



CODE ON ENVIRONMENTAL PROTECTION AND BUSINESS ETHICS

Pollmann International

**Dear stakeholders and business partners,
Dear employees,**

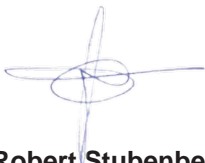
Pollmann International takes its social responsibility very seriously. The promotion of environmental protection and compliance with ethical business practices are an integral part of our corporate culture.

The management board of Pollmann International has signed this Code on Environmental Protection and Business Ethics. The Code is based on key international standards and strategies for environmental protection and business ethics, such as the Paris Climate Agreement, the EU Green Deal, the ISO 14000 family, the principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the automotive industry's guiding principles for improving sustainability in the supply chain.

This Code explains how our company promotes and implements environmental protection and business ethics. Important topics such as the responsible use of energy and resources, decarbonization, fair dealings with business partners and responsibility in the supply chain are also included.

This Code applies to employees and suppliers of Pollmann International GmbH, Pollmann Austria GmbH, Pollmann Werkzeugbau GmbH, MAXXOM Automation GmbH, Pollmann CZ s.r.o., Pollmann Mechatronics (Kunshan) Co., Ltd., and Pollmann de México S.A. de C.V. In this way, we are making an indispensable contribution to the long-term success of our company.

Sincerely,



Robert Stubenberger
COO Pollmann International



Helmut Grobbauer
Director People & Culture
Pollmann International



Markus Pollmann
Owner Pollmann International

CONTENTS

- 1. FOUNDATIONS 5**
 - 1.1. SCOPE OF APPLICATION 5
 - 1.2. NORMS AND STANDARDS 5
- 2. ENVIRONMENTAL PROTECTION 6**
 - 2.1. ENVIRONMENTAL MANAGEMENT 6
 - 2.2. DECARBONIZATION 6
 - 2.2.1. Disclose traceable greenhouse gas emissions 7
 - 2.2.2. Increase energy efficiency 7
 - 2.2.3. Use renewable energies 7
 - 2.2.4. Compensate for unavoidable CO₂ emissions 8
 - 2.3. CIRCULAR ECONOMY 8
 - 2.3.1. Save resources 9
 - 2.3.2. Prevent waste 9
 - 2.3.3. Reuse or recycle 9
 - 2.4. PROCUREMENT OF RAW MATERIALS 9
 - 2.4.1. Restricted substances and chemicals 10
 - 2.5. WATER, AIR AND SOIL QUALITY AND NOISE PREVENTION 10
 - 2.6. BIODIVERSITY, LAND USE AND DEFORESTATION 11
 - 2.7. ANIMAL PROTECTION 11
- 3. BUSINESS ETHICS 11**
 - 3.1. COMBATING CORRUPTION AND MONEY LAUNDERING 11
 - 3.2. DATA PROTECTION AND DATA SECURITY 11
 - 3.3. FINANCIAL RESPONSIBILITY (CORRECT RECORDS) 12
 - 3.4. FAIR COMPETITION AND ANTITRUST 12
 - 3.5. EXPORT CONTROLS AND ECONOMIC SANCTIONS 12
 - 3.6. DISCLOSURE OF INFORMATION 12
 - 3.7. CONFLICT OF INTEREST 12
 - 3.8. PLAGIARISM, COUNTERFEITING AND PRODUCT SAFETY 12
 - 3.9. INTELLECTUAL PROPERTY 12
 - 3.10. WHISTLEBLOWING AND PROTECTION FROM RETALIATION 13
- 4. COMPLIANCE WITH THE CODE 13**
 - 4.1. RESPONSIBILITY AND DUE DILIGENCE 13

- 4.2. CONTROL AND MONITORING..... 14
- 4.3. CORRECTIVE MEASURES..... 14
- 4.4. CONSEQUENCES OF VIOLATIONS..... 14
- 4.5. QUESTIONS, REPORTS AND INFORMATION..... 14
- 4.6. REVIEW AND DIALOG 15
- 5. FINAL CLAUSE 15**

1. FOUNDATIONS

Pollmann International has integrated responsible, sustainable and legally compliant action as a fundamental principle in its corporate values and firmly anchored it in its corporate strategy. Through its serious commitment to ecological and social responsibility, Pollmann International has created a stable foundation to ensure the long-term success of the company.

We attach great importance to a partnership-based agreement for mutual business success, and our business partners make a significant contribution to this. We want to support our business relationships with this Code. It demonstrates our social, ecological and economic responsibility and also addresses necessary ethical and legal behavior.

This Code is an essential foundation for sustainable and successful cooperation. We expect our suppliers and business partners to meet the same sustainability standards that we pursue ourselves. Subcontractors and other third parties are also obliged to implement compliance with the Code.

Our products can only survive in the face of constant competition if ethical, legal and also voluntary obligations are met. These obligations must be met not only by employees, but also by suppliers and business partners. Only together can sustainable and economic success be ensured for the future.

1.1. SCOPE OF APPLICATION

This Code applies to all suppliers, their employees and supply chains, as well as to employees of Pollmann International within the scope of the business relationship or employment relationship. This Code is an integral part of the contract from the supplier's first delivery. It expands the existing Code of Conduct of Pollmann International as well as all the other internal principles, guidelines and instructions. The Code therefore applies to the supply chain and globally at all locations and in all business units of the Pollmann Group.

The Pollmann Group consists of the following companies:

- Pollmann International GmbH (PINT)
- Pollmann Austria GmbH (PAT)
- Pollmann Werkzeugbau GmbH
- MAXXOM Automation GmbH
- Pollmann CZ s.r.o.
- Pollmann Mechatronics (Kunshan) Co., Ltd.
- Pollmann de México S.A. de C.V.

For easier reading, "Pollmann" in this document refers to the entire Pollmann Group.

1.2. NORMS AND STANDARDS

The requirements specified here are based on national and international standards and conventions, including:

- ISO 14000 family – Environmental management
- Paris Climate Agreement
- EU Green Deal
- CSRD and ESRS
- EU Taxonomy
- GHG Protocol
- UN Sustainable Development Goals
- REACH – EC 1907/2006
- GADSL – Global Automotive Declarable Substance List
- Globally Harmonised System (GHS) of Classification and Labelling of Chemicals (CLP) in European countries
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-

- Affected and High-Risk Areas
- OECD Guidelines for Multinational Enterprises
- Principles of the UN Global Compact
- Automotive Industry Guiding Principles to Enhance Sustainability Performance in the Supply Chain (AIAG & Drive Sustainability)
- Automotive Sustainability Practical Guidance (AIAG & Drive Sustainability)
- EU Whistleblowing Directive and Whistleblower Protection Act
- Supply Chain Due Diligence Act
- Customer-specific sustainability requirements

2. ENVIRONMENTAL PROTECTION

Environmental protection is not only a responsibility for Pollmann, but also an integral part of our values and business practices. This Code sets out clear standards for environmental protection and is aimed at all employees as well as all suppliers, their employees and supply chains.

Our focus areas include structured environmental management, the decarbonization of our processes, the promotion of the circular economy and many other important topics for the long-term preservation of our environment and the creation of a sustainable basis for future generations.

2.1. ENVIRONMENTAL MANAGEMENT

An environmental management system comprises measures for monitoring, controlling and improving environmental performance in all areas of the company. It enables companies to improve the environmental impact of their business activities, products and services in a structured and forward-looking manner. Within this framework, additional guidelines are often developed, targets are set, compliance with legal and other requirements is monitored, risk management is carried out and continuous improvement in environmental protection is implemented.

Employees should understand Pollmann's environmental goals and policies and support them through environmentally conscious behavior.

Suppliers must disclose on request and provide evidence in the form of a certificate or process description of how they systematically reduce their environmental impact. A certified environmental management system (ISO 140001 or comparable) should be sought. Certified environmental management systems may be required for certain order inquiries. Suppliers should also ask their own supply chain to introduce environmental management systems.

2.2. DECARBONIZATION

Pollmann is committed to climate protection and to global agreements that aim to limit global warming to well below 2 °C – or preferably 1.5 °C – compared to pre-industrial levels. To achieve this goal, greenhouse gas emissions must be reduced as quickly as possible. Greenhouse gases trap heat in the atmosphere and contribute to global warming.

Pollmann has therefore set itself the goal of complete decarbonization by 2038. The term decarbonization describes the removal of all greenhouse gas emissions (Scope 1, 2, 3 according to the Greenhouse Gas Protocol) from a company's value chain. The following approach is being pursued to achieve the target: know greenhouse gas emissions, increase energy efficiency or reduce energy consumption, use renewable energy sources, offset remaining unavoidable CO₂ emissions. An interim goal is the full decarbonization at Scope 1, 2 level for all Pollmann locations in Austria from 2025 and for all other global Pollmann locations from 2028.

Employees as well as suppliers and their supply chains have to understand Pollmann's CO₂ reduction goals and measures and support their achievement. Suppliers are also encouraged to define their own

CO₂ reduction targets that meet the requirements set out in this Code and, if applicable, the additional requirements for certain order inquiries. A science-based approach in accordance with the Science Based Target Initiative (SBTi) is recommended.

Upon request, suppliers must disclose sustainability reports and ratings or participate in certain sustainability surveys. Publication of the reports is generally recommended.

2.2.1. Disclose traceable greenhouse gas emissions

Information on greenhouse gas emissions promotes climate protection, demonstrates responsibility towards the environment and society, clarifies compliance with ever-increasing requirements, supports the development of measures to reduce emissions and improves a company's competitiveness and image.

The calculation of emissions has to consider all relevant greenhouse gas emissions according to the Greenhouse Gas Protocol and meet the international standard ISO 14067 concerning the Product Carbon Footprint.

Employees are required to support the necessary emissions calculations, i.e. to record them, document them in a comprehensible manner and forward them to internally defined databases or persons.

Suppliers must state the Product Carbon Footprint in kg (or tons) of CO₂ equivalent per kg of material (or per item) with each delivery bill or invoice. The information takes into account the emissions from raw material extraction to the factory gate of the respective Pollmann site where the delivery is made (cradle-to-gate approach).

Upon request, suppliers must report on the level of greenhouse gas emissions at company or site level in CO₂ equivalents, broken down by scope. In summary, Scope 1 refers to all direct emissions of the company caused by the combustion of fossil fuels at the site, Scope 2 refers to all indirect emissions caused by the generation of purchased electricity, heat or steam, and Scope 3 refers to all indirect emissions associated with all other activities in the value chain, including upstream and downstream emissions.

Upon inquiry, suppliers must provide comprehensible calculation bases, such as energy consumption, conversion and emission factors. Furthermore, proof of compliance with the required calculation standards may be requested.

2.2.2. Increase energy efficiency

Energy efficiency at a production site aims to reduce energy consumption per unit produced in order to minimize the environmental impact and promote the responsible use of energy as a resource.

Employees are encouraged to avoid and highlight wasteful use of energy.

Suppliers should specifically look for cost-effective methods to systematically improve energy efficiency and minimize energy consumption. Regular energy audits or the implementation of an energy management system in accordance with ISO 50001 are particularly recommended. Corresponding evidence may be required for certain order inquiries.

2.2.3. Use renewable energies

Renewable energy sources are natural, inexhaustible resources that regenerate naturally, including solar energy, wind energy, hydropower, biomass, geothermal energy and tidal energy. These energies play a crucial role in reducing fossil fuels and protecting the environment.

Employees must be informed about the facts of green energy certificates, the benefits of renewable energy sources and current related key figures in order to raise awareness.

Suppliers are recommended to actively seek opportunities to increase the share of renewable energy in their production processes.

Suppliers are obliged to disclose on request whether the requested product or material is manufactured using green electricity. Proof may be required for certain order inquiries. Common proof of green electricity includes generation data directly from the supplier's location, green electricity tariffs, green electricity suppliers, power purchase agreements and international green electricity certificates (iRECs). In addition, information on the supplier's current electricity mix can be requested, e.g. the proportion of renewable, nuclear and fossil energies as well as the proportion of renewable sources for heating and cooling buildings.

2.2.4. Compensate for unavoidable CO₂ emissions

The basic idea of CO₂ compensation is to offset emissions in one place through measures in another. It should be noted that CO₂ offsetting should only be considered for those unavoidable greenhouse gas emissions that cannot be completely prevented despite all efforts to reduce them. Pollmann demands that CO₂ compensation certificates must actually have a demonstrable impact on the climate. Unfortunately, this cannot be proven for many certificates on the market. The Gold Standard is a trustworthy and effective seal of approval for climate protection projects, which sets high standards for environmental and social compatibility and is recognized internationally, including by our customers – developed by WWF and other NGOs to ensure that CO₂ reduction projects achieve measurable emission reductions and at the same time contribute to the UN sustainability goals. Compared to other certificates, the Gold Standard emphasizes comprehensive impacts by taking into account social and environmental benefits such as better living conditions, the protection of biodiversity and the promotion of renewable energy.

Preference is given to suppliers with a low Product Carbon Footprint. Specific limit values may be required for certain order inquiries, depending on the type of material. On request, proof of the calculation basis can be requested, e.g. degree of achievement through CO₂ compensation measures as well as their type and quality. If no actual climate effectiveness can be proven in the course of the review, the compensation will be rejected and a correspondingly lower assessment of the Product Carbon Footprint will be used. If specified limits are exceeded, the supplier is given the opportunity to make improvements within a defined period of time.

Suppliers are required to identify unavoidable emissions and take climate-friendly measures – with the aim of delivering a CO₂-neutral carbon footprint for certain materials and products by 2038.

2.3. CIRCULAR ECONOMY

Thanks to circular economy, resource consumption and waste can be reduced significantly. This does not only relieve the environment, but also brings competitive advantages. The aim is to reduce waste to a minimum or, if possible, avoid it altogether throughout the entire life cycle, in the development and production process as well as in the use and recycling of products. The same applies to raw material requirements, which can be reduced by using secondary materials.

Employees are encouraged to use materials carefully, separate waste correctly and make suggestions for process optimization and additional waste avoidance and recycling options.

We prefer to work with suppliers who, together with Pollmann, are committed to the circular economy and help us to actively offer our customers solutions.

2.3.1. Save resources

Responsible use of resources means reducing consumption in order to conserve raw materials and avoid unnecessary use.

Suppliers are obliged to state the proportion of secondary material [%] in the materials and products supplied with each delivery bill or invoice. Detailed information on the following percentages must be provided on request:

- Post-consumer material [% by weight]: Materials that have been collected, recycled and then reused after use by end consumers, such as plastic from household waste.
- Pre-consumer material [% by weight]: Industrial by-products or waste generated during the manufacturing process that are recycled before reaching end users.
- Reutilization [% by weight]: Materials or products that are directly reused without being broken down into their raw materials, such as recyclable packaging.

2.3.2. Prevent waste

The generation of waste should be reduced or avoided in advance. All waste generated must be disposed of or recycled safely and responsibly in order to ensure the health and safety of employees and protect the environment.

Employees should receive regular training on how to separate waste correctly and contribute to improving waste prevention. Notices of non-compliance and the active contribution of ideas for optimization promote awareness of waste reduction.

The waste management company or waste acceptor of the respective Pollmann site must, upon request, provide information and, if necessary, proof of the route taken by the respective waste fraction, e.g. reuse or recycling, incineration, landfilling or other disposal with more detailed information. The ban on the import and export of hazardous waste from and to EU third countries and some contracting states must be complied with in accordance with the Basel Convention and Council Directive 91/689/EEC.

Suppliers should set clear waste reduction targets and develop a waste management hierarchy that considers the following priorities: Prevention, reduction, reuse, recovery, recycling, removal and disposal.

2.3.3. Reuse or recycle

Reuse means reusing existing materials or products without transforming them. Recycling, however, describes the conversion of a product into raw material that can be used to manufacture a new product.

Employees, suppliers and waste management companies are encouraged to actively identify and support recycling opportunities.

2.4. PROCUREMENT OF RAW MATERIALS

With regard to suppliers and their supply chains, Pollmann requires that only products and materials are supplied whose raw materials are free from human rights violations, bribery and breaches of ethical principles, health and safety risks and environmental damage during extraction and processing. Suppliers are therefore obliged to introduce processes that take into account the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. This applies in particular to raw materials such as tin, tungsten, tantalum and gold from conflict-affected and high-risk areas. These may only come from validated conflict-free smelters and refineries. Furthermore, legal and customer-specific requirements for restricted substances and conflict minerals must be complied with.

In the event of further restrictions on existing materials, the supplier is obliged to propose suitable alternative materials and to develop or test them together with us.

Suppliers should only purchase raw materials from verified sources. This also applies to the following raw materials, among others: aluminum, leather, nickel, chromium, lithium, platinum group metals, graphite, manganese, rare earths, cobalt, mica, steel / iron, copper, natural rubber and zinc. Proof of the source of origin as well as product or supplier-related CMRT and EMRT from the Responsible Minerals Initiative may be required.

Serial material suppliers are required to use the International Material Data System (IMDS) and to keep material entries up to date and correct at all times. Pollmann is also committed to this.

Preference is given to those suppliers who have demonstrably implemented processes or guidelines that include the responsible procurement of raw materials as described above or a supply chain visualization (Supply chain mapping).

Employees must receive regular training on restricted substances and chemicals as well as conflict minerals and related policies. Safety data sheets and operating instructions must always be kept up to date.

2.4.1. Restricted substances and chemicals

We are all obliged to handle chemicals and restricted substances responsibly and safely. All legal requirements must be complied with. The restrictions serve to protect health and the environment from hazardous substances and chemicals by regulating the manufacture, use or import of such substances. Examples of restricted substances are chromium(VI), lead and phthalates. The most important legal regulations include

- REACH: EU regulation on the registration and regulation of chemical substances
- RoHS: Restriction of hazardous substances in electronics
- End-of-Life Vehicles Directive: Promotion of recycling and waste prevention in the automotive industry
- Minamata Convention: Control of mercury use
- Stockholm Convention: Regulation of persistent organic pollutants
- Basel Convention: Ban on the import/export of hazardous waste to third countries

Suppliers are required to identify all substances that are subject to restrictions or classified as hazardous to health and the environment in their manufacturing processes and end products and, where possible, to minimize them or replace them with more environmentally friendly alternatives. Furthermore, control measures must be established for the safe transportation and handling of these substances.

Suppliers must demonstrate compliance with the requirements mentioned above and the responsible handling of chemicals and restricted substances upon request. This can take the form of process descriptions and guidelines. Suppliers must provide safety data sheets that meet all applicable requirements.

2.5. WATER, AIR AND SOIL QUALITY AND NOISE PREVENTION

Employees and suppliers are obliged to handle water resources with care, to maintain water, air and soil quality and to avoid noise emissions towards neighbors.

The amount of used water in production and sanitary facilities should be reduced to a necessary minimum and pollution or chemical contamination should be avoided. Water consumption must be documented internally and regularly checked for potential reductions. Furthermore, measures must be taken to prevent the environmental impact of flooding.

Suppliers are obliged to appropriately control, minimize and, if possible, completely eliminate emissions that contribute to air pollution, taking into account all applicable legal requirements.

Soil contamination must generally be prevented. Where relevant due to potential environmental impacts, soil quality must be monitored appropriately.

Noise pollution for residents and the environment must be reduced and, above all, legal requirements regarding noise emissions must be complied with.

2.6. BIODIVERSITY, LAND USE AND DEFORESTATION

Soil and land use for company and production areas reduces the habitats of animals and plants. This reduces biodiversity and the stability of the ecosystem. We have set ourselves the goal of biodiversity and try to maintain and preserve ecosystems.

Suppliers and their supply chain should record the impact of their business activities on the ecosystem and develop and implement measures to avoid, reduce and offset negative impacts. They are not allowed to illegally remove land, forests (including illegal deforestation) and water or carry out forced evictions.

2.7. ANIMAL PROTECTION

Employees and suppliers should respect the five animal freedoms defined by the World Organization for Animal Health (WOAH) with regard to animal welfare. No animal should be raised and killed for the sole purpose of being used in an automotive product.

3. BUSINESS ETHICS

At Pollmann, corporate ethics are based on integrity, transparency and fairness. The standards listed apply to our employees, all suppliers and their employees and supply chains. None of the aforementioned may be involved in associated violations or sanctions.

Our focus areas include the fight against corruption and money laundering, compliance with competition rules, transparent disclosure of relevant information and many other important topics for responsible action and sustainable success in cooperation.

3.1. COMBATING CORRUPTION AND MONEY LAUNDERING

All legal requirements to combat corruption and money laundering must be complied with and a zero-tolerance policy towards any form of bribery, extortion, embezzlement and money laundering must be pursued. This includes the prohibition of directly or indirectly promising, offering, accepting or transferring anything of value for the purpose of obtaining improper advantages or influencing business transactions. Potentially corrupt acts and suspicious financial transactions must be reported immediately. It must be ensured that no funds from illegal sources enter a company's financial circuit.

3.2. DATA PROTECTION AND DATA SECURITY

Information exchanged within the scope of the business relationship must be treated confidentially and may not be passed on to unauthorized third parties. The use of personal data is only permitted within the framework of the respective business agreement. The protection and confidentiality of all entrusted data, in particular personal information, must be ensured. All applicable data protection laws and contractual conditions must be strictly complied with.

3.3. FINANCIAL RESPONSIBILITY (CORRECT RECORDS)

It must be ensured that the accounting is correct, transparent and proper and that all business activities are correctly reflected in the financial reporting. Generally accepted accounting and financial reporting standards should be followed to ensure ongoing consistency. An appropriate control system for financial reporting should be sought to ensure the accuracy and integrity of the data.

3.4. FAIR COMPETITION AND ANTITRUST

Fair competition is the foundation for good cooperation. Therefore, compliance with all applicable antitrust and competition law regulations is necessary. Violations or restrictions of free and fair competition such as price fixing, bid rigging, unauthorized exchange of information, etc. are expressly prohibited, must be reported and will be punished accordingly.

3.5. EXPORT CONTROLS AND ECONOMIC SANCTIONS

All national and international laws and principles concerning trade, import and export of goods and economic sanctions are to be complied with. Compliance with these regulations needs to be controlled continually. In case of violations, appropriate measures need to be taken.

3.6. DISCLOSURE OF INFORMATION

Transparent and ethically responsible conduct is important to us as well as to our suppliers and their entire supply chains. Suppliers have to disclose financial as well as non-financial information according to the applicable regulations and standard industry practices.

3.7. CONFLICT OF INTEREST

Decisions have to be made objectively and without the influence of private interests. Conflicts of interest occur when personal or business-related advantages interfere with professional responsibility. It must be ensured that such conflicts are avoided and disclosed.

3.8. PLAGIARISM, COUNTERFEITING AND PRODUCT SAFETY

It is strictly prohibited to use or place on the market plagiarism or counterfeited parts and materials. Effective procedures must be put in place to minimize the risk of introduction into deliverable products and to identify, isolate and report plagiarism and counterfeits.

Quality and safety of vehicles are the highest priority in the automotive industry. No product, from the smallest part to large system components, may be dangerous to health, life or the environment. They must comply with all legal and customer-specific safety standards and requirements and be documented in an accurate and traceable manner in order to ensure product safety and conformity. Customer-specific requirements will be communicated in the course of the order inquiry.

3.9. INTELLECTUAL PROPERTY

Intellectual property rights must be respected. Confidential technology and know-how like patents, copyrights, trademarks or designs may not be passed on or misused without authorization. Economically justifiable measures must be taken to prevent this.

3.10. WHISTLEBLOWING AND PROTECTION FROM RETALIATION

Suppliers and their supply chains must establish a whistleblowing system that complies with legal and international standards (e.g. UN Guiding Principle 31) and allows concerns about suspicious activities to be reported confidentially and anonymously without retaliation or adverse consequences against the reporting person. Suppliers must take and support legally compliant measures for redress if their business activities have had a negative impact on the environment or society.

4. COMPLIANCE WITH THE CODE

Pollmann undertakes to consistently implement the requirements and standards for environmental protection and business ethics set out in this Code and to pass them on to the supply chain. Environmental and ethical business practices are an integral part of our corporate culture and our values. They are incorporated into all relevant management processes and decision-making structures. This is the only way we can remain sustainably successful together with our suppliers, customers and business partners.

To ensure compliance with the standards, we openly communicate the contents of this Code to all employees and make it transparently available to our suppliers, customers and business partners. The Code is implemented and developed further in a continuous process, supported by regular training, audits and an open dialog with all parties involved.

4.1. RESPONSIBILITY AND DUE DILIGENCE

Managers at Pollmann are responsible for the implementation and consistent compliance with this Code in their respective areas of responsibility. They are obliged to inform and train their employees about the content and importance of the Code and to ensure that it is taken into account in all business processes. This not only includes leadership in the day-to-day business, but also decision-making processes that affect management of employees, choice of suppliers and the strategic positioning of the company. If there are indications of violations of the Code, managers are obliged to report them immediately, investigate them and take appropriate measures.

Pollmann employees have a responsibility to adhere to this Code and to act accordingly. They are encouraged to report indications of possible violations and, if necessary, to make suggestions for improvement. Irregularities can be reported either directly to the manager or via the confidential whistleblower system SecuReveal mentioned below. All reports are handled discreetly and in accordance with data protection regulations, with the compliance team reviewing the next steps and initiating corrective measures if necessary.

With regard to the supply chain, Pollmann requires its suppliers to assume appropriate responsibility and due diligence. This means continuous monitoring and transparent communication regarding compliance with the above-mentioned standards and requirements, starting with the procurement of raw materials through to the selection of suppliers. An appropriately proactive approach should be pursued here. We encourage our suppliers to introduce their own binding guidelines or codes of conduct on environmental protection and business ethics, which cover at least the requirements and standards mentioned in this Code, and to pass these on to their respective supply chain. These guidelines and codes can serve as verification documents for Pollmann and other auditors. In the event of indications of violations of the Code, suppliers have a duty to immediately report, investigate and take appropriate action.

4.2. CONTROL AND MONITORING

In principle, every effort must be made to ensure continuous, proportionate monitoring of the requirements and standards of the Code within the supply chain and to minimize the risk of violations. Pollmann expects its suppliers and their supply chains to establish effective internal control mechanisms to ensure compliance with the Code. This includes regular reviews and audits to ensure compliance with the defined ethical and environmental standards. Suppliers are required to identify potential violations at an early stage and initiate the necessary corrective measures promptly.

Pollmann reserves the right to carry out sustainability risk assessments and audits of suppliers, which may extend to the source of origin of the raw materials on an ad hoc basis. Audits on a random basis to monitor the sustainability requirements can be carried out at the supplier's site with prior notice. Suppliers have to immediately rectify any deviations identified and must provide corresponding evidence on request. Furthermore, suppliers have to actively support Pollmann's inspections and respond to inquiries within the agreed period. Contact persons for environmental, social, ethical and human rights issues shall be disclosed.

In addition, it is recommended that suppliers take advantage of training opportunities regarding the Code and make sure that all employees concerned are familiar with the content and requirements of the Code. Training certificates must be provided on request.

4.3. CORRECTIVE MEASURES

Violations of the obligations set out in the Code must be terminated immediately. If this is not immediately possible, a concrete plan with timelines for ending or minimizing the violations must be drawn up and submitted to Pollmann. The measures undertaken must be documented and their effectiveness must be checked. Suppliers have to clarify suspected violations promptly and inform Pollmann of the progress and results of this clarification.

4.4. CONSEQUENCES OF VIOLATIONS

Violations of the Code on Environmental Protection and Business Ethics are considered breaches of contract. This leads to a substantial impairment of the business relationship. The supplier or business partner must inform Pollmann about the nature of the measures taken to prevent future violations within an agreed and reasonable period of time. Pollmann also reserves the right to terminate the contractual relationship or withdraw from the contract in the event of serious breaches or non-compliance with the obligations (e.g. initiation of improvement measures) within the deadline.

4.5. QUESTIONS, REPORTS AND INFORMATION

Incoming questions, reports and information are processed by a compliance team. Occasionally, relevant specialist departments or external stakeholders are also involved in the process. The team reviews the reported matters and initiates the necessary measures. If the review reveals that Pollmann has directly or indirectly caused or contributed to a violation, appropriate corrective measures are initiated immediately. Violations of the Code may lead to consequences under labor law in accordance with applicable local legislation.

Any suspected violations and misconduct can be reported via the following website: <https://pollmann.secureveal.com>

4.6. REVIEW AND DIALOG

The management of Pollmann International receives regular reports on the status of implementation of the Code on Environmental Protection and Business Ethics.

This Code on Environmental Protection and Business Ethics was developed in cooperation with the responsible specialist departments of Pollmann and external stakeholders. Due to the constantly changing challenges in the area of environmental protection and business ethics, Pollmann is committed to regularly reviewing its requirements and standards and ensuring that they are always up to date and effective. Pollmann will closely monitor important changes in its immediate environment and adapt internal processes accordingly if necessary. The company also undertakes to carry out critical self-reflection with regard to its position on environmental protection and business ethics.

5. FINAL CLAUSE

The Code on Environmental Protection and Business Ethics of Pollmann International becomes effective on the day it is signed. No individual claims or claims of third parties can be derived from the Code. Only the German version of this Code is binding.