

BWPARTS GmbH attaches great importance to maintaining a fair and transparent partnership with its business partners, which also includes compliance with laws and regulations, social responsibility towards our employees and the use of resources to protect the environment. We also place these requirements on our business partner network and therefore the following points are a basic prerequisite for our business relationship and must be practiced and actively lived by our business partners without restriction.

In addition to our endeavors, this action is required by our mutual customers and should also be in the interest of the social obligation of every company. BWPARTS GmbH reserves the right to take appropriate measures in the event of violations.

Scope of application

This Code of Conduct applies to all business partners and service providers, including their business partners, who work for us.

Compliance with laws and social norms

The business partner shall comply with the applicable laws and regulations of the respective applicable legal systems and shall also respect national customs, traditions and other social norms.

Prohibition of corruption, bribery and extortion

The business partner shall not tolerate any form of corruption, bribery or extortion and shall ensure that its employees do not offer, promise or grant any benefits to BWPARTS GmbH employees or related third parties with the aim of obtaining an order or other preferential treatment in the business relationship.

Export controls and economic sanctions

The business partner complies with all export controls and economic sanctions.

Enforce supplier standards with own Tier 1 suppliers

The business partner must ensure that the standards of BWPARTS GmbH are enforced at its Tier 1 suppliers

Transfer of standards along the supply chain

The business partner ensures that all standards are enforced along the supply chain. The rules of conduct should already be taken into account when selecting business partners. Any detected violations or already existing suspicions must be reported to the management of BWPARTS GmbH.

Rights of women

The business partner respects the fact that women have a right to political, economic and social equality. We ensure that women receive the best possible support and can realize their full potential.

Freedom of association and collective bargaining

The business partner shall ensure that freedom of association and the possibility of collective bargaining are guaranteed.

Diversity, equality and inclusion

The business partner is responsible for ensuring that all people are treated equally and that the principles of diversity, equality and inclusion are respected.

Financial responsibility (accurate records)

The business partner undertakes to keep proper accounts.

Avoidance of conflicts of interest

The business partner only makes decisions based on objective criteria. Conflicts of interest with private interests or other economic or other activities, including those of relatives or other related persons or organizations, are avoided from the outset.

Fair competition and antitrust law

The business partner behaves fairly in competition and observes applicable antitrust laws. Participation in agreements with competitors that violate antitrust law and the abuse of a dominant market position is prohibited.

Respect for the fundamental rights of employees

The business partner observes and respects international human rights and does not violate them.

The business partner respects the personal dignity, privacy and personal rights of each individual.

The employment relationships with the business partner are based on the free decision of the employees and were not concluded under duress.

The business partner respects and promotes equal opportunities and equal treatment of its employees. Any form of harassment, discrimination or disadvantage based on skin color, race, nationality, social origin, disability, sexual orientation, political and religious beliefs, gender and age is prohibited and will not be tolerated.

The business partner shall comply with the minimum standards laid down in the laws or international labor standards, in particular with regard to freedom of association, the prohibition of forced labor, the appropriateness and equality of remuneration (minimum wages), compliance with working hours, protection against discrimination, compliance with the minimum age and the prohibition of child labor.

Fair working conditions and human rights

Rights of children:

The Business Partner is against any kind of child labor and respects the rights of children and young workers m/f/d. All applicable laws and regulations regarding the minimum age for admission to employment and work must be complied with by the Business Partner.

Wages and benefits:

The business partner's remuneration (wages and salaries) and social benefits shall at least comply with international, national and regional legal provisions or comply with agreements.

Working hours:

The business partner must comply with all applicable regulations/laws regarding working hours and vacation.

Modern slavery / forced labor:

BWPARTS GmbH does not accept any form of forced or compulsory labor, including human trafficking.

Freedom of association:

Employees of the business partner may communicate openly with the management or respective department management about working conditions without fear of reprisals, intimidation or harassment.

Employees are also entitled to associate freely in accordance with the applicable national legislation.

Rights of minorities and indigenous peoples:

BW Parts respects the rights of minorities and indigenous peoples worldwide. We support the demands to protect the rights of indigenous peoples to preserve and develop their institutions, traditions, cultures and identities.

Guidelines on corporate ethics (according to QMH BW Parts)

Like its predecessor companies, the newly founded BWPARTS GmbH is also interested in sustainable customer relationships based on partnership and therefore strives to ensure this through product and service quality, reliability and competitive prices. Our suppliers, many of whom have been with us for many years, support us in this.

All employees are treated with respect and appreciation, regardless of their position, nationality or specialist knowledge. We see diversity as an opportunity.

The continuous suggestion scheme used in the company and constant communication with customers and suppliers is geared towards the continuous development and improvement of our products, services and processes. In this way, we can ensure the constant further development of the company and respond to customer requirements in a needs-oriented manner.

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Respect for the health and safety of employees

The business partner shall take care to provide a safe and healthy working environment, including adequate lighting and ventilation, appropriate room temperatures and sanitary and social facilities. In this context, the business partner shall observe the applicable occupational health and safety regulations and take appropriate preventive measures to avoid accidents at work, injuries and work-related illnesses. The business partner shall ensure that its employees are provided with appropriate specialist knowledge through regular instruction. The business partner shall practice effective and responsible hazardous substance management when using hazardous substances.

Compliance with the rules and obligations to protect whistleblowers

The business partner complies with the EU Directive on the protection of persons who report breaches of Union law (so-called "Whistleblower Directive").

Compliance with data protection, confidentiality

The business partner observes all relevant laws for the protection of personal data. The business partner shall also ensure the protection of trade and business secrets and shall only pass on confidential information after express written approval by BWPARTS GmbH.

Compliance with resource/environmental protection

The business partner observes the legal norms and international standards for energy/environmental protection. Environmental pollution must be minimized and operational energy/environmental protection must be continuously improved. The business partner shall ensure that its employees are instructed in sustainable behavior through regular training. The business partner is expected to use natural resources (e.g. water and raw materials) sparingly. The business partner should be committed to the development and use of climate-friendly products and processes to reduce energy consumption and emissions. The

business partner shall also develop and effectively implement measures to avoid waste. The production and use of chemicals must not have any significant negative impact on human health and the environment.

Land, forest and water rights and eviction

The business partner undertakes to refrain from unlawful appropriation of land, forest and water rights, based on the national and international laws for the respective location concerned, as well as unlawful forced evictions

Use of private or public security forces

The business partner shall ensure that the role of public or private security forces is to protect workers, facilities, equipment and property in accordance with the rule of law and guaranteed human rights.

Reduction of greenhouse gas emissions, animal welfare, soil quality and land use

The business partner undertakes to contribute to the reduction of greenhouse gas emissions as far as possible. At the very least, it must ensure that clear plans are pursued to reduce greenhouse gases. All negative consequences for animals, soil, forests and unnecessary emissions, including noise emissions, must be avoided.

Disclosure of information

When disclosing information on business activities, structure, financial situation and performance, the business partner undertakes to do so exclusively in accordance with the relevant regulations and standard practices.

The manipulation of records and the misrepresentation of conditions and procedures in the supply chain will not be tolerated

Plagiarism

The business partner undertakes to respect intellectual property protected by patent law and not to place any plagiarized products on the market

Appendix Supplements to the Supply Chain Due Diligence Act of BWPARTS GmbH (as of 10/2024)

1. the negotiating/contractual partners shall ensure that applicable law, including international agreements on human rights and environmental protection, is complied with in their supply/service chains.

2. the contractor (subcontractor/supplier) assures to comply with, the following human rights and environmental due diligence obligations and to address them appropriately along its supply and service chain for the respective contractual relationship with the client (general contractor/purchaser BWPARTS or DKS Group):

- no child labor, i.e. employment only from the age at which compulsory schooling ends according to the law of the place of employment, whereby the age of employment may not be less than 15 years.
- no forced labor, i.e. no work or service that is demanded of a person under threat of punishment and for which he or she has not volunteered.
- Compliance with the occupational health and safety regulations applicable at the place of employment, in particular appropriate provision and maintenance of the workplace, the workplace and the work equipment.
- Appropriate and suitable protective measures to avoid harmful effects from chemical, physical or

biological substances.

- Reasonable and appropriate measures to reduce excessive physical and mental fatigue.
- adequate training and instruction of workers
- respect for freedom of association, whereby workers are free to form or join trade unions the formation, joining and membership of a trade union shall not be used as a ground for unjustified discrimination or retaliation.
- trade unions may operate freely and in accordance with the law of the place of employment,

including the right to collective bargaining and strike equal pay for work of equal value and equal treatment in employment, in particular with regard to national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion or belief, unless unequal treatment is justified by the respective requirements of the employment

- no falling below the minimum wage set by the law applicable at the place of employment, no unlawful eviction or unlawful deprivation of land, forests and waters, the use of which ensures the livelihood of persons, in the production-related acquisition, development or other use of land, forests and waters
- adequate instruction and control when private or public security forces are used to protect production, to ensure that the prohibition of torture and cruel, inhuman or degrading treatment is observed, that life and limb are not harmed
- freedom of association and freedom of association are not impaired or prevented
- no harmful soil change, water pollution, air pollution, harmful noise emissions, water consumption that are likely to
- significantly impair the natural basis for the preservation and production of food
- impair, deny persons access to safe drinking water
- impede or deny persons access to sanitary facilities, harm the health
- of persons, no production of mercury-added
- products, no use of mercury and mercury compounds in
- production processes no treatment of mercury waste
- no production and use of persistent organic pollutants
- environmentally sound handling, collection, storage and disposal of persistent organic pollutants
- Export of hazardous waste in particular
- only to countries that have signed the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal
- only to countries that have not banned the import of hazardous waste in particular
- only to countries that have given their written consent to the respective import
- only to countries in which the hazardous waste is treated in an environmentally sound manner
- no import of hazardous waste in particular from countries that have not signed the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal

3. the contractor (subcontractor/supplier) shall...

- ...to train and educate its employees deployed for the respective contractual relationship with the agent (customer BWPARTS GmbH) to the extent necessary to enforce the contractual obligations mentioned under 2. above
- ...take appropriate account of the aforementioned human rights and environmental due diligence obligations when selecting direct suppliers and service providers for the respective contractual relationship with the client (general contractor/purchaser BWPARTS GmbH)
- ...take immediate and appropriate remedial action if a human rights or environmental violation of due

diligence obligations is imminent or has occurred in its own business or at a direct supplier or service provider in order to prevent, end or minimize the extent of such a violation

- ...immediately and, if possible, jointly develop and implement a concept with a concrete timetable for ending or minimizing a violation with a direct supplier or service provider if the violation of a human rights or environmental due diligence violation is such that the supplier or service provider cannot end it in the foreseeable future; the contractor (subcontractor/supplier) is entitled to do so with regard to the respective contractual relationship with the client (customer BWPARTS GmbH),
- ...to join forces with other companies within the framework of industry initiatives and industry standards in order to increase the possibilities of exerting influence on the perpetrator of an infringement
- ...temporarily suspend the business relationship with a direct supplier or service provider during efforts to minimize risk
- ...terminate a business relationship regarding a delivery or service for the respective contractual relationship with the client (customer BWPARTS GmbH) if it has significant influence over a supplier or service provider and the violation of a human rights or environmental due diligence obligation is considered very serious (e.g. the implementation of measures developed in a concept does not remedy the situation after a period of time specified in the concept has expired the contractor (subcontractor/supplier) has no other, milder means at its disposal, not even within the scope of exhausting its possibilities of influence, to report to the client (customer BWPARTS GmbH) on an ad hoc basis or at its request on all measures with which the contractor (subcontractor/supplier) has complied with its obligations described above under 2.
- ...inform the client (customer BWPARTS GmbH) immediately if the human rights or environmental risks for the respective contractual relationship with the client (customer BWPARTS GmbH) along the supply and service chain of the contractor (subcontractor/supplier) have significantly changed or deteriorated