

# Compliance Statement

## Rules of Compliance and Conduct of ISOWA GmbH

### 1.) Introduction

The present self-commitment expresses efforts of ISOWA GmbH to contribute to promoting fair and sustainable standards in the company itself, in dealing with competitors, in relation to environmental protection, animal protection, industry organisation, and communication. We are convinced that the highest product and service quality must go hand in hand with matching process quality and that consumer or customers have the right to expect it. The present Code of Conduct forms thus the basis for a constant improvement of corporate performance.

Rules of Compliance set out in this Code apply to all locations and business units directly. In addition, we promote using these or comparable principles along supply chains.

All employees have the possibility to turn to the company equal opportunities officer(s) confidentially, if aspects of this Statement listed below are violated so that relevant remedial measures can be developed and implemented.

### 2.) Corporate culture and world of work

#### **Moral integrity, law and regulation**

ISOWA GmbH complies with general human rights, with prevailing laws and statutes regarding quality, information security, environmental protection, energy, safety and health at work, with export controls and economic sanctions and demands this also of its suppliers. It orients its practice by universal ethical values and principles, integrity, honesty, respect for human dignity, openness and non-discrimination based on religion, worldview, gender, and ethics in particular.

We take on the financial responsibility for all business documents and records – always in accordance with applicable law and with generally accepted accounting principles.

#### **International law**

International activities of ISOWA GmbH require dealing with different rules of foreign trade, tax, and customs legislations. These rules are complied with and every possible measure is taken for implementing these acts.

#### **Diversity and the principle of equal treatment**

We want to promote diversity and tolerance in our company, which is why discrimination and harassment are not permitted. Irrespective of whether someone is excluded on the basis of race or ethnic origin, gender, religion, ideology, age, illness or disability, sexual identity or other personal characteristics, discrimination is not tolerated. Respect and fairness are the basis for our dealings with one another. In all employment decisions including, but not limited to, hiring

and promotions, compensation, fringe benefits, training, layoffs and terminations, all employees are treated strictly according to their abilities and qualifications.

We would like to draw your attention to the following points in particular:

- When working together, your colleagues' right to dignity and privacy must always be respected.
- Equal opportunities, trusting cooperation and non-discriminatory interaction must play a major role here.
- Any employee who has experienced discrimination or harassment should inform the person concerned of their misconduct. If this procedure is not desired, a line manager or an employee from the HR department can be contacted at any time.

### **Data protection**

In order to do justice to the protection of personal data, we take all necessary measures to ensure that the collection, processing and use of personal data in our company complies with the applicable legal provisions on data protection. All this with the aim of avoiding improper and prohibited use and creating a framework of confidentiality and integrity within the company.

- Any processing of personal data requires the consent of the data subject or a legal basis.
- The privacy of employees, business partners and third parties must always be respected.
- If there are any uncertainties regarding data protection, the company data protection officer should be consulted.

### **Corporate Citizenship**

The principle of appreciation is a fundamental component of corporate and management culture of ISOWA GmbH. It represents respect and fairness in people's dealings with one another.

Furthermore, the social commitment of the employees is promoted, e.g. in fire services or associations. ISOWA GmbH shows civic engagement by bringing in positive contributions into the society.

### **Promotion and further education of employees**

Training of young people is an important social task. Therefore the entries to employment of young people as well as their individual developments are supported. Further training is of high significance in the company, too. That is why the professional and personal development of employees is promoted.

The sustainability of the company is being strengthened in this way at the same time.

### **Forced labor**

All forms of forced labor, including forced labor, bonded labor, servitude and slave labor or slavery, and conditions similar to these are rejected. Company employees must not be forced to work either directly or indirectly through violence or intimidation.

### **Child labour**

Child labour and all forms of exploitation of children and juveniles are refused. Respective laws are adhered to.

### **Harassment**

The employees are seen as individuals. They are not subjected to any corporal punishments or other corporal, sexual, psychic or verbal harassments or abuses. If a harassment action is announced, relevant reactions follow and legal or disciplinary measures are used.

### **Remuneration and employee rights**

Remuneration, including wages, overtime and fringe benefits, shall be paid at least at the level specified in the applicable law or collective agreement. The remuneration granted for full employment is sufficient to meet the basic needs of the employee. Remuneration is paid in a practical manner and a pay slip is provided to an appropriate extent. The right of employees to freedom of association, freedom of assembly and collective bargaining, as far as this is legally permissible and possible in the respective country, is respected.

### **Working hours**

Working hours comply with the applicable national law, the industry standard or the relevant ILO conventions. Overtime must be voluntary.

If national provisions do not set lower maximum working hours and except in case of exceptional circumstances of the company, the employees shall not be required to complete a standard work week of more than 48 hours per week or total working hours of more than 60 hours per week (including overtime hours) on a regular basis. The equivalent of at least one free day shall be granted to employees in each period of 7 days.

### **Health and occupational safety**

Occupational safety is particularly important to ISOWA GmbH. Therefore, high standards for a safe and hygienic working environment, which are based on legal regulations, are a high priority for us. The aim is always to improve working conditions through appropriate procedures. Health and safety regulations must be observed by every employee. In addition, working time planning ensures that the required work breaks are observed. Freedom of association and collective bargaining autonomy

ISOWA GmbH recognizes and respects the legal right of employees to freedom of association, representation by trade unions and collective bargaining autonomy.

### **Freedom of assembly and free collective bargaining**

ISOWA GmbH acknowledges and respects the legal right of employees to freedom of assembly, representation by labour unions, and free collective bargaining.

### **Complaints management**

Complaints from employees and third parties can be reported to the internal reporting officers. The whistleblower receives a confirmation of receipt as well as timely feedback on

the facts of the case. The external reporting office at the Federal Office of Justice is another option for submitting reports.

### 3.) Competition Law

#### **Fair competition**

ISOWA GmbH is unreservedly committed to principles of social market economy and fair competition. Corporate goals are pursued according to the performance principle and in compliance with applicable competition rules exclusively. The same is expected also of competitors and business partners.

#### **Business relations**

Business relations are established or maintained according to objective criteria, e.g. according to quality, technological standard, and reliability of business partners. Commercial decisions, consulting services or recommendations of employees shall not be based on private interests or invoked by material benefits.

ISOWA GmbH operates in accordance with the generally accepted business practices of fairness and honesty. We maintain confidential dealings with authorities. Consumer protection standards are observed.

The company avoids conflicts of interest, whether internal or external, if these could have an improper influence on business relationships.

#### **Bribery, corruptibility and corruption**

ISOWA GmbH rejects corruption and bribery in accordance with the corresponding UN Convention (from 2005). At the same time, transparency, acting with integrity and responsible management and control within the company are promoted in an appropriate manner. Every employee is obliged to perform his or her duties and functions only by fair means within the scope of what is legally permissible. This means that no personal dependencies or obligations to customers or suppliers may arise. In particular, company employees may not accept or give any gifts that could reasonably be expected to influence business decisions.

If gifts are customary and polite in a country, it must be ensured that this does not result in any binding dependencies and that the national legal standards are observed.

Violations will generally be punished with measures under labor law.

## **Money laundering, terrorist financing and trade controls**

ISOWA GmbH strictly rejects money laundering and the financing of terrorism. It complies with its legal obligations to prevent money laundering and does not participate in transactions that serve to conceal criminal or illegally acquired assets.

Before entering into business relationships, the company checks the identity and reliability of its business partners. When making payments to or from business partners, it looks for warning signs of money laundering. Business processes are dutifully documented. In particular, this includes compliance with trade, export and import laws.

- Compliance with legal regulations on foreign trade and export control law, tax and customs law, money laundering and terrorist financing must always be observed
- In day-to-day business transactions, care must be taken to ensure that payments are made by bank transfer and that no cash is requested or accepted
- If dubious practices are demanded from business partners, the compliance officer in the company must be informed
- To counter these risks, the identity of the sender of internal payment instructions and the accuracy of these must always be checked. The dual control principle should be used as an aid and queries should be made in the event of unusual practices

## **Antitrust law and competition law regulations**

ISOWA GmbH is committed to fair competition. Laws protecting competition, the antitrust law as well as other laws regulating the competition are complied with in particular. Illegal agreements on prices or other conditions, production programmes, sales areas or customers as well as an abuse of market power contradict ISOWA GmbH principles. It makes no difference whether they are in the form of an agreement or informal talks – also out of official occasions.

## **Responsibility in the supply chain**

The company is aware that responsible conduct within the supply chain is becoming increasingly important. When selecting our suppliers, we take into account as far as possible whether they have also committed themselves to acting responsibly and apply either this or an equivalent level of compliance.

## **Handling confidential information and the property of third parties**

All information about ISOWA GmbH and our business partners is always treated confidentially and is subject to our protection. This is right for us, as confidential information is a particularly important asset. It is therefore strictly forbidden to pass it on to third parties.

Confidential information may include, for example, non-public financial data or data on production, sales figures, production process plans, information on the sale or acquisition of companies, information on investments, earnings forecasts and brand development forecasts, internal information on employees, customers and suppliers, price lists or information on research and development.

We have introduced an IT security concept / information management system for protection.

The intellectual and material property of third parties is respected and this is also expected of other companies.

#### 4.) Environment, innovation and laws

##### **Innovation, progress**

ISOWA GmbH is constantly competing for best products and services. The products are developed in an environmental-friendly way, in accordance with the state of the art, in the interest of latest innovations, and according to customer needs.

##### **Environment protection & environmental laws**

Environmental protection issues are particularly important to the company and its employees. We observe the goals of sustainable environmental protection. In this context, we strive to use environmentally friendly production methods. In accordance with the principles of the Rio Declaration of the United Nations, the company handles natural resources responsibly. Against this background, ISOWA GmbH operates certified management systems in the areas of environment and energy.

##### **Handling chemicals**

In addition, ISOWA GmbH is aware of its responsibility when handling chemicals. Therefore it abides by the current legal situation in the chemical law all the time. All provisions for the safe handling of chemicals during plant operation are complied with and the employees are appropriately trained and protected.

##### **Labelling of products**

The requirements concerning products in the industry are high. All standards and directives are complied with. The products are labelled so that purchasers and consumers are able to handle them safely.

### **Product safety and responsibility**

The products are developed and manufactured under strict application of quality management systems. To this end, we have introduced a quality management system in the company and certify it regularly. Monitoring of products on the market and a review of all indications to the subject of safety follow subsequently. If required, the competent authorities are informed immediately and all necessary measures for the protection of customers are taken. ISOWA uses suitable methods and processes to minimize the risk of counterfeit products on the market.

### **Recycling and recovery**

The entire life cycle of products is monitored in line with high technical requirements and responsibility for environmental protection. Therefore means and resources are used efficiently, environmental design considerations are taken into account in the product development, and recycled materials are used in the production, if possible.

## **5.) Organisation and communication**

### **Communication**

ISOWA GmbH is obliged to communicate all requirements related to this Code to all interested parties.

### **Transparency and consumer dialogue**

We recognise the right of consumers to obtain important pieces of product and process information required for qualified purchasing decision. The relevant pieces of information are laid down and publicly accessible, possible complaints are dealt with effectively.

The company's internal and external reports and documents, in particular financial information, are complete, appropriate, up-to-date and comprehensible representations of the company. They are prepared in accordance with recognized accounting principles and recognized control systems.

### Commitment and contact persons

This compliance and adherence to all instruction regulations is binding for all employees and suppliers. The obligation to adhere to compliance arises from the aforementioned laws, the other company guidelines and the obligations arising from the employment relationship. If this compliance is breached, measures may be taken under employment law as a consequence.

Our aim is to act with reliability and credibility towards our business partners and third parties. Adherence to our compliance policy and the laws mentioned therein is a fundamental prerequisite for this. If you become aware of any misconduct or violations of the compliance declaration or relevant laws, we encourage you to report them to your line manager or their management. You can be assured of our support in this and we will ensure that you are not at risk of any disadvantages. Every report of critical behavior made in good faith shows that the employee is adhering to compliance. It is also possible to report via our whistleblower system. Further information on this can be found in the Whistleblower System Policy.

The whistleblower system gives you the opportunity to report potentially serious incidents via a confidential, optionally anonymized procedure. Responsible use of the system is essential. To this end, you must act to the best of your knowledge and belief and only report information that is true.

Freudenberg, January 10th, 2024  
ISOWA GmbH Management