

Code Of Conduct

A. Preamble

ECOMAL Europe GmbH and its ECOMAL sister companies in Europe (hereinafter referred to as “ECOMAL”) strive to conduct their business activities in a legal, ethical and responsible manner for people and the environment.

In addition to compliance with applicable laws and regulations, this requires business activities that are based on social, ecological and ethical principles.

ECOMAL has formulated these principles as binding guidelines in the form of this Code of Ethics. Its content is based on internationally recognized standards such as the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the United Nations Universal Declaration of Human Rights.

ECOMAL is committed to working fairly, honestly and with integrity in its dealings with its business partners and its own employees in accordance with these values.

In order to realize our corporate values, ECOMAL expects its business partners to observe and implement the values set out in this Code.

B. Work

I. **Employee protection**

In accordance with the understanding of the international community, employees are to be treated with dignity and respect.

1. Free choice of employment

All work must be voluntary. ECOMAL rejects forced, bonded (including debt bondage) or compulsory labor, involuntary or exploitative prison labor, slave labor or labor based on human trafficking.

2. Prohibition of child labor

The employment of young workers who have not reached the minimum age for employment under local law is prohibited.

The minimum age for employment must not be below the age at which compulsory education ends in the country in which the ECOMAL supplier operates.

3. Reasonable working hours

Working hours must not exceed the maximum number of hours applicable under local law. In addition, weekly working hours, including overtime, should not exceed 60 hours. Exceptions are emergencies and exceptional circumstances. All overtime must be voluntary.

4. Payment of living wages

The remuneration paid to employees must comply with all relevant laws on remuneration. The wage must be a living wage. In line with the Global Living Wage Coalition, a living wage is defined as a wage that provides a full-time employee with an adequate standard of living at their place of work.

5. Freedom of association

In accordance with local legislation, the right of all employees to form or join trade unions of their choice, to bargain collectively and to hold peaceful assemblies is respected. The same applies to the right of employees to refrain from these activities.

6 Prohibition of discrimination and harassment

No harassment or unlawful discrimination will be tolerated in the workplace. For example, employees will not be discriminated against or harassed in compensation, promotions, awards and access to training opportunities based on the following characteristics: ethnic origin, skin color, age, gender, sexual orientation, national origin, disability, pregnancy, religion, political affiliation, union membership or marital status.

II. Occupational safety

A safe and healthy working environment helps to minimize work-related injuries and illnesses.

Possible risks to the health and safety of employees, e.g. from machinery or moving heavy loads, must be identified and assessed so that suitable measures can be taken to counter them.

For example, pregnant women should not work in high-risk working conditions. Where machinery presents a risk of injury to workers, it must have guards that are properly maintained.

Procedures and systems must also be in place to prevent, manage, track and report occupational accidents and diseases.

C. Environment

In its business activities, ECOMAL takes care to reduce negative effects on the environment and conserve natural resources. One expression of this endeavor is ECOMAL's certification in accordance with DIN ISO 14001, which requires the company to continuously improve its own contribution to environmental protection.

I. Reduction of waste

Waste must be declared, recycled and disposed of in accordance with local legislation. The primary goal is to reduce or avoid all forms of waste, whether through company processes, the use of alternative materials, savings, recycling or reuse of materials.

II. Reduction of emissions

Emissions must be typified, measured and subjected to the necessary treatment in accordance with local legislation. The primary objective is to reduce or avoid emissions caused by operational processes that could harm the environment.

III. Conservation of natural resources

Natural resources such as water, fossil fuels and minerals must be used sustainably, whether through substitution, for example by purchasing electricity from renewable energy sources instead of coal, or through efficiency improvements such as a reduction in electricity and water consumption.

IV. Transparency regarding hazardous substances

Hazardous substances must be declared and handled in accordance with local legislation so that safety is ensured during their transportation, storage, use, disposal and recycling.

D. Ethics

ECOMAL is committed to maintaining high ethical standards.

I. Responsible purchasing policy

When selecting its suppliers, ECOMAL ensures that they share the same values as those set out in this Code of Ethics. For example, ECOMAL requires its suppliers to comply with the international rules prohibiting trade in conflict minerals in order to contribute to greater compliance with these rules.

II. Business conduct with integrity

ECOMAL does not tolerate any form of bribery, taking advantage or corruption. There is a zero-tolerance policy in this respect.

Furthermore, ECOMAL maintains fair business practices and fair competition. Compliance with local antitrust and competition legislation is respected, as is the protection of intellectual property rights and confidential customer and supplier information.

The expectations of customers and suppliers in the area of data protection are also met by complying with local legislation when collecting, storing, processing and transferring or passing on personal data.

E. Management systems and measures

ECOMAL ensures compliance with the obligations of this Code of Ethics through various management systems and measures.

I. Compliance management system

ECOMAL ensures compliance with the relevant legal requirements in the areas of labor, environment and ethics through its own compliance management system.

The management has created a dedicated compliance office for this purpose, which operates and continuously develops the compliance management system.

The Compliance Office is responsible in particular for

- identifying legal requirements that are essential for ECOMAL and
- deriving the necessary measures that need to be implemented at ECOMAL, including advising the specialist departments in this regard, and
- ongoing monitoring of whether the specialist departments comply with the legal provisions applicable to them in their day-to-day business, as well as
- reporting to the management in this regard.

II. Specific facilities relating to employee protection and occupational safety

ECOMAL ensures compliance with the duties of conduct in the area of employee protection and occupational safety through various facilities.

For example, ECOMAL has set up a system through which employees can lodge a complaint if, in the context of their employment relationship, they feel that their employer, superiors, other employees or third parties have discriminated against them on the grounds of race or ethnic origin.

- race or ethnic origin
- gender
- religion or belief
- disability
- age
- sexual identity

feel disadvantaged.

Furthermore, ECOMAL has implemented the following measures in particular, which help to create a safe and healthy working environment that minimizes work-related injuries and illnesses:

- Appointment of occupational safety officers
- Cooperation with an external occupational safety specialist
- Appointment of a company doctor
- Workplace health promotion as a voluntary service

III. Specific facilities relating to environmental protection

ECOMAL is certified in accordance with ISO 14001 and operates an environmental management system in this context, which it is continuously developing.

The head of environmental management is responsible in particular for

- Deriving environmental targets from the environmental policy formulated by the management,
- defining methods and metrics for measuring the achievement of environmental targets,
- setting up and operating the environmental management system,
- reporting on this to the management.

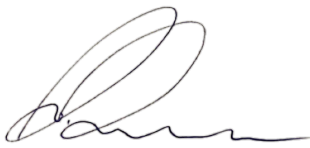
ECOMAL's purchasing department also evaluates its suppliers, whereby environmental protection aspects in the form of certifications and transparent communication regarding hazardous substances in accordance with the REACH and RoHS regulations play a decisive role.

IV. Specific facilities regarding ethics

All benefits received by ECOMAL employees from third parties outside the company or granted to third parties outside the company must be entered in an ECOMAL benefits register. This register can be viewed by every ECOMAL employee. This effectively prevents bribery, taking advantage and corruption.

Furthermore, ECOMAL protects confidential information and personal data not only through technical and organizational measures, but also in particular through the appointment of a Data Protection & Information Security Officer. This officer carries out regular checks to ensure the effectiveness of the protection of confidential and personal data at ECOMAL.

Kirchzarten, April 14, 2026



Alexander Dziadur

Managing Director