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From QMN	Code of conduct for suppliers	Editor Uchtmann	Date 17.06.2025

As an internationally active company, Möhlenhoff GmbH and its subsidiaries assume their responsibility in observing human rights and avoiding child labor. In all countries in which it operates, it adheres to the Universal Declaration of Human Rights of the United Nations, the UN Convention on the Elimination of Discrimination against Women, the UN Convention on the Rights of the Child and other international standards for the protection of human rights. Following the UN Global Compact, the Möhlenhoff Group commits itself to support the implementation of the ten principles in the sub-areas of human rights, labor standards, environmental protection and anti-corruption. In accordance with these principles of action, Möhlenhoff expects that all suppliers who maintain a business relationship with the Möhlenhoff Group of Companies will also comply with these principles.

## 1. PURPOSE OF THIS SUPPLIER CODE OF CONDUCT

The Supplier Code of Conduct sets guidelines for the worldwide cooperation of the Möhlenhoff Group and its subsidiaries (hereinafter: "Möhlenhoff") with its external partners and suppliers. The Supplier Code of Conduct contains the most important principles for the business activities of the suppliers as well as for their handling of human rights, working conditions, safety and health regulations, environmental protection regulations, and with regard to ethically impeccable business conduct.

## 2. PRINCIPLE

Möhlenhoff is aware of its economic, ecological and social responsibility towards its investors, employees, customers, business partners, the state, society and the environment. It is convinced that ethical behavior is indispensable for successful business in the long term. Möhlenhoff assumes its responsibility through ethical behavior in its entire business activity and also expects this from its suppliers. Möhlenhoff considers compliance with the rules of conduct set forth in this Supplier Code of Conduct as well as with all relevant laws and regulations and with the contractual agreements with Möhlenhoff by suppliers and their employees as a prerequisite for joint business activities. Möhlenhoff encourages suppliers and their employees to contact <https://mh.whistleblower-hotline.online> directly to report violations of or questions about this Supplier Code of Conduct.

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### 3. GENERAL BUSINESS ACTIVITY

#### 3.1. *Compliance with laws*

The supplier shall comply with applicable laws, regulations and relevant international standards in all countries where the supplier operates.

#### 3.2. *Corporate Governance*

The supplier shall have effective corporate governance and shall implement it in a timely manner, reviewing it periodically and adjusting it as necessary.

#### 3.3. *Fair Competition*

The supplier is committed to fair competition based on performance. The supplier shall neither engage in unlawful competitive practices nor participate in agreements that violate antitrust law.

#### 3.4. *Bribery and acceptance of advantages*

Möhlenhoff does not tolerate active or passive bribery. The supplier does not grant any unjustified advantages to members of the government or authorities or to employees of private companies to influence their decisions, nor does he accept such advantages from third parties.

#### 3.5. *Money Laundering*

The supplier shall comply with all relevant legal obligations for the prevention of money laundering and shall not engage in money laundering activities.

#### 3.6. *Conflicts of interest*

The supplier acts in the best interest of Möhlenhoff and puts personal interests and benefits aside. The supplier undertakes to fully disclose any personal and financial interests that may significantly conflict with those of Möhlenhoff.

#### 3.7. *Information policy*

In awareness of his economic, ecological and social responsibility, the supplier pursues an open and transparent information policy towards all stakeholders.

#### 3.8. *Confidentiality and data protection*

Suppliers and their employees are not allowed to pass on or use manufacturing and business secrets with Möhlenhoff, neither internally nor externally, during and after the employment relationship. The supplier agrees to conclude a suitable confidentiality agreement if necessary.

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### *3.9. Intellectual property*

The supplier and his employees shall ensure that Möhlenhoff's intellectual property rights are respected, that they are protected and that they are used in a responsible manner.

### *3.10. Product safety*

Möhlenhoff is committed to the quality and safety of its products. Möhlenhoff guarantees that customers can trust Möhlenhoff products due to their reliability, quality and performance. All products of Möhlenhoff's suppliers must therefore also comply with the national and international legally defined standards as well as the internal quality assurance guidelines.

## **4. RESPONSIBILITY TOWARDS EMPLOYEES**

### *4.1. Human rights and child labor*

The supplier fully complies with human rights and does not tolerate child labor. It complies with the United Nations Universal Declaration of Human Rights, the UN Convention on the Elimination of Discrimination against Women, the UN Convention on the Rights of the Child and other international standards for the protection of human rights in all countries in which it operates.

### *4.2. Discrimination and Equal Opportunities*

The supplier shall promote equal opportunities and equal treatment and shall prevent discrimination in the recruitment of employees and in the promotion or granting of training and further education measures. No employee may be unlawfully discriminated against on the grounds of gender, age, skin color, culture, ethnic origin, sexual identity, disability, religious affiliation or world view.

### *4.3. Health and Safety*

The supplier complies with all legal requirements / standards and takes the necessary organizational measures to protect the health and safety of its employees in the best possible way.

### *4.4. Working hours and payment*

The supplier ensures that working hours and wages comply with all legal requirements and that no illegal practices are used to circumvent these requirements. The supplier also does not allow forced labor in its companies.

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#### *4.5. Freedom of Association*

The supplier shall, in accordance with national legislation, respect the rights of employees to form employee representation and to bargain collectively.

## 5. RESPONSIBILITY TOWARDS THE ENVIRONMENT

### *5.1. Environmental protection standards*

The supplier is aware of the environmental impact of its business activities. It shall comply with local and international environmental standards and laws. The supplier shall strive to continuously improve its environmental performance, taking into account the following non-exhaustive points:

- To develop products that can be recycled as easily as possible
- Use recycled materials whenever possible
- Avoid waste or recycle it as much as possible; where this is not possible, dispose of it in accordance with applicable laws and regulations.
- To use resources, such as water and energy, carefully and to optimize the use of resources on an ongoing basis.

### *5.2. Regulated substances*

Supplier agrees to comply with all applicable laws and regulations, in particular e.g. REACH, RoHS, CLP (Classification, Labelling and Packaging) etc. and declares with respect to metals and minerals that all relevant international guidelines or regulations or national legislation on "conflict minerals" will be complied with.

## 6. Sanctions in case of violation of the Supplier Code of Conduct

Any violation of the principles and requirements stated in the Möhlenhoff Supplier Code of Conduct will be considered as a significant impairment of the contractual relationship on the part of the suppliers. In case of suspicion of non-compliance with the described principles and requirements of the Möhlenhoff Supplier Code of Conduct (e.g. negative media reports), Möhlenhoff reserves the right to demand information about the respective facts. Furthermore, Möhlenhoff has the right to terminate individual or all contractual relationships with suppliers without notice, who demonstrably do not comply with the Supplier Code of Conduct or who do not strive for and implement improvement measures, after Möhlenhoff has set an appropriate deadline for this. The supplier undertakes to work towards ensuring that the company complies with the principles of this Supplier Code of Conduct, in particular by designing and, if necessary, adapting guidelines and processes.

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## 7. COMPLIANCE

The supplier shall name a responsible contact person for the Code of Conduct to Möhlenhoff, who can provide binding information for compliance with the Code of Conduct. The supplier will work towards compliance with the Code of Conduct by the supplier and its management by means of suitable organizational precautions. This should be done in particular by introducing and maintaining appropriate controls and plausibility checks.

The supplier hereby confirms that he has read and understood the above declaration of commitment and that he agrees with the contents.

Company: \_\_\_\_\_

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Location: \_\_\_\_\_ Date: \_\_\_\_\_

\_\_\_\_\_

Company stamp

\_\_\_\_\_

Signature