

## Code of Conduct of Wilhelm Layher GmbH & Co KG and Layher Steigtechnik GmbH

### 1. BASIC PRINCIPLES

This Code of Conduct is based on a shared understanding of socially responsible company management. We, the companies Layher GmbH & Co KG and Layher Steigtechnik GmbH, do all we can to take responsibility for society. This means bearing in mind the legal, economic and technical consequences of our business decisions, including social and ecological factors. The Code of Conduct is a voluntary commitment to the principles of fair, sustainable, responsible and ethical action as we understand them.

This Code of Conduct sets forth the basic requirements governing our business activities, and we require our employees to comply with them. We expect our senior executives not only to communicate these requirements to their employees, but also to lead by example. We also insist on the same basic attitude from our business partners, in particular our suppliers and their subcontractors. This shall not constitute a basis of third-party rights.

### 2. GUIDELINES FOR OUR BUSINESS ACTIVITIES

#### 2.1. Compliance with the law

Corporate governance in compliance with the law is the foundation for all of Layher's business actions and decisions. Our conduct as a company is consistent with the relevant laws and with the due diligence obligations set forth in the Supply Chain Due Diligence Act. This Code of Conduct additionally covers the most important requirements applicable to all Layher employees.

#### 2.2. Social responsibility

##### 2.2.1. Human rights

Respect for human rights is the prerequisite for our business activities and the activities in our supply chains. We respect and support compliance with human rights within the meaning of the Supply Chain Due Diligence Act, in particular the following:

- the prohibition of the employment of a child under the age at which compulsory schooling ends according to the law of the place of employment;
- the prohibition of the worst forms of child labour for children under 18 years of age (e.g. slavery, trafficking in drugs);
- the prohibition of forced labour and all forms of slavery.

##### 2.2.2. Fair working conditions

We comply with the applicable laws and regulations pertaining to working hours, remuneration and social benefits in each country concerned. Remuneration, including wages, overtime pay and non-wage benefits, must be at least at the level set by applicable law. Employees must be able at any time to obtain information on the composition of their remuneration.

Layher respects the rights of its employees to freedom of expression, association and assembly within the scope of applicable laws and regulations. When it employs external personnel, it complies with applicable national laws in its contractual and employment relations,

regardless of the type of contract (e.g., contract for work or temporary employment).

##### 2.2.3. Occupational safety and health

We comply with the occupational safety and health standards applicable in the country of employment and ensure safe and healthy workplace conditions. In this way, we maintain the safety and health of our employees, protect third parties and avoid accidents, injuries and work-related illnesses. We safeguard and promote the health of our employees by means of appropriate health and occupational safety measures in the following areas:

- compliance with applicable national laws and regulations relating to health, occupational safety, and fire and explosion protection;
- appropriate workplace design and safety regulations, along with provision of suitable personal protective equipment;
- preventive monitoring, risk evaluation, emergency measures, accident notification chain, recording and investigation of incidents, plus other continuous improvement measures.

We see to it that our employees are trained in a way they can understand. They are responsible for keeping their workplace in a neat and safe condition.

##### 2.2.4. Equal opportunity and equal treatment

We promote equal opportunity and do not tolerate discrimination in employment. We treat all people in the same way, irrespective of gender, age, skin colour, ethnic origin, sexual identity and orientation, disability, religious affiliation, worldview or any other individual characteristics.

##### 2.2.5. Training and qualification

Layher's future critically depends on the abilities and skills of its employees. For this reason, we provide initial vocational training and advanced training at the workplace in accordance with their needs. We also promote employees' personal development and support their efforts to move ahead in their careers.

#### 2.3. Ecological responsibility

##### 2.3.1. Environmental protection and climate change mitigation

The protection and preservation of our natural resources is important to all of us and is a universal obligation. With this aim, we take ecological aspects into account when conducting our business. We act in keeping with applicable laws and regulations to minimise negative impacts on the environment, and we continually work to improve environmental protection and mitigate climate change. We are also committed to the environment-related obligations contained in the annexes to the Supply Chain Due Diligence Act, in particular the following:

- the prohibition of the manufacture of mercury-added products and the use of mercury in manufacturing pursuant to the Minamata Convention of 10 October 2013;
- the prohibition, pursuant to the POP Convention of 23 May 2021, of the production, use, handling, collection, storage and disposal of waste from persistent organic pollutants (POPs) in a manner that is not environmentally sound.

We are firmly committed to the use of an appropriate energy and environmental management system in our business activities.

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eb.layher.com

## 2.3.2. Waste disposal, waste water and emissions

We ensure compliance with local laws and regulations pertaining to the generation, storage, disposal and recycling of waste material, exhaust gases and waste water. We also take measures to reduce and minimise waste and emissions from our operations (such as greenhouse gases, noise, light, exhaust air and waste water).

## 2.3.3. Resource consumption

We encourage the economical use of natural resources such as water and raw materials and the efficient use of energy so that these assets can be conserved as long as possible. Layher is committed to the promotion of a circular economy and seeks to reduce the consumption of natural resources in order to protect them over the long term.

Monitoring and documentation of energy consumption are essential for us. We are determined to find cost-effective solutions that can improve energy efficiency and minimise energy use. We are striving to increase energy efficiency and the share of renewable energy sources in our energy consumption.

## 2.4. Ethical business conduct and integrity

### 2.4.1. Avoiding conflicts of interest

We want to make sure that our employees' interests are in harmony with the interests of the company. Employees should therefore avoid situations that could lead to a conflict between their personal interests and company interests. Such a conflict could arise in the case of work for other companies or investments in them. Friends or family members should also not engage in such activities. Business relations of this kind should be avoided and reported to a supervisor without delay. Paid secondary employment must be approved in writing in advance by the senior management or the HR department.

### 2.4.2. Handling of assets

We require our employees to protect Layher's material and immaterial assets. These include buildings, land, vehicles and office equipment as well as intellectual property, patents, technologies and other information that is valuable to Layher and must therefore be protected. It goes without saying that this also applies to assets that are entrusted to Layher by third parties. Machinery and equipment can be used for private purposes only with express permission.

### 2.4.3. Handling of information

We inform and train employees who have access to personal data on the regulations governing data protection. We also obligate them to comply with all applicable data protection laws. In addition, we expect employees to treat personal data, information, inventions and intellectual property confidentially. They must not disclose business secrets, and they must use such information only for business purposes. This information is the foundation for our continued success. It must not be passed on to third parties without authorisation or made accessible in other ways unless permission has been granted or the information is publicly accessible. The same applies to the personal data of Layher's employees, customers and suppliers under the General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG).

We process, store and protect personal data in compliance with Art. 5 GDPR. Thus personal data are treated confidentially, and only for legal, previously specified purposes. This is done in a transparent manner, and the data will be collected and stored only as long as necessary. We process personal data only if it is protected by means of appropriate technical and organisational measures against loss, destruction, modification and illicit use or disclosure.

## 2.4.4. Selection of suppliers

We check all bids submitted by our suppliers in a fair and unprejudiced manner. Contracts are awarded and processed according to strict, objective criteria. Agreements are fully and clearly worded; later modifications and additions are documented. All employees must observe the in-house principle of dual control, which ensures cross-checking.

## 2.4.5. Fair competition

We adhere to the rules of fair competition and support the principles of open markets and free trade. We do not allow anti-competitive behaviour that restricts free competition. For this reason, we expect all of our employees to comply with the competition and anti-trust laws in the countries where Layher does business.

It is therefore not permissible to make agreements with competitors that can have an impact on competition. The same applies without exception to sharing of information on prices, terms, capacities, market shares, profits, costs, the contents of offers and bidding behaviour.

## 2.4.6. Corruption, bribery and embezzlement

We do not tolerate corruption, bribery, blackmail or embezzlement in any form. All of our actions are guided by the principles of honesty and responsibility.

Employees who allow customers or suppliers to influence them unfairly, or who themselves seek unfairly to influence customers or suppliers, will be subject to disciplinary action. No payments can be associated with the granting or acceptance of favours.

Gifts and invitations are generally impermissible. They are allowed in exceptional cases only if they are not large enough in terms of value to influence the recipient's actions or decisions.

## 2.4.7. Money laundering, terrorism financing and conflict minerals

We comply with our legal obligations to prevent money laundering and the financing of terrorism and do not participate in transactions that serve to disguise or place criminally or illegally acquired assets into the legitimate economic system.

We exercise reasonable care to document the supply chain for conflict minerals in a transparent manner.

## 3. COMPLIANCE WITH THE CODE OF CONDUCT

### 3.1. Communication of the Code of Conduct

We communicate our Code of Conduct to employees, customers and suppliers. It is publically available at <http://code-of-conduct.layher.com>. We train our employees on specific topics in the Code as needed.

### 3.2. What we expect from our employees

We want to be a reliable partner for our customers, suppliers and business partners. The same holds true within our company. Besides being known for our expertise, innovativeness and high-quality products, we want to communicate openly, honestly and transparently. This means keeping our promises and adhering to our contractual relationships.

We expect Layher's employees to comply with the relevant laws and in-house guidelines. In this respect, our senior executives are called

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upon in particular to exercise their function as role models. They should expressly refer each employee to this Code of Conduct. Violations of the Code will not be tolerated. Affected employees will be asked to alter their behaviour. Severe violations can result in disciplinary action or prosecution.

### 3.3. What we expect from our supply chains

This Code of Conduct also reflects our expectations on the suppliers and other contracting parties in our supply chains. We expect our suppliers to be guided by this Code or to apply equivalent ones. For this reason, we include the Layher Code of Conduct as part of each contract with a direct supplier. In addition, we expect our suppliers to address these issues in their own supply chains and to demand that their respective suppliers implement corresponding guidelines and requirements.

We reserve the right to check our suppliers, systematically or as the need arises, for compliance with this Code of Conduct. This can be done by self-reporting, supplier surveys, audits or other means. As a general rule, we count on long-term business relationships in a spirit of partnership. If we encounter serious violations, we reserve the right to take appropriate steps under the contract, including termination of the business relationship. In any case, if violations occur, we expect a reaction in the form of suitable preventive measures or remedies.

### 3.4. Notes on violations

We offer our employees, customers and business partners access to a protected system which allows confidential reporting of possible violations of the principles of this Code of Conduct. If there are conflicts of interest or if violations become known, Layher's reporting channel should be contacted:

- Directly by e-mail: [meldestelle@layher.com](mailto:meldestelle@layher.com)
- Anonymously via the reporting channel:  
<https://meldesystem.layher.com/>

Persons who call attention in good faith to actual or suspected misconduct will not suffer any disadvantages as a result. If violations of this Code of Conduct are investigated, the emphasis will be on maximum confidentiality, whistleblower protection and compliance with data protection rules.

## 4. EFFECTIVE DATE

This Code of Conduct has been adopted by the management of Wilhelm Layher GmbH & Co KG and Layher Steigtechnik GmbH and comes into effect on 1 December 2023.

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