

## **ETHICS CODE (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 November 25, 2025, we hereby declare the following Ethics Code:

### **1. Principles**

This Ethics Code constitutes binding rules of conduct applicable throughout our company. We undertake to comply with the following provisions as well as all relevant national and international laws and regulations.

### **2. Non-Discrimination**

Noone shall be disadvantaged or privileged because of their gender, descent, race, language, homeland or origin, marital status, age, disability, faith, or religious or political convictions.

Any conduct that violates the dignity of another individual, or constitutes discrimination or harassment, is strictly prohibited.

### **3. Equal Opportunities**

We are committed to ensuring equal opportunities for all employees.

### **4. Business Relationships**

In all business relationships, we respect the principles of fair and free competition. We commit to complying with all anti-corruption regulations and the prohibition of money laundering.

### **5. Conflicts of Interest**

Conflicts of interest must be avoided. Potential conflict situations must be reported early. Accepting or granting benefits to third parties, particularly of a financial nature, is prohibited. Exceptions to this rule are only customary business invitations and (promotional) gifts that are clearly not related to the granting of advantages.

## 6. Occupational Health, Safety, and Environmental Protection

We ensure that all employees work in a safe and healthy environment. Environmental protection is one of our highest priorities. During work, neither employees nor the environment should be harmed, and any impact should be kept as minimal as possible.

## 7. Confidentiality

Confidential information as well as trade and business secrets of the company and its business partners are respected and protected.

## 8. Intellectual Property

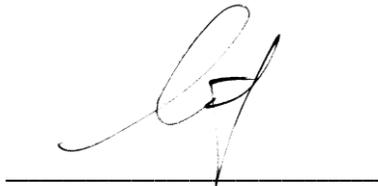
We respect the intellectual property of third parties and protect it accordingly.

Düsseldorf, November 25, 2025



Ralf Neumann

CEO



Wolfram Schäfer

CEO