

Supplier Code of Conduct

# 1. The Importance of the Code of Conduct in the Management's View

Getzner Werkstoffe GmbH with its affiliated companies (hereinafter 'Getzner') is known for vibration protection and is considered worldwide as a reliable partner.

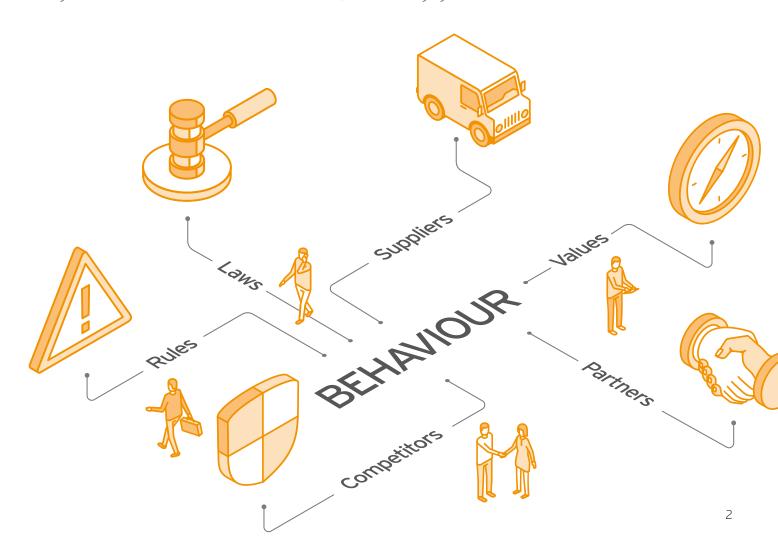
Since 1969, Getzner has been offering solutions for the damping and insulation of vibrations and structure-borne noise. The high-tech materials Sylomer®, Sylodyn® and Sylodamp® originate from our own research and are used in the railway, construction and industrial sectors. They reduce vibrations and noise, extend the service life of the stocked components and thus reduce the maintenance and servicing costs of rail infrastructure, vehicles, construction works and machinery. Getzner applications reduce environmental impacts such as noise and vibration and reduce the CO<sub>2</sub>-footprint in the overall system.

Getzner materials are distributed through selected partners on every continent of the world. Getzner thus valuably contributes to increasing quality of life on a global basis. Getzner is committed to sustainable, economic action and to protecting environment and resources. However, compliance with ethical, social and legal concerns is equally important for Getzner. In this context, this Supplier Code of Conduct shows all our partners the way to combine the corporate philosophy with sustainable competitiveness.

Bürs, December 2023

Jürgen Rainalter

Managing Director Getzner Werkstoffe GmbH

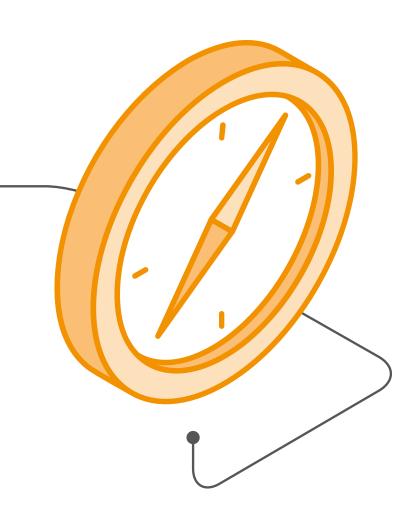


## 2. Subject Matter of the Code of Conduct

This Supplier Code of Conduct ('Supplier Code') sets out the principles that apply to all activities of all our suppliers.

It defines the standard, requirements and expectations of Getzner towards its suppliers with regard to sustainability, integrity and correct behaviour in the business environment. It is based in particular on the principles of the UN Global Compact and the 17 Sustainable Development Goals (SDGs). Getzner's suppliers undertake to comply with the provisions of this Supplier Code accordingly and confirm this by returning the signed declaration (last page of the Supplier Code of Conduct).

Getzner always complies with applicable local and international law. If mandatory local law is stricter than the provisions of this Supplier Code of Conduct, the stricter provisions shall apply. If such legal regulations exist, there is no room for discretion. The Supplier Code of Conduct is therefore to be understood as a "minimum standard".



## 3. Ethical and Social Values

Ethical and social values guide our daily actions - worldwide.

#### Human rights

The supplier shall ensure that human rights are respected and protected in the performance of its activities as well as along its supply chain and towards its employees. In particular, the supplier shall ensure that neither forced labour (including modern slavery and human trafficking) nor child labour is used or tolerated.

#### Occupational safety

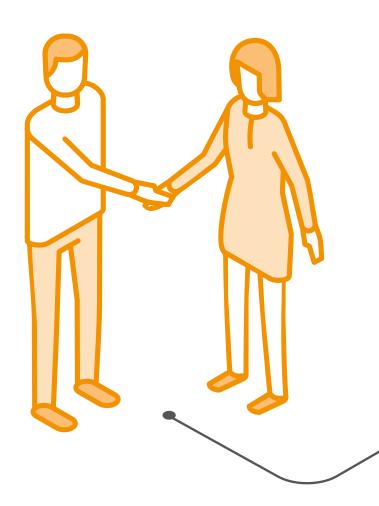
Suppliers undertake to respect the respective applicable laws and regulations for the protection of persons working for the company and to train its employees accordingly as well as to guarantee employees the active exercise of their rights. The supplier shall comply with all regulations regarding minimum wages and working hours in accordance with the respective applicable local regulations. Employees shall receive appropriate remuneration for their services, which shall be at least equal to the local minimum wage or the comparable values of the industry if these exceed the local standard. The supplier shall grant its employees equal remuneration for equal work.

#### Prohibition of discrimination

The supplier treats all employees with respect and prohibits any kind of discrimination, unequal treatment, harassment, abuse or inhumane treatment of persons.

#### Conflict minerals

The supplier shall ensure that its products / materials do not contain conflict minerals that directly or indirectly finance or favour armed groups and cause human rights violations. Such minerals may include in particular tin, tantalum, tungsten and gold from politically unstable countries. The supplier shall comply with all due diligence requirements to promote responsible commodity supply chains, in particular with regard to EU legislation and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.



## 4. Environment

We take our responsibility for the future seriously, that's why sustainability plays a central role in all our activities – and we demand the same from our suppliers.

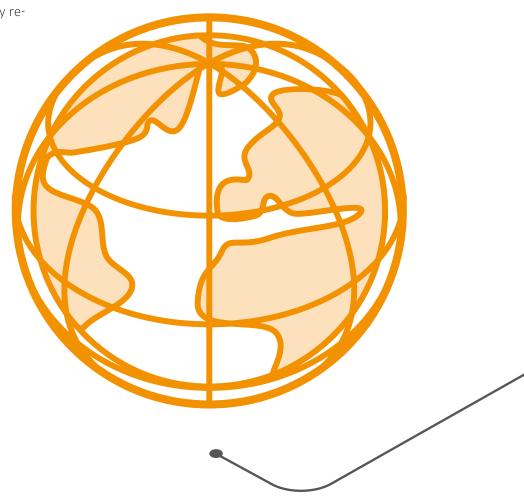
All applicable laws and regulations / obligations as well as internationally recognised standards for the protection of the environment are complied with by the supplier.

The supplier shall promote the safe and environmentally sound development (incl. recyclability), production, transport, use and disposal of its materials / products.

The supplier ensures efficient and economical use of resources, uses energy-efficient and environmentally friendly technologies and continuously reduces waste quantities as well as emissions to air, water and soil.

Negative impacts on biodiversity, climate change and water scarcity are steadily reduced to protect people's livelihoods.

Due to suitable management systems, the supplier shall ensure that product quality and safety comply with the respective applicable requirements / binding obligations.



## 5. Integrity in Business

The business relationship shall be professional and transparent - we expect our suppliers to act with integrity.

#### Protection of competition

The supplier undertakes not to restrict free competition and not to violate national or international competition law regulations. In particular, the supplier shall comply with the applicable antitrust regulations (no participation in illegal agreements, no abuse of a dominant market position etc.).

#### Sanctions, export controls, embargoes

The supplier shall comply with all applicable sanction regulations as well as export control and embargo regulations. The supplier shall in particular ensure that it itself, its beneficial owners or other representatives as well as all subcontractors used are not listed on any applicable sanctions list as sanctioned companies / persons.

#### Prohibition of corruption and bribery

Corruption and bribery of any kind is rejected by the supplier. In particular, he will not offer or accept any unlawful benefits or other inducements to obtain an unfair advantage.

#### Conflicts of interest

All business decisions with regard to Getzner shall be made only on the basis of objective criteria. Conflicts of interest with private interests or other economic / other activities, including those of relatives or otherwise related persons / organisations, are to be prevented.

#### Confidentiality of information

The supplier shall ensure that business information as well as business and trade secrets of Getzner that have specifically become known are always treated confidentially and, where applicable, in accordance with any confidentiality agreements. The supplier shall take precautions to protect such information.

#### Protection of data

The privacy and confidential information of all employees as well as of business partners shall be respected by the supplier and data and intellectual property shall be protected from misuse. The supplier shall comply with all applicable data protection laws.

# Money laundering and terrorism financing

The supplier shall comply with the applicable obligations for the prevention of money laundering and terrorism financing.



## 6. Implementation of the Code of Conduct

### Ensure supplier code of conduct

In order to ensure that the provisions of this Supplier Code of Conduct are complied with, Getzner reserves the right to conduct audits at the supplier's premises. Such audits shall be announced in writing at least one week in advance.

The supplier shall also ensure that its employees and subcontractors are informed of the contents of this Supplier Code of Conduct and comply with the provisions accordingly.

At Getzner's request, the supplier shall provide Getzner with all documents required to assess compliance with the Supplier Code of Conduct.

#### **Violations**

Violations of the provisions of this Supplier Code of Conduct shall be deemed a breach of material contractual obligations. In the case of minor breaches, a request for rectification will generally be made first. However, Getzner reserves the right in all cases to take appropriate (further) action, such as terminating existing contracts or ending the business relationship with the supplier altogether.

Further contractual obligations shall remain unaffected by the provisions of this Supplier Code of Conduct and shall take precedence.

#### Reporting of misconduct

If the supplier discovers violations of this Supplier Code of Conduct or if it has concerns about unlawful conduct / misconduct, it shall immediately report these to its contact persons at Getzner. The supplier may also report any violations identified, in particular in the areas of competition and antitrust law, corruption, environmental protection, data protection etc., via Getzner's online whistleblower system – also anonymously. Access to the system and details can be found at www.getzner.com/compliance.



#### Protection of whistleblowers

All reports in connection with misconduct within the meaning of this Supplier Code of Conduct and other legal regulations will be treated with the same degree of care and confidentiality. In order to promote open and trusting communication, it is expressly stated that whistleblowers do not have to expect any negative consequences of any kind as a result of their report. The prerequisite is that the report has been made in good faith and that the whistleblower is not (partly) responsible for the violation. In particular, the laws implementing the EU Whistleblower Directive will be complied with accordingly. However, Getzner expressly reserves the right to take appropriate measures against whistleblowers who intentionally or grossly negligently make false accusations.



## Declaration of the supplier

The supplier hereby confirms that it has received the Code of Conduct for Suppliers ('Supplier Code') of the Getzner Werkstoffe Group and undertakes to comply with the principles described in this Supplier Code. By signing this declaration, the Supplier Code shall become an integral part of all contractual relationships between Getzner and the supplier.

Place, date
Supplier (name + company stamp)
ooppilor (name company stamp)
Representative (name + position in block letters
Signature