



Fritz Winter

Code of conduct

for suppliers and business partners
of

Fritz Winter Eisengießerei GmbH & Co. KG

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Introduction

FRITZ WINTER EISENGIESSEREI GmbH & Co. KG is a globally active company with a long tradition. All companies within the Fritz Winter Group (hereinafter referred to as FW) bear social responsibility toward customers, employees, investors, and the public.

These corporate responsibilities require that FW complies with all applicable laws at all times, respects ethical principles and acts in a sustainable manner.

By joining the United Nations Global Compact, FW has become obliged to follow its 10 principles in the areas of human rights, working norms, environmental protection and anti-corruption.

In addition, FW follows the working standards set out in the conventions of the International Labour Organization (ILO). Finally, with the code of conduct, FW has obliged itself to follow binding guidelines concerning responsible behaviour. This code of conduct is based essentially on the principles of the Global Compact.

In accordance with the compliance strategy pursued by FW, we also expect that suppliers (any contracting partner which supplies FW with goods, materials or services) and business partners (this includes those with mediation or representation functions which act in the interest of or at the commission of FW to support sales, such as advisors, brokers or commercial representatives etc. as well as their employees act in a responsible manner and obligate themselves to fulfil the basic principles listed in this code of conduct for suppliers and business partners.

Should the suppliers or business partners engage third parties within the framework of the business relationships with FW (for example sub-contractors or representatives), FW expects that the third parties mentioned also obligate themselves to fulfil the basic principles set out in this FW code of conduct for suppliers and business partners.

1. Social Responsibility

The obligation to comply with the law and all applicable statutes is part of socially responsible business. FW expects that its suppliers and business partners comply with the following basic principles in particular:

Human rights

The suppliers and business partners of FW comply with and protect the worldwide regulations concerning the protection of human rights as fundamental and universally applicable guidelines. This also includes, in particular, that the suppliers and business partners of FW do not engage forced labour or child labour. The suppliers and business partners observe the regulations set out in the ILO Convention 138 concerning the statutory minimum age for the employment of young people and the requirements of the law on corporate due diligence in supply chains (➤ Lieferkettensorgfaltspflichtengesetz-LkSG).



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Responsible procurement of conflict minerals

Suppliers and business partners may not supply FW with goods containing "conflict minerals" from sources that serve to finance or support armed groups in the Democratic Republic of Congo (DRC) or its neighbouring countries ("Covered Countries" are currently Angola, Burundi, the Central African Republic, the Republic of Congo, Rwanda, Southern Sudan, Tanzania, Uganda and Zambia) in accordance with Art. 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

All suppliers and business partners are required to inform FW in writing upon conclusion of any contracts for the sale of goods to FW if such goods contain conflict minerals. The notification shall specify the conflict raw material including the country of origin and the name of the processing smelter.

If the conflict mineral originates from a "Covered Country", the supplier must confirm that its purchase was not directly or indirectly used to finance or support armed groups in these countries and provide a basis for its confirmation.

To facilitate the exchange of information regarding the country of origin and the smelters or refiners processing the minerals within the supply chain, FW applies the following Responsible Minerals Initiative (RMI) standards:

[Conflict Minerals Reporting Template](#) / [Extended Minerals Reporting Template](#)

FW reserves the right to withdraw from corresponding orders in case of the use of conflict minerals.

Sustainable Procurement and Supply Chain Responsibility

As part of its corporate social responsibility, FW takes a holistic approach to sustainable procurement, paying particular attention to the relevant legal requirements for supply chains. FW expects its suppliers and business partners to:

- conduct a risk-based analysis of human rights and environmental risks
- ensure transparency and traceability throughout the supply chain
- integrate these requirements into their own processes
- pass these requirements on to upstream suppliers

The risk analysis is conducted based on appropriate internal and external data sources as well as structured assessment procedures.

Critical Materials

As part of its sustainable procurement practices, FW also takes critical materials into account in accordance with industry-standard requirements in the automotive sector.

FW expects suppliers to:

- Identify and assess risks associated with critical materials
- Implement appropriate preventive and corrective measures
- Take supply security and sustainability aspects into account
- Provide relevant information transparently



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To further ensure supply chain transparency, FW also considers raw materials in its sustainable procurement practices that may be associated with increased human rights risks due to their extraction or processing.

These raw materials include, in particular:

aluminum (bauxite), chromium, iron & steel, graphite, cobalt, copper, leather, lithium, magnesium, manganese, mica, molybdenum, natural rubber, nickel, niobium, palladium, platinum, quartz sand (glass) and silicon, rhodium, rare earth elements, tantalum, tungsten, zinc, and tin.

FW expects its suppliers and business partners to ensure appropriate transparency regarding these raw materials throughout the supply chain, to identify potential human rights risks, and to implement appropriate measures to minimize those risks.

Additional raw materials with increased risk can be identified as needed and included in the requirements.

Product Carbon Footprint (PCF)

As part of its sustainable procurement efforts, FW is increasingly taking into account the climate-related impacts of products throughout the supply chain, particularly the Product Carbon Footprint (PCF). This PCF data is being gradually integrated into purchasing decisions and decarbonization strategies.

FW expects the following from its suppliers and business partners:

- the provision of information on greenhouse gas emissions at the product level (Product Carbon Footprint), particularly in accordance with recognized standards (e.g., DIN EN ISO 14067),
- full consideration of transport and logistics emissions along the upstream supply chain (cradle-to-gate approach), including the provision of actual primary data on transport routes and modes, and support in the collection, validation, and continuous improvement of CO₂ data along the supply chain, as well as
- active participation in measures to reduce greenhouse gas emissions

The consideration of the Product Carbon Footprint is an integral part of the ongoing evaluation and development of supplier relationships.

Risk Management and Measures

Suppliers and business partners are obligated to:

- Regularly assess and prioritize risks
- Implement preventive measures
- Take corrective action in the event of violations
- Inform FW of relevant risks

To support the risk analysis and assessment of its suppliers, FW uses standardized tools such as supplier self-disclosure forms to systematically collect and evaluate relevant information on sustainability, compliance, and human rights and environmental risks.



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Equality of opportunity and non-discrimination

The suppliers and business partners of FW do not discriminate against anybody on the basis of ethnic or national origin, race, sex, religion, world view, age, disability, sexual orientation or other characteristics protected by law, unless mandatory laws prescribe otherwise. This includes, in particular, respect for women's rights, the promotion of diversity, equality and inclusion, and respect for the rights of minorities and indigenous peoples.

Inclusive Procurement

In addition to its existing principles, FW is committed to preventing discrimination in the supply chain and promoting inclusive procurement. Transparent, objective, and performance-based criteria are applied in the selection and evaluation of suppliers to ensure fair and equal treatment of all potential suppliers. In doing so, FW aims to give appropriate consideration to both local and global companies within the scope of economic and technical possibilities.

Environmental protection

The suppliers and business partners of FW assume responsibility in respect of the interests of environmental protection and comply with all statutory regulations concerning the environment and sustainability, in particular they adhere to the corporate due diligence obligations in supply chains described in the LkSG. They use natural resources in a sparing manner and minimise effects on the environment.

As a supplier or business partner of FW, you declare the following in respect to environmental protection:

- You have a process or your own organisation, which ensures compliance with statutory regulations and customer requirements in respect to operational and product-related environmental protection.
- You document and regularly check all necessary permits and/or approvals for the operation of your business locations.
- Work processes or technologies are implemented to reduce the noise level (noise emissions).
- You have a suitable management system (for example ISO 14001) or a comparable system for operational environmental protection.
- You have rules, guidelines, internal standards or similar for sustainability and product and process-related environmental protection (product design, substance restrictions, labelling, information requirements, reuse, environmentally compatible product use, maintenance, disposal, chemicals legislation and responsible chemicals management where applicable, protection of resources such as air and water) and train your employees accordingly.
- You have ongoing processes for the continuous improvement of energy efficiency and the ongoing reduction of greenhouse gas emissions (decarbonization).
- Saving energy and CO₂ are maxims of your daily actions. You are committed to the development, realization and continuous improvement of resource-saving production processes and have adequate reporting on greenhouse gas emissions.



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- You actively inform your customers concerning the environmental sustainability of your products (for example product environment declarations, environmental protection reports).
- You promote the use of renewable energies, soil protection (land use and deforestation) and biodiversity, forest protection and animal welfare.
- Waste avoidance and appropriate handling of hazardous substances to minimize environmental impact are its objectives.

Product safety

The suppliers and business partners of FW comply with all respectively applicable regulations and guidelines under product safety laws, in particular the statutory guidelines concerning safety, identification and packing of products, as well as the use of hazardous substances and materials.

Safety at work

The suppliers and business partners of FW comply with the respectively applicable statutory regulations concerning safety and protection of health in the workplace. They support the further development and improvement of working conditions.

FW expects that its suppliers assume responsibility for the health and safety of their employees.

Your contribution as a supplier or business partner to active implementation concerning the health and safety of employees:

- Clear commitment of company management to workplace safety and protection of health.
- Continued assessment and taking into account of possible effects of work, products and services on the health of employees.
- Regular implementation of measures to avoid accidents on construction sites and in factories.
- Immediate correction of unsafe and dangerous situations.
- Implementation of protective measures against accidents and occupational diseases.
- You have specialist persons who are responsible for workplace safety and protection of health and ensure compliance by means of suitable measures.
- The employees must be equipped with identifiable protective equipment for their work and must undertake to use it.



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Employee rights

FW expects that its suppliers comply with the fundamental employee rights, which are contained in international conventions of the United Nations (UN), the International Labour Organization (ILO), the Organization for Economic Co-operation and Development (OECD) and the UN Global Compact initiative.

Your contribution as a supplier to the active implementation of this code of conduct concerning compliance with fundamental employee rights:

- You have internal regulations, with which compliance with the applicable employee rights is ensured.
- When hiring employees and carrying out personnel measures, such as for example training and further development, as well as promotion, you comply with the principles of equal opportunity and equal treatment. This means that discrimination on the basis of race or skin colour, nationality, social background, any disabilities, sexual orientation, political or religious views, sex or age is not permitted.
Employees are always recruited in accordance with national and international labor standards and in a fair and transparent manner that respects human rights (ethical recruitment).
Misleading or deceiving potential workers about the nature of the work, requesting payment of recruitment fees and/or confiscating, destroying, concealing and/or denying access to workers' passports and other government-issued identification documents is not permitted.
At the beginning of their employment, workers shall receive a written contract in a language they understand, in which their rights and obligations are truthfully and clearly set out.
- You do not employ any persons who are obliged to work for you due to a law, an official decree or a court decision. This means that forced labour as defined in Convention 29 of the International Labour Organization (ILO) is not permitted.
- You have developed internal rules concerning fair treatment of each other and monitor compliance. Your employees are free to raise complaints with their superiors without the fear of reprisals. Behaviour, which is sexual, forced, threatening, abusive or exploitative, will not be tolerated (including gestures, words and physical contact).
- You pay your employees a fair salary (wages and social benefits) and comply with relevant country-specific statutory minimum wages and working times.
- You accept the applicable right of employees, which is outlined in the respective legal framework to form organisations such as trade unions and do not favour or discriminate against members of employee organisations or trade unions.

2. Transparent business relationships

Openness and transparency are the keys to credibility and trustworthiness in the course of business. FW expects that its suppliers and business partners comply with the following basic principles in particular:

Avoiding conflicts of interest

The suppliers and business partners make their decisions exclusively on the basis of objective criteria and do not allow their decisionmaking to be influenced by personal interests and relationships.

Prohibition/fighting of all forms of corruption

FW's suppliers and business partners do not tolerate corruption, bribery, threats, extortion or other unfair business practices. They shall ensure that their employees, subcontractors or agents do not give, offer, accept bribes, kickbacks, improper donations or other improper payments or benefits to, or from, customers, public officials or other third parties, or engage in or tolerate other unfair business practices.

Gifts, hospitality and invitations

The suppliers and business partners of FW do not offer FW employees or third parties unreasonable favours in the form of gifts, hospitality or invitations either directly or indirectly in order to gain undue influence. In addition, the suppliers and business partners do not request or accept such unreasonable favours.

Occasional giveaways and gifts which are granted to FW employees voluntarily by business partners may only take place to a reasonable value and extent. When checking whether something is reasonable, we proceed on the basis of a value of 50 euros per annum.

The invitation of business partners to meals or events must serve a business purpose, not take place unreasonably often and the hospitality must take place within the framework of usual co-operation, as well as be reasonable in relation to the purpose.

The state as customer and dealing with authorities

The suppliers and business partners of FW comply with the strict statutory guidelines when dealing with governments, authorities and public institution. When participating in public tenders, they comply with the relevant legal guidelines and the rules of free and fair competition.

Consultants and agents

The suppliers and business partners of FW only engage consultants or agents in agreement with applicable laws. In particular, they ensure that the remuneration paid to consultants or agents is only granted in respect of advice and brokerage services which have actually been carried out and that the remuneration is proportionate to the work which has been provided.

3. Fair market behaviour

FW is a fair and responsible market participant and complies with contractual obligations. FW also expects this from its suppliers and business partners, in particular compliance with the following basic principles:



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Free competition

The suppliers and business partners of FW comply with the applicable cartel laws. In particular, they do not conclude any agreements with competitors, suppliers or customers, which infringe competition and do not abuse any possible market leading position.

Export controls

The suppliers and business partners of FW confirm compliance with all respective applicable laws concerning the import and export of goods, services and information, including export controls and compliance with economic sanctions and sanctions lists.

Money laundering

The suppliers and business partners of FW only maintain business relationships with partners of whose integrity they can be assured. They ensure that the respective applicable statutory regulations concerning money laundering are not breached and observe all recording and reporting obligations.

Plagiarism

The Compliance Officer must be informed if there is a risk of the introduction of counterfeit and pirated materials. If detected, the materials will be isolated and the original equipment manufacturer (OEM) and/or law enforcement authorities will be notified.

Business information

The suppliers and business partners of FW publish business data and report their business activities in a truthful manner and in accordance with the respective applicable laws.

Supply chain

A proportion of added value in the supply chain also arises on the part of our suppliers. Therefore, it is important to us that our suppliers reasonably support and actively implement compliance with this code of conduct and their own equivalent code of behaviour in their supply chain.

Therefore, we expect that our suppliers do not just comply with this code of conduct in their own organisation, rather that they also forward on and promote the standards summarised by us in this code of conduct in relation to their own suppliers.

FW employs a structured supplier management system that encompasses the selection, evaluation, monitoring, and continuous development of suppliers.

Transparency and Monitoring in the Supply Chain

To ensure fair and responsible market conduct, FW expects its suppliers and business partners to maintain an appropriate level of transparency and oversight throughout the supply chain.

Suppliers and business partners specifically commit themselves to:

- provide relevant information regarding the origin of materials and services upon request,
- to implement processes for monitoring compliance with legal, regulatory, and contractual requirements in the supply chain,
- to identify and assess identified risks and deviations related to compliance, market conduct, and regulatory requirements at an early stage,
- to implement appropriate measures to prevent, minimize, and remedy such risks, and
- to inform FW of significant risks and measures taken upon request.

FW reserves the right to verify compliance with these requirements through self-disclosures, audits, and assessments.

4. Protection of data, business secrets and company assets

In the course of the cooperation, suppliers and business partners of FW may gain knowledge of confidential information. Confidential data, business secrets and company assets must be protected. Confidential data, business secrets and company assets must be protected. FW expects that its suppliers and business partners comply with the following basic principles in particular:

Confidentiality measures

FW's suppliers and business partners are obliged to take appropriate confidentiality measures for such confidential information, such as physical access restrictions or contractual security mechanisms, in order to prevent this information from becoming accessible to unauthorized persons. Should we suffer any damage as a result of the unauthorized disclosure, access or use of such confidential information, you are obliged to compensate us for this damage.

Data protection

The suppliers and business partners of FW comply with all respectively applicable laws concerning the protection of personal data of employees, customers, suppliers and other concerned parties.

Protection of know-how, patents, operating and business secrets

The suppliers and business partners of FW respect the intellectual property, know-how, patents, operating and business secrets of FW and third parties. You shall not forward such information on to third parties without the prior express written consent of FW or transmit the information in any other unauthorised manner.

Handling of company assets

The suppliers and business partners of FW bear financial responsibility and respect the tangible and intangible assets of FW and do not use it for unfair purposes or for purposes which are not related to operating activities. You shall ensure that your employees as well as any third parties engaged within the framework of the business relationship (such as

subcontractors or representatives) do not damage the assets of FW or use them in an abusive manner, i.e. against the interests of FW.

5. Protection and maintenance of information security

The basic handling of information security at suppliers and business partners of FW, the handling of subcontractors and the security regulations to be observed for the use of information and IT equipment must be ensured during cooperation with FW. These requirements are based on the current specifications of the standards for information security systems ("TISAX") developed by the VDA and ENX Association.

Confidentiality agreement between the contractor and its employees

The suppliers and business partners of FW undertake to conclude a non-disclosure agreement (separately or as part of the employment contract) with all employees who receive or have access to FW information in the course of the cooperation. The supplier and business partner shall be responsible for proving compliance and shall provide evidence thereof at any time upon request by FW.

Compliance with information security in supply chain

When subcontracting, suppliers and business partners shall ensure that FW's requirements for compliance with information security based on the current NIS2 Directive and the current TISAX specifications (Chapter 5 of CoC | Protection and Maintenance of Information Security) are also complied with by the subcontractors. As far as information of FW to be treated confidentially is concerned, the suppliers and business partners must conclude corresponding non-disclosure agreements with the subcontractors. Proof of compliance shall be the responsibility of the suppliers and business partners and must be provided at any time upon request by FW.

If suppliers and business partners are entitled to subcontract, they shall be fully liable for this, independently of any contractual or statutory limitations or exclusions of liability.

Physical transport of media

As a general rule, media containing FW information must be protected from unauthorised access, misuse or falsification during transport, even across organisational boundaries.

Care must be taken to ensure that all necessary and appropriate precautions are taken (e.g. encryption) to protect against the access, modification and deletion of information by unauthorised persons during transport and use in public areas. Data carriers with secret information are always transported escorted by a staff member. Documents must be transported visibly protected, e.g. in a non-transparent folder.

Exchange of information

Care must be taken in all conversations about FW confidential or secret information, including telephone conversations, to ensure that they cannot be overheard without authorisation.



Information security incident handling and reporting

Serious information security events (e.g. malfunctions occurring, violations of internal guidelines, loss of FW data or information) with concrete effects on companies of the Fritz Winter Group must be reported immediately to FW's Information Security Officer (ISB) at the e-mail address ISB@FritzWinter.de.

Use of Artificial Intelligence (AI) and Information Security

Our suppliers commit to making the use of Artificial Intelligence (AI) transparent and ensuring that all AI systems comply with applicable data protection laws, in particular the GDPR.

- Transparency: Suppliers must disclose where and how AI is used in their processes.
- Data Security: Appropriate measures must be taken to protect sensitive data from unauthorized access or misuse by AI systems.
- Fairness: AI systems must not make discriminatory or unfair decisions. Regular reviews for potential biases are required.
- Responsibility: Suppliers bear the responsibility for the security and reliability of the AI systems used and are liable in the event of security incidents or malfunctions.
- Training: Suppliers' employees must be trained in handling AI to minimize risks and ensure information security.
- Monitoring: The use of AI systems is regularly monitored and verified through audits to ensure compliance with security and ethical standards.
- Ethics and Sustainability: AI systems must be used responsibly and in a resource-efficient manner.

6. Whistleblower system

FW aims to act ethically in all business activities and in accordance with legal requirements; integrity and transparency of all business processes have top priority. This applies worldwide and to all organizational levels.

FW has established various reporting channels to enable suppliers and business partners of FW to report possible violations of laws and regulations.

Who can report violations?

- Every employee, including trainees, interns or temporary workers
- External parties, e.g. employees of external service providers
- Any business partner, e.g. suppliers, customers or cooperation partners and their employees
- Any third party

Which violations should be reported?

All specific events that indicate a criminal act, e.g. fraud, bribery, theft, a violation of other legal provisions or a violation of our corporate regulations, e.g. this Code of Conduct for Suppliers and Business Partners, can be reported. This also applies to human rights and environmental risks and corresponding breaches of rules.



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What details should be reported?

- What type of misconduct does it concern?
- When and where did it occur?
- How exactly did the suspect person or company go about it?
- Do you have documents that corroborate the allegations?
- Are there witnesses who can confirm the suspicion?

How can it be reported?

- by email: compliancebeauftragter@fritzwinter.de
- to our ombudsman

Suppliers and business partners also have the option of contacting the FW Compliance Office by mail via the ombudsman. The lawyer and notary Mr. Florian Möller from the law firm Immel & Möller, Stadtallendorf has been appointed as the company's external ombudsman. Employees and third parties can turn to this neutral body in confidence and also anonymously if they observe improper business practices in the company.

Mr. Florian Möller, lawyer and notary
Am Markt 6
35260 Stadtallendorf

Suppliers and business partners have the option of submitting their report without giving their name. However, FW recommends that a contact be named to the FW Compliance Office, if necessary, also via a person of trust. This is the only way we can consult with you if there is still a need for clarification. Otherwise, it may not be possible to clarify the matter further without the cooperation of the supplier or business partner.

7. Legal consequences in case of breaches of the code of conduct

Should a supplier or business partner of FW not comply with the basic principles laid down in this code of conduct, FW reserves the right to extraordinarily terminate the supply relationship with this supplier or the business relationship with this business partner.

FW expressly reserves the right to check the sustainable compliance with the obligations and principles laid out in the code of conduct for FW suppliers. Thereby the following methods can be used, whose support by qualified personnel is to be ensured by the suppliers or business partners.

- Self-assessment, Supplier audit, Event-related inspection

The on-site inspection will only be carried out following prior notification by FW, only during normal business hours and only in accordance with the respective applicable law. In addition, it will be ensured that the business activities of the supplier will not be restricted and no

breach of confidentiality agreements of the supplier with third parties will take place. All data will be handled in accordance with the applicable legal regulations concerning the protection of personal data and data security, as well as the provisions under antitrust law.

Consequences in case of breach:

In case of deviations from the principles of the code of conduct, it will be jointly clarified with the supplier as to what corrective measures will be sustainably implemented within a reasonable period of time.

All measures, which are ascertained due to the monitoring, will be recorded in the FW supplier assessment. The implementation of measures therefore influences the assessment of the services of the supplier, the estimation of future potential of the supplier, as well as the status of the supplier approval.

Should a serious breach be present, the business relationship will be suspended.

8. Contractual obligations

FW considers the principles and requirements of this code of conduct to be a minimum standard for sustainable supplier management. This code of conduct forms the basis of our business relationships and is therefore an integral part of our purchasing agreements with suppliers or other contractual agreements with business partners.

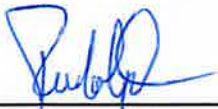
Alongside our own obligations concerning the values of the code of conduct, the legally effective obligation of our suppliers and business partners concerning this code of conduct is a decisive component of the FW compliance programme.

By means of the contractual obligations incumbent on the suppliers and business partners, FW has the right to take corresponding legal action in case of serious breaches of this code of conduct, in particular the option of termination of the contractual relationship.

By means of a legally binding signature and return of the declaration attached as an enclosure, our suppliers are therefore obliged to comply with the rules of code of the conduct for suppliers and business partners of Fritz Winter – Group.

Stadtallendorf, July 2026

Fritz Winter Eisengießerei GmbH & Co. KG



Klaus J. Rudolph
Managing Director



Gerald Höbler
SC-R/Compliance Officer



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9. Supplier declaration

concerning the code of conduct for suppliers and business partners of Fritz Winter Eisengießerei GmbH & Co.KG

We have been informed of the contents of the code of conduct for suppliers and business partners of Fritz Winter Eisengießerei GmbH & Co. KG and its affiliated companies and are aware of it.

We expressly agree that the Code of Conduct for Suppliers and Business Partners published at <https://www.fritzwinter.de/downloads/allgemein/> in its current version shall form the contractual basis for the existing business relationship between

(add name of company and address)

and the Fritz Winter Eisengießerei GmbH & Co.KG

Place, date

Name in block capitals

Role

Signature