

CODE OF BUSINESS CONDUCT (STATUS: NOVEMBER 2025)

Walther Flender GmbH
Schwarzer Weg 102-106
40593 Düsseldorf



For round about 90 years, the Walther Flender family business is your partner for quality, technical expertise, and customised drive solutions. Our daily business is determined by various principles for proper corporate governance and a catalogue of values. This Code of Business Conduct is our guideline for our business activities.

1. General Guidelines

Walther Flender is committed to legal and properly processes. Ethical and sustainable behaviour are fundamental values of our company. The Code of Business Conduct is the basis for any cooperation between management, employees, customers, and business partners. The principles and values set out in this Code of Business Conduct determine all behaviour within the company and towards third parties.

2. Principles for proper corporate governance

Walther Flender complies with all relevant legal requirements, in particular commercial, tax, and labour law regulations as well as all legal requirements relating to safety at work, environmental and data protection. Quality management processes at Walther Flender are certified in accordance with DIN ISO 9001.

3. Human rights & working conditions

Walther Flender - including our supply chains and business partners - is fully committed to and respects all international human rights. For us, human rights include especially prohibition of discrimination (for whatever reason), child and forced labour. Walther Flender ensures that its employees work in a safe and healthy working environment. This includes not only all relevant labour safety regulations, but also reasonable measures that go beyond these and are beneficial to the health and safety of employees.

4. Environment

Walther Flender - including our supply chains and business partners - is fully 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 the TÜV Rheinland. As early as 2005, we also began converting our office buildings to alternative energies such as photovoltaics and geothermal heating systems. Walther Flender intends to continuously monitor and improve its environmentally relevant business activities, processes, products, and resource consumption. Our aim is to reduce all climate-damaging emissions from our value chains and thus make a sustainable contribution to climate-friendly business in the future.

5. Business relations

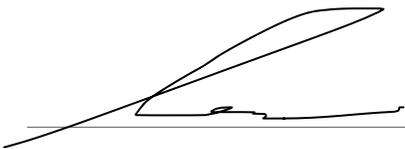
In our business relationships, we respect the principles of fair and free competition as well as national and international competition laws. At the same time, we are fully committed to comply with anti-corruption regulations and the ban on money laundering. We respect intellectual property of third parties and confidential information and protect it accordingly.

6. Catalogue of values

Values are our guideline for how we want to behave within the company and towards thirds parties. For us, the following values are particularly important to us:

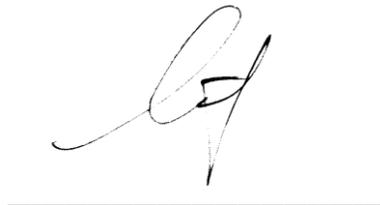
- Integrity & responsibility
- Social responsibility & justice
- Fairness & trust
- Solidity & honesty
- Solidarity & loyalty

Düsseldorf, November 25, 2025



Ralf Neumann

CEO



Wolfram Schäfer

CEO