

Supplier Code of
Conduct

ARNOLD

UMFORMTECHNIK
GmbH & Co. KG

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INTRODUCTION

For ARNOLD Umformtechnik GmbH & Co. KG (hereinafter referred to as "ARNOLD"), compliance with applicable law is a matter of course. Values in dealing with each other and with our business partners play a central role. Mutual trust, predictability, honesty and straightforwardness, both internally and externally, are basic principles that are firmly anchored at ARNOLD. Doing business in harmony with people and the environment are also principles that we pursue and that make a significant contribution to our long-term corporate success.

We see these values as an essential cornerstone of our supplier relationship. The ARNOLD Supplier Code of Conduct sets out binding minimum requirements that must be observed and implemented by our suppliers.

The ARNOLD Supplier Code of Conduct is based on the Universal Declaration of Human Rights and on the principles of internationally recognized standards for responsible corporate governance. These include the UN Global Compact, the core labour standards of the International Labour Organization (ILO) and the Rio Declaration on Environment and Development.

The basis of every entrepreneurial activity is, of course, compliance with the respective national legal requirements. If the regulations of the individual countries, business areas or markets differ from the requirements of the ARNOLD Supplier Code of Conduct, the stricter regulation applies in each case.

Universal Declaration of Human Rights

www.ohchr.org/EN/UDHR/Documents/UDHR_Translations/ger.pdf

10 principles of the UN Global Compact

www.globalcompact.de/de/ueber-uns/Dokumente-Ueber-uns/ THE TEN PRINZIPIEN-1.pdf

ILO Core Labour Standards

www.ilo.org/berlin/arbeits-und-standards/kernarbeitsnormen/ long--de/index.htm

Rio Declaration on Environment and Development

www.un.org/Depts/german/conf/agenda21/rio.pdf

I. HUMAN RIGHTS AND OCCUPATIONAL SAFETY

1.1 Respect for human dignity

The supplier respects general personal and human rights. Violence, intimidation, bullying, sexual harassment and other assaults are prohibited. The supplier shall also ensure that such attacks do not occur when security forces are deployed.

Discrimination

Human dignity is inviolable. It must be respected and protected. Discrimination – i.e. any disadvantage, degradation and unequal treatment on the basis of gender, gender identity, social or ethnic origin, nationality, language, skin colour, religion, sexual identity, physical or mental impairment, political conviction or other personal characteristics – will not be tolerated in any way. Equal treatment and equal opportunities must be guaranteed throughout the entire employment relationship. We also encourage our suppliers to actively stand up against discrimination and for inclusion.

Rejection of forced labour, modern slavery and human trafficking

All forms of forced labour, modern slavery and exploitation are prohibited. All employees volunteer their work or services. Any kind of threat of punishment such as isolation, restriction of movement, exploitation, physical violence, intimidation, excessive overtime, withholding of identity documents and other sensitive documents, or withholding wages is prohibited. If a third party is hired to hire employees of the supplier, any costs may not be transferred to employees.

1.2 Prohibition of child labour

Child labour and any exploitation of children and adolescents is not tolerated by ARNOLD. Under no circumstances may employees be under the age of 15 (or 14 years if national law allows this in accordance with ILO Convention 138). The minimum age for employment must not be less than the age at which compulsory schooling ends in the country in which the supplier does business. Proof of age of the employees must be available.

1.3 Protection of vulnerable employees

Employees in need of protection are expectant mothers, physically and mentally disabled people and young people under the age of 18. They must be protected to a

particular extent against overload and damage to health. For this group, regulations must be made to limit working hours and type of employment.

1.4 Right to freedom of association and assembly

In accordance with national legal regulations, employees must be granted the right to freedom of association and assembly.

1.5 Decent working conditions

The supplier must ensure that a safe, humane and non-harmful working environment is guaranteed. This includes ensuring that employees have sufficient clean sanitary facilities at their disposal, as well as that the company and offices are cleaned regularly to guarantee hygiene in the workplace.

Corporate apartments

If the travel times from the company location to the nearest private accommodation are disproportionately long, it is desirable that the supplier provides accommodation for the employees, which the employee can use voluntarily. The accommodations must be humane, clean and safe.

1.6 Security

The supplier must be aware of the possible operational risks and take measures to prevent and reduce accidents, emergencies, fires, etc.

Safety briefing

Employees must be given the necessary safety briefing before starting work on machines, equipment and potentially dangerous work, as well as for emergency situations and fire protection. The instructions are repeated in accordance with legal requirements or in the event of changes in the workplace. Receipts must be kept for the admissions.

Occupational health and safety

Based on a risk assessment, it must be determined and communicated in which area occupational safety equipment must be worn. The occupational safety equipment must be provided to the employees free of charge, in sufficient quantities and in a functional condition by the supplier.

The equipment and the safety equipment must be regularly maintained and checked for functioning. The emergency shutdown of machines must be functional and accessible at all times.

Substitution test

The use of hazardous substances must be kept as low as possible. Hazardous substances must be subjected to a substitution test. This means that if it is equally suitable for the processing process, the substance that poses a lower risk to humans and the environment must be used.

A safety data sheet must exist for every chemical present. Safety data sheets contain information on handling, storage, transport, disposal, critical and important material data, possible hazards and first aid measures.

Emergency planning and fire protection

The supplier keeps disaster and fire protection plans in his company. Corresponding exercises must be carried out and documented regularly.

Fire alarms and an evacuation alarm must be present during operation. Sufficient fire extinguishers are accessible to every person and at any time, depending on the type and risk of the work, the size of the buildings and floors and the number of people in the company. There must be enough employees who are trained to use fire protection equipment.

Emergency exits and escape routes

The emergency exits, escape routes and assembly points are clearly indicated and must not be blocked at any time. The number of emergency exits and escape routes depends on the number of people, room size and workplace distribution and ensures the safe and rapid evacuation of all employees.

First aid kit

First aid equipment is available in an appropriate manner and in sufficient quantity for all employees, during all shifts, in all buildings and on every floor, openly accessible and ready for use. The type and scope corresponds to the nature of potential risks and the size of the company. There must be enough trained first aiders on each shift who are able to act in the event of an accident.

1.7 Working hours

The legally stipulated maximum number of hours is not exceeded. The weekly working time, including overtime, may not exceed 60 hours. Employees are entitled to at least one day off in a seven-day week. The vacation days must at least correspond to the national statutory vacation entitlement. The supplier must grant employees a reasonable break, but at least a 30-minute break after 6 hours and a total of 45-minute break from nine hours, unless the national working time laws provide for a stricter regulation.

1.8 Remuneration

Employees receive appropriate remuneration, which at least corresponds to the national statutory minimum wages. In the absence of legal regulation, the wage must at least be sufficient to secure the livelihoods (housing, food, education, technology) of the employees and their families. Wages must be issued regularly and in legal tender. Employees must be provided with information about the agreed conditions in writing in an understandable manner in the form of an employment contract and a payslip. It is forbidden to use wage deductions as a disciplinary measure. National social security requirements must be complied with.

1.9 Respect for the rights of local communities and indigenous peoples

The supplier must take into account local impacts on communities and indigenous peoples in the course of its business activities. In particular, potentially negative impacts on livelihoods, including access to land, water or forest, security and health of local communities and indigenous peoples, must be avoided.

Customary rights to land and natural resources must be respected. We reject forced evictions and similar practices.

II. ENVIRONMENT

The applicable national laws, regulations and standards for limiting and avoiding environmental pollution must be complied with.

If there is a risk of pollutant contamination in water, soil and air in connection with the supplier's business activities, appropriate measures for reduction and prevention must be implemented at all costs.

2.1 Emissions

Emissions are air pollutants, noises, vibrations, light, heat or radiation emanating from the supplier's installations and similar environmental effects which, due to their nature, extent and duration, are likely to cause hazards, significant disadvantages or significant nuisances to humans, animals, plants, soil, water, atmosphere as well as cultural and other material assets.

The supplier must type, verify and treat emissions, in particular volatile organic chemicals, aerosols, corrosives, particles, ozone-depleting chemicals or by-products from operations resulting from combustion, and treat them in a way that makes the emissions harmless.

The noise caused must not exceed the legal requirements.

2.2 Water use

The impeccable quality and availability of water in water bodies and groundwater is the basis of life for humans, animals and plants and must not be impaired by the supplier. Water must therefore be used sparingly for all processes. In industrial plants, there should be recirculation systems that allow multiple uses.

Sewage

Wastewater is water whose properties have been altered by domestic, commercial, agricultural or other use.

The supplier must ensure that the wastewater from its operations, manufacturing processes and sanitary facilities is subjected to the necessary treatment before it is discharged into the groundwater. The concentration of hazardous substances in the water, such as salts, heavy metals and their compounds, oxidizable substances, nitrogen, phosphorus and organic halogen compounds and other chemicals, must only be so low that the wastewater does not cause any negative effects on people and the ecosystem.

If there is no infrastructure for water treatment at the site, qualified/suitable companies must be commissioned for transport and treatment.

2.3 Waste

Waste is any substance or object that its owner discards, intends to discard or has to discard.

Hazardous waste (hazardous waste) is waste that poses a risk to health and/or the environment and has one or more of the following properties: flammable, oxidizing, explosive, irritating, corrosive, infectious, toxic in contact or release of toxic gases, carcinogenic, infectious, toxic to reproduction or ecotoxic.

General Handling

The handling, storage, transport and disposal of waste must not have any harmful effects on air, soil, water or the health of employees and must be carried out by qualified persons. Explosions, ignitions and other sudden dangerous events must be prevented.

The supplier must take measures to avoid and reduce waste.

Handling hazardous waste

Hazardous waste must be clearly labelled and disposed of properly. Handling must be carried out with sufficient protective equipment. The hazardous waste is kept separate from the non-hazardous waste.

Disposal and recycling

Recycling of the waste is preferred over disposal, e.g. by landfilling. The supplier sorts the waste in preparation for the best possible form of recycling.

Material recycling is preferred to energy recovery. In material recycling, waste is used as a recyclable material or raw material substitute for the production of a new product, while in energy recovery, waste is incinerated in an incineration plant and used for energy use.

2.4 Chemicals and other hazardous substances

Hazardous substances are substances, mixtures and products with hazardous properties that cause acute damage to human health, are flammable, explosive or hazardous to the environment. Hazardous substances include, for example, chemicals but also uranium, asbestos or welding fumes.

General Handling

The handling, storage, transport and disposal of hazardous substances must not have any harmful effects on humans, animals, plants, soil, water, atmosphere as well as cultural and other material goods and must be carried out by qualified persons. Explosions, ignitions and other sudden and dangerous events must be prevented.

The supplier must carry out documentation on the quantity and type of chemicals and hazardous substances present and/or used in the company.

Storage

Hazardous substances must be stored separately from each other and closed.

The floor in the storage areas is designed in such a way that it does not absorb the hazardous substances and does not react with them. The supplier uses sufficiently large drip trays for liquid substances. All liquid hazardous materials storage tanks must be regularly monitored to prevent leaks.

When handling substances or processes whose gases are toxic, employees use the necessary protective equipment provided by the supplier.

Disposal

The disposal of hazardous substances is carried out properly. Care is taken to ensure that hazardous substances that react with each other are not disposed of together.

Marking

Chemical and hazardous materials containers must be labelled with safety-relevant information that represents the hazard risk. The labelling is carried out in accordance with the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) of the United Nations.

2.5 Natural Resources and Raw Materials

Natural resources are raw materials, environmental media, energy sources and physical space available in nature without human intervention.

The supplier must use natural resources sparingly and keep their use and consumption as low as possible.

This can be done either directly at the point of origin or through procedures and measures, such as changing production and maintenance processes or operations in the company, using alternative materials, saving, recycling and reusing materials.

Responsible raw material sourcing

The supplier develops measures to ensure and improve the transparency and traceability of the raw materials processed in the product within the supply chain. In particular, the aim is to ensure that the raw materials used come from responsible sources.

Particular attention should be paid to ores, concentrates and metals containing tantalum, tin, tungsten, cassiterite, coltan and gold, which come from conflict regions and high-risk areas. These are in particular mining areas that are the scene of armed conflicts, that are in a fragile post-conflict situation or whose governance and security are weak or non-existent and in which international and human rights are systematically violated.

The procurement of raw materials must not result in human rights violations or the financing of armed groups. To ensure this, the supplier will exercise due diligence on the origin and chain of custody of these minerals in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains for Minerals from Conflict and Risk Areas and will disclose these due diligence measures to ARNOLD upon request.

If the above list of critical product ingredients is expanded in the future, the supplier is obliged to implement due diligence measures for the additional substances as well.

To protect ecosystems and biodiversity, no raw materials may be extracted from nature reserves.

OECD Due Diligence Guide to Promoting Responsible Supply Chains for Minerals from Conflict and Risk Areas.

III. ETHICS

3.1 Anti-corruption

No form of corruption or bribery will be tolerated. The supplier must ensure that no personal dependencies on customers, suppliers or other business partners arise through bribes or other illegal payments. Conflicts of interest must be avoided.

Supplier will not accept or offer gifts, invitations or other benefits that can reasonably be assumed to be likely to influence business decisions in an unfair manner.

Employees who violate the above regulations will be held responsible by the supplier - regardless of criminal consequences.

3.2 Fair competition

The supplier is committed to fair, performance-oriented competition and does not participate in anti-competitive agreements with other market participants. This means, in particular, that it does not participate in cartels or other restrictive or unfair practices, including the unlawful use of intellectual property.

3.3 No money laundering and financing of illegal sources

The supplier shall obtain its funds exclusively from legitimate sources. This prohibits direct or indirect support for terrorism or organized crime such as human trafficking, drug trafficking, bribery, arms trafficking, etc.

3.4 Compliance with export control and customs borders

Export bans, sanctions and embargoes in international trade must be complied with by the supplier.

3.5 Data protection and data security

The supplier must protect the personal data of all customers, suppliers, other business partners and employees in compliance with national and international data protection regulations. The personal data is protected from access and unlawful use by unauthorised persons and must not be used to the detriment of the respective stakeholders.

The Supplier undertakes to keep company data, trade and trade secrets as well as other confidential information strictly confidential and to use them exclusively for the purposes of the Supplier's cooperation with ARNOLD. They must be protected against unauthorised access and insight by colleagues or other third parties who are not involved, as well as against deletion and unauthorised modification.

IV. COMMUNICATION AND CONSEQUENCES

The supplier communicates the requirements of the ARNOLD Supplier Code of Conduct and its implementation to the relevant stakeholders, but at least to its employees and upstream suppliers, and ensures compliance with the requirements through appropriate measures.

4.1 Complaints procedure

The supplier must provide employees with access to internal and/or external grievance procedures and make them known. The complaints procedure must enable all potentially affected parties within the supply chain to point out human rights or environmental risks as well as violations of human rights-related or environmental obligations. Language and technical barriers must be avoided.

All employees of the supplier are invited to use the Würth Group's anonymous reporting hotline – **SpeakUp** – to report violations:

www.bkms-system.net/wuerth

4.2 Documents and compliance control

All verification documents and documents are dutifully prepared, protected against unauthorized access, modification and destruction and stored securely. The documents, records, permits, reports, etc. are accurate, trustworthy, and transparent. They must be submitted to ARNOLD upon request. The Supplier shall inform ARNOLD without being asked to do so about matters that are incompatible with the requirements of the ARNOLD Supplier Code of Conduct.

ARNOLD reserves the right to conduct unannounced audits to check compliance with the Supplier Code of Conduct. To this end, the auditor must be granted access to the relevant areas and the required documents. ARNOLD reserves the right to entrust a third party with the execution of the audits.

4.3 Consequences

The ARNOLD Supplier Code of Conduct is an integral part of the contract between ARNOLD and the supplier and must be fully complied with. If there is a suspicion of a violation of the ARNOLD Supplier Code of Conduct, the supplier supports ARNOLD in clarifying the facts.

In the event of a breach, ARNOLD will respond depending on the severity of the breach. A preferred consequence is the immediate remedy of the defects by the supplier, but ARNOLD is also entitled to claim damages and to terminate the contract with the supplier extraordinarily without notice.

#unsereVerantwortung

Our responsibility means that all of us, as a company, as individuals and as employees, are called upon to act responsibly when it comes to sustainability, environmental protection and the future.

We would like to thank all suppliers who work with us to promote responsible and ethical behavior in business.

IMPRINT

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