

CODE OF CONDUCT FOR BUSINESS PARTNERS OF J.W. OSTENDORF

Acting responsibly. Growing together.

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Values and Expectations of J.W. Ostendorf

J.W. Ostendorf is a family-oriented company built on strong values and business principles, working with numerous partners across the globe. We see ourselves as a reliable partner for industry and trade, distinguished by a clear focus, high agility, and a strong service mindset. Thanks to our outstanding research and development capabilities, we are committed to making our products increasingly sustainable and resource-efficient.

We believe it is vital that all our business partners uphold our high ethical standards and integrity, and work with us to ensure they are maintained.

This Business Partner Code of Conduct sets out what we expect from you as a partner of our company. Regarding human rights, labour law, environmental protection, and anti-corruption, the Code refers to the ten principles of the UN Global Compact. J.W. Ostendorf is committed to these principles and integrates them into our business practices. Further details can be found in our Statement of Principles on Respect for Human Rights.

As a business partner of J.W. Ostendorf, we expect you to actively implement the standards outlined in this Code within your own operations—if you are not already doing so—and to require the same from your own partners.

Scope and Compliance

The Business Partner Code of Conduct applies to all our partners, regardless of the country or region in which they operate. If local laws, regulations, or standards exceed the principles and requirements set out here in scope, content, or reach, we expect you to comply with the stricter provisions.

Compliance with Legal Requirements

In addition to adhering to the principles outlined in this Code, we expect you to respect and comply with all applicable laws, regulations, and industry standards. Should there be any conflict between a law, regulation, or standard and the principles stated here, you must inform us so that we can work together to find an appropriate solution.

Principles of the J.W. Ostendorf Business Partner Code of Conduct

Health and Safety

At J.W. Ostendorf, workplace health and safety is a top priority—and we expect the same from our business partners. You must comply with all applicable health and safety regulations, provide a safe and healthy working environment, and strive to prevent workplace accidents.

If you work with hazardous goods or substances, you must ensure that all associated risks are properly controlled and managed in a safe manner. This includes, in particular:

- Implementing safe procedures for handling hazardous goods and substances, with relevant guidelines readily available in the workplace.
- Ensuring safety information, including safety data sheets, is easily accessible.
- Providing appropriate training and personal protective equipment to employees who may come into contact with hazardous goods and substances.

Bribery and Corruption

J.W. Ostendorf is committed to conducting business honestly and fairly, prohibiting bribery, corruption, extortion, and fraud. As our business partner, we expect you to operate in a fair, transparent, and lawful manner and to avoid any involvement in bribery. This includes giving, soliciting, or accepting bribes, as well as engaging in improper payments or corrupt practices.

Any favours extended to J.W. Ostendorf employees or their close relatives must be reasonable in scope, value, and frequency, and in line with customary local business practices. Under no circumstances may cash or cash equivalents (including gift vouchers) be offered to J.W. Ostendorf employees. The publicly available employee Code of Conduct, including rules on gifts and applicable value limits, must be respected.

Political Donations, Charitable Contributions, and Sponsorships

J.W. Ostendorf does not support political organisations and never uses charitable or commercial sponsorships to improperly influence decision-makers. Accordingly, we expect our business partners to refrain from political contributions and to avoid making charitable donations or sponsorships with the intent of gaining an unfair advantage or influencing decisions related to transactions with J.W. Ostendorf.

Conflicts of Interest

At J.W. Ostendorf, all business dealings are conducted objectively and free from personal interests or preferences. We expect our business partners to act transparently in their business decisions and transactions with us to prevent potential conflicts of interest. If an employee of J.W. Ostendorf directly involved in our business dealings—or a close relative of such an employee—has a (potential) significant economic or personal interest in your company, you must inform J.W. Ostendorf of this situation.

Fair Competition

J.W. Ostendorf is committed to the principle of fair, open, and unrestricted competition and conducts its business exclusively in a fair and lawful manner. We expect our business partners to comply with all applicable competition and antitrust laws and to refrain from any anti-competitive practices, such as price-fixing, profit-sharing, market allocation, production restrictions, bid rigging, collusion in tenders, or similar activities.

Company Assets, Intellectual Property, and Confidential Information

J.W. Ostendorf strives to protect company assets, intellectual property rights, and confidential information, as these represent significant value for us and our partners. Accordingly, we expect you to exercise due

care to ensure that confidential information belonging to J.W. Ostendorf is not disclosed to unauthorised third parties. Furthermore, we expect you to safeguard J.W. Ostendorf's assets and comply with all laws relating to intellectual property rights. As a business partner, you must never knowingly infringe the intellectual property of J.W. Ostendorf or any other party.

Accounting

Accurate and complete record-keeping is fundamental for J.W. Ostendorf. As our business partner, you must also comply at all times with all applicable laws, regulations, and accounting standards relevant to your business.

International Sanctions and Export Controls

J.W. Ostendorf adheres to applicable international sanctions and export control restrictions and takes appropriate measures to ensure compliance. We expect our business partners to do the same and to fully comply with all relevant international sanctions and export control requirements.

Anti-Money Laundering

J.W. Ostendorf is not involved in any money laundering activities and does not tolerate such involvement. As our business partner, you must have adequate internal control systems in place to monitor your business for signs of money laundering, thereby minimising the risk of becoming involved in such practices.

Equal Opportunity

J.W. Ostendorf believes that diversity and inclusion are key to success. We expect our business partners to provide a working environment that fosters inclusion and ensures that every individual—regardless of nationality, ethnicity, language, skin colour, age, gender, social background, status, property, obligations, professional position, religion, personal opinion, education, sexual orientation, gender identity, health status, or any other status recognised by international law—is treated with respect.

In addition, you are expected to actively work to prevent any form of discrimination and harassment in the workplace.

Workplace Rights

J.W. Ostendorf respects the rights of employees in the workplace. We expect our business partners to support their employees' right to freedom of association and to recognise their right to join a trade union or other collective bargaining organisation. Employees must receive fair wages for their work and have the opportunity to take breaks and paid leave in accordance with local legislation.

Child Labour

J.W. Ostendorf never employs children. This requirement also applies to subcontractors and other business partners. You must ensure that neither your own operations nor those of your suppliers involve child labour. Unless stricter national laws apply, the minimum age for employment is 15 years. In rare cases, and only where permitted by national law, children under 15 may perform light work that does not negatively affect their education or personal development. Employees under the age of 18 must not work night shifts and should not handle hazardous goods or substances.

Forced Labour

J.W. Ostendorf rejects all forms of forced labour and expects its business partners to grant employees freedom of movement during their employment. Personal documents, such as passports, and/or wages must not be withheld with the intent of restricting this freedom or promoting involuntary or forced labour.

Environment

At J.W. Ostendorf, we care about the environment and support environmental protection through responsible action. As a business partner, you should always comply with applicable environmental legislation and strive to minimise your environmental impact. This includes identifying areas where your environmental footprint is greatest and continuously seeking improvements (e.g., waste reduction, energy efficiency, recycling).

Contact Person and Internal Reporting Office

If you have any questions or suggestions regarding this Code of Conduct, the Compliance Officer at J.W. Ostendorf is available to assist you at the contact information listed below. As a responsible company, we encourage our business partners and their employees to report any suspected cases of potentially unethical or unlawful behaviour related to J.W. Ostendorf.

For this purpose, all business partners of J.W. Ostendorf GmbH & Co. KG can contact the Compliance Officer and Ombudsman, who act as the internal reporting office. All information will, of course, be treated confidentially. You can reach them at the following contact details:

Compliance Officer Services Legal
Lawyer Stephan Rheinwald

Telemannstraße 22

53173 Bonn
Germany

Phone: +49228 / 35036291

E-Mail: s.rheinwald@cos-legal.eu

Shaping the Future Together: Transparency and Partnership

Shared Values as the Foundation of Our Partnership

The J.W. Ostendorf Business Partner Code of Conduct applies to all our business partners, and compliance is mandatory. Our decision to work with you as a business partner is based not only on the quality, price, and professionalism of your services or products, but also on your respect for our commitment to conducting business ethically, sustainably, and responsibly in accordance with this Code.

Assessment and Review

We may ask certain business partners to work openly and transparently with us so that we can assess compliance with the J.W. Ostendorf Business Partner Code of Conduct. Such an assessment initially involves J.W. Ostendorf collecting data related to the Code in dialogue and agreement with you. Optionally, we may request additional information through a detailed self-assessment questionnaire. Under certain circumstances, we may conduct an on-site review and, if necessary, jointly initiate improvement measures.

Possible Actions Following Review or Discovery of Non-Compliance

If J.W. Ostendorf—through a review or otherwise—determines that a business partner has repeatedly or seriously violated the Code, we expect that partner to engage in constructive dialogue aimed at developing and implementing appropriate corrective measures. If the Code continues to be repeatedly or seriously disregarded, we reserve the right to terminate our business relationship or suspend further dealings until we are satisfied that sufficient progress has been made regarding corrective actions.

Legal Documentation

J.W. Ostendorf may require business partners to agree to the inclusion of appropriate, legally binding clauses in contractual documents to ensure adherence to the principles and, where applicable, procedures set out in this Code.

Questions and Answers

If you have any questions or suggestions regarding specific aspects of the J.W. Ostendorf Business Partner Code of Conduct, please contact your designated representative within our company or reach out to the Compliance Officer at J.W. Ostendorf using the contact details provided on page 7.

Imprint

J.W. Ostendorf GmbH & Co. KG

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