



CODE OF CONDUCT

OF RAMPF GROUP

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Foreword

Our daily actions and interactions within the company and with our business partners are based on our values:

fair, future oriented, passionate.

We assume social, economic, and ecological responsibility – as a manufacturer, business partner, and employer. With this Code of Conduct (hereinafter: „CoC“), we contribute to the promotion of fair and sustainable standards within the company, in our dealings with business partners, in environmental protection, and toward society.

We are convinced: Our commitment to our values contributes significantly to our corporate success. That is why ethical and responsible conduct is a central component of our business strategy. Our operational activities are guided by the principle of sustainability. Based on this conviction, we have also integrated these principles into our business practices and expect our business partners and employees to act in an equally responsible manner. The principle of recognition and appreciation are core elements of our corporate and leadership culture. We are committed to treating each other fairly and with respect. In addition, we display our corporate citizenship by making positive contributions to society and encourage social commitments of our employees.

For reasons of better readability and without any intention of discrimination, we only use the abbreviated form of the masculine gender in this Code of Conduct. All references to people apply equally to all genders.

The following standards of this CoC are based on the principles of the International Labour Organization (ILO) conventions, on the Universal Declaration of Human Rights of the United Nations, the UN-Conventions on the rights of the child and on the elimination of all forms of discrimination against women, the Organisation for Economic Co-operation and Development (OECD) guidelines for international companies, and the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG).

1. SOCIAL RESPONSIBILITY

1.1 Child labor

Child labor is strictly prohibited and shall not be used or supported. We are committed to complying with national minimum age requirements and the prohibition and elimination of the worst forms of child labor as set out in the ILO Convention. If the applicable national or local regulations at a place of employment provide stricter provisions in this regard, these shall take precedence.

1.2 Forced labor and slavery

RAMPF strictly rejects the use of any form of forced labor or slavery, including but not limited to labor resulting from human trafficking or unacceptable treatment, such as economic or sexual exploitation. All work must be performed voluntarily. Employees must be able to terminate their employment at any time in compliance with the applicable notice period.

1.3 Occupational health and safety

We are committed to complying with all relevant regulations and standards for safety and health at work. The aim is to prevent work-related injuries and illnesses and to create safe and healthy working conditions.

To reduce risks, hazards are systematically identified, assessed, and – where possible – eliminated. Where this is not possible, appropriate protective measures are taken. Including, but not limited to, the handling of hazardous substances, machinery, work equipment, and physical, ergonomic, and psychological stress. RAMPF provides all employees with the necessary personal protective equipment and ensures that it is used consistently. Work equipment is operated as intended and protective devices always remain functional. Our employees always have access to safety information such as safety data sheets and operating instructions as well as information on proper storage and disposal. We ensure that all our employees are adequately trained and instructed to avoid hazards associated with their work tasks.

For continuous improvement, each company in the RAMPF Group regularly reviews the effectiveness of its occupational health and safety management system and develops it further as necessary.

1.4 Freedom of association

RAMPF respects the right of its employees to form and join trade unions, to engage in collective bargaining, and to exercise the right to strike, including the right not to do so, in accordance with applicable law. Employees can exercise these rights without fear of unjustified disadvantages, discrimination, or retaliation. Employee representatives shall not be unlawfully denied access to other employees.

1.5 Prohibition of discrimination; equal opportunities

We do not tolerate any form of discrimination. Including but not limited to, no physical punishment or other physical, sexual, psychological, or verbal harassment or abuse. Unequal treatment of employees because of national or ethnic origin,

skin color, social background, disability, sexual orientation, age, gender, political opinion, religion, or ideology is also prohibited. Exceptions to the prohibition of unequal treatment are only permitted if required by the nature of the job. Unequal treatment includes, but is not limited to, when individuals are given preferential treatment in recruitment, promotion, and training without professional and objective reasons, or when unequal pay is paid for work of equal value without objective reasons.

1.6 Fair working conditions and remuneration

We are committed to complying with the provisions of the ILO conventions on fair working conditions. These include, but not limited to, regulations regarding remuneration, social benefits, working hours, and vacation. Where applicable regulations are stricter, these shall be complied with. Deductions from pay as a disciplinary measure are not permitted at RAMPF if this is not allowed under applicable law. We take measures to prevent excessive physical and mental fatigue and maintain a suitable work organization regarding working hours and rest breaks.

Remuneration, including wages, overtime, and fringe benefits, is fair and reasonable and is at least equal to the amount specified in applicable law. Remuneration is paid on time and in a practical manner, and a pay slip is provided to an appropriate extent.

1.7 Employee development and training

The education and training of people is an important social responsibility. Therefore, we promote people's entry into the profession, their individual development, and further training. This also strengthens the future viability of our company.

1.8 Eviction and deprivation of land, forests, and water

We are committed to complying with the prohibition of unlawful eviction and the prohibition of unlawful deprivation of land, forests, and water when acquiring, developing, or otherwise using such resources. In doing so, we will also respect the corresponding rights of communities, especially indigenous communities.

1.9 Use of private and public security forces

We undertake to comply with the prohibition of the use of private or public security forces if, due to a lack of instruction or control on our part, the use of security forces (i) violates the prohibition of torture and cruel, inhuman, or degrading treatment, (ii) causes injury to life or limb, or (iii) impairs freedom of association and coalition.

2. ENVIRONMENTAL RESPONSIBILITY

2.1 Environmental protection

We are committed to complying with all relevant national and international laws, regulations, and agreements that serve to protect the climate and the environment. This includes, but not limited to, regulations governing the handling of persistent organic pollutants and hazardous waste and substances. To ensure continuous improvement, every company in the RAMPF Group regularly reviews the implementation and/or effectiveness of its environmental management system and develops it further as necessary.

2.2 Resource and Energy Efficiency

We are committed to the responsible and sustainable use of natural resources and energy consumption. We take measures to avoid, reduce, or optimize the consumption of resources and energy with the aim of continuously improving resource utilization, energy efficiency, energy use, and energy consumption along the entire value chain.

2.3 Emissions; climate protection and CO₂ reduction

We are committed to avoiding or minimizing negative environmental impacts from operational emissions, including air pollutants, greenhouse gases, noise, and waste heat. We comply with all applicable limits and take appropriate measures to limit emissions to the minimum necessary. We are also committed to reducing greenhouse gas emissions and controlling noise emissions in such a way that the environment and human health are not adversely affected.

We support the goals of the Paris Climate Agreement and are committed to doing our part to limit global warming to 1.5°C. In doing so, we are guided by the science-based reduction pathways defined by the Science Based Targets initiative (SBTi).

2.4 Water and soil

We are committed to protecting water resources and soil and avoiding harmful impacts. We take measures to prevent water and soil contamination and to use water responsibly.

We ensure, including but not limited to, that our activities do not cause any harmful soil changes or water pollution that could adversely affect the environment, food production, or human health.

2.5 Transportation and logistics

We strive to use environmentally friendly means of transport, consolidate deliveries, and optimize routes to reduce emissions. In addition, we strive to use low-emission or alternative drive technologies (e.g., electric vehicles, rail transport) wherever economically and infrastructurally possible. Packaging materials are selected to conserve resources as much as possible and transport volumes are used efficiently.

2.6 Biodiversity and land use

We are committed to not sourcing or processing any products that contribute to deforestation or the destruction of natural habitats. Therefore we, including but not limited to, do not use any raw materials that have been produced in violation of applicable environmental regulations or international agreements on land use. When selecting our raw material sources, we also consider protected areas, biodiversity, and sensitive ecosystems.

2.7 Waste management and hazardous substances

RAMPF strives to avoid environmental hazards and pollution caused by its waste and to always work toward minimizing them. We handle our waste in accordance with the relevant regulations. Among other things, we comply with the ban on the manufacture of products containing mercury under the Minamata Convention and the ban on the export of hazardous waste under the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes.

2.8 Chemicals

We are committed to complying with and observing all applicable legal and regulatory requirements when purchasing, storing, using, and disposing of chemicals. In this way, we help to prevent potential impacts on human health and the environment.

2.9 Product labeling

The requirements for products in our industry are high. All mandatory standards and guidelines are complied with. Products are labeled to enable customers and consumers to use them safely.

3. ETHICAL BUSINESS PRACTICES

3.1 Fair competition

RAMPF will respect the rules of fair and free competition in its business activities. We are committed to complying with all relevant antitrust and competition law regulations. We will not enter into any agreements or engage in any conduct that restricts or has the effect of restricting free competition. We are committed to complying with the prohibition of unfair business practices.

3.2 Data protection and data security; AI

We are committed to complying with the relevant data protection laws, the applicable security requirements for information technology systems, and the relevant regulations on the use of artificial intelligence.

3.3 Protection of intellectual property; confidentiality

We respect and protect the intellectual property rights of our employees and business partners. This includes, but not limited to, the unauthorized use of trade secrets and the infringement of copyrights, trademarks, and patent rights.

3.4 Export control, economic sanctions

RAMPF complies with all applicable tax, export control, and sanctions regulations. This means, including but not limited to, that we refrain from delivering goods or services to countries and to people or organizations if such deliveries are prohibited by the applicable legal regulations.

3.5 Corruption, bribery, and fraud; donations and sponsorship

RAMPF does not tolerate corruption. We are committed to complying with all applicable regulations and prohibitions on corruption, bribery, fraud, embezzlement, and extortion. Including but not limited to, we refrain from unlawfully demanding, accepting, offering, or granting any advantage for ourselves, an individual, a company, or a public official to influence a decision. This also applies to gifts, hospitality, invitations to events, or other benefits. Donations and sponsorship of individuals, groups, or organizations are not used to obtain unlawful business advantages.

3.6 Conflict of interest

We make business decisions based on objective considerations. Including but not limited to, we avoid conflicts of interest that appear likely to influence business decisions. Any actual or potential conflict of interest shall be reported immediately, and appropriate measures shall be taken to prevent any influence.

3.7 Money laundering

We comply with all applicable laws on money laundering prevention and terrorist financing, as well as with the corresponding reporting obligations.

3.8 Minerals

We undertake to maintain a current template for Conflict Minerals Reporting Templates (CMRT) or Extended Minerals Reporting Template (EMRT) of the Responsible Minerals Initiative (RMI) whether products or components contain ingredients that are classified as conflict minerals (tantalum, tin, tungsten, and gold) or extended minerals (cobalt, mica, copper, natural graphite, lithium, and nickel).

In this way, RAMPF contributes to ensuring compliance with the RMI's requirements for transparency regarding the origin and mining conditions of these raw materials.

4. WHISTLEBLOWER SYSTEM

Consistent adherence to the values and principles of this CoC is only possible through collective action. We therefore call on all employees, business partners, and other affected parties to report any suspected cases and violations of this CoC, within the limits of what is legally permissible. The RAMPF whistleblower system (compliance.rampf-group.com), which is accessible online at any time, can be used for this purpose. We encourage our business partners, unless they are already legally obliged to do so, to offer effective complaint mechanisms that are suitable for reporting legal violations and/or violations of this Code of Conduct, as well as suspected cases of such violations.

5. IMPLEMENTATION

The provisions of this CoC are an integral part of RAMPF's daily operations. To comply with and promote the requirements of this Code of Conduct, we will provide our employees with regular and appropriate training in this regard. We strive to oblige our own suppliers to comply with the principles and requirements of this Code of Conduct through appropriate agreements. As part of our regular materiality analysis, which we carry out for our own business areas, our supply chain, and our services and products, we identify issues and risks that we consider to be priorities due to their potential severity and our ability to influence them. This materiality analysis is intended to identify, assess, prioritize, and proactively manage (potential) negative impacts on human rights and environmental protection in our value chain through the implementation of measures. We incorporate the results of our analyses into relevant business processes and implement appropriate measures. If our business activities cause or contribute to actual human rights or environmental violations, effective remedial measures are implemented.



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