

BROCKHAUS

Code of Conduct

Our commitment to a responsible future



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Our commitment to a responsible future

Our Code of Conduct contains guidelines for ethical behavior and the topic of compliance. We understand the term compliance to mean adherence to our internal guidelines from the Code of Conduct and the associated work and procedural instructions as well as the associated legal regulations. Conduct is ethical if it corresponds to the general principles of acting with integrity and decency and is perceived as right by others.

Our mission statement

"We strive every day to understand our customers better. This understanding enables us to optimize our services. This makes us a partner to our customers and ensures long-term success."

is also supported by five values determined through an anonymized employee survey.

This approach ensures that these selected values are embraced by the entire workforce. The following values are an integral part of our mission statement and our corporate culture:

Reliability

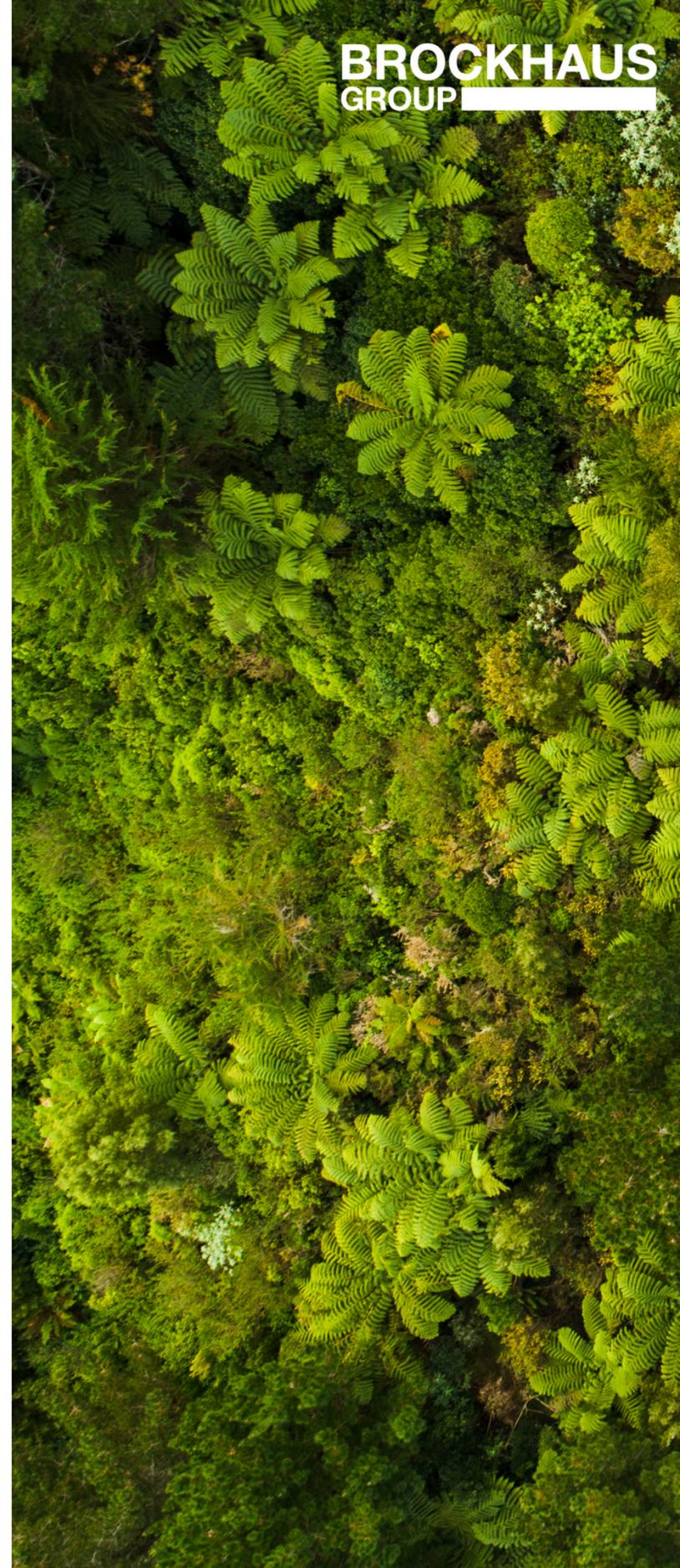
Responsibility

Teamwork

Respect

Environmental Consciousness

As a group of companies, we bear responsibility for our actions in all areas that are affected by them. We strive to create added value for these areas and act according to this maxim in our direct interactions.



Our responsibility towards society

1.1 Compliance with the law and integrity

Compliance with laws and regulations forms the foundation of our business activities. Every employee is obliged to comply with all legal and internal company regulations. Violations of the law can not only result in considerable economic damage and loss of reputation, but can also have criminal consequences for the individuals involved. To avoid this, we must continuously inform ourselves about the laws relevant to our activities and seek legal advice in case of doubt. Integrity and ethical conduct are not only a legal obligation, but also an expression of our corporate values and culture.

Our standards of ethical conduct go beyond mere compliance with the law. We expect our employees to act responsibly and transparently in all business situations. This includes communicating clearly with customers and business partners and avoiding any form of deception or misleading behavior. As representatives of the company, all employees have a special responsibility to strengthen the trust of our stakeholders through their conduct and to maintain the credibility of our company. Honest and respectful interaction with each other and with external partners is essential.

Every employee is required to report potential compliance violations immediately. We have set up an anonymous whistleblower system for this purpose, which ensures that employees are protected from any form of retaliation. The confidentiality of reports is strictly maintained. Through regular training and awareness-raising measures, we ensure that all employees are informed about the importance of compliance and ethical conduct and have the necessary tools to act in a legally and ethically correct manner.

1.2 Human rights and labor standards

The protection of human rights is of central importance to us. We respect the fundamental rights of every individual and strictly reject all forms of forced and child labor (ILO No. 138, 182 & 29). Our commitment to respecting human rights extends not only to our own activities, but also to our entire supply chain. We only work with partners who share our high standards and who also respect and promote human rights. This commitment reflects our obligation in accordance with the principles of the UN Guiding Principles on Business and Human Rights and the ILO Core Labor Standards.



An essential part of this commitment is the recognition of the right of workers to participate freely and without fear of discrimination or retaliation in collective bargaining (ILO No. 87 & 98). This applies both to our own employees and to employees in our supply chain. We expect our business partners and suppliers to respect and promote fundamental rights as well. Respecting these rights helps to ensure fair and safe working conditions and effective representation of workers' interests.

We are actively committed to promoting fair working conditions. This includes fair wages, reasonable working hours and safe working conditions for all employees. Discrimination based on gender, ethnic origin, religion, disability, age or sexual identity is not tolerated in our company. We promote a culture of diversity and inclusion in which all employees have the same opportunities to develop and contribute their skills and talents. Our labor practices comply with international labor standards and we continuously work to improve our processes to protect the rights and well-being of our employees (ILO No. 100, 105, 111, 155 & 187).

We continuously review and assess our commitment to human rights and labor standards so that we can ensure that our obligations in these areas are met. These measures help us to identify risks at an early stage and take appropriate measures to prevent violations. We encourage our employees and business partners to openly communicate their concerns and observations. Through our committed approach to human rights and labor standards, we contribute to creating a fair and respectful working environment while supporting sustainable development in the communities in which we operate.

1.3 Health and safety at work

The health and safety of our employees is our top priority. We strive to create a working environment that is free from hazards and risks and protects the health of our employees. This includes complying with all relevant health and safety laws and regulations and implementing internal safety standards. Every employee is required to report potential hazards and actively contribute to improving occupational safety. Through preventive measures and continuous improvements, we ensure that accidents at work and work-related illnesses are avoided.

We promote a culture of prevention and sustained progress in the area of occupational safety. Regular training courses help our employees to become aware of the importance of health and safety and to implement appropriate measures in their daily working environment. Our aim is to prevent accidents and work-related illnesses and to ensure a safe, healthy and productive working environment for everyone. We use the latest technologies and best practices to ensure the highest safety standards and promote the well-being of our employees.

Our managers have a special responsibility for the health and safety of their teams. They are required to ensure that all safety policies and procedures are implemented in their areas of responsibility. Through regular inspections, we review compliance with our safety standards and identify areas for improvement. We believe that a safe and healthy working environment not only increases productivity, but also promotes the general well-being and satisfaction of our employees.



1.4 Promoting diversity and inclusion

We value the diversity of our workforce and see it as an important success factor for our company. Different perspectives and experiences enrich our corporate culture and contribute to our innovative strength. We promote a culture of inclusion in which every employee is respected and valued regardless of gender, ethnic origin, religion, disability, age or sexual identity. Equal opportunities for all employees are a central component of our HR policy and we are actively committed to eliminating inequalities.

Our efforts towards diversity and inclusion begin in the recruitment process. We ensure that our recruitment processes are free from bias and focus on the skills and qualifications of applicants.

We believe that diversity and inclusion is not only ethically right, but also commercially beneficial. A diverse workforce helps to increase creativity and innovation and helps us to better respond to the needs of our global customers. Our leadership personnel is responsible for fostering an inclusive culture and ensuring that all employees have the opportunity to reach their full potential. Through our commitment to diversity and inclusion, we help create a respectful and dynamic work environment that supports the success of our business.



Our responsibility towards our business partners

2.1 Fair competition and business integrity

Compliance with competition and antitrust laws is of central importance to us. We are committed to upholding fair market practices and ensuring that all business transactions are conducted in accordance with the applicable legal framework. Our employees are obliged to avoid any form of anti-competitive behavior, including agreements with competitors on prices, market sharing or other anti-competitive measures. We ensure that all employees understand and comply with the importance and requirements of fair competition.

Business integrity is at the heart of everything we do. We do not tolerate any form of corruption or bribery. Our zero-tolerance policy against bribery covers both the acceptance and offering of improper benefits. Every employee has to report any attempts at corruption or unethical behavior immediately. We have established clear procedures and reporting channels to investigate and respond appropriately to such incidents. These measures not only protect our company, but also strengthen the trust of our business partners and the public in our integrity.

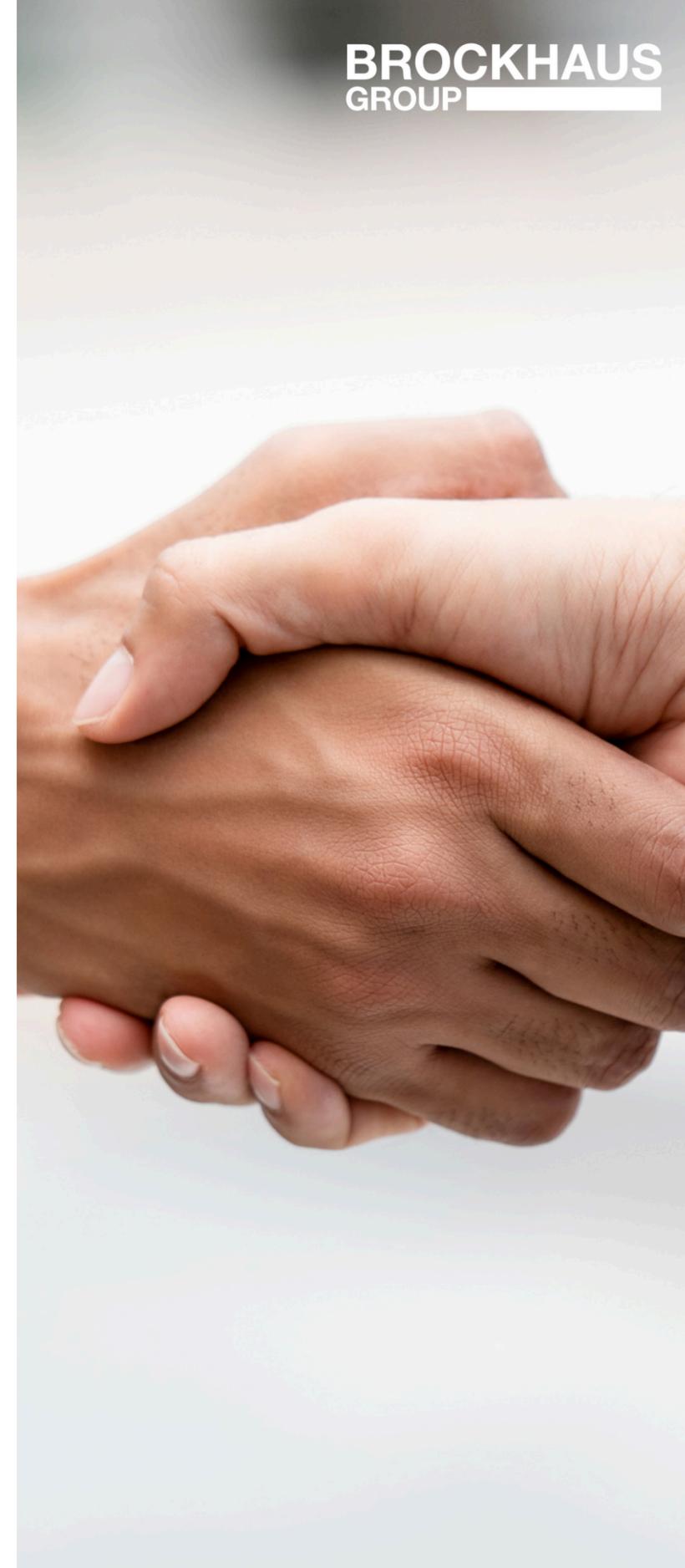
We are aware that our business practices have a significant impact on our reputation and long-term success. We therefore place great importance on transparency and ethical behavior in all our business relationships.

2.2 Responsible procurement

Our procurement strategies are designed to promote sustainable and ethical practices along the entire supply chain. We select our suppliers carefully and only work with partners who share our values and standards. This includes compliance with environmental, social and governance (ESG) criteria to ensure that our sourcing decisions have a positive impact on society and the environment.

We rely on long-term partnerships with our suppliers based on trust and shared responsibility. Our suppliers are regularly audited and evaluated to ensure that they meet our high standards in terms of quality. We encourage our suppliers to adopt sustainable practices and support them in continuously improving their processes.

Responsible sourcing also means that we are aware of our social responsibility. We are committed to not sourcing materials from conflict areas. Our procurement practices are geared towards respecting human rights and promoting fair working conditions.



2.3 Transparency and cooperation

Transparency in our business relationships is an essential part of our corporate philosophy. We are committed to ensuring that all business processes are open and traceable. This applies in particular to our relationships with suppliers.

Cooperation is the key to success in our supply chain. We promote close and constructive cooperation with our suppliers in order to achieve common goals and overcome challenges. By working in partnership, we build trust and ensure that our suppliers share our commitment to high standards of quality, ethics and sustainability.

Our commitment to transparency and collaboration also includes communicating expectations and requirements to our suppliers. We ensure that all suppliers are aware of our company policies and standards and support them in implementing these requirements. This not only strengthens our supply chains, but also contributes to creating a responsible and sustainable business environment.



Our responsibility towards the environment

3.1 Sustainability

Sustainability and environmental protection are key elements of our corporate strategy. We are committed to continuously reducing the environmental impact of our business activities. This includes minimizing waste, reducing emissions and promoting recycling and reuse. By implementing environmentally friendly processes and technologies, we strive to minimize our environmental footprint. Our commitment to sustainability extends to all areas of our business and is monitored through strict internal guidelines and regular audits. Efficient use of resources is a key principle of our environmental management. We optimize our production processes to minimize the consumption of raw materials, water and energy. Through innovative technologies and efficient processes, we ensure that resources are used as effectively as possible. We are also involved in research and development to find new ways to conserve resources and promote sustainable practices. Our employees are asked to use resources responsibly and actively contribute to the implementation of our environmental goals.

3.2 Climate and environmental protection

Our sustainability and environmental protection efforts are not limited to our own sites. We work closely with our suppliers and partners to promote environmentally friendly practices along the entire supply chain. This includes adhering to strict environmental standards and supporting our partners in implementing sustainable solutions.

Our commitment to climate protection is an integral part of our sustainability strategy. We are determined to make our contribution to reducing greenhouse gas emissions and thus support the goals of the Paris Climate Agreement. This includes the continuous monitoring and reduction of our CO₂ emissions. We rely on innovative technologies and processes to reduce our emissions. We compensate for those emissions that are unavoidable at the present time through appropriate commitment.



Our responsibility towards our customers

4.1 Data protection and information security

The protection of personal data is a top priority for us. We are committed to complying with all relevant data protection laws and ensuring that the personal data of our employees, customers and business partners is secure at all times. Our data protection policies are based on the strictest international standards, such as the EU General Data Protection Regulation (GDPR), and are regularly reviewed and updated to meet new legal requirements and technological developments. These measures not only protect our stakeholders' data, but also strengthen their trust in our company.

Information security is an integral part of our business processes. We have implemented comprehensive security measures to protect sensitive information from unauthorized access, misuse and loss. Our IT systems and networks are continuously monitored and checked for potential security risks.

We understand that ensuring data protection and information security is an ongoing process. That is why we continuously invest in state-of-the-art technologies and procedures to improve our security infrastructure. Our measures include securing sensitive data, implementing robust access controls and conducting regular penetration tests to identify and address vulnerabilities. Through these proactive approaches, we ensure that our information security meets the highest standards and that our data is protected at all times.

4.2 Product quality and safety

Providing safe and high-quality products is a central concern of our company. We are committed to supplying our customers with products that meet the highest safety and quality standards. This begins with the careful selection of raw materials and continues through all stages of production. Each product line undergoes rigorous quality control and testing procedures to ensure that our high standards are maintained. Our quality assurance programs are based on international standards such as ISO 9001, ISO 15001, ISO 14001, IATF 16949, with the aim of ensuring that our products meet our customers' requirements.

Safety is an essential aspect of our product development. We integrate safety aspects into the design phase of our products in order to identify and minimize potential risks. This includes comprehensive testing to ensure the safety of our products under real-life conditions. This approach ensures that our products are safe and reliable.



Our commitment to product quality and safety does not end with the delivery of our products. We provide comprehensive customer service and support to ensure that our products remain safe and functional throughout their life cycle. Regular maintenance, training and fast response times to customer inquiries are essential components of our service offering. By maintaining a close dialog with our customers and continuously improving our processes, we ensure that we meet and exceed their expectations.

4.3 Honesty and transparency

Honesty and transparency form the foundation of how we communicate with customers, business partners, and the public. We are committed to clear, open and truthful communication in all our business relationships. This means that we provide our customers and partners with comprehensive information about our products, services and terms and conditions and ensure that all information is easy to understand and accessible. Through this transparent communication, we strengthen the trust of our stakeholders and promote long-term, positive business relationships.

Transparency also extends to our internal processes and decision-making. We promote a corporate culture in which employees can communicate freely and openly and important information is accessible. This helps us make informed decisions and increase the effectiveness of our business processes. We keep our employees and stakeholders informed of important developments and results through regular reports and updates. This transparency not only strengthens trust within the company, but also helps create a positive and cooperative work environment.



Responsibility in dealing with Artificial Intelligence (AI)

5.1 Ethical use of AI

In times of radical technological innovations, the ethical use of artificial intelligence (AI) is of central importance to us. We are aware of the far-reaching impact that AI can have on society and the economy and are therefore committed to fair, transparent and responsible applications. We are guided by international guidelines such as the EU Guidelines on AI Ethics and the principles of the IEEE Global Initiative on Ethics of Autonomous and Intelligent Systems.

We strive to ensure that the AI systems we use are deployed responsibly and do not produce unethical or discriminatory results. This includes regular reviews of these AI systems to ensure that they comply with ethical standards and do not have any unforeseen negative effects. Through the use of best practices and continuous improvement, we ensure that the AI technologies used contribute to the well-being of our customers and society as a whole.

5.2 Data protection and AI

Data protection is a central component of our AI strategy. We ensure that all data used in our AI systems is processed in accordance with applicable data protection laws and regulations. This includes compliance with the EU General Data Protection Regulation (GDPR) and other relevant international data protection guidelines. Our data protection measures ensure that personal data is treated securely and confidentially and is only used for the intended purposes.

5.3 Bias and Discrimination

Avoiding bias and discrimination in the AI systems we use is of paramount importance. We are aware of the risks that can arise from unconscious bias in data and algorithms. To counteract this, we regularly review and validate training data and adapt it to minimize bias.



Scope, reporting channels, monitoring and implementation

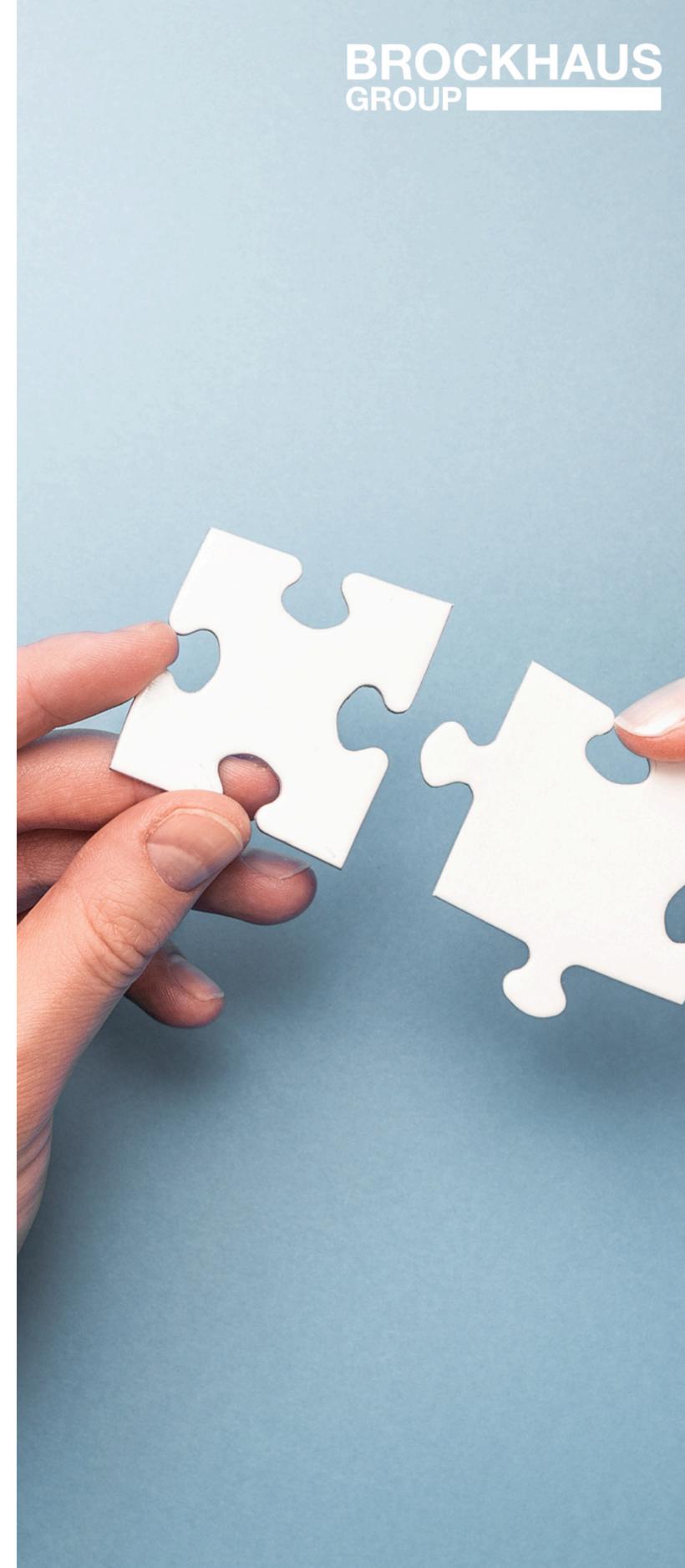
As part of the Whistleblower Protection Act, we have set up an internal reporting channel that enables our employees to report violations securely and anonymously. Employees are fully protected from any resulting discrimination or retaliation. Ensuring the confidentiality and integrity of the report is of the highest value to the company.

The relevant reporting office can be found below:

Link: <https://www.sor.de/hinschg-meldekanal/brockhaus/>

To ensure that our values and our responsibility towards our stakeholders always remain in line with the latest developments, our Code of Conduct is continuously reviewed and revised on an interdisciplinary basis. The updated version is available to all employees and interest groups via our website. In addition to this process-based revision, all external and internal suggestions, comments and proposals for improvement are welcome.

We expect the company's direct suppliers (i.e. those with whom we have contractual business relationships) to comply with our Code of Conduct. In addition, they are requested to promote and comply with the Code of Conduct among their suppliers (upstream suppliers) to the best of their ability and to request that they also comply with the Code of Conduct.



Concluding Remarks on the UN Global Compact

We are not an official participant in the UN Global Compact as we do not want to bear the very high administrative effort and associated costs as a medium-sized company. Nevertheless, our management structure as a medium-sized family business enables us to achieve the overarching goals in the areas of human rights, labor rights, environmental protection and anti-corruption. Our Code of Conduct is based on the UN Global Compact and therefore also takes into account the following declarations and agreements: Relevant standards and international guidelines

- UN Global Compact
- UN Guiding Principles on Business and Human Rights
- Universal Declaration of Human Rights
- International Labour Organization (ILO) Core Labour Standards
- OECD-Guidelines for Multinational Enterprises
- European Convention on Human Rights
- EU General Data Protection Regulation (GDPR)
- ISO 14001 (Environmental Management)
- ISO 50001 (Energy Management)
- ISO 9001 (Quality Management Systems)
- IATF 16949
- EU Guidelines on AI Ethics
- Corporate Social Responsibility (CSR) Guidelines
- UN Sustainable Development Goals (SDGs)
- Whistleblower Protection Directive (EU)

This Code of Conduct is a voluntary commitment of the BROCKHAUS Group and applies to all companies and branches of this company.

To enhance clarity, gender-specific spellings are not used. All personal names are intended to be inclusive of all genders.

BROCKHAUS Code of Conduct – Version 2.1, as of February 2025

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