

**BLANC &
FISCHER**

Familienholding

Declaration of Principles for Social Responsibility and Human Rights in the Supply Chain



BLANC &
FISCHER
CORPORATE
SERVICES

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Declaration of Principles for Social Responsibility and Human Rights in the Supply Chain

The BLANC & FISCHER Family Holding and its affiliated corporate groups are committed to environmentally and socially responsible corporate governance.

We are committed to preventing, ending, or minimizing, as far as possible, any adverse human rights impacts within our operations and supply chains. We expect the same behavior from our suppliers to ensure successful and future-oriented cooperation. We also expect our employees to observe the principles of ecological, social, and ethical conduct. Furthermore, we strive to continuously optimize our business activities and products in terms of sustainability and call on our suppliers to contribute to this in the sense of a holistic approach. Our human rights and environmental expectations of our employees and partners in the supply chain are set out in our Code of Conduct/Supplier Code of Conduct (see annex to this Policy Statement). With these codes, we are actively addressing all employees, the works council, and all direct suppliers. The documents are available at <https://www.blanc-fischer.com/familienholding/compliance>

We have also implemented a supply chain compliance management system to fulfill our social responsibility and support human rights in our supply chain. This involves ongoing analysis of our business area, our entire supply chain, and individual evaluation of our suppliers. This evaluation considers product-related, country-related, and supplier-specific risks in particular. We only work with suppliers who accept the basic provisions of our Supplier Code of Conduct. Depending on the supplier evaluation, measures such as onsite audits by certified third parties, qualified self-assessments of the suppliers, and supplier-specific corrective and improvement measures take place. The individual measures are also described in the Code of Conduct under “[Implementation of requirements](#).”

The risks identified in this way in our supply chain are mainly due to our global supplier base. Naturally, it also includes countries that have different standards in terms of social responsibility and human rights. This applies in particular to the following risks:

- Freedom of association & collective bargaining
- Health & safety
- Pollution & resource consumption
- Discrimination & gender equality
- Working hours

In the risk analysis, we consider country, product, and supplier-specific risks in particular.

The country-specific risk analysis is based on several internationally recognized indices. In particular, we consider the expected severity of a risk, its scope, and the irreversible nature of the respective risk.

Products entail different risks depending on their nature (product-specific risks). These risks mainly arise from the raw materials used, the respective processing activities, and the industry. To ensure that products have a risk value (known as “Risk Score”), individual products are aggregated into product groups (including with the help of the corresponding customs tariff numbers and their classification) and assessed based on various criteria (e.g., increased probability of human rights violations, increased resource and energy intensity, increased environmental risks, and the possible use of conflict minerals).

In particular, the purchasing volume of the previous calendar year is used to assess the supplier-specific risk. For this purpose, we create categories and define limit values.

A separate risk score is established for each approach (country, product, and supplier-specific). An overall score of the respective supplier (known as the CSR Supplier Risk Score) is determined from their respective scores. Based on this individual CSR Supplier Risk Score, all suppliers are categorized into corresponding risk groups. The resulting risk group is fundamentally decisive for the measures and specifications that the supplier must implement or comply with.

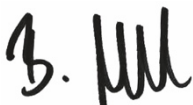
The previous analysis has also shown that human rights and environmental risks in our business area and sales are to be regarded as minimal and that these are sufficiently countered by measures that have already been implemented. For example, reviews and audits of our business area are carried out by the Compliance Management System, Internal Auditing, the internal control system, Risk Management, and by specialist departments such as Safety, Energy & Environment. If these reviews and audits identify risks that have not yet been sufficiently addressed, we immediately initiate appropriate measures in accordance with the provisions of the Compliance Management System.

Our reporting procedure also enables us to draw attention to human rights, environmental risks, and possible breaches of duty. The reports are processed in accordance with the rules of the Compliance Management System and can be made by internal and external persons, including anonymously.

The effectiveness of the supply chain compliance management system described above is ensured by continuous documentation and regularly checked by an independent body.

Oberderdingen, December 1, 2022

Management Board of the BLANC & FISCHER Family Holding



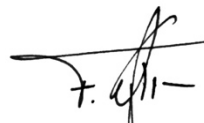
Bernd Eckl
CEO



Benno Rudolf
CFO



Dr. Kaiheinz Hörsting
Member of the management



Frank Gfrörer
Member of the management



Supplier Code of Conduct



Supplier Code of Conduct

The following compliance requirements apply to all suppliers of the affiliated companies of the BLANC & FISCHER Family Holding.

Preamble

The BLANC & FISCHER Family Holding (hereinafter also referred to as “the company”) is committed to environmentally and socially responsible corporate governance. We expect the same conduct from all our suppliers. We also expect our employees to observe the principles of ecological, social, and ethical conduct. Furthermore, we strive to continuously optimize our business activities and our products in terms of sustainability and call on our suppliers to contribute to this in the sense of a holistic approach.

The contracting parties agree on the validity of the following provisions in future collaborations. This agreement shall be the basis for all future deliveries and services. The contracting parties undertake to comply with the principles and requirements of the Code of Conduct below and endeavor to oblige their subcontractors to comply with the standards and regulations listed in this document. This agreement shall enter into force upon signature.

The Code of Conduct is based on national laws and regulations as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on Child Rights and Business Conduct, the United Nations Guidelines on Business and Human Rights, the International Labor Organization’s (“ILO”) International Labor Standards and the United Nations Global Compact.

Requirements for suppliers

Exclusion of forced labor

Slave labor, slave-like practices, servitude, or other forms of exercise of control or repression in the vicinity of the workplace, such as extreme economic or sexual exploitation and humiliation or work of a similar nature, must not be used. The BLANC & FISCHER Family Holding does not accept forced labor or human trafficking of any kind in its supply chain. All work must be voluntary within the employment relationship framework and performed without the threat of punishment. Neither will indebted or indentured labor or involuntary prison work be accepted. Practices such as retention of personal property, passports, wages, work certificates, or other documents for inappropriate reasons are unacceptable. Employees must be able to terminate their work or employment relationship at any time in accordance with legally applicable regulations. Furthermore, unacceptable treatment of workers, such as psychological damage, sexual and personal harassment, intimidation, and humiliation, must not occur. The commissioning or use of security forces, whether private or public, must be refrained from if, due to a lack of instruction or control on the part of the supplier, the use of security forces violates the prohibition of torture and cruel, inhuman, or degrading treatment, injures life or limb, or impairs the freedom of association and coalition.

Prohibition of child labor

Child labor may not be employed in any phase of production. The definition of child labor is based on the specifications of the ILO, in particular, Convention No. 138 of June 26, 1973, on the Minimum Age for Admission to Employment and Convention No. 182 of June 17, 1999, on the Prohibition and Immediate Measures to Eliminate the Worst Forms of Child Labor. Accordingly, the age should not be less than the age at which the general compulsory schooling ends under the law of the place of employment and, in any case, not less than 15 years old. If a local law stipulates a higher legal minimum age for employees or extended compulsory schooling, the higher age/stricter regulation applies. If children are discovered performing work, the supplier must document the measures taken to remedy the situation and enable the children to attend school. Young workers under 18 may not be employed for work that is harmful to children's health, safety, or morality. Special safety regulations must be observed.

Fair remuneration

Remuneration for regular working hours and overtime must be paid regularly, on time, and in full. It must comply with the national statutory minimum wage or industry minimum standards, whichever is greater. Overtime compensation must, in any case, exceed the remuneration for regular hours if the applicable law requires this at the place of employment. Employees must be paid living wages as full-time employees and must be provided with all the benefits prescribed by law. Deductions from wages as punishment are not permitted. The supplier shall ensure that employees receive clear, detailed, and periodic information in writing about the composition of their remuneration.

Fair working time

Working times must comply with local laws or industry standards and ILO regulations. Overtime is only permitted if it is provided voluntarily and does not exceed 12 hours per week, while employees must be given at least one day off after six consecutive working days. The workweek may not exceed 48 hours on a regular basis. Sufficient break times must be ensured.

Freedom of association

The right of workers to form organizations of their choice, to join them, to conduct collective bargaining, and to strike must be respected. It is essential to ensure that trade unions are allowed to operate freely and in accordance with the law of the place of employment, which includes the right to strike and collective bargaining. In cases where the freedom of association and the right to collective bargaining are restricted by law, alternative means of an independent and free association of workers for the purpose of collective bargaining should be provided. Employees shall not be discriminated against based on their establishment, activity, or membership in such an organization. Employees' representatives must be given free access to their colleagues' workplaces to ensure they can exercise their rights in a lawful and peaceful manner.

Prohibition of discrimination

The unequal treatment of employees in any form is not permitted unless it is justified by the employment requirements. This applies, for example, to discrimination based on gender, national, ethnic, or social origin, color, disability, health status, political conviction, ideology, religion, age, pregnancy, or sexual orientation. Unequal treatment includes, in particular, unequal pay for work of equal value. The personal dignity, privacy, and personal rights of each individual are respected. Care should be taken to provide an inclusive and supportive work environment by focusing on diversity when selecting employees.

Health and safety; occupational safety

The supplier is responsible for a secure and healthy working environment. By setting up and applying appropriate occupational safety systems, the necessary precautionary measures are taken against accidents and damage to health that may arise in connection with the activity. Workers must be adequately protected from chemical, biological, and physical hazards. Appropriate measures must be taken to prevent excessive physical or mental fatigue. In addition, employees are regularly informed and trained on applicable health and safety standards and safety measures. Employees are given access to sufficient quantities of drinking water and access to clean sanitary facilities.

Preservation of natural resources

The supplier may not, in violation of legitimate rights, remove land, forests, or bodies of water or force them to be removed, if their use ensures the livelihoods of persons. The supplier must refrain from any harmful changes to the soil, water and air pollution, noise emissions, and excessive water consumption if this would harm the health of people, significantly impair the biological basis for food production, or prevent people from having access to clean drinking water or sanitary facilities.

Complaint mechanisms

The supplier must distribute notices received from the BLANC & FISCHER Family Holding regarding the availability, responsibility, and implementation of a complaint procedure to its employees and suppliers in a suitable manner. The complaints procedure must be accessible to employees while maintaining the confidentiality of identity and effective protection against discrimination. In the absence of a notice, the supplier is responsible for establishing an effective complaints mechanism at the plant level for individuals and communities that may be adversely affected. The supplier must also provide complaint mechanisms if it is obliged to do so by law, for example, a whistleblower protection law.

Handling conflict minerals

For the conflict minerals tin, tungsten, tantalum, and gold, as well as other raw materials such as cobalt, the company establishes processes in accordance with the Organization for Economic Cooperation and Development (OECD) guidelines for the fulfillment of due diligence obligations for the promotion of responsible supply chains for minerals from conflict-affected and high-risk areas and expects this from its suppliers. Melting and refineries without appropriate, audited due diligence processes should be avoided. If applicable, the specifications of the Conflict Minerals Regulation (EU) 2017/821 must be complied with.

Treatment and discharge of industrial wastewater

Wastewater from operations, manufacturing processes, and sanitary installations shall be typed, controlled, checked, and, where necessary, treated before discharge or disposal. In addition, measures should be introduced to reduce wastewater generation.

Handling air emissions

General emissions from operations (air and noise emissions) and greenhouse gas emissions shall be typified, routinely supervised, verified, and, where necessary, treated before they are released. The supplier is also responsible for overseeing its emission control systems and is required to find cost-effective solutions to minimize any emissions.

Handling of waste and hazardous substances

The supplier follows a systematic approach to identify, manage, minimize, and responsibly dispose of or recycle solid waste. Compliance with local regulations and laws on waste handling must be ensured. The bans on the export of hazardous waste in the Basel Convention of 22 March 1989, as amended, must be observed. Chemicals or other materials which present a hazard when released into the environment shall be identified and handled in such a way as to ensure safety when handling, transporting, storing, using, recycling, or reusing and disposing of them. Mercury shall be used in accordance with the prohibitions of the Minamata Convention of October 10, 2013, and persistent organic pollutants in accordance with the Stockholm Convention of May 23, 2001, as amended.

Reducing the use of raw materials and resources

The use and consumption of resources during production and the generation of waste of any kind, including water and energy, should be minimized. This is either done directly at the point of origin or by utilizing procedures and measures, e.g., changing production and maintenance processes or operations in the company, using alternative materials, reducing costs, and recycling or reusing materials. Everyone in the supply chain should be committed to further developing and using environmentally and climate-friendly products, processes, and technologies. Applicable laws and regulations regarding the prohibition and restriction of certain substances in production must be strictly observed, and labeling for recycling and disposal must be carried out.

Dealing with energy consumption/efficiency

Energy consumption must be monitored and documented. Cost-effective solutions are to be identified to increase energy efficiency and minimize energy consumption.

Environmental aspects

Supplier shall comply with applicable local environmental laws, regulations, and standards. Furthermore, the entire supply chain should strive to establish and apply an appropriate environmental management system. Environmental impacts and risks should be minimized, and environmental protection established and improved in daily business operations. Corresponding evidence and reporting must be available upon request.

Fair competition

The standards of fair business activity, fair advertising, and fair competition must be observed. In addition, the applicable antitrust laws must be applied, prohibiting agreements and other activities that influence prices or conditions when dealing with competitors. Furthermore, these regulations prohibit agreements between customers and suppliers with which customers are to be restricted in their freedom to autonomously determine their prices and other conditions for resale.

Conflicts of interest

Any conflicts of interest in the cooperation with the BLANC & FISCHER Family Holding must be avoided, i.e., suppliers may make their decisions in collaboration with the company solely based on objective considerations and must not be guided by individual interests. This applies particularly to close personal connections between suppliers and employees of the BLANC & FISCHER Family Holding. Suppliers shall proactively and promptly notify the company of any situation that may give rise to a conflict of interest to allow the company to take appropriate action. Suppliers may only accept personal orders from the BLANC & FISCHER Family Holding employees with the prior written consent of the management board.

Confidentiality/data protection

The supplier undertakes to meet the reasonable expectations of its client, suppliers, customers, consumers, and employees regarding the protection of personal information. The supplier shall comply with data protection and information security laws and regulatory requirements when collecting, storing, processing, transmitting, and disseminating personal information.

Intellectual property

Intellectual property rights shall be respected, and technology and know-how transfer shall be done in a manner that protects intellectual property rights and customer information.

Integrity/bribery and avoidance of conflicts of interest

The highest standards of integrity must be applied in all business activities. The supplier shall adopt a zero-tolerance policy prohibiting all forms of bribery, corruption, extortion, embezzlement, insolvency offenses, and advantage taking. Procedures for monitoring and enforcing standards shall be used to ensure compliance with anti-corruption laws.

Money laundering and terrorist financing

Domestic and foreign regulations on the prevention of money laundering and the financing of terrorism must be complied with, and transactions that serve the purpose of money laundering or terrorist financing must be refrained from.

Foreign trade and customs regulations

The BLANC & FISCHER Family Holding expects everyone in its supply chain to comply with the applicable foreign trade and customs laws and regulations in all countries in which it operates and to inform them without delay if a delivery/service is subject in whole or in part to export restrictions under national law, EU regulations, or other international embargo and export regulations

Implementation of requirements

We expect our suppliers to identify supply chain risks and take appropriate preventive and remedial measures. Suppliers shall also impose this code or, accordingly, comply with the regulations contained in this code on their suppliers and employees through appropriate contractual arrangements. If violations are suspected and to secure high-risk supply chains, the supplier shall promptly and, if necessary, periodically inform the company about the identified violations and risks and the measures taken.

If necessary, the company will check compliance with the standards and regulations listed in this document using a self-assessment questionnaire and supplier certifications. The company and the supplier may agree on the details of the certifications, in particular the certificate issuer, in a separate document.

If the company's risk analysis determines that an audit at a supplier's site is necessary, the supplier hereby agrees that the customer may conduct such an audit to verify compliance with the code at the supplier's relevant site during regular office hours upon reasonable advance notice by persons appointed by the customer. The supplier undertakes to provide BLANC & FISCHER Family Holding with all documents and information necessary to perform an audit. The BLANC & FISCHER Family Holding will comply with data protection regulations when performing the audit and maintain the confidentiality of the supplier's business secrets.

Should a breach of the provisions of this Code of Conduct be identified, the company shall inform the supplier of this in writing without delay. It shall set a reasonable grace period for the supplier to bring its conduct into line with these provisions. If it is not possible to remedy the situation in the foreseeable future, the supplier shall notify the company without delay and, together with the company, draw up a concept with a time plan for terminating or minimizing the violation. If the grace period expires without results, or the implementation of the measures contained in the concept does not remedy the situation after the time plan has passed and no alternative means are available, the company can terminate the business relationship and all contracts. A statutory right to extraordinary termination without setting a grace period, in particular in the case of violations that are to be assessed as very serious, remains unaffected, as does the right to compensation for damages.

No third-party protection

This Supplier Code of Conduct exclusively regulates the relationship between the BLANC & FISCHER Family Holding and its suppliers. Third parties are not included in the scope of protection of this Code of Conduct and cannot assert any rights from there.

Acknowledgement and agreement of the supplier

The supplier hereby confirms that it has read and understood the Code of Conduct. The supplier undertakes to act responsibly and comply with the listed principles/requirements. The supplier undertakes to communicate the content of this code or a similar code in a manner understandable to the employees, agents, and subcontractors and to take all necessary measures for implementing the requirements.

Place, date

Full company name of the business

Full name of the signor

Signature