

d.velop Code of Conduct for Suppliers and Business Partners

Preamble

d.velop is committed to ecologically, ethically and socially responsible corporate governance. We therefore also expect our employees to observe the principles of ecological, social and ethical conduct and to integrate them into our corporate culture. We strive to continuously optimise our business activities as well as our products and services from a sustainability perspective.

We expect the same conduct from our contract partners, consultants, suppliers, manufacturers, representatives and all other third-party undertakings that together constitute the d.velop supply chain ("Suppliers"). We ask you to contribute to this initiative in a holistic sense. The following d.velop Code of Conduct for Suppliers and Business Partners (the "Supplier Code of Conduct") provides the framework for acceptable conduct which we expect from our Suppliers. All d.velop Suppliers are required to implement the requirements of this Supplier Code of Conduct within their own processes and supply chains.

This Supplier Code of Conduct is based on national legislation and regulations, such as the Supply Chain Act (Lieferkettensorgfaltspflichtengesetz - LkSG) and international conventions, such as the United Nations Universal Declaration of Human Rights, the Children's Rights and Business Principles, the United Nations Guiding Principles on Business and Human Rights, and the international labour standards of the International Labour Organization.

d.velop reserves the right to update this document at regular intervals and adapt it to legal and business requirements.

Social Responsibility

Prohibition of forced labour

Our Suppliers ensure that they do not use or permit the use of forced labour, slave labour or comparable work. Employee labour must be voluntary and without threat of punishment.

In addition, our Suppliers must take effective steps to eliminate and prevent forced labour. The individual freedom and dignity of workers must be respected. Employees must be able to terminate their work or employment relationship at any time. Furthermore, there must be no inappropriate treatment of workers, such as psychological hardship, sexual or personal harassment or humiliation. The hiring or use of security personnel must be prohibited if individuals are treated in an inhumane or degrading manner or injured in carrying out their duties, freedom of association is impacted, or the security personnel violate applicable laws.

Our Suppliers must strictly prohibit any form of torture or cruel, inhuman or degrading treatment or punishment. This also includes psychological and physical abuse and the use of coercion or violence.

Prohibition on child labour

Our Suppliers may not use child labour at any point in their activities. They must comply with the recommendations in the ILO Conventions on the minimum age for the employment of children. Furthermore, our Suppliers must ensure that this minimum age is no lower than the age required to complete compulsory schooling. Under no circumstances may employees be under 15 years of age. Our Suppliers expressly commit to the unrestricted prohibition on, and effective elimination of, the worst forms of child labour, such as slavery, debt bondage, forced and compulsory labour.

If children are found at work, our Suppliers must implement and document the measures to be taken to remedy the situation and enable the children to attend school. Young workers under the age of 18 must not be engaged in work that is harmful to the health, safety or morals of children. Special safeguards must be observed.

Fair remuneration

Remuneration for regular working hours and overtime must correspond to the national statutory minimum wage or the minimum standards customary in the industry, whichever is higher. Employees must be granted all legally prescribed benefits. Our Suppliers undertake to pay all employees appropriate wages (local minimum wage). Wage deductions as punitive measures are not permitted. Our Suppliers must ensure that employees receive clear, detailed and regular written information on their remuneration structure.

Compatibility of work and private life

The regulations regarding working hours are in line with the ILO Conventions and correspond at least to the nationally applicable law. Weekly working time, including overtime, must not exceed 60 hours. Overtime must be voluntary. Employees must be granted at least one day off after six consecutive working days. Exceptions are only possible in emergencies or exceptional circumstances.

Furthermore, our Suppliers must take measures to promote employee work-life balance.

Freedom of association

Our Suppliers must respect the right of workers to form and join organisations of their choice, to bargain collectively and to strike. In cases where freedom of association and the right to collective bargaining are restricted by law, our Suppliers must provide alternative means of independent and free association of workers for the purposes of collective bargaining. Employees must not be discriminated against based on their founding, joining or membership of such an organisation. Employee representatives must be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner.

Prohibition on discrimination

The unequal treatment of employees in any form is not permitted unless it is justified by the requirements of the relevant employment. This applies, for example, to discrimination based on gender, national, ethnic or social origin, skin colour, disability, health status, political views, ideology, religion, age, pregnancy, or sexual

orientation. Our Suppliers must ensure equal opportunities among employees and equal pay for work of equal value, without discriminating based on gender-specific characteristics or other discriminatory factors. The personal dignity, privacy and personality rights of each individual must be respected.

Training and skills development

Our Suppliers must continuously promote the training and skills development of their employees and are actively committed to training their own suppliers and partners throughout the value chain. This includes regular courses, particularly on sustainable environmental, social and ethical business practices, as well as the targeted advancement of employees' professional development and qualifications. In addition, our Suppliers must sensitise their employees to the importance of sustainability and its integration into daily work processes.

Health and safety

Our Suppliers must provide a safe and healthy working environment. By establishing and applying appropriate occupational safety systems, our Suppliers must take the necessary precautions against accidents and damage to health that may arise in connection with their activities. Appropriate measures must be taken to prevent excessive physical or mental fatigue among employees. In addition, employees must be regularly informed and trained on applicable health and safety standards and safety measures. Our Suppliers must provide employees with access to sufficient drinking water and access to clean sanitary facilities.

Preservation of nature

Our Suppliers must not, in violation of their legitimate rights, deprive third parties of land, forests or bodies of water, the use of which secures the livelihoods of people. They must refrain from harmful soil changes, water and air pollution, noise and excessive water consumption if this harms people's health, significantly impairs the natural basis for food production, or prevents people from having access to safe drinking water or sanitary facilities.

Dealing with conflict minerals

For the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt, our Suppliers must establish processes in accordance with the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and agree this with their suppliers. Smelters and refineries without appropriate, audited due diligence processes must be avoided.

Environmental responsibility

Treating and discharging industrial wastewater

Our Suppliers must categorise, monitor, check and, if necessary, treat wastewater from operating procedures, production processes and sanitary facilities before it is discharged or disposed of. In addition, measures must be introduced to reduce the generation of wastewater.

Dealing with emissions

Our Suppliers must standardise, routinely monitor, check and, if necessary, treat general emissions from operations (air and noise emissions) and greenhouse gas emissions before they are released. In addition, our Suppliers must monitor their emission control systems and find cost-effective solutions to minimise any emissions.

Handling waste and hazardous substances

Our Suppliers must follow a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste. The bans on the export of hazardous waste in the current version of the Basel Convention of 22 March 1989 must be observed. Chemicals or other materials that pose a risk if released into the environment must be identified and managed in a manner that ensures safety during handling, transport, storage, use, recycling or reuse, and disposal. Mercury must be used in accordance with the prohibitions in the Minamata Convention of 10 October 2013, and persistent organic pollutants in accordance with the current version of the Stockholm Convention of 23 May 2001.

Reducing consumption of raw materials and natural resources

The use and consumption of resources during production, as well as the generation of all types of waste - including water and energy - must be reduced or avoided. This must be done either directly at the point of origin or through procedures and measures such as changing production and maintenance processes or procedures within the company, using alternative materials, economising, recycling, or reusing materials.

Dealing with energy consumption/efficiency

Energy consumption must be monitored and documented. Cost-effective solutions must be found to improve energy efficiency and minimise energy consumption.

Ethical business conduct and compliance**Fair competition**

Our Suppliers must comply with the standards of fair business, advertising and competition. They must also comply with the applicable antitrust laws which in particular prohibit agreements and other activities that influence prices or conditions when dealing with competitors. These laws also prohibit agreements between customers and suppliers intended to restrict customers' freedom to determine their own prices and other resale conditions.

Integrity/bribery and avoiding conflicts of interest

Our Suppliers must apply the highest standards of integrity in all business activities and have a zero-tolerance policy towards all forms of bribery, corruption, extortion and embezzlement. They must apply procedures to monitor and enforce standards to ensure compliance with anti-corruption laws. In addition, we expect our Suppliers to comply with the applicable legal provisions against money laundering and to fulfil their obligations under applicable tax laws.

Complying with import and export laws and economic sanctions

Our Suppliers must ensure compliance with all national and international laws governing the import, export or domestic trade in goods, technology or services. They must strictly comply with all relevant laws, requirements and regulations relating to economic sanctions and export control. Transactions with third parties must not violate applicable trade embargoes or import and export control regulations, particularly as regards combating the financing of terrorism.

Product quality

Our Suppliers must be oriented by internationally recognised quality management standards and comply with them. They must deal with risks in a transparent, professional and responsible manner. We expect our Suppliers to comply with all legal requirements regarding the quality, safety, labelling and packaging of products, and the use of hazardous substances and materials. They must also take steps to avoid counterfeit parts or pirated products if this is relevant to their business activities.

Handling data, information and property**Observing data protection, confidentiality and information security**

We expect our Suppliers to treat and protect business-relevant, confidential, secret and personal data with the utmost sensitivity, integrity and confidentiality, and to comply with legal and company regulations on information security and data protection. In the event of a security incident, our Suppliers must inform d.velop immediately.

Dealing with third-party property and IP

Our Suppliers must protect the know-how, patents, intellectual property and confidential information, in particular the trade and business secrets of d.velop and third parties, appropriately and store such information securely.

Responsibility throughout the supply chain

We expect our Suppliers not only to comply with our expectations themselves, but also implement them throughout their own supply chain in an appropriate manner, identify risks within it and take appropriate measures. In the event of suspected breaches, and to safeguard supply chains with increased risks, our Suppliers must inform d.velop promptly and, as appropriate, regularly regarding the breaches and risks identified and the measures taken.

Reporting options and contact details in the event of a breach

The principles of conduct set out in this Supplier Code of Conduct are of decisive importance for sustainable and successful relationships between d.velop and its Suppliers.

We therefore expect our Suppliers to report any breaches of these principles as soon as they become aware of them, regardless of whether they are committed by third parties or a representative of d.velop itself.

Such breaches can be confidentially reported through the linked ["BDO Compliance Assistance"](#) tool or a report sent by post to the following address:

d.velop AG
Schildarpstraße 6-8
48712 Gescher

Our Suppliers must also pass on to their employees in an appropriate manner any information received from d.velop regarding contactability, responsibility for, and the implementation of a complaints procedure. The complaints procedure must be accessible to employees while maintaining confidentiality as regards identity and effective protection against discrimination. If no such information is given, our Suppliers themselves must be responsible for setting up an effective grievance mechanism at company level for individuals and communities that may be affected by negative consequences.

Supplier acknowledgement and consent

Our Suppliers must act responsibly and must comply with the principles/requirements in this Supplier Code

of Conduct. In addition, our Suppliers must communicate the content of this Supplier Code of Conduct to their employees, authorised representatives and sub-contractors in an understandable way and take all necessary preparatory steps to implement its requirements.