Code of Conduct for Business Partners



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Foreword

Münzer sees itself as a responsible, internationally active family business that sets high standards for ethical, legally compliant and responsible conduct. However, these standards are not one-dimensional. On the contrary: these standards are also expected of us by society and we expect them from our business partners.

Long-term economic success and trust are built on partnerships based on shared values. For this reason, we have developed this Code of **Conduct for Business Partners**. It describes the core principles that we expect to be upheld in the course of our cooperation, including unconditional respect for **human rights**, a commitment to **equal treatment and diversity**, the **rejection** of all forms of **corruption** and **bribery**, and the promotion of **transparency** in all relevant business processes.

We attach great importance to ensuring that the standards set out in this Code, as well as national and international law, are observed by our suppliers, service providers, distribution partners and all other business partners. This applies in particular to fair working conditions, responsibility towards the environment and society, integrity in business transactions and the protection of sensitive information and data.

This Code of Conduct reflects our commitment to promoting responsible and ethical business practices together with our partners. We regard compliance with these principles as the basis for all current and future business relationships.

We thank you for your commitment to working with us to pursue the highest standards and actively contribute to the integrity of our supply and value chain.

The Executive Management
Published in August 2025



Purpose

This Code of Conduct for Business Partners sets out our expectations and guidelines for a trust-based and sustainable cooperation in our business relationships and beyond, throughout the value chain.

Based on the commitments we have made to ourselves in our Code of Conduct and Ethics, we expect our business partners to act with integrity at all times and to demonstrate responsible business conduct in accordance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. This includes identifying, preventing, mitigating and remedying potential and actual negative impacts on human rights, the environment and the economy.

Scope

This Code of Conduct forms an integral and binding part of our contractual relationships and applies to all suppliers, customers, recycling partners, subcontractors, consultants, and other business partners (collectively “Business Partners”) that supply products or services to, purchase products or services from, or act on behalf of Münzer Holding GmbH or any of its subsidiaries (hereinafter referred to as „Münzer”).

The principles and guidelines set out in this Code must be observed regardless of the country in which activities are carried out. The principles of this Code of Conduct are a central component of our business philosophy. This Code therefore also contains ongoing obligations that will continue to apply to business partners in the future in order to create a transparent and legally compliant business environment.



Environmental protection

Our business partners are obliged to act in accordance with all applicable environmental and climate protection laws and official regulations. They must ensure that all necessary permits and licenses are obtained and complied with.

Particular attention is paid to actively addressing the environmental impact of their business activities – especially in the areas of energy consumption, water resources, waste management, use of chemicals and quality of air and soil. Risks to people and the environment must be consistently avoided, negative impacts minimised and continuous improvements in environmental protection promoted.

With regard to the future application of the EU Deforestation Regulation (EUDR) in particular, business partners are obliged to take all necessary precautions to ensure that no goods from sources associated with deforestation or slash-and-burn practices enter the supply chain. They must document the origin of raw materials, in particular products such as soy, in a transparent and traceable manner and, where necessary, provide appropriate evidence and certificates. This also includes the continuous review of supply chain practices in accordance with the requirements of the EUDR to ensure compliance with EU requirements on combating deforestation and sustainable land use.



Human rights and fair employment

We expect our business partners to respect internationally recognised human rights, in particular the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

Fair working conditions

Our business partners are obliged to comply with all labour law requirements regarding minimum wages, social benefits, working hours and overtime. Working hours and rest periods must be in accordance with applicable law and fair working conditions must be established and set out in writing in an employment contract in a language that can be easily understood.

Freedom of association and the right of employees to organise themselves in trade unions or other employee representative bodies and to engage in collective bargaining must be respected. The decision to join a trade union must be free from discrimination, pressure or reprisals. Employee representatives must be given appropriate access to the workplace.

Protection against exploitation

All forms of child labour, forced labour, compulsory labour, illegal employment, modern slavery and human trafficking are strictly prohibited. This includes the prohibition of withholding identity documents, demanding money or valuables as security, making wage deductions in connection with recruitment or migration, or unlawfully making it difficult to terminate the employment relationship.

The employment of minors below the applicable legal minimum age is not permitted. It must be ensured that young people under the age of 18 do not perform hazardous work. Minors must not be impaired in any way in their physical, mental or social development as a result of their work.

Equal treatment

Discrimination based on gender, ethnic or social origin, skin colour, nationality, religion or belief, political or other opinion, age, sexual orientation, or disability is strictly prohibited. We expect our business partners to create a working environment in which all employees are treated equally. Respectful and appreciative treatment must be guaranteed at all times.

Business partners are also expected to respect the cultural, social and economic rights of local communities, minorities and vulnerable groups and to conduct their business activities in such a way as to avoid negative impacts on human rights.



Occupational health and safety

Our business partners are obliged to comply with all applicable laws and standards on health and safety at work. They must ensure safe working conditions, provide personal protective equipment and conduct regular training and instruction on occupational safety. In addition, an effective procedure for dealing with injuries must be established.

We expect our business partners to introduce and consistently apply a comprehensive occupational health and safety management system. This should promote continuous improvement of safety standards and systematically identify, assess and control risks in order to avoid them in a targeted manner. Appropriate measures must be taken to prevent any negligent or intentional behaviour that could cause direct or indirect damage to persons or to material and immaterial resources.

Health and safety are ensured through the regular updating of working methods and the use of the best available technologies and protective measures. Our business partners must ensure unconditional commitment and full support of their management concerning occupational health and safety. At the same time, training and awarenessraising for all employees with regard to safe behaviour and the maintenance of health and safety must be guaranteed.

Business partners are obliged to actively oppose unlawful or dangerous behaviour and to report any potentially dangerous situations immediately in regard to the business relationship. Close cooperation with Münzer and any other partners involved is particularly important when carrying out activities at Münzer company locations. This specifically includes reporting and investigating all incidents (including near misses) and sharing any insights acquired from them.

Ethical corporate governance

Our business partners undertake to comply with all applicable legal regulations at all times. In addition, they are required to implement and continuously operate an effective compliance management system within their organisation.

This system should include, in particular, a comprehensive risk analysis, the definition of clear compliance guidelines and rules of conduct, and the implementation of regular training and internal control mechanisms. The aim is to identify potential risks at an early stage, prevent violations and promote a corporate culture of integrity and transparency.

We recommend that our business partners adhere to internationally recognised compliance standards such as ISO 37301 and use proven methods to ensure compliance. We also expect them to take appropriate measures to continuously improve their compliance management and to consistently investigate and sanction violations.

Free competition

Business partners are obliged to maintain free and fair competition and to strictly comply with all applicable competition and antitrust laws. Any form of unfair or anti-competitive practices is prohibited.

This includes, among other things, the prohibition of:

- ✓ unlawful price or bid fixing price or bid fixing and the manipulation of tenders,
- ✓ the division of markets or customers, and the deliberate restriction of supply,
- ✓ misleading or false statements about one's own products or those of competitors, and
- ✓ any collusive or unfair market strategies that impair competition.

Business partners must compete solely on the basis of performance, quality and price. The principles of loyalty, transparency and lawful conduct in the market have top priority.

Prevention of money laundering and terrorist financing

All laws designed to prevent money laundering and terrorist financing must be complied with by our business partners.

Money laundering refers to the process by which illegally or dishonestly acquired assets are introduced into the legal economy in order to conceal their criminal origin. The aim is to hide the true origin, legal owners or actual intended use of the money and make it appear as if it has been earned legally.

Our company condemns all forms of money laundering and is actively committed to combating and preventing the concealment of the origin, ownership and use of assets, and expects the same from its business partners.

Anti-corruption

Münzer pursues a zero-tolerance policy towards corruption, in particular in the form of bribery, and is committed to full compliance with all applicable anti-corruption laws in the countries in which it operates. This commitment equally applies to all business partners.

Corruption can take many forms, including unlawful payments, inappropriate gifts, direct or indirect payments, or so-called „facilitation payments" (unofficial payments to expedite routine activities). Such practices are strictly prohibited.

Business partners are prohibited from:

- Offering, promising, giving or paying material, economic or other advantages to public officials or private parties, either directly or indirectly – nor may third parties be authorised to do so;
- accept such advantages from public officials or private individuals or authorise third parties to accept or demand them;

in particular if the intention is to:

- induce a person to perform an official or business act inappropriately or to receive consideration for doing so;
- to influence official decisions or omissions by unfair means;
- gain an unfair business advantage or circumvent legal requirements.

Any form of bribery is strictly prohibited and must be reported to Münzer immediately.

In addition, it must be ensured that all business payments are made exclusively on the basis of the contractually agreed services and are made exclusively to the contractual partners.

Economic sanctions

Our company ensures that natural or legal persons which are subject to sanctions (e.g. by the European Union or the United Nations) are not accepted as business partners. Business partners are obliged to act in accordance with the applicable international sanctions regulations and to pass this obligation on to their own contractual partners. Business activities involving sanctioned parties or embargoed goods require thorough review and are permitted only in strict compliance with applicable sanctions laws.

Conflicts of interest

Conflicts of interest can significantly impair the integrity and fairness of business conduct. It is therefore of utmost importance to us that potential or actual conflicts of interest are identified at an early stage, disclosed and consistently avoided. We expect our business partners to ensure that their own business, financial or personal interests do not conflict with their obligations to Münzer.

Business partners must proactively and immediately disclose any situations that are or appear to be incompatible with Münzer's interests, particularly in the case of existing economic, financial or personal ties. This also applies if an employee of Münzer has a direct or indirect interest in the business, the company or its shareholdings.

A trust-based and transparent cooperation on equal terms forms the basis for sustainable business relationships – this applies equally to us and our business partners.

Confidentiality

Business partners undertake to safeguard and protect the intellectual property and all data and confidential information belonging to Münzer and third parties. This includes compliance with all applicable legal, regulatory and contractual confidentiality obligations, regardless of the form in which the information was obtained in the course of the business relationship.

Confidential information may only be used within the scope for which it was intended. Business partners must ensure that any information published or disclosed is accurate, complete and truthful.

The security of sensitive information must be ensured in accordance with the respective protection requirements. In particular when processing or storing relevant data, a risk assessment must be carried out in order to identify and implement appropriate technical and organisational protective measures.

Business partners are also obliged to recognise and respect the intellectual property rights of Münzer and third parties. This includes, among other things, trademarks, company logos, domain names, patents, utility models, design patents, copyrights and technical know-how. Any actual or potential infringement of these rights must be identified immediately and reported to Münzer.

Cooperation

We strive for long-term and sustainable partnerships along the value chain. Our business partners undertake to inform their employees about the topics of this Code of Conduc and to ensure that its rules and the relevant laws are understood and complied with.

At the same time, we expect them to take appropriate measures to ensure that their own business partners along the value chain comply with the principles of this Code of Conduct. This includes the implementation and continuous monitoring of processes that ensure that all suppliers and actors in the value chain comply with ethical and legal requirements.

We continuously monitor the actions of our business partners to ensure that they meet our requirements. Business partners who do not meet these requirements are obliged to implement appropriate and concrete corrective measures promptly upon request. In the event of persistent violations of applicable law or the Code of Conduct, our company reserves the right to take appropriate action against the business partners concerned. Depending on the severity of the violation, these measures may include termination of the business relationship.

Compliance with national standards

In countries where national laws provide a different standard of protection than this Code of Conduct, business partners shall adhere to principles that offer higher protection for employees and the environment without violating national laws.

Whistleblower system

If business partners become aware of actual or potential violations of the obligations under this Code of Conduct or within the value chain, they are obliged to inform Münzer immediately and at the same time take appropriate remedial measures.

To this end, a **Whistleblower System** has been set up through which reports can be submitted both personally and anonymously. This system is intended for the confidential reporting of possible violations of legal and regulatory provisions, internal company guidelines and this Code of Conduct. Alternatively, reports can also be sent directly by email to **compliance@muenzer.com**.

We are committed to providing all employees, partners and communities with whom they interact through secure and accessible channels through which concerns and reports can be submitted, including anonymously. There is an **explicit prohibition on retaliation** against individuals who report in good faith. At the same time, we reserve the right to take action against individuals who knowingly make false reports.

Business partners are also expected to provide comparable internal mechanisms that enable their own employees and affected third parties to report anonymously, confidentially and without penalty.

Contact

If you have any questions, suggestions or comments regarding this Code of Conduct for Business Partners, please feel free to contact us at any time by email at **compliance@muenzer.com**.



Place, date	Company
Name and function of the signatory	Signature