

## **Code of Conduct**

### **Preamble**

We consider ourselves part of an internationally interconnected economy and, as a company at our locations, as part of the states and their societies in which Mittelmann Sicherheitstechnik GmbH & Co. KG operates. We embrace our corporate responsibility and adhere to the principles of the “honourable merchant”.

We monitor the direct and indirect impact of our business activities on the environment and society and aim to balance economic, ecological and social concerns in an appropriate way.

We act in accordance with generally recognized values and principles, comply with the law and, in particular, respect internationally recognized human rights and labour standards, as set out below.

We stand for the goals and content of the Code of Conduct and will make every appropriate and reasonable effort within the scope of our legal and practical capabilities to comply with the voluntary self-commitment at all our company locations in Germany and abroad on an ongoing basis. If national regulations conflict with the Code of Conduct or the domestic context makes it impossible to comply with it without restriction, we will seek ways to uphold the requirements of the Code of Conduct as far as possible.

### **Ethical / moral commitment and integrity**

We conduct our business in a lawful and ethical manner and maintain business relationships exclusively with reputable partners.

We act fairly and respectfully towards business partners and customers. We respect different legal, economic, social and cultural backgrounds and the particular circumstances of the countries and regions in which it operates. In doing so, we comply with the laws and regulations of the countries and regions in which business activities take place.

Mittelmann Sicherheitstechnik GmbH & Co. KG always bases its business activities on universal ethical values and principles, with integrity and respect for human dignity.

We rely on free and fair world trade.

### **Corruption, trade control, money laundering**

We oppose all forms of bribery and corruption. To this end, we avoid even the appearance of this whether in the form of granting or accepting unfair advantages. We act in accordance with the applicable regulations for import and export control and adhere to the legal requirements for the prevention of money laundering.

### **Fair competition**

We are committed to free and fair competition. We do not tolerate any anti-competitive agreements and ensure that the company acts in accordance with applicable antitrust laws. We reject competitive advantages gained through unfair business practices.

### **Handling of personal data, protection of confidential information and intellectual property**

We respect the personal rights of our employees, business partners and customers and, when handling personal information, comply with the applicable legal and official requirements for the processing of personal data and for information security.

We protect business secrets and other confidential information of our business partners and customers from unauthorized acquisition, use and disclosure, at least in accordance with the relevant legal provisions for the protection of business secrets. We respect intellectual property rights of our business partners, customers and other third parties and ensure that adequate precautions are taken to protect intellectual property rights when exchanging know-how and technologies.

### **Protecting consumer interests**

Insofar as products and services from Mittelmann Sicherheitstechnik GmbH & Co. KG affect consumer interests, appropriate measures are taken to ensure the safety and quality of the products or services. We ensure that the products or services comply with the relevant legal consumer protection regulations.

In the context of information and sales measures, we take consumer interests into consideration by applying the legal requirements for fair business, marketing and advertising practices and consumer education.

### **Protecting the environment and climate**

We take our ecological responsibility seriously by complying with the applicable legal requirements and recognized standards for protecting the environment and climate. Our environmental management system has been certified to ISO 14001 since 2019 and with its help we are working to continuously reduce the negative impact of our business activities on the environment and climate. We comply with applicable law and take appropriate measures based on legal and internationally recognized standards, covering the following topics, among others:

- Proper and responsible handling of hazardous substances, chemicals and waste, including their disposal
- Measures to reduce or avoid waste

- Minimizing emissions from operations (e. g. wastewater, exhaust air, noise, greenhouse gases)
- Conserving natural resources, for example by saving water, chemicals and other raw materials and promoting recycling
- Use of climate and environmentally friendly technologies, processes, raw materials and products
- Measures to increase energy efficiency and the share of renewable energies at the company's locations

### **Animal and species protection**

We adhere to the principles for the protection of animals and biological diversity and align our business activities accordingly. The keeping and use of animals must meet the applicable legal animal protection requirements and be species-appropriate. The Washington Convention on International Trade in Endangered Species is the guiding principle here.

### **Human rights and labour standards**

Human dignity is inviolable. Therefore, we respect the internationally recognized human rights enshrined in the United Nations Universal Declaration of Human Rights. We follow the internationally recognized labour standards of the International Labour Organization (ILO), as listed below. In all our business activities, we strive neither to cause nor to contribute to human rights violations. Mittelmann Sicherheitstechnik GmbH & Co. KG expects the same from its business partners. As far as necessary and possible, we support our suppliers in this.

### **Employment relationships**

We treat our employees with respect. We reject any form of unlawful punishment, abuse, harassment, intimidation, or other unworthy treatment of employees. We comply with the applicable labour law in all employment relationships and expects the same from our contractual partners. At the beginning of the employment relationship, employees are provided with comprehensible information about essential working conditions, including their rights and obligations, working hours, remuneration and payment and billing arrangements. We respect and protects employees' right to terminate their employment in compliance with the applicable notice period.

## **Rejection of child labour and protection of young workers**

We do not tolerate child labour and adhere to the applicable legal minimum age for employment. In any case, we do not employ persons under the age at which compulsory schooling ends according to the law of the place of employment or under the age of 15. Internships are organized in accordance with legal requirements.

Mittelmann Sicherheitstechnik GmbH & Co. KG expects its contractual partners to have adequate means of determining age to prevent child labour. If child labour is detected, all necessary measures must be taken immediately to focus on the well-being, protection and development of the child. For individuals under 18 years of age, the rights of young workers must be observed; they may only be employed if it is ensured that the working and employment conditions do not pose a risk to their health, safety or morals and are not harmful to their development.

## **Rejection of forced labour**

We reject all forms of forced or compulsory labour. This also applies to any form of debt bondage, servitude, slavery or slave-like practices, human trafficking and extends to all forms of involuntary labour and services that are incompatible with internationally recognized labour and social standards.

## **Principles of remuneration**

We apply the statutory or – where applicable – collective agreement provisions when remunerating work performance. We ensure that the applicable statutory minimum wage or the collectively agreed or industry-standard minimum wage, is paid to employees. In countries or regions without a statutory or collectively agreed wage framework, we ensure that the wages paid for a regular full-time job are sufficient to meet the basic needs of the employees. We do not tolerate any legally unauthorized wage deductions, including wage deductions as a disciplinary measure.

## **Working hours**

We comply with the statutory or applicable collective bargaining provisions for working hours, including overtime, rest breaks and vacation. We ensure that the regular weekly working hours plus the maximum possible overtime are not exceeded and that working hour regulations are observed.

### **Freedom of association**

We respect the right of employees to freedom of association and the right to form trade unions as well as the right to collective bargaining, insofar as this is legally permissible and possible in the respective country of employment. If this is not permitted, Mittelmann Sicherheitstechnik GmbH & Co. KG will endeavour to reach appropriate compromises for the benefit of its employees.

### **Diversity and inclusion, prohibition of discrimination**

We value the diversity of our employees and promote a working environment that enables inclusion. Therefore, we are committed to equal opportunities and reject any form of discrimination and unequal treatment based on national and ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or belief. We adhere to the principle of equal pay for male and female workers for work of equal value.

### **Health and safety at work**

We comply with national and international occupational health and safety standards. We ensure a safe and healthy working environment (preventing accidents, injuries and work-related illnesses) to maintain the safety and health of our employees and third parties.

### **Management**