

Supplier Code of Conduct

Rev. 5

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1. Purpose and scope

This Supplier Code of Conduct (SCoC) serves as a binding guideline for responsible, ethical, and sustainable behavior within our supply chain. It sets out the SpiraTec Group's expectations of all business partners to ensure that our joint activities are in line with our principles of conduct, legal requirements, and international standards. The Supplier Code of Conduct applies to all suppliers, subcontractors, and service providers who work directly or indirectly for the SpiraTec Group. It applies to all business activities and interactions—from production and delivery to services. We expect our partners to be familiar with, respect, and actively implement this code, and to ensure that their own suppliers, subcontractors, and service providers also comply with the principles contained therein.

Our goal is to promote responsible, transparent, and sustainable cooperation that respects human rights, minimizes environmental impact, and ensures the highest standards of integrity and fairness. Compliance with this Code helps to reduce risks, strengthen trust, and protect the reputation of all parties involved.

Note: In this Supplier Code, "SpiraTec Group" or "SpiraTec" always refers to SpiraTec AG and all its affiliated companies.

2. Basic principles

The fundamental principles of our Supplier Code of Conduct form the basis of the principles of behavior that are essential for SpiraTec and its business partners. Together with our suppliers and service providers, we are committed to ethical behavior and sustainability in terms of legal, economic, ecological, and social responsibility. This includes long-term, trusting partnerships and compliance with all applicable laws and regulations. The responsibility for verification and compliance lies with the supplier. Our principles are based, among other things, on the following internationally recognized conventions and standards:

- Principles of the United Nations (UN) Global Compact
- Agreements of the International Labor Organization (ILO)
- Charter for Sustainable Development of the International Chamber of Commerce (ICC)
- SA8000 (standard for socially responsible corporate management)
- Dodd-Frank Act (conflict minerals)

3. Behavioral requirements

The behavioral requirements specify the expectations for responsible and legally compliant conduct in all business activities. The requirements form the basis for a trusting and long-term cooperation.

3.1 Business ethics

Compliance with legal regulations

We expect our suppliers to comply with legal regulations, respect human rights, and, in particular, preserve human dignity. This also includes compliance with all relevant legal regulations regarding the employment of employees. The supplier takes effective action against illegal employment and undeclared work and commits to SpiraTec to comply with all posting laws in the country of operation. This applies in particular to reporting requirements to government authorities and agencies. SpiraTec is allowed to ask for any proof of registration. In the event that residence and/or work permits are required in the country of operation, SpiraTec is entitled to obtain the current residence and work permits at any time.

Export controls and economic sanctions

The supplier undertakes to comply with all applicable national and international export control laws, sanctions, and embargo regulations. This includes, in particular, checking products, technologies, services, and business partners for possible trade restrictions and ensuring that no business relationships exist with sanctioned parties. The supplier must implement appropriate processes and control mechanisms to prevent violations of export control and sanctions regulations and to identify risks at an early stage.

Prohibition of corruption

SpiraTec does not tolerate any form of corruption from its suppliers, such as bribery, granting or accepting unlawful advantages, regardless of whether these are made directly or through intermediaries to private individuals or public officials. In particular, the offering (active bribery, granting of advantages) and acceptance (passive bribery, acceptance of advantages) of benefits for the purpose of obtaining an unlawful advantage are prohibited.

Fair competition

SpiraTec expects its suppliers to comply with international and national laws on fair competition. This includes provisions on unfair competition and antitrust laws. Agreements with competitors on prices, sales conditions, quantity restrictions, territorial divisions, or bids in public tenders, etc. are strictly prohibited.

Intellectual property

Suppliers shall protect SpiraTec's intellectual property, such as patents, trademarks, copyrights, designs, trade secrets, samples, models, and know-how, and shall respect the intellectual property of third parties. In particular, suppliers shall ensure that the products and services supplied to SpiraTec do not infringe the intellectual property of third parties. To this end, jointly signed non-disclosure agreements (NDAs) shall be observed where applicable.

Product safety

The services and products procured by SpiraTec from its suppliers do not pose a risk to people or the environment and comply with the agreed or legally prescribed standards regarding product safety. Suppliers are obliged to clearly communicate information on safe use.

Insurance

The supplier undertakes to take out and maintain all legally required insurance policies (in particular social security, accident insurance, and public liability insurance) as well as, if necessary, additional insurance policies related to the project order (e.g., installation insurance, transport insurance, professional liability insurance) in a proper and timely manner for the entire duration of the contractual relationship with SpiraTec. Upon request, the supplier shall provide SpiraTec with suitable evidence of the existence and validity of the aforementioned insurance policies at any time (e.g., insurance confirmations, guidelines, or proof of contributions). If the supplier uses third parties (e.g., subcontractors, temporary workers) to fulfill its contractual obligations, it shall ensure that they also have appropriate insurance coverage. SpiraTec is entitled to request suitable proof of this as well.

3.2 Working conditions and occupational safety

Health and safety at work

Suppliers must provide a safe and healthy working environment that complies with applicable legal regulations and international standards. This includes, for example, effective measures to prevent accidents at work, protect against fires, occupational diseases, and hazards from dangerous substances or machinery. Appropriate sanitary conditions, health, and safety guidelines must be in place and followed. In addition, suitable emergency plans must be in place. Regular training on occupational safety and health protection is mandatory.

Living wages / Fair working hours

SpiraTec expects its suppliers to be aware of their social responsibility towards their employees and to ensure that their remuneration and working hours are fair and appropriate. The supplier shall grant its employees the social benefits to which they are entitled by law or contract.

3.3 Human rights

Prohibition of forced labor and child labor

SpiraTec does not tolerate forced or child labor, either at its own facilities or at those of its suppliers. Suppliers must comply with the minimum age for admission to employment in accordance with the applicable national regulations. If no national legislation exists, the core labor standards of the International Labor Organization (ILO) agreements apply.

Prohibition of all forms of discrimination and harassment

SpiraTec does not tolerate discrimination or harassment and expects its suppliers to prohibit any form of unequal treatment within their organizations, for example on the basis of gender, marital status, race, skin color, origin, religious affiliation, sexual orientation, disability, political opinion, or other personal characteristics. In addition, suppliers are expected to value diversity, equality, and inclusion in

the workplace and to understand and respect different perspectives and backgrounds as enriching for cooperation.

3.4 Compliance

Compliance with laws

Compliance with all applicable laws and regulations is a fundamental requirement for working with SpiraTec. Suppliers are obliged to comply with all relevant national and international legal standards that apply to their business activities and the services they provide.

Prohibition of disciplinary measures

SpiraTec expects its suppliers not to punish employees physically or psychologically in any way. This applies in particular when employees report in good faith company practices that violate national, international, or internal regulations.

3.5 Data protection and information security

Data protection

Suppliers are obliged to comply with all applicable data protection laws. Personal data may only be processed for the intended purpose and may not be stored for longer than necessary. The rights of the persons concerned must be protected at all times, and data may only be passed on to third parties within the framework of the statutory provisions.

Protection of information

Suppliers must ensure the confidentiality of all SpiraTec business information. This includes, for example, technical data, contract content, prices, intellectual property, and all other confidential information.

Information security

Appropriate technical and organizational measures, such as access restrictions to data and IT systems, as well as internal guidelines, must be implemented to ensure that confidential information is not disclosed, misused, or manipulated without authorization. This includes, among other things, the use of firewalls, encryption, secure communication channels, and regular security checks. Suppliers must report security incidents or data breaches immediately and actively cooperate in their investigation. We also expect employees to receive regular training on data protection and information security.

For additional security, the SpiraTec Group may require the conclusion of non-disclosure agreements (NDAs). These serve to protect sensitive information and are an integral part of a trusting working relationship.

3.6 Environmental standards and environmental protection

Environmental legislation

SpiraTec expects its suppliers to comply with the applicable national environmental laws.

Prevention and reduction of environmental pollution

SpiraTec expects its suppliers to use the necessary resources, in particular materials, energy, and natural resources, effectively and to minimize environmental impact. This also applies to logistics/transportation costs. Waste is avoided or regulated as far as possible.

Responsible procurement of raw materials

SpiraTec's suppliers support activities that ensure responsible sourcing of raw materials. The procurement and use of raw materials that have been obtained illegally or through ethically reprehensible or unreasonable measures must be avoided. The use of raw materials such as conflict materials that are subject to embargoes or other import restrictions must be excluded. Suppliers are therefore obliged to identify these raw materials in manufactured products in the supply chain and to disclose the origin of the sources of the raw materials they use.

3.7 Financial responsibility

Reliability, transparency

SpiraTec attaches particular importance to the responsible handling of finances – both internally and in its interactions with business partners. The same is expected of suppliers.

Suppliers must ensure a solid economic basis and transparent financial practices in order to guarantee reliable cooperation. This includes, for example, compliance with all applicable legal regulations on accounting, tax, and financial reporting. We expect suppliers to have effective processes in place to prevent fraudulent practices such as balance sheet fraud, money laundering, or tax evasion. Payment obligations to employees, sub-suppliers, and business partners must be met on time and in full.

SpiraTec reserves the right to verify the financial integrity of suppliers in order to minimize risks in the supply chain.

4. Implementation, monitoring and responsibilities

Commitment to compliance

Compliance with the Supplier Code of Conduct is binding for all suppliers and business partners of the SpiraTec Group.

Audit and monitoring rights

SpiraTec reserves the right to monitor implementation of the Code. This may be carried out by SpiraTec itself or by commissioned third parties. If violations are detected, we expect immediate notification and the implementation of appropriate corrective measures.

Consequences of violations

We expect our suppliers to have effective processes in place and to review them regularly to ensure compliance with legal requirements and identify risks at an early stage. Violations of this Code, applicable law, or regulatory requirements can lead to serious consequences, such as the suspension of orders or the termination of the business relationship.

Reporting violations and whistleblower system

SpiraTec provides a whistleblower system through which suppliers and their employees can confidentially and securely report violations of this Code or applicable law. Reports can be made anonymously and will be treated as strictly confidential.

The whistleblower email address and other contact details are published on our website. We encourage all partners to report possible violations at an early stage so that we can work together to find solutions and minimize risks. Reports must not lead to discrimination or sanctions against whistleblowers.

Responsibilities

Compliance with the Supplier Code of Conduct is a shared responsibility. SpiraTec provides appropriate systems (e.g., whistleblower systems) and expects active cooperation in clarifying violations. Upon request, the supplier must provide all necessary information for an assessment in a correct and comprehensive manner.

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5. Confirmation of the SpiraTec Supplier Code of Conduct

As a SpiraTec supplier, by signing this document, you confirm that you have read and understood the SpiraTec Supplier Code of Conduct, that you accept it, and that you will fully implement and comply with its requirements.

Company name

Name of contact person and position

Place, date

Signature