



HEITKAMP & THUMANN
GROUP

H&T Supplier Code of Conduct

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INTRODUCTION

The Heitkamp & Thumann Group (“H&T” or “the Group”) is a leading global partner for the development and supply of world class precision formed components, devices and services. Our products serve a broad global audience daily, contributing to key sectors including portable energy, electromobility, and healthcare. We provide sustainable, safe and productive solutions that keep goods and people moving, deliver the equipment to build and maintain vital infrastructure and improve millions of patients’ life, while driving the shift towards a decarbonized system.

We do this by operating a responsible business, and collaborating with others to drive change in a fair, ethical, and transparent way. At H&T, we believe that we have a collective responsibility to make the world we live in a better place. By working with our three sustainability pillars – **Climate**, **Resources**, and **People** – and by conducting our business with **Integrity**, we are committed to minimize our climate footprint, respecting the boundaries of our planet, maximizing social impact, while continuously adhering to all applicable regulations and laws.

Climate

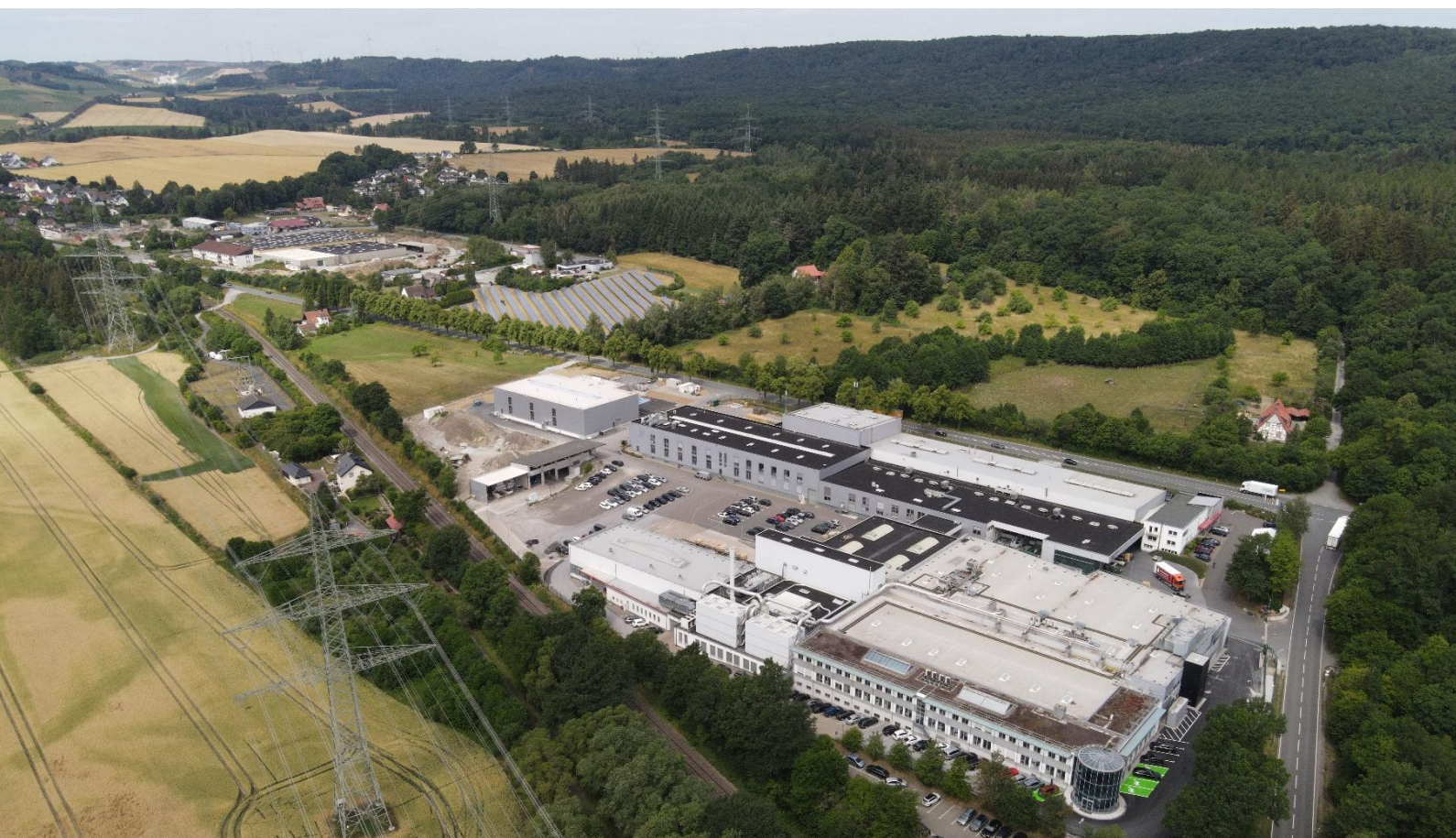
Our focus on cutting greenhouse gas emissions is critical in meeting the ambitions of the UNFCCC Paris Agreement. We are committed to achieving a net-zero greenhouse gas emissions value chain by 2050. We see the transition to net-zero through fossil-free solutions as an opportunity to create meaningful impact, while also leveraging the growth potential the transition will offer.

Resources

We take on the challenge of fulfilling the needs of transportation and infrastructure within the limitations of planetary boundaries, in our own operations and our supply network.

People & Business Integrity

We invest in health, empowerment, business ethics and compliance, and respect for human rights, striving for 100% safe products and operations. Furthermore, we conduct all necessary compliance measures being committed to our Mission Statement “Integrity will never be compromised”. Therefore, our written H&T Code of Conduct places the highest value on business integrity of our Group Companies, executives and employees.



SUPPLIER REQUIREMENTS

H&T, as a global market player, also recognizes its responsibility for the integrity of its supply chain and therefore also focusses on topics across the value chain. Our Business Partners, in this regard all suppliers that deliver goods and/or services to any of the entities of the H&T Group, including all subsidiaries, play an integral role for us to succeed with our ambitions and mission.

Working with our Business Partners, we want to identify and address Sustainability & Integrity risks proactively together. Therefore, this H&T Supplier Code of Conduct outlines requirements for our supply network.

H&T has defined two categories of supplier requirements. **Expectations** are regulatory and best-practice requirements which all H&T Business Partners must comply without exception. You can identify an "expectation" by the wording: *"responsible", "requested", "is required", "must do", "must have", "has to", "is expected"*. **Recommendations** refer to activities where the H&T Group encourages its Business Partners to go beyond best practices to further improve sustainable and ethical performance together. You can identify an "recommendation" by the wording: *"should do", "should have", "recommend to", "encouraged to"*.

We expect our Business Partners to operate transparently in regard to our expectations. We aim for an open dialogue concerning all topics discussed in this document including areas for improvement, as well as addressing risks of violation. Furthermore, we kindly ask you to implement, share, and promote the expectations internally and throughout your supply network in to facilitate adherence in your operations and value chain.

Management System | Governance

To manage all areas of this H&T Supplier Code of Conduct and applicable law, we recommend the Business Partner to establish and continuously review a reasonable Management System based on its size and risk exposure. This may contain responsibilities and accountabilities on adequate senior level, documented policies and procedures, risk assessments, monitoring, reporting and due diligence. Furthermore, it may contain adequate training for employees.

In addition, each Business Partner should release an internal Code of Conduct to clarify the proper conduct for their employees.

At a minimum, we request that our Business Partners establish adequate channels for their employees and their Business Partners to raise concerns, complaints, and recommendations without fear of retaliation and to manage complaints methodically according to best practices.

SPEAK UP TO H&T

In order to achieve our goals in respect to Climate, Resources, People & Integrity, we encourage all external business partners to promptly report concerns about potentially unethical or illegal conduct at H&T Companies by either contacting the relevant H&T contact person, the respective Management of the H&T Company, the H&T Group Executive Committee, or H&T Group Compliance.

**Get in touch with
H&T Group Compliance**
anonymously via reporting line:
<https://ht-group.vispato.com/>



Concerns can also be (anonymously) reported through H&T's dedicated external reporting line, called "Vispato," at <https://ht-group.vispato.com/>. Reports are accepted in all languages. H&T Group Compliance will acknowledge receipt of reports within 48 hours, where possible, and aim to contact the sender within two weeks if further information is required. H&T takes all reports seriously, ensuring protection against retaliation for individuals raising concerns in good faith. Confidentiality will be maintained to the extent possible, in line with legal requirements and investigative needs.

Furthermore, we always appreciate your open & honest feedback and recommendations for improvement towards your H&T contact person.

CLIMATE

The climate change is one of our greatest challenges, and H&T strongly believes that environmental and climate protection is the responsibility of every individual and organization. A net-zero supply network is vital, and together with our Business Partners, we aim to build a low-carbon future aligned with the 1.5°C scenario.



GHG-Emissions: Business Partners must consider and implement reasonable measures to minimize direct and indirect greenhouse gas emissions (Scope 1 & Scope 2) and must comply with applicable environmental laws and permits.

Transparency: We expect our Business Partners to be transparent regarding their own emissions as well as those of their upstream supply chains. Therefore, Business Partners are required to support with best-effort to gather and submit auditable information on climate expectations and key sustainability data via H&T questionnaires on request.

Environmental Policy: Business Partners are expected to have a reasonable environmental management policy or system as required per applicable law.

CO2-Emissions: Business Partners are encouraged to annually quantify and disclose their Corporate Carbon Footprint (as per ISO 14064 or the GHG Protocol) and their Product Carbon Footprints (as per ISO 14067), to drive better understanding of the responsibility each supply chain participant has on the decarbonization efforts.

Targets: H&T encourages all Business Partners to align with the UNFCCC Paris Agreement and set near-term reduction targets, including those that apply to their supply chain, toward net-zero greenhouse gas (GHG) emissions by 2050.

Management Systems: Business Partners should have an integrated sustainability and procurement policy. Suppliers are encouraged to obtain ISO14001 and ISO50001 certifications or equivalent systems.

Product Design: Business Partners should minimize emissions and contribute to clean air and water by ensuring environmentally safe development, manufacturing, transport, use, and disposal of products.

RESOURCES

At H&T, we are committed to circular, innovative solutions that reduce climate impact. This includes focus on waste reduction and the use of recyclable or reusable packaging materials. We recognize the critical importance of efficient water management, being one of the world's most valuable resources. Our goal is to implement sustainable practices that minimize environmental impact and drive long-term resource efficiency. Responsibility toward the environment means protecting finite resources. Therefore, the careful and efficient use of resources is of the utmost importance to H&T.

H&T wants to do business the right way. This includes our direct suppliers, and enterprises and workers throughout the supply chain.

Conflict Minerals: Business Partners must follow the OECD Due Diligence Guidance when sourcing from conflict-affected and high-risk areas (CAHRAs), maintain documented due diligence, and provide declarations and evidence upon request.

Ethical Sourcing: Business Partners must ensure sustainable procurement practices, including traceability and transparency for critical raw materials; their subcontractors must adhere to equivalent standards.

No Harm: Business Partners must protect employees, local communities, business partners, and public from hazards arising from operations and must comply with applicable environmental, waste, water, and hazardous substance laws.

Together, we commit to preserve water resources through responsible handling and stewardship:

Water Management: Business Partners must responsibly use, consume, and drain water, ensuring alignment with local water management regulations.

Water Pollution: Business Partners are expected to actively prevent water pollution and encouraged to implement necessary filtration systems to safeguard aquatic environments.

Circularity: Business Partners are encouraged to adopt a circular approach to raw materials, using innovative solutions to reduce impact across design and manufacturing.

Waste Treatment: Business Partners should apply the waste hierarchy (prevention, reuse, recycling, recovery, disposal). It is recommended that treatment is environmentally responsible and documented.

Packaging: Business Partners are encouraged to use recyclable or reusable packaging where feasible.

PEOPLE & BUSINESS INTEGRITY

H&T is committed to doing business “the right way”, adhering to international standards of business ethics. We are committed to building a better future through collaboration. As a human-centric organization, we recognize the invaluable contributions of people and uphold the fundamental principles of Human & Labor Rights, Business Integrity, Anti Bribery & Corruption, Health & Safety in the workplace as well as Information Security. Our commitment extends beyond our operations and employees to encompass the communities, surrounding our operations, our Business Partners, and all individuals impacted by our products and solutions.



Human & Labor Rights

H&T understands basic human and labor rights as fundamental pillars of modern economies and societies. The Group adheres to United Nation’s Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. **H&T requires that its Business Partners and their subcontractors are also compliant with international human and labor rights.**

Employment is Freely Chosen: All work must be voluntary. Forced, bonded, trafficked or prison labor must be strictly prohibited. Workers must retain control of their identity documents and must not be required to pay recruitment fees. Workers may terminate employment after giving reasonable notice without penalty. Recruitment and employment must be free, transparent, and non-discriminatory. Workers must have the right to form, join and bargain collectively through trade unions of their choice without fear of reprisal.

No Child Labor: No worker below the age of 15 or the legal school-leaving age must be employed. Young workers under 18 must not perform hazardous work, night work or overtime and should receive special protection, training and supervision.

No Excessive Working Hours: Normal working hours should not exceed 48 per week. At a minimum, total working hours, including overtime, must not exceed legal limits. Overtime must be voluntary, should only be used exceptionally and must be paid at standards required by applicable law. Any legal requirements as to rest breaks and days off must at all times be complied with.

Non-Discrimination and Fair Treatment: H&T respects individuals of all backgrounds, capabilities and opinions. Therefore, Business Partners must treat everyone with dignity and respect, providing equal employment opportunities and conditions based on ability, regardless of gender, origin, religion, disability, age, or sexual orientation. Business Partners must ensure fair working conditions including fair remuneration.

H&T further encourages suppliers to promote diversity, support vulnerable groups, and implement measures to ensure fair and inclusive workplaces.

Business Integrity

H&T operates under strict compliance with international, federal and local laws such as anti-corruption laws, including, but not limited to, the FCPA, UK Bribery Act, OECD Anti-Bribery Convention, and UN Convention Against Corruption. We uphold the highest integrity standards and have zero tolerance for bribery, corruption, or any unethical conduct by employees, partners, or representatives. Therefore, any violations may result in termination of the business relationship along with any other remedies available under applicable law.



Contract Compliance: We expect Business Partners to comply with contractual terms and conditions agreed with the H&T Group.

Legal Compliance: We expect our Business Partners to comply with all laws and regulations which are applicable to them (local, federal and international) including among others: trade law & export controls, fair competition, money laundering & terrorism financing and laws for financial integrity. We consider as a matter of course that legally required licenses, registrations, inspections and permits must be in place. In case there are discrepancies between our expectations and the law which the Business Partner is exposed to, the most stringent term should apply.

Compliance Management System: Business Partners are encouraged to have suitable policies, risk assessments, trainings and due diligence procedures to identify applicable regulations and to prevent any bribery, corruption, unfair competition, money laundering or other non-compliant activities within their own operations and supply chain.

Conflict of Interest: We request our Business Partners to disclose and solve potential or actual conflicts of interest related to business with H&T.

Anti-Bribery: H&T Business Partners must not engage in, support, or allow any form of bribery, either directly or indirectly. They must not offer or accept any improper advantage from & to any third party whether private or public; to gain or keep business, or to receive any kind of special treatment. Such benefits include, but are not limited to cash, job offers, personal favors, travel, facilitation payments, promises to pay debts, or illegal gifts and entertainment. Of course, these requirements extend to the business relationship with the H&T Group without any exception. Donating, sponsoring and gifting must adhere to the allowed legal limits, must be conducted only voluntarily and without intention to achieve unlawful business advantages.

Anti-Trust: Business Partners must comply with all applicable antitrust and competition laws and must not engage in price fixing, bid rigging, market or customer allocation, or output limitation. Business Partners must not exchange competitively sensitive information with competitors (e.g., pricing, capacities, costs, margins, or future commercial strategies) unless clearly permitted by law. Any suspected violation related to business with H&T must be reported without undue delay.

IP & Product Piracy: Our Business Partners must take all reasonable effort to avoid the introduction of counterfeit products within their supply chain and must adhere to Intellectual Property rights.

Export Controls & Sanctions: The Business Partner must further represent and warrant that neither it nor any of its subsidiaries, affiliates, officers nor beneficial owners is listed on any sanctions or restricted-party list issued by the United Nations, the European Union & any of its countries, the United Kingdom or the United States. Should any such designation arise, the Business Partner must notify H&T in writing without undue delay. If applicable, Business Partners must comply with trade regulations as e.g. customs, import and export requirements and provide accurate trade documentation as required for the supplied goods and services. Business Partners must ensure that statements on origin and preferential origin are correct, substantiated, and kept up to date in case of changes. Any trade-related issues that could impact deliveries to H&T must be communicated promptly.

Health and Safety in the Workplace

In H&T, protecting and promoting employee health is a top-priority. H&T has established a group-wide Health & Safety Program and monitors key indicators such as accidents and absences caused by accidents. H&T wants to ensure safe working conditions within its supply chain as well.

EHS Compliance: H&T expects all suppliers to comply with applicable national and international occupational health and safety laws, including standards for working hours, health protection, and safe working conditions.

Emergency Preparedness: Emergency preparedness, fire safety, and risk management measures (scenarios management) must be in place. Fire safety procedures should be periodically reviewed and trained (e.g. fire drills), where required, these drills must be approved by local authorities.



Health & Safety Program: Suppliers are responsible for identifying, assessing, and controlling exposure to workplace hazards, including machinery, equipment, chemicals, and physical or biological agents. Identified risks must be addressed, including safe design, risk-based training, proper maintenance, and clear work procedures. Business Partners are further encouraged to proactively implement a long-term Health and Safety program with defined KPIs, trainings and knowledge sharing among employees. They are encouraged to establish a certified occupational health and safety management system (e.g., ISO 45001) and maintain a clear policy.

Well-Being: Suppliers should also include well-being measures to their daily operations, with proactive measures to manage psychosocial risks related to work conditions, social dynamics, and tasks. At a minimum H&T expects all suppliers to maintain a workplace which is free from harassment, abuse, and any form of violence.

Hazard: Hazardous substances in chemical products must be handled, transported, stored, recycled, and disposed in a safe and sustainable manner.

Information Security

The H&T Group has identified the risk of cyber breaches and therefore operates its IT infrastructure according to best practices in regard to cybersecurity. Together with our Business Partners, we are committed to protecting the confidentiality, integrity, and availability of information, systems, and services related to our collaboration.

Identity & Access Management: In case our Business Partners stores and processes critical data from the H&T Group, access to according systems and data must be role-based, least-privileged, and subject to periodic access re-certification. Furthermore, multi-factor authentication (MFA) is mandatory for administrative, remote, and external-facing access. Administrative and user accounts must be separated; privileged access should be time-bound and logged.



Information Security Management System (ISMS): Business Partners must operate an appropriate Information Security Management System as required by applicable laws and regulations. It is recommended aligning the program to recognized standards (e.g., ISO/IEC 27001) and implementing regular security awareness training and phishing simulations for applicable employees.

Vulnerability Management: In line with applicable law and regulations, Business Partners must perform periodic vulnerability scanning and penetration testing and should have independent assurance. Critical vulnerabilities must be remediated in a timely manner with defined patching timelines (e.g., Critical within 7 days; High within 30 days), or risk-accepted with documented compensating controls when remediation is not feasible.

Incident Management: Security incidents impacting our data or services must be communicated immediately (no later than 24 hours after detection) and followed by full cooperation in investigation, remediation, and root-cause analysis. Business continuity and disaster recovery should be documented, plans with defined KPIs (e.g., RTO/RPO), should be tested at least annually.

Data Security: Where personal data is processed, Business Partners must comply with applicable data protection laws (e.g. GDPR) and process personal data only for legitimate, specified purposes and to the extent necessary for performing the agreed services. Furthermore, confidential H&T data in transit and at rest must have strong encryption. Subcontractors must have equivalent security controls and oversight through contractual flow-down and periodic review. Cloud use should follow secure configuration baselines (e.g., CIS Benchmarks), with clear data location/residency and transparency.