

CODE OF CONDUCT

FOR BUSINESS
PARTNERS



MARQUARDT

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FOREWORD

The Marquardt Group (hereinafter referred to as “Marquardt”) is a globally active, owner-managed family business that has successfully established itself on the market in various business areas since 1925. Marquardt’s sustainable success is essentially characterized by the fact that the Executive Board, all employees and all business partners* always act with integrity, transparency and responsibility. This is essential, especially in times of increasing risks for companies, for society and for the environment.

The common goal at Marquardt for the topic of compliance and for the areas of environmental, social and governance (ESG): taking responsibility for oneself and one’s actions and ensuring compliance with all applicable ESG principles.

In addition to its own employees, Marquardt expects the same commitment from all its business partners and their employees. If our business partners use third parties, such as subcontractors or suppliers, it must be ensured that these third parties also commit to the requirements of this “Marquardt Code of Conduct for Business Partners” defined below.

Management Board
 Rietheim-Weilheim / February 2024


 Dr. Harald Marquardt


 Dr. Kristjan Ambroz


 Jochen Becker

* Business partners are all legal or natural persons with whom the Marquardt Group maintains business relationships, such as customers and suppliers.

ENVIRONMENTAL (E)

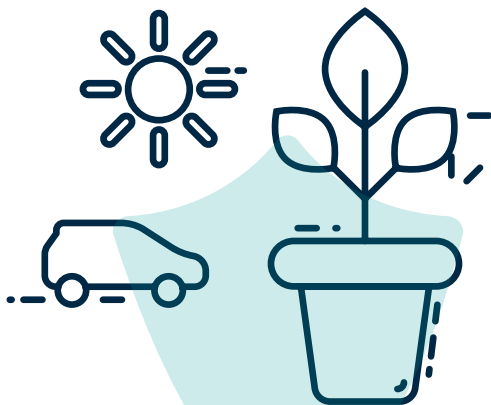
Innovation and the highest standards of environmental awareness go hand in hand. Marquardt therefore consistently pursues its self-imposed environmental protection goals and expects its business partners to be equally responsible members of society. Our business partners undertake to comply with all environmental protection laws and recognized environmental regulations.

ENVIRONMENTAL MANAGEMENT SYSTEM

Business partners with production sites maintain suitable environmental management systems, such as in accordance with ISO 14001 or ISO 50001 (energy management) or the European Union's EMAS regulation, or are at least developing in this direction.

WATER PROTECTION

Business partners must extract, consume and discharge water responsibly and contribute to the preservation of water and water quality. Drinking water must be used in a resource-efficient manner and wastewater must be handled properly in compliance with legal and official requirements.



SOIL QUALITY

The quality of the soil and natural environment must be protected by all business partners. Harmful changes to the soil and sealing of surfaces must be kept to a minimum and soil contamination must be avoided.

DECARBONIZATION AND AIR POLLUTION CONTROL

Marquardt can only succeed in keeping the air clean and thus improving air quality together with our business partners, which is why we expect them to pay attention to CO₂ emissions, record them and reduce them to a minimum.

CONSERVING RESOURCES

Our business partners should use ecologically compatible materials and technologies in accordance with the current state of the art and use natural resources sparingly and in an environmentally friendly manner in order to make a sustainable contribution to increasing energy efficiency and reducing waste, water consumption and emissions. Where possible, recycles and natural materials should be used.

PROTECTION OF BIODIVERSITY

Our business partners ensure that their business activities do not contribute to or benefit from the illegal conversion of natural ecosystems. This also applies to illegal deforestation and land use. Where there are risks in the value chains for the conversion of natural forests or other natural ecosystems, appropriate due diligence measures must be taken to ensure the long-term protection of these natural ecosystems, including the protection of natural and cultural values as well as biodiversity and species diversity.

ANIMAL WELFARE

Marquardt respects animal welfare and requires its business partners to implement standards and best practices in order to comply with nationally and internationally applicable regulations and ethical principles with regard to animal welfare.

WASTE DISPOSAL AND RECYCLING

Waste should be avoided, reused or recycled wherever possible. The principles of the circular economy must be observed. Waste, chemicals and waste water must be disposed of in a safe and environmentally friendly manner. In order to carefully classify, collect, store, condition and dispose of hazardous waste on site, we expect our business partners to have suitable waste management systems and procedures in place. Business partners must also ensure that no waste is disposed of illegally on the disposal route.

HAZARDOUS SUBSTANCES

When handling chemicals and other hazardous substances that are stored or processed on the company premises or are created during production, identification and labeling must be carried out in accordance with the statutory regulations and the provision of suitable storage areas and processing procedures as well as the instruction of employees must be ensured. Hazards arising from these substances, such as air and soil pollution, water pollution and other harmful effects, must be avoided as far as technically possible.



SOCIAL STANDARDS (S)

Marquardt expects all business partners to be aware of their social responsibility in the context of their professional activities and to comply with all applicable national and international standards for the protection of human rights.

By recognizing this “Marquardt Code of Conduct for Business Partners”, our business partners also undertake to comply with our “Declaration of Principles on Respect for Human Rights” and to provide information on compliance upon request.

The “Declaration of Principles on Respect for Human Rights” takes particular account of the defined principles of the “UN Guiding Principles on Business and Human Rights” and the “ILO Core Labor Standards”. These include, for example, the prohibition of child and forced labor, compliance with occupational health and safety, the prohibition of unequal treatment and discrimination, the principle of freedom of association and the guarantee of fair working conditions, as well as the protection of indigenous peoples.

COMPLIANCE AND GOVERNANCE (G)

In the context of corporate responsibility, integrity, transparency and fairness are key factors that must be taken into account not only by ourselves but also by our business partners in our day-to-day business.

CONFLICT MINERALS AND CRITICAL RAW MATERIALS

As part of our corporate duty of care, we expect our business partners to handle raw materials and input materials responsibly. The extraction of conflict minerals or critical raw materials, in particular tin, tantalum, gold, tungsten and the additional conflict minerals cobalt and mica, must be carried out responsibly and in a human rights-friendly manner in their countries of origin. In addition, suitable measures must be implemented that aim to reduce the risk of human rights violations and prevent the (in-)direct financing of armed conflicts.

We demand corresponding transparency from our business partners and oblige them to provide information on their procurement of conflict minerals and critical raw materials on request. This information must be provided at least on the basis of the latest version of the Conflict Minerals Reporting Templates (CMRT / EMRT) of the Responsible Minerals Initiative (RMI).

CORRUPTION

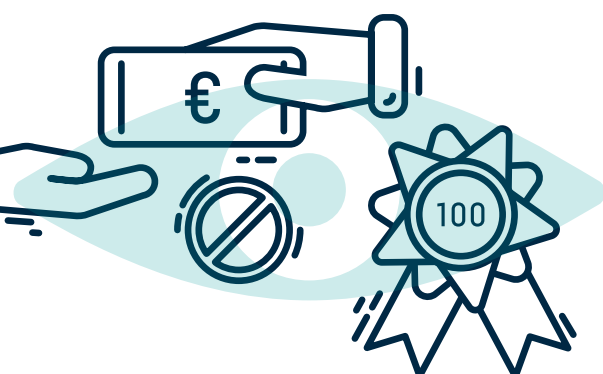
Business partners must strictly prevent and combat corruption, which is why bribes, kickbacks, improper donations or other improper payments or benefits to customers, public officials or other third parties may neither be granted nor accepted. Contributions to or from third parties that have an inappropriate influence and are outside the legal limits must not be tolerated.

MONEY LAUNDERING

Marquardt supports the international fight against money laundering and terrorist financing. We therefore expect all business partners not to violate any legal provisions relating to money laundering or the financing of terrorism and to maintain business relationships only with (sub) companies whose integrity and respectability the respective business partner is convinced of.

CONFLICTS OF INTEREST

Marquardt expects its business partners to avoid any appearance of extraneous considerations and conflicts between personal and business interests to the best of their ability. The decisions of business partners and their employees are to be made exclusively on the basis of objective criteria and free from the influence of personal interests and relationships.



TAX, CUSTOMS AND EXPORT CONTROL REGULATIONS

Marquardt's business partners who operate globally and maintain cross-border supply and business relationships recognize that cross-border business transactions are subject to certain restrictions, licensing requirements, prohibitions or other monitoring measures due to export controls. In this respect, business partners undertake to comply with all applicable regulations for the import and export of their goods, services and information as well as customs, foreign trade and tax law.



FREE COMPETITION

Marquardt's business partners unconditionally respect the globally applicable competition and antitrust laws for the protection of fair and free competition. For the benefit of all market participants, no anticompetitive agreements, either written or verbal, and no agreements on any other competition-relevant behavior with competitors, suppliers or customers are to be made. Nor may any existing dominant market position (if any) be misused.

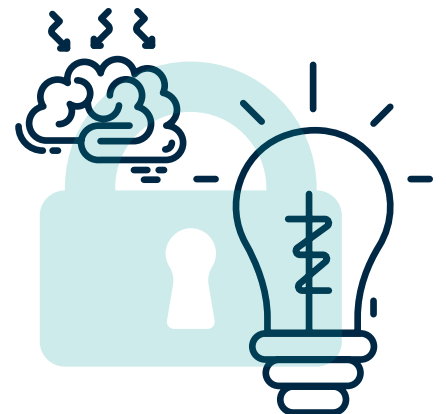
DATA PROTECTION AND DATA SECURITY

Marquardt's business partners must comply with the applicable data protection laws. The processing of personal data of customers, suppliers and employees is carried out exclusively for a specific purpose, in accordance with the principles of data avoidance and data minimization and in compliance with the statutory provisions.

With regard to IT and data security standards, Marquardt's business partners must ensure that all operating and processing locations where products intended for Marquardt are manufactured, processed or treated, stored and/or loaded or where services are provided for Marquardt are protected against unauthorized access by third parties as part of an intact, reliable and secure supply chain.

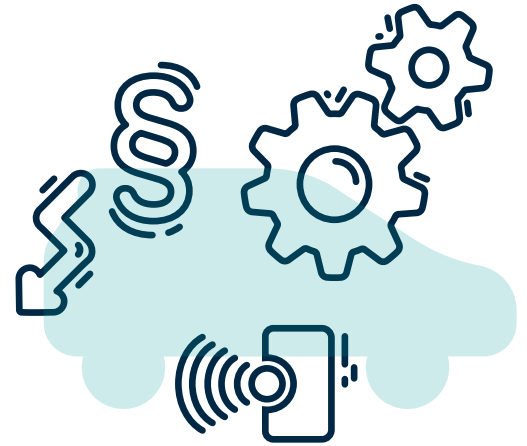
INFORMATION SECURITY AND PROTECTION OF INTELLECTUAL PROPERTY

Business partners of Marquardt undertake to always respect patents, trade and business secrets and know-how of Marquardt and/or other third parties and not to publish or pass these on to third parties without the express prior written consent of Marquardt. The use, further processing or marketing of plagiarized material will not be tolerated.



PRODUCT CONFORMITY AND SAFETY

The risks, disadvantages and dangers to the health and safety of customers and end users and to the environment resulting from the use of Marquardt products must be avoided as far as possible. The standards, legal and official regulations applicable to the products of our business partners, such as the requirements of REACH and RoHS or the Dodd-Frank Acts, as well as product safety standards and the labeling and packaging of products must always be complied with. Furthermore, a suitable chemicals management system must be implemented. Unforeseen deviations must be responded to immediately with suitable measures.

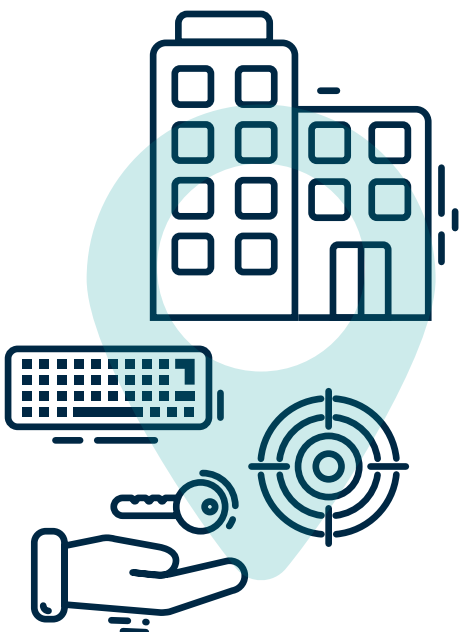


DEALING WITH PUBLIC INSTITUTIONS

If Marquardt's business partners maintain any business relationships with governments, authorities or public institutions, they must observe all valid and applicable legal requirements in this regard. If they participate in public tenders, the respective legal requirements and the rules of free and fair competition must be complied with. If a (potential) business partner is excluded from public tenders, Marquardt must be informed of this without being asked before an order is placed.

SENSITIVITY IN PURCHASING AND PROCUREMENT

Business partners of Marquardt must always select all their subcontractors and downstream business partners with whom they maintain business and supply relationships carefully and according to objective, factual criteria and in accordance with the principles of this "Marquardt Code of Conduct for Business Partners" and must also familiarize them with the principles contained in this "Marquardt Code of Conduct for Business Partners" and ensure compliance with them.



REPORTING CHANNELS FOR INFORMATION AND COMPLAINTS

We expect our business partners and their employees, as well as our own employees, to recognize and report unethical business practices at an early stage.

This requires attention and a willingness to point out possible violations if there are concrete indications. The business partners are obliged to set up a procedure for reporting misconduct within their sphere of influence so that violations of the principles of the “Marquardt Code of Conduct for Business Partners” can be reported to Marquardt. The business partners undertake to pass on access to the Marquardt whistleblower system to their suppliers and to ensure, as far as possible and reasonable, that the obligations are also passed on in their supply chain.

Marquardt offers various reporting channels for both external and internal reports and complaints regarding possible violations of laws or the “Marquardt Code of Conduct for Business Partners”.

Reports can be submitted via

E-MAIL compliance@marquardt.com

PHONE +49 7424 99-2002

WHISPERBOX at our locations

iWHISTLE (our electronic whistleblowing-system) via marquardt.iwhistle.de/en

The Whisperbox and the electronic whistleblowing-system iWhistle can be used to report information or violations anonymously.

The information is received and processed by the Corporate Compliance Department at the headquarter in Rietheim-Weilheim.

Individuals who make a report in good faith or report a violation will not be subject to retaliation. Their confidentiality will be protected to the fullest extent possible in accordance with the law and company policy and the requirements necessary to conduct an effective investigation.

IMPLEMENTATION AND COOPERATION

PARTICIPATION

As part of our business relationship, we rely on the support of our business partners, particularly with regard to working together to improve the human rights and environmental situation in global value chains. We therefore expect our business partners to provide us with all relevant information on request and to the extent permitted by law or contract. In addition, we expect cooperation and partnership on an equal footing in the event of information, identified risks or violations.

TRAINING

In order to ensure the implementation of the basic principles and compliance with this “Marquardt Code of Conduct for Business Partners”, business partners are required to provide their employees with demonstrable and continuous training in this regard and to make them aware of the relevant reporting channels and complaints mechanisms.

AUDIT

Marquardt reserves the right, in justified individual cases, to verify compliance with the basic principles set out in this “Marquardt Code of Conduct for Business Partners” with business partners by internal or external experts on site and to request access to the documents for this purpose and, if necessary, to make copies. The inspection of documents is limited to documents relating to the fulfillment of this Code of Conduct. Representatives of the business partner may be present at any time during such an inspection. Such an inspection shall also only take place after prior notice and during regular business hours and in compliance with applicable law, in particular in accordance with trade secret and data protection laws.

In any case, however, Marquardt reserves the right to use a self-assessment questionnaire (also from commissioned third parties, such as EcoVadis or NQC) to query compliance with the basic principles of this “Marquardt Code of Conduct for Business Partners” and the associated “Declaration of Principles on Respect for Human Rights” or to have this confirmed by the business partner.

REMEDIES AND LEGAL CONSEQUENCES

References to the validity of statutory provisions are for clarification purposes only. Even without such clarification, the statutory provisions therefore apply unless they are directly amended or expressly excluded in this “Marquardt Code of Conduct for Business Partners”.

Marquardt is entitled to amend this “Marquardt Code of Conduct for Business Partners” at any time and without giving reasons. Business partners will be informed of future changes in individual cases by electronic notification.

If a business partner violates the basic principles set out above, it is at the sole discretion of Marquardt to terminate the business relationship with its business partner in whole or in part by means of extraordinary termination if the continuation of a trusting business relationship is no longer reasonable. Unreasonableness is determined by the severity and possible repetition of the breach.

Notwithstanding this, Marquardt reserves the right to take alternative measures if and insofar as the business partner concerned can plausibly demonstrate that it has immediately remedied the breach and implemented suitable countermeasures to prevent future breaches in order to avert the aforementioned consequences.

In cases in which individual contractual obligations deviating from these principles have been agreed with the business partners, these shall take precedence.



MARQUARDT

Marquardt Management SE | Schloss-Straße 16 | 78604 Rietheim-Weilheim | Germany
Phone + 49 7424 99-0 | **Fax** + 49 7424 99-2399 | www.marquardt.com