



## MAPAL Code of Conduct for Suppliers

MAPAL is committed to compliance with the Ten Principles of the UN Global Compact.

In this Code of Conduct for Suppliers, MAPAL Dr. Kress KG and the group of companies (can be viewed at [www.mapal.com](http://www.mapal.com)), hereinafter referred to as "MAPAL" for short, has set out its requirements and principles for cooperation with its business partners, in particular for compliance with ethical standards, applicable law and integrity. MAPAL expects its suppliers to comply in their activities with the applicable national laws, the principles of the UN Global Compact and this MAPAL Code of Conduct for Suppliers. Furthermore, they are expected to implement suitable processes that support compliance with the applicable laws in their companies and promote continuous improvement with regard to the principles and requirements of the MAPAL Code of Conduct for Suppliers. Furthermore, MAPAL expects its suppliers to ensure that their affiliated companies also comply with and recognize all the principles and requirements described here.



## MAPAL Code of Conduct for Suppliers

### Social responsibility of our business partners

We expect our business partners to align their actions with the following principles:

#### Compliance with laws

Suppliers are required to comply with all applicable laws and regulations of the countries in which business activities are conducted or services are provided.

#### Human Rights

Suppliers are expected to treat others with respect and dignity, promote diversity, accept differing opinions, support equal opportunities for all and promote an ethical corporate culture.

#### Child Labor

Suppliers strictly reject child labor and comply with applicable regulations prohibiting child labor.

#### Equal opportunities

Suppliers shall promote diversity within the company and shall not tolerate discrimination in the hiring and employment of employees.

#### Freedom of association

Suppliers shall respect the rights of workers to freedom of association and to communicate with management regarding working conditions without fear of persecution, intimidation, punishment, interference or reprisal.

In addition, suppliers are expected to respect all labor rights to freedom of association, including the right to join an association of their choice.

#### Harassment in the workplace

Suppliers must ensure that their employees are not subjected to physical, psychological and verbal harassment or other abusive behavior in the workplace.

#### Non-discrimination

Suppliers shall provide equal employment opportunities to all employees and applicants for employment without discrimination.

#### Working hours and wages

Suppliers will comply with applicable national laws regarding working hours. Suppliers' employees are also expected to receive compensation that is consistent with applicable national laws.



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### Fighting corruption

MAPAL does not tolerate any form of corruption or other unfair business practices.

#### Anti-corruption laws

Suppliers do not tolerate any form of corruption or white-collar crime by their own employees or employees in the supply chain.

Suppliers are prohibited from offering or providing improper monetary payments or benefits of monetary value to government officials, political parties, candidates for public office, or any other person. In addition, payments to expedite or ensure the performance of routine government activities such as obtaining a visa or clearing customs are prohibited even in locations where such activity does not violate applicable local law.

Suppliers are expected to exercise due diligence in preventing and detecting corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the engagement of intermediaries such as agents or consultants.

#### Conflicts of Interest

Suppliers are expected to avoid any conflicts of interest or situations that create the appearance of a potential conflict of interest. Suppliers are expected to notify all affected parties in the event of an actual or potential conflict of interest. This includes a conflict between MAPAL's interests and their own interests or those of family members, friends or acquaintances.

#### Illegal payments

Suppliers must not offer or accept illegal payments from their customers, suppliers, agents, representatives or other persons. It is not permitted to accept, give and/or hold out the prospect of receiving money or monetary benefits, whether directly or indirectly, for the purpose of exerting undue influence or obtaining an improper advantage.

#### Fraud and deceit

Suppliers shall not obtain any advantage by fraudulent act, deception or false pretenses, or permit any other person to do so. This includes fraud or theft from companies, customers or third parties, and any misappropriation of property.

#### Competition and antitrust law

Suppliers are not allowed to collude with their competitors on prices or tender offers. They are not permitted to exchange existing, current or future price information with competitors. Suppliers are prohibited from participating in any cartel.

#### Gifts/Business Courtesies

Suppliers are expected not to misuse invitations and gifts to influence. Invitations and gifts to MAPAL employees or persons close to them are only granted if the occasion and scope are appropriate, i.e. they are of low value and can be regarded as an expression of locally generally accepted business practice. Similarly, suppliers do not demand unreasonable benefits from MAPAL employees.



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### Maintaining accurate records

Suppliers are expected to maintain accurate records and not alter any entry to conceal or misrepresent the underlying transaction. All records, regardless of format, made or received to evidence a business transaction must fully and accurately document the transaction or process. Records shall be retained based on applicable record retention requirements.

### Protection of Information

#### Confidential/Proprietary Information.

Suppliers agree to properly handle sensitive information, including confidential, proprietary and personal information.

Information shall not be used for any purpose (e.g., advertising, publicity, etc.) other than the original business purpose unless prior permission has been granted by the owner of the information.

#### Intellectual Property

Suppliers must comply with all applicable intellectual property laws. This includes patents, copyrights and trademarks, as well as protection against disclosure.

#### Information Security

Suppliers shall protect third party confidential and proprietary information and their personal data from unauthorized access, destruction, use, modification and disclosure through appropriate physical and electronic security procedures. Suppliers shall comply with applicable data protection laws.

### Occupational safety, environmental protection and health protection

Suppliers shall comply with the environmental standards applicable to them and are committed to the principles of sustainable business and to environmental protection as a corporate value. They take effective measures that reflect their responsibility for the environment.

#### Occupational health and safety

Suppliers shall protect the health, safety and welfare of their employees, business partners, visitors and those who may be affected by their activities.

#### Waste and resource management

The development, manufacture, use and subsequent recovery of products shall take into account the avoidance of waste, reuse, recycling, environmentally friendly disposal of residual waste, chemicals and wastewater, and the economical use of resources (water, raw materials, electricity).



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### Compliance in global trade

#### Import

Suppliers must ensure that their business practices comply with all applicable laws, instructions and regulations governing the import of parts, components and technical data.

#### Export

Suppliers shall ensure that their business practices comply with all applicable laws, instructions and regulations governing the export of parts, components and technical data. Suppliers agree to provide truthful and accurate information and obtain any required export licenses or permits.

#### Responsible sourcing of mineral raw materials

Suppliers are required to perform their due diligence with respect to relevant raw materials - particularly tin, tantalum, tungsten, gold, and cobalt.

#### Counterfeit components

Suppliers are expected to develop, implement and maintain effective methods and processes appropriate to their products to avoid the risk of counterfeit components and materials being introduced into their products to be supplied. In addition, suppliers agree to notify recipients of counterfeit components when warranted and to exclude such components from the deliverable.

### Ethics Program- Expectations

#### Whistleblower Protection

Suppliers are expected to allow their employees to raise legal or ethical issues and concerns without fear of retaliation. In addition, suppliers are expected to take steps to prevent, detect and remedy retaliation.

#### Consequences for Violations of the Code

In the event of non-compliance with these Code provisions, the business relationship may be reviewed and corrective action may be taken in accordance with the terms of the applicable contract(s).

#### Principles of Ethics

In accordance with the size and nature of the business, suppliers shall establish management systems to support compliance with laws and regulations and the expectations described in this Supplier Code of Conduct. Suppliers are encouraged to establish their own rules of conduct in writing and to pass on their principles to the companies supplying them with goods and services. MAPAL expects its suppliers to implement effective programs that - beyond compliance with laws, regulations and contractual terms - motivate employees to act in an ethical, value-oriented business manner.