

# P U E H L

## Code of Conduct

The company Pühl GmbH & Co KG, Herscheider Straße 33, 58840 Plettenberg, Germany is a family business with a long tradition. We are aware of our social and ecological responsibility in the context of our business relationships and therefore make the following binding declaration in the context of our supplier relationship with you:

We are committed to our social responsibility, a liberal basic order, a fair market economy with free competition. We respect the laws and culture of the countries in which we operate. We live equality and reject discrimination of any kind, while at the same time ensuring transparency, reliability, and openness in our internal and external communications. Finally, protecting the environment and health is important to us. We therefore use the best available technology to avoid the harmful effects of our business activities. This is based on a shared understanding of socially and ecologically responsible action and ethical business conduct as an essential basis for this.

Having this said, we declare the following:

1. We always act in accordance with the law. We respect the Human Rights Code of the United Nations, the internationally recognized core labor standards of the International Labor Organization (ILO). We work to ensure that our own suppliers also comply with all relevant laws, regulations and other legal provisions that apply to them.

2. Social responsibility / human rights

We comply with internationally recognized human rights and actively promote their observance. This means that we reject all forms of forced labor and slavery and comparable work and instead respect the principle of freely chosen employment. There must be no unacceptable treatment of employees, for example through psychological hardship, sexual and personal harassment.

It goes without saying that we respect the ban on child labor and only employ workers who are not subject to compulsory education under the law of the place of work and who are at least 15 years old, unless the legislation in the law of the place of work deviates from this. We also guarantee compliance with the rights of children.

We also guarantee appropriate wages and social benefits for our employees that at least meet the standard of the national minimum working conditions or those set out in collective agreements. We also comply with the regulations applicable at the place of employment regarding working hours, overtime, breaks and regular paid vacation.

We also respect our employees' right to freedom of association and representation of interests as granted by our constitution. In exercising these rights, our employees are of course not hindered or disadvantaged by us.

# P U E H L

We do not tolerate any discrimination against employees based on gender, skin color, nationality, disability, political opinion, ethical or social background, religion,

age, sexual orientation, or other reasons. The personal dignity, privacy and personal rights of each individual employee are respected.

We also ensure a safe and healthy working environment and take all necessary measures in this context in cooperation with the authorities responsible for this at the place of employment.

### 3. Protection of natural resources / ecological responsibility

We adhere to the ban on causing harmful soil emissions, soil changes, water pollution, air pollution and harmful noise emissions above and beyond the quantities permitted by national law. We are also committed to the preservation of clean-living conditions.

With this in mind, we take full responsibility for the environment by complying with all relevant laws, regulations and other legal provisions relating to the environment and sustainability.

We constantly avoid or reduce waste volumes and emissions to air, water, and soil. Disposals are carried out exclusively in accordance with the applicable legal provisions.

We also strive to minimize the use and consumption of resources constantly and continuously in our production and the generation of waste.

We monitor and document our energy consumption and strive to constantly improve our energy efficiency. We strive to use renewable energies as much as possible. In this way, we aim to reduce the impact of our activities on biodiversity, climate change and water scarcity.

### 4. Ethical business conduct / anti-corruption

We make decisions solely based on factual considerations and, as your business partner, do not allow ourselves to be unduly influenced by personal interests. If we identify a potential conflict of interest, we will inform you immediately.

We conduct ourselves and our competitors fairly and comply with the statutory regulations for the protection of free competition. Furthermore, we do not enter into any agreements with other market participants that could have the purpose or effect of preventing, restricting or distorting competition.

We also apply the highest standards of integrity to our employees. We comply with applicable anti-corruption laws, foreign trade regulations, customs regulations, and related sanction regulations.

### 5. Intellectual property / Confidentiality

We comply with all applicable laws and regulations for the protection of intellectual property. We ensure that our clients' confidential information is kept secret even after the end of the business relationship. To this end, we have issued corresponding internal instructions to our employees under labor law.

# P U E H L

## 6. Data protection and information security

We undertake to observe and comply with the laws and official regulations on data protection and information security regarding the protection of personal data when collecting, storing, processing, transmitting, and passing on personal information.

## 7. Money laundering and terrorist financing

We comply with all relevant laws, regulations, and other legal provisions for the prevention of money laundering and terrorist financing.

## 8. Update

We will adapt the Code of Conduct if further legal interests are to be placed under the protection of the Code of Conduct or if this becomes necessary due to the opening of a new business division, the inclusion of new products or adjustments due to changes in the law.

## 9. Confidential whistleblower reporting system

A secure and effective internal reporting channel is available to employees, customers and third parties for reporting misconduct such as, but not limited to, corruption, abuse of power, discrimination, breaches of occupational health and safety regulations, breaches of the Minimum Wage Act, breaches of the duty to provide information and disclosure to bodies of the Works Constitution, etc:

Reports can be submitted anonymously via the confidential web-based reporting channel:

[puehl.integrityline.com](http://puehl.integrityline.com)

Every whistleblower is guaranteed full confidentiality. The reporting system complies with data protection requirements and the requirements of EU Directive 2019/1937 on the protection of whistleblowers.

10. Regulation on details of enforcement of this policy in regard to employees can be found in this Code of Conduct, our guidelines on corporate policy, quality policy, environmental and energy policy, as well as other internal company guidelines that contain detailed regulations on individual special topics.

Plettenberg, 13.11.2023



Ralf Kalthener  
Managing Shareholder



Joachim Rohwedder  
Managing Director



ppa. Sebastian Pieper  
Authorized Officer / Head of Sales