

SUPPLIER CODE OF CONDUCT

(AS OF 02/2024)

HAHN AUTOMATION GROUP GMBH

1. Foreword

The HAHN Automation Group is a globally active group of companies with shared values in terms of legally compliant, ethical and sustainable business practices. As a group, we specialize in factory automation for the automotive, medical technology and electronics industries. As an internationally active group of companies, ecologically and socially responsible corporate governance is particularly important to the HAHN Automation Group. The companies of the HAHN Automation Group act in accordance with all relevant laws and regulations and internal rules, in particular our own Code of Conduct.

We expect our employees to adhere to the principles of social, ethical and sustainable conduct. This requirement is also important to us when working with suppliers. In addition to high expectations regarding fair prices, high quality, punctual delivery and compliance with legal regulations and laws, we also expect our partners to deal with the principles and expectations of this Code of Conduct and to take measures to fulfil them.

The Supplier Code of Conduct is based on recognized global standards such as the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the international labour standards of the International Labour Organization.

Area of application

This Supplier Code of Conduct applies to all legal and natural persons who sell or provide products and services directly or indirectly (via third parties, e.g. subcontractors, affiliated companies, etc.) to the HAHN Automation Group ("Supplier"). The HAHN Automation Group includes HAHN Automation Group Holding GmbH and all companies in which this company directly or indirectly holds a majority interest.

This Supplier Code of Conduct applies to all HAHN Automation Group suppliers worldwide, even if in certain countries official bodies and the public demand, expect or tolerate behavior or business practices that contradict this Supplier Code of Conduct. If stricter rules or principles of conduct apply in a country than those defined in this Supplier Code of Conduct, these stricter rules shall apply.

2. Labor and human rights

The Supplier shall respect internationally recognized human rights as set out in the Universal Declaration of Human Rights and standards of the ILO and ensure healthy and fair working conditions worldwide. Therefore, the Supplier shall treat all persons with respect and fairness and comply with applicable national and international regulations.

2.1 Fair working conditions

The Supplier is expected to pay remuneration and social benefits that at least comply with national and local legal standards, regulations or agreements. Employees should have at least one day off every seven days. The applicable regulations on working hours and vacation are complied with.

2.2 Equal opportunities

The Supplier must ensure in its company and in its supply chains that no discrimination against individuals or groups on the basis of skin color, ethnic origin, gender, age, nationality, social origin, disability and sexual orientation as well as religious affiliation or ideology is permitted. Any form of harassment, such as sexual harassment, sexual abuse, physical punishment, psychological or physical coercion or verbal abuse will be prevented by our suppliers by all means.

2.3 No forced and child labor

The Supplier must prevent all forms of modern slavery. Examples of this include forced overtime, the withholding of identity documents and human trafficking. The principle of freely chosen employment must be respected.

The supplier only employs persons who have reached the minimum age required to perform work in accordance with the applicable national legislation. They shall also respect and observe the rights of children. In this context, suppliers are expected to ensure that young workers under the age of 18 do not work at night or overtime and are protected from working conditions that are harmful to their health, safety and development.

2.4 Dialog with employees and employee representatives

We expect our Suppliers to respect the freedom of association and the right to form interest groups. The Supplier must grant its employees the right to protect their interests on the basis of national legislation.

2.5 Health protection and occupational safety

The Supplier must at least comply with the respective national or local standards for a safe and hygienic working environment. The Supplier is expected to take appropriate measures to ensure health and safety in the workplace in order to ensure healthy employment. The use of a certified occupational health and safety management system is recommended.

3. Legal compliance and business ethics

3.1 Corruption

The HAHN Automation Group does not tolerate corrupt practices and takes action against them. Our Supplier must not participate in or tolerate corruption, bribery, extortion or embezzlement in any form. Any form of direct or indirect bribery or acceptance of advantages, whether by accepting or making payments, gifts or benefits of any kind beyond the legal framework or the customary level, is not permitted. This shall also apply if the Supplier cooperates with third parties within the scope of its activities for the HAHN Automation Group.

We encourage our Suppliers to actively promote the prevention of corruption and fraud.

3.2 Money laundering and terrorist financing

The Supplier undertakes to comply with its legal obligations to prevent money laundering and terrorist financing within the framework of the applicable legal provisions and not to promote these either directly or indirectly.

3.3 Fair competition and antitrust law

HAHN Automation Group expects the Supplier to respect fair and free competition. The Supplier must comply with the applicable competition and antitrust regulations. This includes business practices that unlawfully restrict competition, the improper exchange of competitive information as well as price fixing, bid rigging or abusive market allocation.

3.4 Proper accounting and financial reporting

The Supplier shall always comply with the principles of proper accounting and, where applicable, financial reporting. Proper records shall be kept and no entries shall be altered in order to conceal or falsify any transactions concerned. Records shall be kept in accordance with the applicable regulations.

3.5 Protection of confidential information and intellectual property

The Supplier is expected to respect intellectual property rights and protect the corresponding data.

The Supplier shall ensure that sensitive data (business secrets and personal data) is collected, processed, secured and deleted appropriately and in compliance with the law. The Supplier shall obligate its employees accordingly. Data worthy of protection may not be passed on to third parties without authorization or published in any other form and must be protected accordingly. The Supplier shall adequately secure its technical information systems against cyber threats. A certified information security system is recommended.

3.6 Avoidance of conflicts of interest

The Supplier guarantees to make decisions on the basis of objective considerations and not to be guided by personal interests in an inadmissible manner. If the Supplier becomes aware of a potential conflict of interest that could influence the business relationship, he shall inform the HAHN Automation Group immediately.

3.7 Export controls and economic sanctions

The Supplier strictly observes compliance with all applicable regulations and laws for the import and export of goods, services and information as well as payment transactions. In its business activities, existing sanctions and embargoes are observed within the framework of the laws and regulations.

3.8 No support for armed groups

The Supplier excludes the possibility that its business activities contribute to the direct or indirect support of non-state armed groups.

3.9 Whistleblowing and protection from retaliation

The HAHN Automation Group expects Suppliers to allow their employees to speak out freely and without fear of retaliation within their company, e.g. via an internal reporting office, if they become aware of a violation of the content of this Supplier Code of Conduct.

4. Environment

4.1 Resources and raw materials

The Supplier is required to avoid hazards to people and the environment, to minimize the impact on the environment and to use resources, in particular raw materials, water and energy, sparingly and to reduce consumption. Applicable legal requirements and standards for fire and environmental protection must be complied with. The Supplier is encouraged to continuously monitor and improve its ecological footprint.

If the Supplier has production sites, a suitable environmental management system is recommended.

4.2 Greenhouse gas emissions

The HAHN Automation Group encourages its Suppliers to find economical solutions for minimizing air emissions, especially greenhouse gas emissions. This may include, for example, the implementation of energy efficiency measures or the purchase of renewable energies. Suppliers who deliver products to the HAHN Automation Group should be able to demonstrate CO₂ emissions in tons at product level upon request.

4.3 Waste, waste water and hazardous substances

The Supplier shall have measures in place to reduce both waste and waste water and to treat them in accordance with all legal requirements. Waste shall be recycled as far as possible. When handling chemicals and hazardous substances, the Supplier shall ensure responsible handling with regard to environmental and health protection.

5. Supply chain

The HAHN Automation Group is committed to a responsible supply chain. Our goal is that our products and materials are free of so-called conflict minerals (tin, tantalum, tungsten, their ores and gold from conflict and high-risk areas), which contribute to the direct or indirect financing of armed groups, forced labor and other human rights violations. We expect our suppliers to source any minerals from conflict-affected and high-risk areas - in particular tantalum, tin, tungsten and gold - only from audited, conflict-free smelters and refineries. If goods and materials contain conflict minerals, the Supplier is obliged to create transparency about the entire supply chain, including the industrial processors (smelter/smelter), upon request.

6. Notification, information and contact persons

The HAHN Automation Group takes indications of possible misconduct very seriously and investigates them. A prerequisite for this is that employees, Suppliers and third parties are made aware of this. We therefore ask for information on relevant, possible breaches of rules.

If you discover possible misconduct by employees of the HAHN Automation Group or employees of our Suppliers during cooperation, you can report this anonymously via the [HAHN Automation Group Whistleblower System](#). Alternatively, a report can be made to the HAHN Automation Group Compliance Officer.

HAHN Automation Group Holding GmbH
Compliance Officer
Liebshausener Straße 3
55494 Rheinböllen
Tel: +49 (0) 173 9934640
E-Mail: compliance@hahnautomation.group

If you have any questions about this Supplier Code of Conduct, you can contact your responsible purchaser or our Compliance Officer (compliance@hahnautomation.group).

7 Compliance, violations and audit law

The HAHN Automation Group reserves the right to verify compliance with this Supplier Code of Conduct through appropriate measures. This may take the form of questionnaires, assessments, or on-site supplier audits, for example. On-site audits are always announced in advance and carried out together with the business partner's representatives in an appropriate manner. We expect our Suppliers to take this Code of Conduct into account when selecting third parties who are used to fulfil the contractual relationship with the HAHN Automation Group and to work towards compliance with it.

If deviations from this Supplier Code of Conduct are identified, corrective measures are jointly defined that can be implemented sustainably within a reasonable period of time.

A violation of this Supplier Code of Conduct constitutes an impairment of the business relationship between the HAHN Automation Group and the business partner. Without prejudice to further rights, HAHN Automation Group reserves the right in this case to demand clarification of the facts and initiation of countermeasures. If the business partner demonstrably fails to initiate suitable improvement measures within a reasonable period of time, or if the violation is so serious that a continuation of the business relationship becomes unreasonable for the HAHN Automation Group, the HAHN Automation Group reserves the right, without prejudice to further rights, to terminate the contractual relationship concerned without notice or to withdraw from the contract concerned.

We hereby confirm that we share, respect, comply with and apply the values of the Supplier Code of Conduct as stated in the above-mentioned Code of Conduct.

Company name

Location

Date and signature

Name and function of the signatory