along the value chain, promotion of energy-efficient processes and technologies and use of sustainable materials and resource-saving production methods.

2. Protection of land, forest, and water rights, as well as local communities

Egon Grosshaus GmbH & Co. KG is committed to the protection of land, forests, and water bodies, the use of which secures the livelihoods of people, especially ethnic minorities and indigenous populations. The company acknowledges the right of the local population to utilise these natural resources for their livelihood.

V. Principles of communication

1. Communication

Egon Grosshaus GmbH & Co KG communicates openly and in a way that encourages dialogue in relation to the requirements of this Code of Conduct and its implementation with employees, customers, suppliers and other interest and stakeholder groups.

2. Protection against reprisals

Egon Grosshaus GmbH & Co KG assures all employees who submit a complaint that they will be protected from threats, harassment and any other disadvantages within the company. Whistleblowers do not have to fear dismissal.

VI. Principles of data and information management

1. Business secrets/confidentiality

Egon Grosshaus GmbH & Co. KG respects and protects the trade and business secrets of others. Confidential information and confidential documents may not be passed on to third parties without authorisation or made accessible in any other way, unless authorisation has been granted, the information is publicly accessible or an enforceable decision by an authority or court so requires.

2. Disclosure of information

Employees of Egon Grosshaus GmbH & Co KG who communicate financial and non-financial information to the company's stakeholders in the course of their work are obliged to do so openly and in accordance with the applicable legislation and regulations.

POLICY

Code of Conduct

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3. Data protection

Acts that infringe the privacy, the protection of the family, home or correspondence of employees and attacks on the honour or reputation of employees are prohibited.

VII. Liability/Responsibility

A breach of this Code of Conduct constitutes a breach of employee obligations. Depending on the circumstances of the case and its severity, a breach of the provisions of this policy may result in disciplinary action under applicable employment law, including termination of employment, or liability under other legislation, including contractual liability.

VIII. Scope of application, implementation, suppliers

1. Scope of application

This Code of Conduct applies to all branches and business units of the company.

2. Implementation and compliance

Egon Grosshaus GmbH & Co KG shall familiarise its employees with the contents of this Code of Conduct and the obligations arising from it. The company shall take appropriate measures to ensure that the Code of Conduct is observed.

3. Suppliers, Service Providers

We expect that the company's direct suppliers (i.e. those with whom we have contractual business relationships) will comply with the Code of Conduct of Egon Grosshaus GmbH & Co. KG. Furthermore, they are obliged to promote the Code of Conduct of Egon Grosshaus GmbH & Co. KG among their suppliers (upstream suppliers), as well as comply with the Code of Conduct of Egon Grosshaus GmbH & Co. KG to the best of their ability, and to request that they also comply with the Code of Conduct of Egon Grosshaus GmbH & Co. KG. As part of its management processes, the company reserves the right to randomly review the application and effectiveness of this Code of Conduct among its direct suppliers in the supply chain (e.g. through site visits, audits or surveys).

Egon Grosshaus GmbH & Co. KG

