

CODE OF CONDUCT ON WORKING CONDITIONS AND HUMAN RIGHTS (STATUS: NOVEMBER 2025)

Walther Flender GmbH
Schwarzer Weg 102-106
40593 Düsseldorf



In addition to the Code of Business Conduct of Walther Flender GmbH dated 25 November 2025, we hereby declare the following Code of Conduct on Working Conditions and Human Rights:

1. Fundamental Provisions on the Protection of Human Rights

Walther Flender fully respects all international human rights – within our company, our supply chain, and with all business partners. This includes the ban on discrimination, child labour, and forced labour.

1.1 Prohibition of Child Labour

Child labour is strictly prohibited and must neither be used nor supported in any form. Statutory minimum age requirements must be strictly observed. Young workers may only perform tasks suitable for their age. Dangerous work that could harm their physical or mental health is not allowed.

1.2 Exclusion of Forced Labour and Slavery

Forced labour, slavery, or similar practices are strictly forbidden. This includes work resulting from debt bondage or human trafficking. Work must be performed voluntarily. Employees must be free to terminate their employment or working relationship at any time in accordance with the applicable contractual or statutory notice period. Employees must not be subjected to any unacceptable treatment, including psychological coercion or economic, sexual, or degrading exploitation.

1.3 Non-Discrimination

Any form of discrimination against employees is prohibited. Unequal treatment based on national or ethnic origin, skin colour, social background, health status, disability, sexual orientation, pregnancy, age, gender, political opinion, religion, or belief system is expressly forbidden unless justified by the requirements of the job. Equal pay must be provided for equal work. There must be no discrimination in hiring, promotions, or training. Everyone's dignity and personal rights must be respected.

2. Working Conditions

Walther Flender ensures that all employees work in a safe and healthy environment. We follow all health and safety laws and regulations and apply additional sensible measures to protect our employees.

2.1 Fair Working Conditions

Employees will be informed - clearly, regularly, and in the legally prescribed form, but at least in written form - of the components of their remuneration. Employees will receive appropriate wages. Remuneration will comply at minimum with all applicable statutory provisions (including the applicable statutory minimum wage) and meet the usual minimum standards of the relevant industry (collective agreements), with the higher amount prevailing.

2.2 Working Hours

We follow all legal and collectively agreed working time regulations.

2.3 Freedom of Association and Assembly

We respect the right to freedom of association and assembly. We respect employees' rights to form or join groups such as works councils or trade unions.

2.4 Occupational Health and Safety

A safe and healthy work environment is essential for us. Through an appropriate occupational health and safety management system, we implement effective preventive measures against workplace accidents and work-related health risks. Walther Flender provides employees with sufficient drinking water and sanitary facilities. Workspaces have proper lighting, ventilation, and temperature.

Düsseldorf, November 25, 2025



Ralf Neumann

CEO



Wolfram Schäfer

CEO