

# **Code of Conduct for Business Partners**

## **Preamble**

As a member of the Kobold Group, Heinrichs Messtechnik GmbH is committed to its social responsibility in the context of its business activities. We have set ourselves the goal of offering our customers products that meet the highest quality standards, while adhering to the principles of legality, ethics and sustainability.

For this reason, Heinrichs Messtechnik has committed itself to a Code of Conduct (hereinafter referred to as "CoC") that is binding for all its business lines and employees<sup>1</sup>. We expect our business associates<sup>2</sup> to share our culture, values and business practices, to behave in accordance with our Supplier Code of Conduct, and to commit to just, ethical and sustainable behaviour when working with ourselves, and all companies of the Kobold Group.

Cologne, November 2024



Dr.-Ing. Sebastian Wenzel  
(Managing Director)

## **1. Basic understanding of socially responsible corporate governance**

This CoC is based on a common basic understanding of socially responsible corporate management. For the undersigned business partner, this means that he or she assumes responsibility by considering the consequences of his entrepreneurial decisions and actions in economic, technological, social and ecological terms and by achieving an appropriate balance of interests.

The undersigned business partner voluntarily contributes to the well-being and sustainable development of the global society at the locations where it operates, within the scope of its respective possibilities and scope of action. It is guided by universal values and principles - in particular integrity, honesty and respect for human dignity.

<sup>1</sup> \*Note: For reasons of better readability, the simultaneous use of feminine and masculine forms of speech has been avoided in the text and the generic masculine has been used. All personal designations apply equally to both genders as well as members of any gender.

<sup>2</sup> Business Associate means any individual, company or entity that supplies goods or services to Kobold Group companies.

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### 2. Scope

This CoC applies to all branches, business units and employees of the undersigned company that are involved in the entrepreneurial activity with the Kobold Group.

#### 2.1 Communication

The business partner communicates openly and dialogue-oriented about the requirements of this CoC and its implementation towards employees, customers, suppliers and other interest and stakeholder groups in its value chain.

All documents and records are dutifully prepared, not unfairly altered or destroyed and stored properly.

### 3. Cornerstones of socially responsible corporate governance

The business partner actively works to ensure that the values and principles mentioned below are observed and adhered to in a lastingly manner.

#### 3.1 Compliance with laws, rules and legal regulations

We expect our business partners to comply with all applicable laws, rules and regulations in the countries in which they operate. This also includes all laws with international validity. Particularly in the case of countries with weak institutional frameworks, it carefully examines which good business practices from their own home country should be applied in support of responsible corporate governance.

In this context, the business partner commits to the following principles:

##### 3.1.1 Compliance to Antitrust Legislations

The business partner undertakes not to restrict free competition and strictly adheres to all applicable antitrust laws. It will not participate in collusion in tenders, price-fixing, territorial division, customer allocation, price discrimination or other unfair trading practices.

##### 3.1.2 Compliance with anti-corruption regulations

The Business Partner undertakes to comply with all applicable anti-corruption laws and regulations<sup>3</sup> of the countries in which it operates, including the U.S. Foreign Bribery Act, the UK Bribery Act, the OECD Anti-Corruption Convention and all international anti-corruption conventions.

It promotes transparency, integrity and responsible management and control in the company in an appropriate manner, does not tolerate any form of active<sup>4</sup> or passive<sup>5</sup> corruption or in any way engages in obtaining an undue or unlawful advantage.

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<sup>3</sup> United Nations Convention against Corruption of 2003, in force since 2005

<sup>4</sup> Offering and granting benefits; Bribery

<sup>5</sup> Promoting and accepting benefits



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He undertakes to actively and resolutely take action against criminal or unethical influence on the decisions of employees of the Kobold Group, employees of other companies or public officials and to combat all forms of corruption as well as fraud, extortion and embezzlement in his company.

### 3.1.3 Money laundering

The business partners undertake to comply with the applicable legal provisions for the prevention of money laundering and not to participate in money laundering activities. It must not do business with persons, companies or organisations associated with terrorism or drug trafficking or where there is a suspicion that their funds have come from criminal activities.

### 3.1.4 Trade Compliance

The Business Partner undertakes to comply with services and goods on the basis of all applicable import and export controls, as well as customs laws and regulations in the countries in which it conducts business. Supplier must comply with all applicable economic sanctions, embargoes, and other laws enacted by its country that control the transfer or shipment of goods, technology, and payments, including embargoed or sanctioned countries and controlled products.

### 3.1.5 Conflicts

The Business Partner undertakes to avoid conflicts of interest or the appearance of a conflict of interest. It is the responsibility of the Business Partner to inform Heinrichs Messtechnik of any conflict of interest it may have in connection with the execution of its business relationship within the Kobold Group. A conflict of interest is not necessarily a violation of this Supplier Code, however a failure to disclose one in a timely manner shall always be considered a violation.

### 3.1.6 Compliance with data protection and protection of trade secrets

The business partner respects the required confidentiality in the use of personal data, protects sensitive information in all relevant processes and ensures compliance with applicable data protection laws.

The business partner undertakes to adequately protect all information and intellectual property of Heinrichs Messtechnik. In particular, the business partner must ensure that this confidential information is kept secret.

The business partner respects the intellectual property rights of third parties and protects entrusted trade secrets from unauthorized disclosure. This also includes the fight against plagiarism.

Any processing of personal data of Heinrichs Messtechnik employees, customers and business partners must be carried out in accordance with applicable data protection laws.

## 3.2 Integrity and Organizational Governance

The business partner bases its actions on universally applicable ethical values and principles, in particular integrity, honesty, respect for human dignity, openness and non-discrimination of religion, ideology, gender and ethics.

In this context, the business partner commits to the following principles:

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### 3.2.1 Respect for employees

The business partner is committed to the promotion of human dignity. It respects human dignity in accordance with the UN Charter of Human Rights<sup>6</sup>. It must ensure a safe, healthy and ergonomic working environment, all employees must be treated with respect and fairness and internationally recognised human rights as set out in the Universal Declaration of Human Rights and the standards of the International Labour Organization (ILO) must be respected.

In accordance with national and international laws, these include, but are not limited to:

- The personal dignity, privacy and rights of each individual must be respected,
- the prohibition of forced or compulsory labour, including all forms of modern slavery, such as the withholding of identity cards and passports, restrictions on movement and debt bondage<sup>7</sup>,
- the prohibition of trafficking in human beings,
- No inappropriate treatment of employees, such as harassment, violence, abuse or exploitation
- equal opportunities and treatment of all employees, regardless of nationality, ethnicity, gender, sexual identity/orientation, disability, age, religion, skin color, maternity, etc.<sup>8</sup>
- Protection and granting of the right to freedom of opinion and expression
- the prohibition of child labour
- Compliance with maximum working hours, as well as the prohibition of dangerous work for young workers under the age of 15, unless local legislation sets higher age limits<sup>9</sup>
- compliance with minimum wage regulations and in any case a living wage<sup>10</sup>,
- reasonable working hours, sufficient rest periods and overtime within the limits set by law<sup>11</sup>,
- Respect for the right to freedom of association, even in countries where this is not regulated by law<sup>12</sup>

### 3.2.2 Health and safety at work

The business partner must take responsibility for the health and safety of its employees. We expect our business partners to conduct their business safely and responsibly based on a systematic management approach.

The business partner is committed to creating a safe and healthy working environment that supports accident prevention and minimizes health risks to its employees and contractors. To this end, it shall include, in particular:

- inform employees in understandable language about identified hazards and the associated measures to minimize the hazards,

<sup>6</sup> Universal Declaration of Human Rights, UN Resolution 217 A (III) of 1948

<sup>7</sup> ILO Convention No. 29 of 1930 and ILO Convention No. 105 of 1957

<sup>8</sup> ILO Convention No. 111 of 1958

<sup>9</sup> ILO Convention No. 138 of 1973 and ILO Convention No. 182 of 1999

<sup>10</sup> ILO Convention No. 131 of 1970

<sup>11</sup> ILO Convention No. 106 of 1957 and No. 153 of 1979 / International Labour Organization

<sup>12</sup> ILO Convention No. 87 of 1948 and ILO Convention No. 98 of 1949



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- To carry out sufficient employee training for the prevention of work-related health disorders, e.g. fire safety, accident prevention, first aid or the handling of chemicals<sup>13</sup>
- Labelling of chemicals used according to the Global Harmonized System (GHS)
- to store chemicals in accordance with national regulations,
- to provide suitable protective equipment and protective clothing free of charge,
- take appropriate steps to remove pregnant women/breastfeeding women from high-risk working conditions;<sup>14</sup>
- install suitable fire protection equipment such as fire alarms and fire extinguishers,
- provide access to sanitation and drinking water,
- monitor and control work-related health hazards and the resulting protective measures.

### 3.2.3 Local Communities and Indigenous Peoples

We expect our business partner to respect and protect the rights of local communities and indigenous peoples, as well as their rights to applicable land, water and resources.

In particular, negative impacts of the business activities of business partners on the health, safety and livelihoods of local communities and indigenous peoples must be avoided. The business partner observes the prohibition of unlawful eviction of land, forests and bodies of water in the acquisition, development or other use of land or forests that serve as the livelihood of a person or municipality.

### 3.3 Raw and source minerals

The Business Partner undertakes to comply with due diligence procedures in order to avoid the risk of negative human rights and environmental impacts in its supply chain with respect to the relevant raw materials, in particular the conflict minerals tin, tantalum, tungsten and gold, as well as cobalt and mica, in order to be able to provide information on the origin and supply chain of conflict minerals.

<sup>13</sup> ILO Convention No. 155 of 1981 and No. 170 of 1990

<sup>14</sup> ILO Convention No. 183 of 2000

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### 3.4 Environmental and climate protection

We expect our business partners to conduct their business responsibly for the environment and to comply with all relevant laws and regulations, as well as national and internationally recognized environmental protection standards.

The business partner is committed to the efficient use of energy, water and raw materials, and is committed to reducing greenhouse gas emissions and providing information about its targets. It uses all natural resources (e.g. water, energy sources, raw materials) sparingly and conserves them in order to reduce its CO2 footprint. Negative impacts on the environment and climate caused by suppliers or in their supply chain must be minimized or eliminated at the source.

The business partner is committed to continuous environmental improvements, including the reduction of raw materials, energy, emissions, exhaust gases, noise, waste and dependence on natural resources and hazardous substances through clear targets and improvement measures at the company level.

The business partner strives to avoid the use of substances and materials with negative environmental or health effects and to find alternative environmentally friendly solutions. It also uses natural resources responsibly, in accordance with the principles of the Rio Declaration<sup>15</sup>, as well as the Minamata<sup>16</sup>, Stockholm<sup>17</sup> and Basel Conventions<sup>18</sup>.

Measures must be taken to minimise pollution and to make continuous improvements in environmental protection.

### 3.5 Reporting and Complaint Mechanism

Heinrichs Messtechnik expects the business partner to report events and violations of the Code, or to uncover information and findings on suspected violations of this Code and misconduct by its employees and suppliers, as well as to cooperate in their investigation. The Kobold Group has set up a web-based whistleblower system in which violations related to the above topics can be reported both openly and anonymously. This system can be used by both your employees and external whistleblowers, and we recommend that our business partners set up a similar system.

For the purpose of disclosure, one of the following whistleblowing channels can be used. Whistleblower office of the Kobold Group:

Internet: <https://koboldgroup.hinweisgeberexpertemeldeplattform.de>

Email: [info@hinweisgeberexperte.de](mailto:info@hinweisgeberexperte.de)

Telephone: +49 (0)89 21 52 74 33

Significant violations, as well as a failure to notify or insufficiently prosecute violations of the above-mentioned principles and standards, can lead to the termination of the business relationship without notice.

<sup>15</sup> The 27 principles of the "Rio Declaration on Environment and Development" of 1992 as a result of the United Nations Conference on Environment and Development in Rio de Janeiro.

<sup>16</sup> Protecting human health and the environment from anthropogenic emissions and mercury releases

<sup>17</sup> prohibition and restriction measures binding under international law for certain persistent organic pollutants

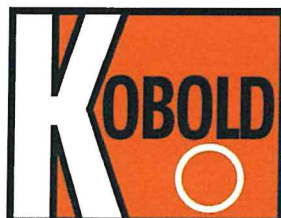
<sup>18</sup> control of transboundary shipments of hazardous waste

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### 4. Implementation and enforcement of this Code of Conduct

The Business Partner shall make all appropriate and reasonable efforts to continuously implement and apply the principles and values described in this CoC. Upon request, and within the framework of reciprocity, contractual partners shall inform on the essential measures so that it is clear how their compliance is fundamentally ensured. There is no entitlement to the disclosure of trade and business secrets, information related to competition or otherwise worthy of protection.

In the event of a violation of any of the requirements of this Supplier Code, Heinrichs Messtechnik may immediately terminate the supply relationship with this business partner. Violations of this Supplier Code should be reported confidentially to the above-mentioned whistleblower bodies.





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### Acceptance Declaration of this Code of Conduct

By signing below, we declare that we **have thoroughly read, understood and agree to comply with** the Kobold Group Code of Conduct for Business Partners.

Klicken oder tippen Sie hier, um Text einzugeben.

\_\_\_\_\_  
Name of the signatory (block letters)

\_\_\_\_\_  
Enterprise

\_\_\_\_\_  
Function of the signatory

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Company stamp

This declaration must be signed by an authorised representative of the business partner and sent to:

[qualitaetssicherung@heinrichs.eu](mailto:qualitaetssicherung@heinrichs.eu)

or

Heinrichs Messtechnik GmbH  
Compliance Officer  
Robert-Perthel-Straße 9  
50739 Cologne  
Germany