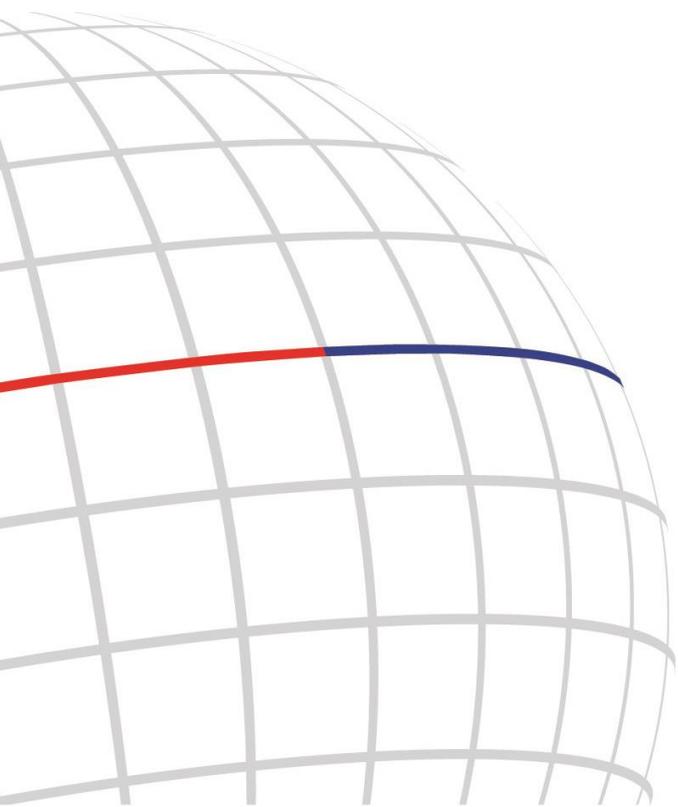


Business Partner Code of Conduct

Last update: July 2021



Fire Protection.

This Business Partner Code of Conduct describes what the Minimax Viking Group expects from the cooperation with suppliers, subcontractors, consultants, sales agents and other suppliers of goods and services (hereafter referred to as the “business partners“), this especially being with regard to the safeguarding of human rights and environmental protection, the observing of ethical standards, the applicable law and integrity. We expect from our business partners that they implement and adhere to the principles stated in this codex in all of the business areas on a global scale. Based on the Minimax Viking Group Code of Conduct, with this Business Partner Code of Conduct, we have the aim of implementing the principles of the International Labour Organisation (ILO), those of the United Nations Global Compact and national and international acts of law and branch standards, in our upstream supply and service chain. This Minimax Viking Business Partner Code of Conduct serves as a basis for all of the contractual relationships of all of the group companies around the world.

With this Business Partner Code of Conduct, we have the following expectations as far as our business partners are concerned:

Safeguarding of Human Rights and Creation of Fair Working Conditions

A human rights risk in the meaning of this Business Partner Code of Conduct is a situation by which facts exist that could result in an infringement of one of the following with a high degree of probability:

1. Child labour

The business partners of the Minimax Viking Gruppe strongly condemn child labour in all forms and the recommendations made in the conventions of the International Labour Organisation (ILO Treaty) are adhered to with regard to the minimum age of workers. Our business partners obligate themselves to adhering to the following requirements and prohibitions:

- the prohibition of the employing of a child aged under the age with which compulsory education terminates according to the law of the place of employment, whereby the age of employment is not to be lower than 15; this is not the case if the law of the place of employment should deviate from this in agreement with ILO Treaty No. 138¹;
- the prohibition of the worst form of child labour for children aged under 18; these comprise the following pursuant to ILO Treaty No. 182²:
 - a) all forms of slavery or all slave-like practices such as the selling of children and trading with children and serfdom, including the compulsory or obligatory recruiting of children for use in armed conflicts;
 - b) the use, placement or offering of a child for prostitution, creation of pornography or for pornographic presentations;
 - c) the use, placement or offering of a child for unlawful activities, especially for the obtaining from and the dealing with drugs;
 - d) work that is of a nature or that is connected to circumstances under which it is carried out, can be expected to pose a hazard to the health, safety, or morality of children.

2. Forced labour and involuntary prison labour

The Minimax Viking Group business partners do not tolerate the use of forced labour and involuntary prison labour. Our business partners obligate themselves to to adhering to the following requirements and prohibitions:

- the prohibition of the employment of persons in forced labour; this comprises all work or services that are demanded from a person with a threat of punishment or work for which they have not volunteered as a result of debt slavery or human trafficking; exceptions from forced labour are work

or services that are conform with ILO Convention No. 29³ or with the International Pact regarding Civil or Political rights⁴;

- the prohibition of all forms of slavery, slave-like practices, serfdom, or other forms of exercising of rule or oppression in the environment of the workplace, as a result of extreme economic or sexual exploitation and humiliation, for example.

3. Occupational safety

The business partners ensure that the health, safety, and morality of the employees are not impaired at the place of work or at all other places where the production or work is carried out. The disregarding of the occupational safety regulations that have validity at the place of employment, is prohibited should this pose a risk of accidents occurring during the work or of work-related risks occurring, especially as a result of:

- obviously inadequate safety standards by the provision and maintaining of the place of employment, the workplace, and the work equipment,
- a lack of suitable protective measures in order to provide protection against the effects of chemical, physical or biological substances,
- a lack of measures designed to prevent excessive physical and/or mental fatigue, especially resulting from an unsuitable work organisation in terms of working hours and breaks, or
- and inadequate training and instructing of employees.

4. Freedom of organisation and coalition

The right and entitlement of the employees to a freedom of organisation and coalition, are recognized and respected by our business partners. There is also a prohibition of the disregard for the right to form a coalition, according to which:

- employees are free to establish trade unions or join them,
- the establishing, joining and membership in a trade union is not to be used as a ground for unjustified discrimination or retaliatory measures and
- trade unions can act freely and in agreement with the law of the place of employment; this also includes the right to strike and the right to conduct collective bargaining negotiations.

5. Unequal treatment and discrimination

Our business partners respect human rights. Each form of harassment or discrimination of employees is not acceptable. There is a prohibition of unequal treatment in employment, such as on the grounds of national and ethnic origin, social origin, health status, disability, physical abilities, sexual orientation, age, gender, political opinion, religion, ideology, nationality, skin colour, trade union membership or marital status, as long as such is not justified by the nature of the employment; unequal treatment especially concerns itself with not paying an equal wage for work of the same quality.

6. Reasonable wage

The employees of our business partners are at least to be paid the minimum wage in agreement with the pertinent laws and regulations, in addition to all the statutory social benefits. All the employment conditions, remunerations, hours of work, days holiday, leave, and public holidays that are conform with the valid laws and regulations, in addition to the obligatory branch standards. The withholding of a reasonable wage is not permissible. The minimum wage is at least to be the minimum wage that is stipulated in the applicable laws and is otherwise calculated conform with the regulations that have validity at the place of employment.

7. Protection of the natural habitat

Our business partners obligate themselves to observing the prohibition of the causing of a damaging soil alterations, water pollution, air pollution, noise emission or an excessive water consumption that

- considerably impairs the natural foundations for the retention and production of food,
- prevents a person from gaining access to impeccable drinking water,
- makes it more difficult for a person to gain access to sanitary systems or prevents the same, or
- damages the health of a person, in addition to

the prohibition of the unlawful forced eviction and the prohibition of the unlawful confiscation of land, forests, and bodies of water, during the acquiring, development, or other use of land, forests, and bodies of water, that secure the livelihood of a person, at all times.

8. Physical integrity and safety

Our business partners obligate themselves to observing the prohibition of the commissioning or use of private or public security forces for the protection of the entrepreneurial project, should the following occur as a result of a lack of instruction or control by the business partner when deploying the security forces:

- the prohibition of torture and brutal, inhuman, or humiliating treatment is not observed,
- life and limb are injured or
- the freedom of association and coalition are impaired.

Our business partners also obligate themselves to not acting or to acting respectively over and above the prohibitions stated under numbers 1 to 8, should such be directly suitable in an especially serious way for the impairing of a protected legal position, whereby its unlawful nature would have been obvious if all of the circumstances had been reasonably considered.

Fulfilment of Environment-related Duties of Care

An environment-related risk in the sense of this Business Partner Code of Conduct is a situation whereby there is a sufficient likelihood that an infringement of one of the following is expected to occur due to the existence of real circumstances. The business partners of the Minimax Viking Gruppe obligate themselves to adhering to the following requirements and prohibitions:

1. All products and services are to be supplied and provided by our business partners respectively conform with valid environmental, quality and safety standards according to the corresponding contractual agreements, their use for their intended purpose also being ensured.
2. Our business partners have a high degree of environmental and safety awareness, and they conduct their business in a sustainable, safe, and environmentally friendly manner. They especially keep burdening environmental impacts to a minimum, make careful use of natural resources and act in accordance with the with the environmental laws and directives.
3. Our suppliers ensure that no products are delivered that include minerals that have been obtained in order to finance or support non-governmental groups and armed conflicts (including in the DR of the Congo and its bordering countries and in other conflict and high-risk areas) (conflict minerals).
4. The business partners act in accordance with all of the relevant laws and regulations pertaining to the handling, storage and disposal of hazardous substances, water-polluting substances,

other chemicals, and waste and that they handle such in an environmentally compatible manner.

5. The Minimata Convention on Mercury⁵ prohibits the following:
 - the manufacturing of products containing mercury;
 - the use of mercury and mercury compounds during the manufacturing processes as from the date specified for the discontinuation as regards the products and processes concerned;
 - the treating of mercury waste in contravention of the terms of the convention.
6. The production and use of chemicals are still to be ensured conform with the Stockholm Convention on Persistent Organic Pollutants (POPs Convention)⁶.
7. Our business partners ensure an environmentally friendly handling, collection, storage, and disposal of waste conform with the rules that are included in the applicable legal system in accordance with the POPs Convention.
8. The prohibition of the exporting of hazardous and other waste in the meaning of the Basel Convention on the Control of Transboundary Movements of Hazardous Waste and its Disposal (Basel Convention)⁷ and directive (EC) No. 1013/2006⁸
 - to a party to the contract that has prohibited the importing of such hazardous and other waste,
 - to an importing state in the meaning of Article 2 Number 11 of the Basel Convention, if such has not issued its written consent to a certain import, even if this import state has not prohibited the importing of this hazardous waste;
 - to a state that has not signed the Basel Convention;
 - to an importing state should such hazardous waste or other waste not be treated in an environmentally friendly manner in this state or elsewhere;

the prohibition of the exporting of hazardous waste from states listed in Annex VII of the Basel Convention to states that are not listed in Annex VII and the importing of hazardous waste and other waste from a state that has not signed the Basel Convention is also to be strictly adhered to.

Safeguarding the Company Ethics

The cooperation between the members of the Minimax Viking Group with its employees, business partners, public authorities and other institutions is always characterised by transparency, honesty, and integrity.

Both our business partners and we strictly adhere to the regulations of foreign trade law in connection with the importing and exporting of goods, intellectual property, and services, this including laws and regulations regarding embargos, import and export controls, trade and other sanctions, money laundering and the financing of terrorism.

We expect from our business partners that they do not make any unlawful donations to others, notwithstanding the form. The offering or granting of benefits such as cash payments, services or gifts is prohibited should it be the intention that the recipient of the benefit is to surreptitiously give preference to someone. Neither our employees nor our business partners accept prohibited donations, irrespective of the form and they also refrain from everything that could be understood as being a demand for the provision of such a performance.

The members of the Minimax Viking Group and its business partners are under an obligation to adhere to the principles of the market economy and fair competition, and they exclusively run their business according to the achievement principle and on the basis of the legal system of permissible competition. They refrain from all conduct that infringes laws of competition or antitrust law and neither do they reach unlawful agreements with each other or with third parties, nor do they accept offers that appear to have such agreements as the aim.

Our employees and business partners shall treat all trade secrets and other confidential data, especially personal data, undisclosed financial, technical, and other data in secrecy.

Final Information

This Business Partner Code of Conduct is unable to reflect specific expectations for all situations in the course of everyday business. We therefore assume that our business partners shall be able to recognise an obvious action or forbearance that is over and above the above expectations and that can directly serve to impair a protected legal position in an especially severe manner, when conducting a reasonable assessment of all circumstances that might be possible and that they shall forebear accordingly.

We expect from our business partners that they not only observe the principles, requirements, and prohibitions in this Minimax Viking Group Business Partner Code of Conduct, but that they also demand this from their own business partners and their suppliers and that they shall apply the necessary degree of care to ensuring that these principles are applied within their own supply chain.

The implementation of these standards is a long-term learning and development process. We shall cooperate with our business partners with the aim of these principles being fully observed and we shall also subject them to ongoing validation and revision, should this be necessary.

We expect from our business partners that they adhere to all of the applicable laws and regulations in the scope of business conducted with members of the Minimax Viking Group and that they apply the principles described in this codex or principles of the same value. Should a part of the codex not be clear or should you have a substantiated suspicion of an infringement of this codex, please contact your contact at Minimax Viking or Minimax Viking Compliance Management (compliance@mx-vk.com). The non-adherence to the Minimax Viking Group Business Partner Code of Conduct can result in an adoption of measures, including a termination of the business relationship.

Confirmation

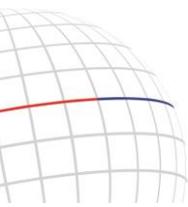
We hereby confirm that we have read, understood, and recognized the basic principles stated in the Minimax Viking Group Business Partner Code of Conduct and that we shall explicitly adhere to them.

Company name / Address

Name / Position

Place, Date

Legally binding signature



Laws, International Conventions and Branch Standards that this Business Partner Code of Conduct is Explicitly Based on without any Claim to Completeness:

- *United Nations Global Compact*
- *Internationalen Labour Organisation (ILO) conventions, especially*
 - ¹ *Convention No. 138 of the International Labour Organisation from 26 June 1973 regarding the minimum age for admission to employment (German Federal Gazette (BGBl.) 1976 II pp. 201, 202)*
 - ² *Convention No. 182 of the International Labour Organisation from 17 June 1999 regarding the prohibition and adoption of measures without delay in order to eliminate the worst forms of child labour (BGBl. 2001 II pp. 1290, 1291)*
 - ³ *Convention No. 29 of the International Labour Organisation from 28 June 1930 regarding forced or compulsory labour (BGBl. 1956 II pp. 640, 641); Protocol from 11 June 2014 to convention No. 29 of the International Labour Organisation from 28 June 1930 regarding forced or compulsory labour (BGBl. 2019 II pp. 437, 438)*
 - *Convention No. 87 of the International Labour Organisation from 9 July 1948 regarding the freedom of association and the protection of the right of association (BGBl. 1956 II pp. 2072, 2071) amended by the convention from 26 June 1961 (BGBl. 1963 II p. 1135, 1136)*
 - *Convention No. 98 of the International Labour Organisation from 1 July 1949 regarding the application of the principles of the right of association and the right to conclude collective negotiations (BGBl. 1955 II pp. 1122, 1123) amended by the convention from 26 June 1961 (BGBl. 1963 II pp. 1135, 1136)*
 - *Convention No. 100 of the International Labour Organisation from 29 June 1951 regarding the equality of the remuneration paid to male and female employees for equal work (BGBl. 1956 II pp. 23, 24)*
 - *Convention No. 105 of the International Labour Organisation from 25 June 1957 regarding the elimination of forced labour (BGBl. 1959 II pp. 441, 442)*
 - *Convention No. 111 of the International Labour Organisation from 25 June 1958 regarding discrimination in employment and occupation (BGBl. 1961 II pp. 97, 98)*
- ⁴ *International pact from 19 December 1966 regarding civil and political rights (BGBl. 1973 II pp. 1533, 1534)*
- *International pact from 19 December 1966 regarding economic, social, and cultural rights (BGBl. 1973 II pp. 1569, 1570)*
- ⁵ *Minamata Convention from 10 October 2013 regarding mercury (BGBl. 2017 II pp. 610, 611)*
- ⁶ *Stockholm Convention from 23 May 2001 regarding Persistent Organic Pollutants (BGBl. 2002 II pp. 803, 804) (POPs Convention), last amended by a resolution adopted on 6 May 2005 (BGBl. 2009 II pp. 1060, 1061)*
- ⁷ *Basel Convention regarding the Control of Transboundary Movements of Hazardous Waste and its Disposal from 22 March 1989 (BGBl. 1994 II pp. 2703, 2704), last amended by the Third Directive from 6 May 2014 on the Amendment of Annexes to the Basel Convention from 22 March 1989 (BGBl. II pp. 306/307)*
- ⁸ *Directive (EC) No. 1013/2006 of the European Parliament and Council from 14 June 2006 regarding the Transportation of Waste (Official Gazette (ABl.) L 190 from 12 July 2006 pp. 1-98), last amended by the delegated directive (EU) 2020/2174 of the Commission from 19 October 2020 (ABl. L 433 from 22 December 2020 pp. 11-19)*
- *Law regarding the entrepreneurial duties of care in supply chains (Supply Chain Duty of Care Act – LkSG) (BGBl. 2021 I, pp. 2959 et seq.)*

