



## Supplier Code of Conduct

### PREAMBLE

As an international company, Fischbach is in constant relationship with a large number of different people and organizations and thus with the representatives of a wide variety of interests.

For this reason, we as a company have addressed what is important to us, how we act and how we want to be perceived.

We require high standards of professional and ethical conduct from all our suppliers. This Supplier Code of Conduct reflects our commitment to a culture of honesty, integrity and accountability and outlines the basic principles and policies with which all suppliers of Fischbach are expected to comply. In this Supplier Code of Conduct, Fischbach and the entities controlled by it are referred to as "Fischbach" and the suppliers of Fischbach, the entities controlled by them and the directors, officers and employees of such entities are collectively referred to as "suppliers". This Supplier Code of Conduct is derived from our Code of Business Conduct and Ethics.

The Supplier Code of Conduct sets out minimum requirements and expectations in terms of legal, economic, ethical and moral aspects of supplier conduct when doing business with Fischbach.

We expect our suppliers to comply with all applicable laws and to adhere to internationally recognized human rights, environmental, social and corporate governance laws and standards ("ESG standards"), as set out in particular in international conventions.

Fischbach reserves the right to terminate business relationships with suppliers violating these policies and standards.

This Supplier Code of Conduct is not exhaustive and no statement of principles and procedures can offer a complete guide to cover all possible situations. Suppliers and Fischbach are expected to observe both the spirit and the letter of this Supplier Code of Conduct and to consult this Supplier Code of Conduct or an appropriate representative of Fischbach when faced with an issue.

Engelskirchen, June 01, 2026

Martin Herrenbrück  
CEO

A blue ink signature of Martin Herrenbrück, CEO, written over a white background.

Martin Schilcher  
CFO

A blue ink signature of Martin Schilcher, CFO, written over a white background.



## 1. ETHICAL AND MORAL BEHAVIOR

Fischbach is committed to sustainable business practices and adheres to the 10 principles of the United Nations Global Compact in its business operations.

Therefore we expect all suppliers to maintain the highest standards of lawfulness, honesty and integrity in all business dealings and practices.

This is achieved based on this Supplier Code of Conduct and on the overarching Fischbach Code of Business Conduct and Ethics. Both guidelines are published on the Fischbach website.

## 2. LEGAL COMPLIANCE

Fischbach suppliers must

- fully comply with all relevant national, state and/or local laws, guidelines and regulations, both domestic and foreign
- behave in a law-abiding and fair manner in competition and respect all applicable competition and antitrust laws and
- fulfil all public law obligations with regard to each relevant legal matter and agreement in a timely and complete manner

In particular, each supplier or contractor expressly assures to be fully compliant with all relevant legal requirements regarding minimum wage, income tax, social security, residence permits and work permits with regards to all employees.

Violation of any of the above points may result in immediate termination of the contractual relationship.

## 3. BUSINESS CONTINUITY AND PRODUCT SAFETY

Our suppliers are encouraged to implement effective business and production continuity plans that support Fischbach's business.

We expect our suppliers to

- use safety programs to control and maintain their work processes, in accordance with applicable safety standards, adapted to the operating sites and process risks
- appropriately communicate, disclose, and control process- and product-inherent risks to ensure that affected or potentially affected third parties are protected
- analyze and communicate major incidents in a timely and effective manner
- for hazardous equipment and processes, regularly perform specific risk assessments
- comply with product safety regulations, properly label their products, and communicate product handling requirements



- provide parties involved, as required, with the applicable documentation containing all necessary safety-related information on all hazardous substances. This includes product information, safety data sheets, notification and approval confirmations
- proactively and transparently share information with all parties involved about the health, safety and environmental aspects of their products

#### 4. QUALITY REQUIREMENTS

We expect our suppliers to

- meet generally accepted quality standards or contracted quality requirements to provide goods and services that consistently meet the needs of Fischbach and its customers,
- promptly address all critical issues that could negatively affect the quality of goods and services,
- inform about changes in the manufacturing or delivery process if they may have an impact on the specifications of goods delivered or services rendered,
- ensure adequate safeguards within their supply chains,
- ensure the integrity of deliveries to Fischbach - from the point of origin to the point of destination and
- support the investigation and prosecution of activities involving contaminated or counterfeit products.

#### 5. SUPPLY CHAIN TRANSPARENCY

We expect our suppliers to

- provide and ensure full transparency over their supply chains and
- its own suppliers and subcontractors also comply with this Code of Conduct.

#### 6. FAIRNESS, HEALTH, SAFETY AT WORK

Fischbach does not tolerate the use of child labour, forced labour, unsafe and hazardous working conditions and environments, or any conduct that fails to respect human dignity and respect for the individual and all other human rights.

We expect our suppliers to

- provide safe and healthy work environments,
- implement policies that prohibit the use of illegal weapons, workplace harassment, and the illegal use or possession of alcohol, drugs, and other substances covered by narcotics laws in the workplace,
- comply with the applicable legal regulations and the regulations on working hours specified by the ILO standards,
- pay fair compensation on a regular, timely and full basis in accordance with applicable laws and equal pay for work of equal value,
- offer their employees appropriate training and development opportunities,
- adequately protect their employees from chemical, biological and physical hazards,



- provide adequate controls, safe work procedures, appropriate maintenance and the necessary technical protective measures to reduce health and safety risks in the workplace and to prevent accidents and occupational diseases and
- provide their employees with appropriate protective clothing and safety information on identified workplace hazards or hazardous substances.

## 7. JOB EQUALITY

We expect our suppliers to

- implement practices in hiring and employment that prevent discrimination on the basis of age, culture and language, disability, ethnicity, gender identity, marital or familial status, national origin, race or colour, creed, sex, sexual orientation, or any other characteristic protected by law,
- make equal treatment of all employees a key principle of corporate policy and
- create an inclusive and supportive work environment by considering diversity in their employee selection process.

## 8. ENVIRONMENT, SUSTAINABILITY AND SOCIAL RESPONSIBILITY

We expect our suppliers to

- adhere to business practices that preserve and protect the environment, contribute to the social well-being of the communities in which they do business and operate, and demonstrate accountability and transparency in sustainability performance,
- use energies, production materials and other resources required in production and service provision as efficiently and sustainably as possible,
- continuously reduce the generation of climate and environmental pollution from emissions, waste, effluents and noise,
- ensure safety and compliance in the handling, storage, transportation, disposal, recycling and reuse of waste, waste gas and wastewater,
- appropriately manage, measure, and control activities that may have a negative impact on human health or the environment,
- minimize the release of hazardous substances,
- support the use of universally accepted sustainability standards and certifications developed by various societal stakeholders to preserve renewable natural resources,
- minimize or eliminate negative impacts on the environment and climate caused by suppliers themselves or within their supply chain,
- commit to the development and use of environmentally and climate-friendly products, processes and technologies.



## 9. INTERNATIONAL TRADE CONTROLS

Suppliers must comply with export control regulations applicable to their business and provide accurate and truthful information about them to customs and other authorities, as required.

## 10. GOVERNANCE AND COMPLIANCE

We expect our suppliers to

- consider corporate integrity as the basis for business relationships,
- implement the principles set out in this Code of Conduct in their upstream supply chain,
- shall develop, implement, apply and maintain management systems and controls related to the content of this Code of Conduct. They shall have the necessary documentation to demonstrate compliance with the principles of this Code of Conduct. If the parties agree, Fischbach may inspect this documentation,
- shall implement tools to regularly identify, assess and manage risks in all areas covered by this Supplier Code of Conduct and with reference to all applicable legal requirements,
- must be aware of and comply with all applicable international, national and local laws and regulations, contractual agreements and internationally recognized standards. Suppliers must also align their practices with generally accepted industry standards, obtain and keep current all applicable permits, certificates, licenses and approvals, and conduct their operations at all times in accordance with the limitations and requirements of the permits,
- prohibit any kind of bribery, corruption and money laundering,
- prohibit gifts to private individuals or public officials that are intended to influence business decisions or otherwise encourage them to violate their obligations,
- respect the privacy and confidential information of all your employees and business partners and protect data and intellectual property from misuse,
- implement an appropriate compliance management system that supports compliance with applicable laws, rules and standards,
- establish training activities to provide your managers and employees with an appropriate level of knowledge and understanding of the content of this Supplier Code of Conduct, applicable laws and regulations, and recognized standards,
- establish communication channels for their employees to file complaints or report possible unlawful conduct without fear of repression, intimidation or harassment. Each communication is to be treated confidentially. Suppliers must investigate and take action, as necessary, based on the reports. They must notify Fischbach of any legal action, administrative investigation or criminal prosecution that could affect their operations for Fischbach or harm their own or Fischbach's reputation and
- must demonstrate commitment to continuous improvement by setting performance goals, executing implementation plans, and taking necessary actions to correct deficiencies identified during internal or external audits, inspections, and management reviews.



## 11. CONFLICTS OF INTEREST

Fischbach suppliers must

- inform Fischbach of any situation that could result in a conflict of interest - such as when Fischbach employees enjoy professional, personal and/or significant financial benefits or have ownership interests in a supplier company and
- avoid any transaction or business relationship that could present, or appear to present, a conflict of interest to third parties.

## 12. CONFIDENTIALITY AND PROTECTION OF DATA

Protection of confidential information and compliance with data protection laws is of paramount importance.

Fischbach suppliers must

- always treat confidential information from Fischbach as confidential. This also applies if no separate confidentiality agreement has been concluded in individual cases,
- take appropriate measures to ensure the security and confidentiality of business information,
- appropriately manage and protect information systems that contain Fischbach's confidential information or data against unauthorized access, use, disclosure, alteration or destruction of data,
- collect personal information only for legitimate business purposes, use it only in a legal, transparent and secure manner, and share it only with authorized parties,
- protect information in accordance with security regulations, keeping it only as long as necessary and requiring third parties to protect it and
- use confidential information appropriately and ensure that proprietary data and the intellectual property rights of its own employees and business partners are safeguarded.

## 13. PUBLICITY

Fischbach prohibits the use or disclosure of its names, logos, likenesses, supplier relationships, products, parts, designs or any other non-public information in press releases, brochures, subscription offers, customer lists, websites without specific prior written permission.