

2026

Business Partner Code of Conduct

COMPLIANCE GUIDELINES



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Preamble

The Weber & Schaeer Group — consisting of Weber & Schaeer GmbH & Co. KG, Braun Battenberg Mahlwerke GmbH, Polymer-Service PSG GmbH, Weber & Schaeer Americas LP and Weber & Schaeer Americas GP Inc. — hereinafter referred to as W&S, is a family-owned trading company founded in Hamburg in 1844.

W&S commits itself and its business partners to acknowledging social and environmental responsibility towards their own employees, towards the companies with which they maintain business relationships, towards the environment and climate, and towards global society. This applies regardless of the place of activity. The W&S Code of Conduct is a voluntary commitment to fair, sustainable and responsible ethical conduct. Like W&S, our business partners should also act in accordance with our Code of Conduct, according to their respective possibilities. The ethical guidelines described in the W&S Business Code of Conduct are minimum standards. Business partners are free to apply requirements that go beyond these or are stricter.

Requirements for Supplying Companies

We communicate the principles of this Code of Conduct to the companies that directly supply us and require them to comply with these principles. We expect our business partners to introduce due diligence processes in order to identify, prevent and minimize risks of human rights violations and environmental impacts in their own supply chains, including suitable grievance mechanisms and reporting based on the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and other relevant guidelines. The business partner shall comply with all applicable laws relating to due diligence obligations along the supply chain.

1. General Principles

The business partner shall commit to fulfill its responsibility towards society, the environment and the climate in all its activities. It behaves fairly towards business contacts and in competition. The health and rights of employees in the workplace are protected. In all business activities and decisions, the applicable laws and other relevant regulations of the countries in which the business partner operates must be followed. If local laws and regulations are less restrictive, business decisions should be guided by the principles of this Code of Conduct.

2. Integrity

Conflict of Interest

When dealing with companies with which business relationships are maintained and with government institutions, the interests of the company and the private interests of employees on both sides are strictly separated. Any activities and decisions are made free from irrelevant considerations and personal interests.

Rejection to Corruption

The applicable criminal law on corruption must be observed by employees and business partners. It must be noted that acts of corruption and bribery in particular — both within the private sector and in relation to the public service — are punishable by criminal sanctions and/or fines. Among other things, the following must be observed:

- The granting of personal benefits, in particular monetary benefits such as payments and loans, including the granting of smaller gifts over a longer period, by the business partner or employees to business partners, civil servants, employees or other public officials with the aim of obtaining advantages for themselves, individual employees or third parties is not permitted.

- Monetary and personal benefits may neither be offered, promised, granted, approved, requested or accepted in our business relationships, nor should anyone allow such benefits to be promised.

Management and employees may not offer, promise, request, grant or accept gifts, payments, invitations or services in business transactions that are granted with the intention of improperly influencing a business relationship or where there is a risk of jeopardizing the professional independence of the business relationship. This is generally not the case for gifts and invitations that fall within the scope of customary business hospitality, custom and courtesy.

Fair Competition

The business partner respects fair competition. The applicable laws that protect and promote competition, in particular the applicable antitrust laws and other laws regulating competition, are complied with. In dealings with competitors, agreements and other activities that influence prices or conditions, allocate sales territories or customer companies, or unlawfully hinder free and open competition must in particular be refrained from. In view of the fact that the distinction between prohibited cartels and permissible cooperation can be problematic, employees should have a contact person available who can be consulted in cases of doubt.

Protection of Confidential Information and Intellectual Property

The business partner shall comply with the applicable laws for the protection of trade secrets and treats confidential information of our business contacts accordingly. Employees are obliged to observe trade secrets and respect intellectual property.

Data Protection

The business partner complies with the legal framework governing the protection of personal data of its employees, members of companies with which it maintains a business relationship, and its investors.

Employees should receive regular training to ensure that no data can be obtained by unauthorized third parties, e.g. through phishing, social engineering, etc. Employees should not be permitted to enter internal information, customer data, project content or other confidential company data into AI (artificial intelligence) or automated third-party systems (e.g. ChatGPT, Google Gemini, Copilot, etc.). This applies regardless of whether the content is text, documents, screenshots or other materials.

The business partner may examine whether the use of licensed services or software can be compatible with a data protection and rights concept controlled by IT.

Transparency

The business partner should comply with its legally prescribed disclosure and reporting obligations.

Representation of Interests

The business partner should comply with the legal provisions of its country when engaging in political advocacy.

3. Social Responsibility

Compliance with Human Rights

Compliance with internationally recognized human rights shall be respected and supported, and it shall be ensured that the business partner is not complicit in human rights violations within its sphere of influence. In particular, the following shall be protected and granted:

- the personal dignity, privacy and personal rights of every individual
- the right to freedom of opinion and freedom of expression
- appropriate treatment of employees without physical or psychological hardship, sexual or personal harassment, or discrimination

Prohibition of Forced Labor

Forced labor, modern slavery or any comparable measures that deprive individuals of their freedom are strictly rejected.

Prohibition of Child Labor

The business partner respects the United Nations regulations on human rights and children's rights and, in particular, complies with the Convention concerning Minimum Age for Admission to Employment (Convention 138 of the International Labour Organization) and the Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (Convention 182 of the International Labour Organization). If a national regulation concerning child labor provides for stricter standards, these must be given priority.

Promotion of Diversity and Equal

Equal opportunities shall be supported and every form of discrimination shall be opposed. The business partner treats all people equally, regardless of gender, age, color of skin, ethnical or cultural origin, sexual identity and orientation, disability, religious affiliation, worldview or other personal characteristics.

Protection of Health and Occupational Safety

Occupational safety and health protection in the workplace shall be ensured within the framework of international standards and the respective national regulations. Measures for continuous improvement shall be implemented. Employees shall be instructed in occupational health and safety as part of their activities.

Freedom of Association and Collective Bargaining

The right of employees to freedom of association and assembly, as well as the right to collective and tariff bargaining within the framework of the applicable rights and laws, is respected.

Remuneration and Working Hours

Remuneration is based on the applicable laws and, where applicable, existing binding collective agreements, and is supplemented by the relevant national minimum wage laws. Employees are informed clearly, in detail and regularly about the composition of their remuneration. Applicable laws and labor standards regarding the maximum permissible working hours are complied with.

4. Environmental Responsibility

Environmental and Climate Protection

Our business partners shall protect the environment and climate as we see our responsibility to ensure sustainability for present and future generations. Relevant laws and international agreements must be complied with. Continuous improvement of our environmental and climate protection measures should be pursued. Environmentally friendly and climate-conscious acting by employees and business partners should be promoted through the exchange of information and supportive behavior wherever possible. The development and dissemination of environmentally friendly technologies should be promoted by using them in the business partner's own business area where possible, or by striving to use them in the future.

5. Compliance

Employees and business partners shall be made aware of the provisions set out in this Code of Conduct and the obligations arising from it. When developing and, where applicable, adapting their own guidelines and processes, the principles of the Business Partner Code of Conduct shall be considered.

The Business Code of Conduct is published on our website and made available to all employees and interested parties. [Downloads - WEBER & SCHAER](#). In addition, the Code of Conduct is made accessible to our employees through our quality management system. In the event of material violations of this Code of Conduct by the business partner, W&S reserves the right, subject to applicable laws, to terminate the business relationship with the business partner.

6. Complaint and Grievance Procedure

We offer our employees and business contacts access to a secure mechanism for confidentially reporting potential violations of the principles of this Code of Conduct. This can be found on our website in the footer under “Whistleblower System” <https://www.intersoft-consulting.de/meldestelle/weber-schaer/>.

The business partner (including all affiliated companies) undertakes, by signing below, to comply with all listed contents:

Place, Date

Signature and company stamp of the business partner