PREAMBLE

What is important to us:
As a globally acting and successful company, we not only have a clear vision, but also a special responsibility.

These we also want to live in future. Even more determined and conscious.

The stable foundation of all decisions and all entrepreneurial activities are our values as well as the commitment to the applicable laws, compliance obligations and general accepted social and ethical principles.

Now they were written in writing in the Drahtwerk Elisental W. Erdmann GmbH - Code of Conduct, consisting of the Code of Conduct and the Joint Statement on Principles of Social Responsibility and their Obligation in the Ethics Guideline for Drahtwerk Elisental W. Erdmann GmbH.

This is also done with the aim of setting a standard with this code of conduct, which unites all employees of the Drahtwerk Elisental W. Erdmann GmbH.

The Code of Conduct is also an example of our self-understanding to think and act in the global Drahtwerk Elisental W. Erdmann GmbH - network.

In the Code of Conduct, the principles of conduct, which exist at the Drahtwerk Elisental W. Erdmann GmbH, are summarized and defined in the Ethics Guideline as the principles of social responsibility and obligation.

Both together form the „Drahtwerk Elisental W. Erdmann GmbH - Code of Conduct“. Completely valid. For everyone.

Both together serve the target of bindingly regulating, communicating, respecting and safeguarding the basic principles of human coexistence and work for all those who work with and for us. For the benefit of all. For the benefit of a goal-oriented and value-oriented management. And to the benefit of our business success, our employment security.

Guidelines and principles are only as good as the commitment behind them and must be fully integrated into everyday tasks.

We ask you to support us in this endeavor and to enable us to achieve our goals. If you have any questions about the Drahtwerk Elisental W. Erdmann GmbH - Code of Conduct or would like to draw attention to any maladministration, please take advantage of the possibilities offered by the Drahtwerk Elisental W. Erdmann GmbH Code of Conduct – through the supervisors or the management.

On the following pages you will find everything that is important and valuable for the compliance and realization of the Drahtwerk Elisental W. Erdmann GmbH - Code of Conduct: the Code of Conduct and the Ethics Guideline.

Drahtwerk Elisental W. Erdmann GmbH
Theo Wingen, Daniel Wingen

CONTENTS

- **Code of Conduct**
- Preamble

I. Basic Rules of Conduct

II. Our Relationship with Business Partners and third Parties

III. Avoidance of Conflicts of Interest

IV. Safeguarding of Company property, No Private Usage

V. Handling Information

VI. Environment, Safety and Health

VII. Internal Organisation, Guideline Implementation

VIII. Complaints and Comments

- **Ethics Guideline**
- Preamble

I. Targets

II. Implementation Principles

III. Escalation policy

IV. Final clauses

CODE OF CONDUCT

Preamble

This Code of Conduct as well as the principles of social responsibility and commitment are an expression of the self-understanding of the Drahtwerk Elisental W. Erdmann GmbH and the foundation for all internal and external actions of the company and its employees.

The Drahtwerk Elisental W. Erdmann GmbH is aware of its responsibility as an international and multicultural acting company and the associated social responsibility.

The success factors of Drahtwerk Elisental W. Erdmann GmbH are:

- Internal and external customer orientation
- Implement legal and regulatory requirements
- Cross-sectoral thinking and action
- Target and result orientation
- motivation and performance orientation as well as constant improvement and promotion

This Code of Conduct is a binding guideline for all employees and companies of the Drahtwerk Elisental W. Erdmann GmbH, worldwide, including the members of the management and the shareholders, the executives,

the employees, and all representatives of the operational Drahtwerk Elisental W. Erdmann GmbH such as consultants, agents and self-employed entrepreneurs, as well as those employed by the employees in the same function (eg temporary workers), and the supplier of the Drahtwerk Elisental W. Erdmann GmbH.

This Code of Conduct applies to all associated companies in the Drahtwerk Elisental W. Erdmann GmbH. If international law is contrary to this Code of Conduct, national law shall apply. Should a local commercial usage or local habit conflict with a regulation of the Code of Conduct, the Code of Conduct should be followed.

Each employee is required to act according to this Code of Conduct. Violations of these principles are not tolerated by Drahtwerk Elisental W. Erdmann GmbH. In case of doubt, the employees are trusting to their supervisor or the responsible management, who will treat the exchange as confidential.

The Drahtwerk Elisental W. Erdmann GmbH provides the Code of Conduct as a guide to the employees in order to recognize and deal with ethical and legal questions which may arise in connection with the activities for the Drahtwerk Elisental W. Erdmann GmbH.

The Drahtwerk Elisental W. Erdmann GmbH reserves the right to adjust or revise this Code of Conduct at any time. Each member of the Management Board, each manager, each employee, and other representatives of the Drahtwerk Elisental W. Erdmann GmbH are responsible for familiarizing themselves with the content of this Code of Conduct.

The Code of Conduct does not explicitly mention all the directives and regulations that are applicable in the Drahtwerk Elisental W. Erdmann GmbH, which continue to apply additional to this Code of Conduct.

I. BASIC RULES OF CONDUCT

1.1 Adherence to laws

The Drahtwerk Elisental W. Erdmann GmbH expressly complies with laws, statutes, as well as concluded contracts and expects the same from its business partners.

Each employee must comply with all applicable laws and regulations of the respective legal systems. Violations of the law, agreements or the Code of Conduct are not tolerated and may lead to labor sanctions.

1.2 Respectful conduct

The diversity of the people as well as a valued basic attitude and way of dealing with each other are the basis of the success of the Drahtwerk Elisental W. Erdmann GmbH.

The Drahtwerk Elisental W. Erdmann GmbH acknowledges and appreciates the personal and individual differences of all employees.

The Drahtwerk Elisental W. Erdmann GmbH strives to provide all employees with ambitious, meaningful and satisfying opportunities for personal and professional development.

All kinds of discrimination, sexual harassment, bullying or verbal abuse are not tolerated.

Interactions between each others are open and honest, characterized by respect, recognition and responsibility.

These principles apply both to internal cooperation as well as the cooperation with external partners.

1.3 Management, Responsibility, Supervision, and Integrity of the Company

Executives bear a special responsibility. It is their task to consciously live the success factors and to promote them accordingly among their employees

The executives ensure the success of the Drahtwerk Elisental W. Erdmann GmbH, take their special responsibility and live the success factors by actively promoting the awareness of customer orientation in their employees, always placing the interests of the Drahtwerk Elisental W. Erdmann GmbH above the interests of their own department, actively seeking and improving cooperation with other departments, and constantly developing their own department according to the company strategy.

They will strive the company's targets and success in a competent, offensively and consistently manner, inform their employees in time regarding all important issues in a comprehensive way, clearly and transparently delegate tasks, competencies, and responsibility, reinforce the identification with and loyalty to the company, develop and live an honest and open interaction among team members, regularly evaluate their employees in a fair manner, and challenge and assist each and every one of them as their coach.

Each executive will competently execute their organizational and supervisory duties and will be responsible for any legal violation occurring in their respective area of responsibility that could have been prevented or hindered by proper supervision. This also applies to the delegation of individual tasks.

The management principles, which have been prepared by management and the first management level, are bindingly observed and implemented at all management levels.

II. OUR RELATIONSHIP WITH BUSINESS PARTNERS AND THIRD PARTIES

2.1 Compliance with the legal requirements of Competition Laws

Stable business cooperation for the benefit of all can only be achieved with fair competition and strict adherence to the legal system.

Each employee is obliged to observe and comply with the national and international rules of fair competition and not to take any action that violates the cartel law. In particular, employees must not talk to competitors about prices or capacities.

The distribution of customers, territories or production programs is just as inadmissible as the submission of bids for tenders or the consultation with competitors about prices or a competition waiver.

2.2 Offering and Granting of Advantages

The Drahtwerk Elisental W. Erdmann GmbH convinces through the performance, quality, price and suitability of the offered products and services.

No employee may offer, promise, grant or approve any unauthorized benefits, directly or indirectly, to others in connection with the business activity, either in the form of money gifts or other services. (Kind)

Promotional gifts should be designed in such a way that their acceptance does not bring the recipient into some kind of obliging dependency. In case of doubt, the recipient is requested to have his / her supervisor approved in writing in advance.

The granting of ordinary occasional gifts of low value also requires the prior consent of the respective supervisor. In cases of doubt, the authorization of the responsible management is to be obtained.

There are no gifts to be given to authorities and other officials. Collaboration with authorized consultants, intermediaries or agents shall be based solely on contracts that ensure that they do not offer or provide unauthorized benefits and comply with local law and the requirements of the Code of Conduct.

2.3 Requesting and Accepting of Advantages

No employee may use his/her position to request benefits or let them be promised or accepted by him-/herself or a third party. They are permitted to accept customary occasional gifts of low value. If there are any uncertainties regarding gifts of a higher value, the respective employee must inform his supervisor of the offer made to him.

2.4 Invitations

The discussion and acceptance of invitations to events or business events (of small value) presupposes that they take place voluntarily, serve a legitimate business purpose and take place within the framework of ordinary cooperation.
In case of doubt, the approval of the supervisor must be obtained.

2.5 Donations

The management will decide on the award of donations.

2.6 Money Laundering

The Drahtwerk Elisental W. Erdmann GmbH supports all the necessary measures to prevent money laundering activities in their domain of influence, i.e. channelling illegally obtained money into the legal financial cycle with the aim of concealing the true origin.

2.7 Embargo and Export Control

The Drahtwerk Elisental W. Erdmann GmbH is committed to ensuring that its business activities never violate international embargo and export control laws established within or applied by the countries where it operates.

In cases where embargo legislation differ from one another, legal advice must be obtained and the issue then submitted to the general management of the company.

III. AVOIDANCE OF CONFLICTS OF INTEREST

The Drahtwerk Elisental W. Erdmann GmbH does its utmost to prevent its employees from being exposed to conflicts of interest or loyalty within the context of their business activities.

However, situations of conflict of interest between employees or persons close to them (family members) and the company may appear. In order to prevent such conflicts, the Code of Conduct establishes procedural principles to balance an employee's right to privacy and the interest of the company.

For this reason, employees will report any situation that may affect their professional objectivity and independence, such as secondary jobs and participations in the ventures of business partners or competitors.

These potential conflicts of interest will be examined by Drahtwerk Elisental W. Erdmann GmbH. There is not a compulsory disclosure requirement for purchases of exchange-traded assets or pure assets.

IV. SAFEGUARDING OF COMPANY PROPERTY, NO PRIVATE USAGE

The Equipment and operating resources provided by Drahtwerk Elisental W. Erdmann GmbH are treated economically, appropriately and carefully. Private use is excluded unless explicitly permitted in individual cases.
In case of doubt, the employee will ask his supervisor to do so.

V. HANDLING INFORMATION

5.1

The basis for a trustworthy and effective cooperation is the truthful and correct reporting within the framework of internal and external communication.

Press releases may only be published with the prior consent of the management or by the management officer. The same applies to the transfer of company-internal information to third parties.

For the competitiveness of the Drahtwerk Elisental W. Erdmann GmbH it is imperative that internal matters, sensitive and protective information are treated confidentially.

The obligation to maintain secrecy also applies after termination of the employment relationship. The Drahtwerk Elisental W. Erdmann GmbH takes into account the obligations with third parties to maintain confidentiality.

5.2

The Drahtwerk Elisental W. Erdmann GmbH is aware of the importance of information security for the company as well as for the individual employee and ensures effective protection through information security and data protection. Personal data are collected, processed or used only to the extent necessary for clearly defined purposes. Protection against unauthorized access to personal data and company data must be ensured.

The use of data must be transparent to the individual concerned, as well as the rights of information and correction as well as to objection, blocking and deletion.

VI. ENVIRONMENT, SAFETY, AND HEALTH

6.1

Environmental and resource protection as well as the prevention of waste and the recovery of valuable substances are a priority both within the framework of product creation, as well as during planning and production. This also takes into account the issues of air and water quality and the responsible use of chemicals.
We consider our facilities and the operating materials used, as well as their energy efficiency and their impact on energy-related performance.
The Drahtwerk Elisental W. Erdmann GmbH complies with the relevant environmental protection requirements. Malpractices are immediately removed.

6.2

The holistic implementation of occupational health and safety has a high priority. The Drahtwerk Elisental W. Erdmann GmbH is aware of the responsibility towards the employees and ensures the prevention of accidents, as

the employees in the daily work ensure a safe and healthy work environment. Within the framework of internal processes, compliance with the legal requirements and the establishment as well as maintenance of a safe working environment are guaranteed.
Any maladministration will be stopped immediately.

VII. INTERNAL ORGANIZATION, GUIDELINE IMPLEMENTATION

7.1

The application of the dual control principle, the separation of incompatible activities (separation of functions) and the strict specification for a complete documentation are components of the internal organization of the Drahtwerk Elisental W. Erdmann GmbH in order to avoid irregularities, especially in procurement and supply. Where appropriate and reasonable, alternative offers are collected. The financial sheets, balance sheets and other reports and records are duly drawn up and adequately reflect the transactions and financial circumstances, in accordance with the generally recognized accounting principles, which are recognized by Drahtwerk Elisental W. Erdmann GmbH. No accounts and/or books are kept outside the accounts.

7.2

All employees are regularly informed regarding the content, meaning and purpose of the Code of Conduct.

7.3

Compliance is, first and foremost, the individual responsibility of every employee. Every manager, executive and employee of the company has the personal responsibility to know and understand the Code of Conduct and the other policies of the company relevant to his or her job or position. Executives and employees who do not fulfill this responsibility or which violate the provisions of the Directive must be subject to disciplinary action and, where appropriate, legal consequences.

VIII. COMPLAINTS AND COMMENTS

In the event of questions or comments on the Code of Conduct or uncertainties regarding its application and interpretation, the employees should contact their supervisor, who then, after consultation with the management and, if necessary, legal support, makes a clarification. In the case of complaints or indications of a possible breach of the Code of Conduct, every employee should contact the supervisor by telephone, in writing or by e-mail, or the management of the Drahtwerk Elisental W. Erdmann GmbH who will treat this matter confidentially, if requested to do so. Employees who report a possible offense or the violation of the Code of Conduct in good faith have no reason to fear any disadvantages.

ETHICS GUIDELINE

Joint Declaration on Principles of Social Responsibility and Obligation of the Drahtwerk Elisental W. Erdmann GmbH.

PREAMBLE

The advancing globalization of commodity and capital markets allows transnational com-panies to create global production and distribution networks. This global network also entails a social responsibility and commitment to respect the basic principles of human coexistence and work.

The company management is committed to this social responsibility of the Drahtwerk Elisental W. Erdmann GmbH as a globally active company.

On the basis of a target-oriented and value-oriented management, the chances for the company and employment success are used and possible risks are minimized.
This is ultimately important for the international competitiveness and thus for the future security of the Drahtwerk Elisental W. Erdmann GmbH and its employees.

The company management is committed for the worldwide business of the Drahtwerk Elisental W. Erdmann GmbH to following objectives and implementing principles. The implementation is carried out taking account of the laws applicable in the various countries and locations as well as recognizing the different cultures.

I. TARGETS

The following basic targets and principles of implementation are inspired by the International Labour Organization's core labour standards and in addition to national legislations take account in particular of ILO Conventions No. 29, 87, 98, 100, 105, 111, 138 and 182.

The Drahtwerk Elisental W. Erdmann GmbH will comply with internationally recognized human rights.

1.1 Freedom of Choice for Employees

The employment in the Drahtwerk Elisental W. Erdmann GmbH is freely chosen. Forced and compulsory labor (including debt or involuntary detention) as defined by ILO Conventions No. 29 and 105 is rejected.

1.2 No Discrimination

Equality of opportunity and equality of treatment, irrespective of ethnic origin, skin color, gender, religion, nationality, sexual orientation, social background or political attitude, as far as these are based on democratic principles and tolerance against different thinking people, are used in the Drahtwerk Elisental W. Erdmann GmbH.
Employees are neither favored nor disadvantaged because of their membership in a trade union or company employee representation.

1.3 No Child Labour

On the basis of ILO Conventions No. 138 and 182, children must not be hindered in their development; their dignity is to be respected and their safety and health must not be impaired. The general guidelines on the minimum age for admission to employment are observed in the Drahtwerk Elisental W. Erdmann GmbH.

1.4 Freedom of Association

The right of all employees to form collective employee representatives and to conduct collective bargaining to regulate working conditions is acknowledged.

The Drahtwerk Elisental W. Erdmann GmbH and the respective employee representatives work in a trusting and constructive manner. Even in the case of contentious disputes, the aim is to maintain sustainable cooperation in the long term.

1.5 Remuneration

The remuneration in the Drahtwerk Elisental W. Erdmann GmbH respects the minimum legally guaranteed minimum rates, the minimum standards of the respective national economic areas and is oriented to the respective labor market, regardless of the gender difference.

1.6 Working Time

In the Drahtwerk Elisental W. Erdmann GmbH are the respective national regulations and agreements on working hours and on regular paid holiday leave respected.

1.7 Occupational Health, Safety and Environmental Protection

Occupational health, safety and environmental protection are an important feature of the corporate policy of the Drahtwerk Elisental W. Erdmann GmbH.

In the Drahtwerk Elisental W. Erdmann GmbH, occupational safety and health at work are ensured at least within national regulations. Health, workplace safety and the human right of working conditions are an important element of corporate policy.

A right to make proposals for the labor, health and environmental protection of the national workers‘ representatives is honored.

1.8 Qualifications

Employees of the Drahtwerk Elisental W. Erdmann GmbH are selected, hired and promoted on the basis of their job-related qualifications and skills.

A target oriented, continuous and demand-oriented qualification of the employees is supported in order to ensure a high performance level and high quality work.

II. IMPLEMENTATION PRINCIPLES

The objectives and implementation principles of this joint declaration are valid in the Drahtwerk Elisental W. Erdmann GmbH worldwide.

Like the guidelines laid down in the Code of Conduct, they form an integral part of the corporate culture and express the self-understanding of the Drahtwerk Elisental W. Erdmann GmbH and serve as the basis for internal and external action by the company and its employees.

2.1 Communication

The contents of this joint declaration are communicated in appropriate form within the respective country language within the Drahtwerk Elisental W. Erdmann GmbH. The type of information is discussed with the local employees within the framework of the overall communication strategy of the Drahtwerk Elisental W. Erdmann GmbH.

2.2 Involvement of Business Partners and Suppliers

The Drahtwerk Elisental W. Erdmann GmbH business partners and suppliers will be encouraged to introduce comparable principles in their corporate structures and to apply them in the context of their own corporate policy.

The Drahtwerk Elisental W. Erdmann GmbH expects its business partners and suppliers to apply these principles as a basis for mutual relations and considers this a suitable criterion for lasting business relations.

III. ESCALATION POLICY

In case of complaints or indications regarding a possible breach of this joint declaration, each employee should contact his/her supervisor, the works council, the human resources department or the management of the Drahtwerk Elisental W. Erdmann GmbH who will treat this matter confidentially, if requested to do so. Employees who report a possible offense or the violation of the Code of Conduct in good faith have no reason to fear any disadvantages.

As a company, it promises to protect anyone who stands up for our principles and to ensure that no retaliatory action is taken against them. We take all reported issues very seriously, conduct investigations and take appropriate action. Participation in illegal activities or undermining our principles may result in disciplinary or corrective action up to and including termination.

IV. FINAL CLAUSES

This guideline applies to all private individuals who are employed by Drahtwerk Elisental W. Erdmann GmbH or carry out work on its behalf, including subcontractors, temporary workers and agency workers.

This joint declaration shall take effect with the date of signature.
No individual claims or claims of third parties can be derived from it.
Only the German version of this declaration is binding.

Drahtwerk Elisental W. Erdmann GmbH
Theo Wingen, Daniel Wingen

Date / Release: 16.02.2026
The Code of Conduct is reviewed annually by the ESK.