



MÄRKISCHES WERK
The Next Level of Performance.®

Code of Conduct

for suppliers
and business partners



Preamble

For more than 160 years, Märkisches Werk GmbH ("MWH") has been a family-owned company, operating successfully in its global markets. Outstanding quality, reliability, and technical innovation have shaped the company's history and are the foundation of its global reputation and success, which we strive to maintain and strengthen. We see ourselves as part of a society committed to sustainable action. We define sustainable action as the interplay of economics, ecology, and society.

As a company, MWH bears responsibility towards customers, employees, shareholders, the public, and the environment by respecting fundamental ethical values, adhering to applicable laws, and using all resources sparingly at all times and in all locations. The collaboration with our suppliers and business partners is an integral part of our activities and contributes significantly to this endeavour.

With its company guidelines, MWH has established binding guidelines for responsible business conduct. The MWH Code of Conduct for suppliers and business partners has been derived from these guidelines and is based on the principles of internationally recognized standards for responsible corporate governance. These include, for example, the Universal Declaration of Human Rights, the United Nations Global Compact (UNGC), the UN guiding principles on business and human rights, the UN free & equal standards, the guidelines for multinational enterprises of the Organization for Economic Cooperation and Development (OECD), the international covenant on civil and political rights and on economic, social and cultural rights of December 19, 1966, and the core labour standards of the International Labor Organization (ILO).

MWH expects its suppliers and business partners (i.e., any contractual partner who supplies MWH with goods, materials, or services, hereinafter referred to as "supplier" or "suppliers"), as well as their employees, to act responsibly and commit to the basic principles set forth in this Code of Conduct. To the extent that national or international laws and regulations are more stringent than this Code of Conduct, they must be observed accordingly. If suppliers engage third parties (e.g., subcontractors or agents) within the scope of their business relationships with MWH, MWH expects these third parties to also adhere to these basic principles.

MWH reserves the right to inspect the supplier's compliance with the requirements listed below on a case-by-case basis after prior notice.



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1. Human and labour rights

Corporate responsibility entails the obligation to comply with the law and all applicable laws. MWH specifically expects suppliers to adhere to the following basic principles.

Human Rights / Free Choice of Employment

MWH's suppliers refrain from any form of forced labour and strictly condemn it in accordance with ILO Convention No. 29. Our suppliers do not tolerate any form of human trafficking or modern slavery, or support for them, in their supply chain.

Prohibition of Child Labor

Child labour may not be used at any stage of production or processing. Suppliers are required to adhere, as a minimum, to the International Labor Organization (ILO) conventions on the minimum age for employment and the prohibition of child labor.

No employees will be hired unless they are at least 15 years old, which must be verified by proof of age. In countries that fall under the developing country exception under ILO Convention No. 138, the minimum age may be reduced to 14 years. No employees may be hired for hazardous work unless they are at least 18 years old according to ILO Convention No. 182.

Equal Opportunities and Non-Discrimination

MWH's suppliers do not discriminate against anyone on the basis of ethnic, national, or social origin, skin colour, gender, religion, ideology, age, disability, sexual orientation, or political opinion, as long as these criteria are based on democratic principles and tolerance of dissent.

Freedom of Association

The fundamental right of all employees to form and join trade unions and employee representative bodies is recognized. Where this right is restricted by local law, alternative, lawful means of employee representation should be encouraged.

Product Safety

MWH's suppliers comply with all applicable product safety regulations and requirements, in particular the legal requirements regarding product safety, labelling, and packaging, as well as the use of hazardous substances and materials.

Workplace Safety and Working Hours

MWH's suppliers comply with applicable legal requirements for occupational health and safety. They support the further development and improvement of working conditions. Working hours must at least comply with the respective national legal requirements or the minimum standards of the respective national regulations. Economic sectors. MWH's suppliers also comply with the occupational health and safety requirements of the MWH site when operating there.



Minimum Wage

MWH's suppliers ensure that their employees receive fair remuneration that at least meets the legally valid and guaranteed minimum wage. In the absence of statutory or collective bargaining regulations, remuneration is based on industry-specific, locally customary, collectively agreed wages and benefits that ensure an appropriate standard of living for employees and their families.

2. Environmental and climate protection

MWH aims to make a significant contribution to environmental and climate protection. MWH specifically expects suppliers to adhere to the following basic principles.

Compliance with legal requirements

MWH's suppliers assume responsibility with regard to environmental protection concerns and adhere to all applicable national legal requirements regarding the environment and sustainability.

Increasing energy and resource efficiency

MWH's suppliers use natural resources sparingly and minimize environmental impacts in their production processes and products. Through emission reduction, reuse, and recycling measures, they contribute to decarbonisation and reducing energy consumption. They contribute to reducing energy consumption and CO2 emissions.

Establishment and implementation of environmental management systems

MWH's suppliers continuously improve their environmental performance. Suppliers with production sites implement appropriate environmental management systems (e.g., according to ISO 14001 or the European Union's EMAS regulation).

3. Transparent business relationships

Due Diligence to Promote Responsible Raw Material Supply Chains

MWH's suppliers comply with their due diligence obligations for a responsible supply chain for raw materials (e.g., Conflict Minerals). This includes improving transparency within their own supply chain up to the extraction of raw materials and implementing appropriate measures to reduce the risk of serious human rights violations, such as child and forced labour, slavery, and the direct or indirect financing of armed groups, in accordance with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.



MWH's suppliers avoid the use of raw materials originating from smelters and refineries that do not meet the requirements of the OECD Guidance on Supply Chain Due Diligence for Mineral Raw Materials from Conflict-Affected and High-Risk Areas. Upon request from MWH, information on the supplier or sub-supplier must be provided.

MWH reserves the right to withdraw from corresponding contracts in the event of the use of conflict minerals. Openness and transparency are key to credibility and trust in business transactions. MWH specifically expects suppliers to adhere to the following basic principles.

Avoiding conflicts of interest

Persons acting on behalf of MWH's suppliers make their decisions exclusively based on objective criteria and are not influenced by personal interests or relationships.

Prohibition of Corruption

MWH's suppliers do not tolerate corruption, bribery, threats, extortion, or other unfair business practices. They ensure that their employees, subcontractors, or agents do not give, offer, or accept bribes, kickbacks, improper donations, or other improper payments or benefits to customers, public officials, or other third parties, or engage in or tolerate other unfair business practices.

Gifts, Entertainment, and Invitations

MWH's suppliers will not, directly or indirectly, offer or solicit inappropriate benefits in the form of gifts, entertainment, or invitations to MWH employees or third parties. They will also not solicit or accept such inappropriate benefits.

Promotional and occasional gifts from suppliers to MWH employees must be of nominal value and reasonable in scope.

Invitations to dinner from suppliers must be for a business occasion, not occur unreasonably frequently, and the entertainment must be within the scope of normal business cooperation and be proportionate to the occasion.

4. Fair market conduct

MWH is a fair and responsible market participant and adheres to contractual obligations. MWH also expects this from its suppliers, in particular compliance with the following basic principles.

Free Competition

MWH's suppliers comply with applicable antitrust laws. In particular, they do not enter into anti-competitive agreements with competitors, suppliers, or customers and do not abuse any dominant market position they may have.



Export Control

MWH's suppliers ensure compliance with all applicable laws governing the import and export of goods, services, and information.

Money Laundering

MWH's suppliers only maintain business relationships with business partners whose integrity they believe in. They ensure that applicable anti-money laundering laws are not violated.

Business Information

MWH's suppliers publish business data and report on their business activities truthfully and in accordance with applicable laws.

5. protection of data, trade secrets and company assets

Confidential data, trade secrets, and company assets must be protected. MWH specifically expects its suppliers to adhere to the following basic principles.

Data Protection

MWH's suppliers comply with all applicable laws regarding the protection of personal data of employees, customers, suppliers, and other data subjects.

Protection of Know-how, Patents, Trade and Business Secrets

MWH's suppliers respect the know-how, patents, trade and business secrets of MWH and third parties. They will not disclose such information to third parties without MWH's prior express written consent or in any other impermissible manner.

Security of the International Supply Chain

MWH's suppliers must ensure that the operating facilities and transshipment points where goods intended for MWH are produced, stored, processed, loaded, and transported are protected from unauthorized access by third parties within the framework of a secure supply chain, and that the personnel deployed are reliable.

MWH's suppliers comply with all applicable laws regarding the protection of personal data of employees, customers, suppliers and other data subjects.



6. Whistleblower system

To give MWH's suppliers and business partners the opportunity to report potential violations of laws and regulations, potential employee misconduct, or violations of the Supplier Code of Conduct in our supply chain, MWH has set up a whistleblower system:

Um Lieferanten und Geschäftspartners von MWH die Möglichkeit zu geben, Hinweise auf mögliche Rechts- und Regelverstöße zu tätigen, um potenzielles Fehlverhalten von Beschäftigten oder Verstöße gegen den Code of Conduct für Lieferanten in unserer Lieferkette zu melden, hat MWH die Möglichkeit zur Meldung über ein Hinweisgebersystem eingerichtet:

- BY E-Mail To: Hinweisgeber@mwh.de
- By mail to: Märkisches Werk GmbH, Attn: Data Protection Officer, Haus Heide 21, 58553 Halver, Germany

This does not affect the statutory right to contact the relevant authorities. Your data will be treated confidentially in accordance with data protection regulations.

7. Legal consequences for violations of the Code of Conduct

If an MWH supplier fails to adhere to the basic principles set forth in this Code of Conduct, MWH is entitled to terminate the business relationship with that supplier by extraordinary termination. MWH may waive such consequences and instead take alternative measures if the supplier can credibly assure and demonstrate that it has promptly initiated corrective measures to prevent future violations.

Valid from: January 1, 2025



Supplier declaration

Regarding the Code of Conduct for Suppliers and Business Partners of Märkisches Werk GmbH

We have acknowledged and understood the content of the Code of Conduct for Suppliers and Business Partners of Märkisches Werk GmbH and its affiliated companies.

We expressly agree that the Code of Conduct for Suppliers and Business Partners published at <http://www.mwh.de/de/purchasing>, in its current version, forms the contractual basis for the existing business relationship between

(Company and adress) _____

and Märkisches Werk GmbH, Haus Heide 21, 58553 Halver, Germany.

By signing this document, the supplier undertakes to act responsibly and to adhere to the principles/requirements listed and to take all necessary precautions to implement the requirements.

(Place, Date) _____

(Name in block letters) (Function) (Signature) _____