

CODE OF BUSINESS CONDUCT (AS OF DECEMBER 2025)

Walther Flender GmbH
Schwarzer Weg 102-106
40593 Düsseldorf



Walther Flender has been a family-owned company for more than 90 years, standing for quality, technical expertise and customised drive solutions. In its activities, Walther Flender GmbH takes into account not only procedural, economic and technical criteria, but also social and environmental aspects such as human rights, working conditions, prevention of corruption and environmental protection.

Within the interplay between product/service, market, region and process, cost, quality, reliability, innovation and sustainability constitute essential factors for the selection and evaluation of business partners.

Therefore, we not only commit ourselves to compliance with this Walther Flender Code of Business Conduct, by which we implement the principles of the International Labour Organization (ILO), the principles of the United Nations Global Compact, as well as applicable national and international laws, industry standards and the requirements of the German Supply Chain Due Diligence Act, but also expect our business partners to comply with the standards of conduct set out herein.

This Code of Business Conduct is furthermore based on the laws, provisions, standards, international agreements and industry standards listed in ANNEX 1, in their currently valid version and without claim to completeness.

We, Walther Flender GmbH, position ourselves with regard to the following topics and address this Code of Business Conduct to our business partners in order to ensure that the principles, objectives and behaviours set out herein are also observed throughout our supply chains.

1. General Conduct

Walther Flender is committed to lawful and orderly processes. Ethical and sustainable conduct constitute fundamental values of our company. The Code of Business Conduct forms the basis for cooperation between management, employees, customers and business partners. The principles and values set out herein determine behaviour and interaction within the company and towards third parties.

2. Principles of Proper Corporate Governance

Walther Flender complies with all applicable legal requirements, in particular commercial, tax and labour law provisions, as well as all statutory requirements relating to occupational safety, environmental protection and data protection. Walther Flender maintains proper processes certified in accordance with DIN ISO 9001.

3. Protection of Human Rights

Walther Flender is fully committed to respecting all internationally recognised human rights. These include, in particular, the prohibition of discrimination (for any reason), child labour and forced labour.

In particular, the following shall apply:

a) The prohibition of employing a child below the age at which compulsory schooling ends under the law of the place of employment, whereby the minimum employment age shall not be less than 15 years; this shall not apply if the law of the place of employment deviates in accordance with ILO Convention No. 138.

b) The prohibition of the worst forms of child labour for persons under 18 years of age, as defined in ILO Convention No. 182, including in particular:

- I. all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom, as well as forced or compulsory labour, including forced recruitment of children for use in armed conflict;
- II. the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
- III. the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs;
- IV. work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

c) The prohibition of forced labour, meaning any work or service exacted from a person under the threat of penalty and for which the person has not offered himself or herself voluntarily, for example as a result of debt bondage or human trafficking; this excludes work or services that are consistent with ILO Convention No. 29 or the International Covenant on Civil and Political Rights.

d) The prohibition of all forms of slavery, slavery-like practices, serfdom or other forms of domination or oppression in the workplace environment, such as extreme economic or sexual exploitation and humiliation.

e) The prohibition of unlawful evictions and forced displacements in connection with human rights violations and illegal acts of any kind.

4. Fair Working Conditions / Occupational Health and Safety

Walther Flender ensures that its employees work in a safe and healthy working environment. This includes not only compliance with all relevant occupational health and safety regulations, but also additional reasonable measures beneficial to the health and safety of employees.

Walther Flender ensures that the health, safety and dignity of employees are not impaired at the workplace or any other place where work is performed.

In particular, it is prohibited to disregard occupational safety obligations applicable under the law of the place of employment if this results in risks of accidents or work-related health hazards, especially due to:

- a) evidently inadequate safety standards in the provision and maintenance of workplaces and work equipment;
- b) the absence of appropriate protective measures against chemical, physical or biological hazards;
- c) the absence of measures to prevent excessive physical and/or mental fatigue, in particular due to unsuitable work organisation with regard to working hours and rest periods;
- d) insufficient training and instruction of employees.
- e) Overburdening with negative effects on the mental integrity of employees shall be avoided.

5. Freedom of Association

Walther Flender respects and recognises the right of employees to freedom of association and collective bargaining. In particular, it is prohibited to restrict such rights, including: the right of employees to form and join trade unions freely; the prohibition of discrimination or retaliation due to union membership; the right of trade unions to operate freely in accordance with the law of the place of employment, including the right to strike and to collective bargaining.

6. Equal Treatment and Non-Discrimination

Any form of harassment or discrimination against employees is unacceptable. It is prohibited to engage in unequal treatment in employment and remuneration, for example on the basis of ethnic or social origin, health status, disability, sexual orientation, age, gender, political opinion, religion, nationality, skin colour, union membership or marital status, unless justified by the requirements of employment. In particular, this includes unequal pay for work of equal value.

7. Appropriate Remuneration

Employees shall receive at least the statutory minimum wage in accordance with applicable laws and regulations, as well as all legally required social benefits. All employment conditions, remuneration, working hours, leave, exemptions from work and public holidays shall comply with applicable laws, regulations and binding industry standards. Withholding appropriate remuneration is prohibited. Overtime, weekend work and shift work shall be compensated separately or offset by time off.

8. Climate Protection / Compliance with Environmental Due Diligence Obligations

Walther Flender is committed to climate protection in line with the Paris Climate Agreement, the European Green Deal and the German Climate Protection Act. All three German production facilities are powered by green electricity certified by TÜV Rheinland. As early as 2005, we also began converting our buildings to alternative energy sources such as photovoltaics and geothermal heating. Walther Flender intends to continuously monitor and improve its environmentally relevant business activities, processes, products and resource consumption. Our objective is to reduce all climate-damaging emissions along our value chains and thereby make a sustainable contribution to climate-friendly business practices in the future.

In particular, the following shall apply:

- a)** The prohibition of causing harmful soil contamination, water pollution, air pollution, noise emissions or excessive water consumption that
 - I. significantly impair the natural basis for the preservation and production of food,
 - II. deny a person access to safe drinking water,
 - III. hinder or destroy a person's access to sanitation facilities, or
 - IV. harm a person's health; as well as
 - V. the prohibition of unlawful forced evictions and the unlawful deprivation of land, forests and waters in connection with the acquisition, development or other use of land, forests and waters, the use of which secures a person's livelihood.

- b)** All products and services supplied by our business partners shall comply with all applicable environmental, quality and safety standards, and their intended use shall be ensured.

- c)** Business partners shall maintain a high level of environmental and safety awareness and conduct their business in a sustainable, safe and environmentally responsible manner. They shall minimise adverse environmental impacts, use natural resources responsibly and comply with all applicable environmental laws and regulations.

- d)** Business partners shall ensure that no products are supplied which contain minerals whose extraction contributes to the financing or support of non-state armed groups or armed conflicts (including, but not limited to, the Democratic Republic of the Congo and adjoining countries, as well as other conflict and high-risk areas) ("conflict minerals").

- e)** Business partners shall comply with all applicable laws and regulations regarding the handling, storage and disposal of hazardous substances, water-polluting substances, other chemicals and waste, and shall handle such materials in an environmentally sound manner.

f) In accordance with the Minamata Convention on Mercury, the manufacture of mercury-added products, the use of mercury and mercury compounds in manufacturing processes after the phase-out date specified in the Convention, and the treatment of mercury waste contrary to the provisions of the Convention shall be prohibited.

g) Furthermore, the production and use of chemicals shall comply with the Stockholm Convention on Persistent Organic Pollutants (POPs Convention).

h) Business partners shall ensure the environmentally sound handling, collection, storage and disposal of waste in accordance with applicable legal requirements and in line with the provisions of the POPs Convention.

i) The prohibition of the export of hazardous and other wastes within the meaning of the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal (Basel Convention) and Regulation (EC) No. 1013/2006 shall be strictly observed, in particular exports:

- I. to a party that has prohibited the import of such hazardous and other wastes;
- II. to an importing state within the meaning of Article 2 No. 11 of the Basel Convention that has not provided its written consent to the specific import, where such import is not prohibited;
- III. to a non-party to the Basel Convention;
- IV. to an importing state where such hazardous or other wastes are not managed in an environmentally sound manner;

as well as the prohibition of exports of hazardous waste from countries listed in Annex VII of the Basel Convention to countries not listed therein, and the import of hazardous and other wastes from a non-party to the Basel Convention.

j) In addition, we take a position on the following topics and require the same from our business partners:

- I. protection of biodiversity,
- II. prevention of pollution of seas and oceans,
- III. protection against pollution of rivers, lakes and freshwater resources,
- IV. prevention of deforestation and land sealing,
- V. respect for animal welfare,
- VI. reduction of noise and air pollution.

9. Business Relations

We comply with the principles of fair and free competition and all applicable competition laws. We are committed to anti-corruption and anti-money laundering regulations and respect intellectual property and confidential information.

In particular, the following shall apply:

a) In the import and export of goods, intangible assets and services, we ensure strict compliance with applicable foreign trade regulations, including, but not limited to, laws and regulations relating to embargoes, import and export controls, trade and other sanctions, money laundering and the financing of terrorism.

b) The offering or granting of advantages, such as monetary payments, services or gifts, is prohibited where such advantage is intended to improperly induce the recipient to grant preferential treatment. Our employees and business partners shall neither accept any undue benefits of any kind nor engage in any conduct that could be construed as soliciting such benefits.

c) We are committed to the principles of a market economy and fair competition and conduct our business exclusively on the basis of performance and in compliance with legally permissible competition. Our business partners shall refrain from any conduct that violates competition and/or antitrust laws, shall not enter into any unlawful agreements among themselves or with third parties, and shall not participate in or accept any offers aimed at such arrangements.

d) We maintain the confidentiality of trade secrets and other confidential information, in particular personal data, as well as unpublished financial, technical and other data.

10. Complaints and Reporting Procedure

Transparency, integrity and responsible conduct are core elements of our corporate culture. In order to strengthen these values on a sustainable basis, we have recently implemented an anonymous complaints management system.

Possible violations of our Code of Ethics, the Code of Conduct, internal policies or sustainability-related matters may be reported securely and without providing personal data via an online form available at:

<https://walther-flender.de/en/company/complaint-form/>

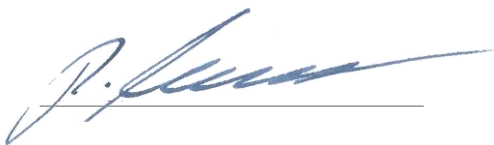
The online form is available in German and English and is submitted directly to the central address sustainability@walther-flender.de.

All reports received shall be treated confidentially and assessed in accordance with our internal procedures. Follow-up actions shall be carried out without any disadvantage to the reporting person.

Annex 1:

Applicable laws, regulations, standards and international agreements

Düsseldorf, 18. December 2025



Ralf Neumann
Geschäftsführer



Wolfram Schäfer
Geschäftsführer

ANNEX 1

- United Nations Global Compact
- International Labour Organization Convention No. 138 of June 26, 1973 concerning the Minimum Age for Admission to Employment (Federal Law Gazette 1976 II p. 201, 202)
- International Labour Organization Convention No. 182 of June 17, 1999 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (Federal Law Gazette 2001 II p. 1290, 1291)
- International Labour Organization Convention No. 29 of June 28, 1930 concerning Forced or Compulsory Labour (Federal Law Gazette 1956 II p. 640, 641); Protocol of June 11, 2014 to Convention No. 29 (Federal Law Gazette 2019 II p. 437, 438)
- International Labour Organization Convention No. 87 of July 9, 1948 concerning Freedom of Association and Protection of the Right to Organise (Federal Law Gazette 1956 II p. 2072, 2071), as amended by the Convention of June 26, 1961 (Federal Law Gazette 1963 II p. 1135, 1136)
- International Labour Organization Convention No. 98 of July 1, 1949 concerning the Application of the Principles of the Right to Organise and to Bargain Collectively (Federal Law Gazette 1955 II p. 1122, 1123), as amended by the Convention of June 26, 1961 (Federal Law Gazette 1963 II p. 1135, 1136)
- International Labour Organization Convention No. 100 of June 29, 1951 concerning Equal Remuneration for Men and Women Workers for Work of Equal Value (Federal Law Gazette 1956 II p. 23, 24)
- International Labour Organization Convention No. 105 of June 25, 1957 concerning the Abolition of Forced Labour (Federal Law Gazette 1959 II p. 441, 442)
- International Labour Organization Convention No. 111 of June 25, 1958 concerning Discrimination in Respect of Employment and Occupation (Federal Law Gazette 1961 II p. 97, 98)
- International Covenant of December 19, 1966 on Civil and Political Rights (Federal Law Gazette 1973 II p. 1533, 1534)
- International Covenant of December 19, 1966 on Economic, Social and Cultural Rights (Federal Law Gazette 1973 II p. 1569, 1570)
- Minamata Convention on Mercury of October 10, 2013 (Federal Law Gazette 2017 II p. 610, 611)
- Stockholm Convention of May 23, 2001 on Persistent Organic Pollutants (POPs Convention) (Federal Law Gazette 2002 II p. 803, 804), as last amended by the Decision of May 6, 2005 (Federal Law Gazette 2009 II p. 1060, 1061)
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal of March 22, 1989 (Federal Law Gazette 1994 II p. 2703, 2704), as last amended by the Third Ordinance Amending Annexes to the Basel Convention of May 6, 2014 (Federal Law Gazette II p. 306/307)
- Regulation (EC) No. 1013/2006 of the European Parliament and of the Council of June 14, 2006 on shipments of waste (OJ L 190 of July 12, 2006, p. 1–98), as last amended by Commission Delegated Regulation (EU) 2020/2174 of October 19, 2020 (OJ L 433 of December 22, 2020, p. 11–19)
- Act on Corporate Due Diligence Obligations in Supply Chains (Supply Chain Due Diligence Act – LkSG) (Federal Law Gazette 2021 I, p. 2959 et seq.)