

Sustainability policy of ZÖLLER-KIPPER GmbH
based on CSRD / ESRS requirements

Table of content

1.	Fundamental understanding.....	3
2.	Compliance with laws.....	3
3.	Integrity and compliance / conduct in the business environment	4
a.	Corruption and bribery.....	4
b.	Hospitality and gifts.....	4
c.	Fair competition / Antitrust Law / Disclosure of information	4
d.	Prevention of money laundering.....	4
e.	Avoidance of conflicts of interest.....	4
f.	Protection of information and intellectual property.....	4
g.	Data protection	4
h.	Whistleblower and protection against sanctions.....	5
i.	Export Controls and Economic Sanctions	5
4.	Compliance with human rights / treatment of employees	5
a.	Working conditions.....	5
b.	Child labour / forced labour / slavery.....	5
c.	Discrimination and harassment	6
5.	Health protection and occupational safety	6
a.	Machine safety.....	6
b.	Workplace ergonomics.....	6
c.	Personal protection.....	6
6.	Environment, Energy and Climate Protection.....	7
7.	Handling conflict materials	7
8.	Consumer interests	7
9.	Supply chain.....	8
10.	Implementation and enforcement.....	8
11.	Signature.....	8

1. Fundamental understanding

ZÖLLER-KIPPER is committed to its social responsibility. Based on this, ZÖLLER-KIPPER takes responsibility for its economic activities towards its own company as well as its employees, customers, and suppliers along the value chain. To fulfil this responsibility, the consequences of corporate decisions and actions are taken into account from a legal, economic, technological, social and ecological perspective. The aim is to contribute to the social, economic, and ecological development of the countries and regions in which ZÖLLER-KIPPER operates.

The sustainability policy is an essential element of the corporate strategy and policy and serves as the basis for securing the company's success in the long term as well as promoting sustainable corporate development.

The basis of all actions is in accordance with the relevant legal regulations. ZÖLLER-KIPPER is guided by ethical values and principles, in particular integrity and righteousness as well as respect for human dignity, as laid down in the principles of the United Nations Universal Declaration of Human Rights, the principles of the United Nations Global Compact, the OECD Policies for Multinational Enterprises, the core labour standards of the International Labour Organisation (ILO) as well as the United Nations Guiding Principles on Business and Human Rights. Within the framework of the Supply Chain Act, ZÖLLER-KIPPER observe human rights and environmental due diligence obligations in an appropriate manner and prevent risks.

This sustainability policy is binding for all employees of the company and is actively claimed. Furthermore, ZÖLLER-KIPPER expects the same basic understanding from its direct suppliers, service providers and other business partners. Rights in favour of third parties are not to be established with this policy.

The contents of this sustainability policy apply at all locations, branches, and business units of the company.

The sustainability policy is drawn up in cooperation between the responsible persons in the company and the management. Once a year, the policy is reviewed and updated in a meeting. The main responsibility for the sustainability policy lies with the sustainability project management. ZÖLLER-KIPPER has also appointed persons responsible for environmental, social, ethical, and human rights.

Department	Telephone number	Mail
Environment/ Ecology	+49 3072 085 110	C.Gysser@zoeller-kipper.de
Compliance / Business ethics	+49 6131 887 270	compliance@zoeller-kipper.de
Human rights	+49 6131 887 270	compliance@zoeller-kipper.de

The responsible persons are available for questions as point of contact.

When referring to the company's own workforce or employees in the following, this also includes non-employees, such as self-employed persons, subcontractors, and temporary workers, in addition to employees.

2. Compliance with laws

Compliance with applicable laws and other legal provisions of the countries in which ZÖLLER-KIPPER operates is an implicitness. In cases where local laws and regulations are less restrictive, actions are guided by the principles of this sustainability policy. In case of a direct conflict between mandatory local law and the principles in this policy, local law shall take precedence. However, ZÖLLER-KIPPER endeavours to comply with the contents of this Sustainability Policy.

3. Integrity and compliance / conduct in the business environment

a. Corruption and bribery

ZÖLLER-KIPPER does not tolerate corruption, bribery or extortion and is committed to complying with the United Nations (UN) and Organisation for Economic Co-operation and Development (OECD) conventions on combating corruption and the relevant anti-corruption laws. Benefits that are connected with the intention or could give the appearance of influencing business decisions or obtaining any other improper advantage will not be tolerated. A strict approach shall be applied in dealing with persons to whom special criminal and liability laws apply.

b. Hospitality and gifts

ZÖLLER-KIPPER regulates the acceptance of hospitality and gifts. Hospitality and gifts are only to be accepted or offered if the extent and occasion can be considered appropriate and comply with the locally applicable value limits in business practice. Furthermore, it is prohibited to accept or offer benefits exceeding the applicable value limits.

c. Fair competition / Antitrust Law / Disclosure of information

ZÖLLER-KIPPER is committed to fair and equitable competition in a free market economy, acts in accordance with national and international competition and antitrust law and does not participate in price fixing, market sharing or unlawful customer, market or bid agreements. In accordance with this, the company cooperates with authorities to clarify suspicious cases and commits to disclose necessary information to them. This disclosure also includes financial issues. In line with this financial responsibility, the company commits to transparent, proper accounting and keeps detailed records of financial transactions.

d. Anti-money laundering

ZÖLLER-KIPPER rejects any form of money laundering on the basis of the relevant legal obligations and according to the internal AML Policy. The company verifies and monitors the identity of customers, suppliers, service providers as well as other business partners and undertakes to conclude transactions exclusively with reputable partners.

e. Avoidance of conflicts of interest

Within the scope of its business activities, ZÖLLER-KIPPER avoids internal as well as external conflicts of interest which could illegitimately influence business relationships. If this does not succeed, these conflicts are disclosed, and appropriate measures are taken to remedy them.

f. Protection of information and intellectual property

ZÖLLER-KIPPER protects confidential information and rejects the illegal appropriation of intellectual and scientific property (plagiarism). Technology and know-how transfers must be conducted in such a way that intellectual property rights and customer information, trade secrets and non-public information are protected. We shall comply with applicable trade secret laws and treat confidential information of our business partners accordingly.

g. Data protection

ZÖLLER-KIPPER processes, stores, protects, and deletes personal data in compliance with the statutory regulations and according to data protection provision. Personal data is collected confidentially, only for legitimate, previously defined purposes and in a transparent manner. In addition, personal data is only processed if it is protected against loss, alteration and unauthorised use or disclosure by appropriate technical and organisational measures in accordance with the highest standards of data security.

h. Whistleblower and protection against sanctions

All activities are based on the EU Whistleblower Directive 2019/1937 and national Whistleblower Protection Law. Every employee is required to actively report violations and suspicious cases and to contribute to the clarification of violations and suspicious cases, taking into account social responsibility. Reports are made visibly or anonymously using the whistleblower procedure and are always treated confidentially to protect against retaliation. In addition to employees, contractual partners and third parties also have the option of using the whistleblower procedure.

i. Export Controls and Economic Sanctions

For export controls, ZÖLLER-KIPPER commits to comply with the relevant legal standards - in particular, licensing requirements, export, and support prohibitions - in the context of transfer and export of goods. The regulations in the context of the Basel Convention should also be underlined here.

4. Compliance with human rights / treatment of employees

The treatment of our own workforce is based on the core labour standards of the International Labour Organisation (ILO), taking into account the laws and legal forms applicable in the various countries and locations. For ZÖLLER-KIPPER it is implicitness to include the interests, views, rights, and expectations of its own workforce, which is significantly affected, in the decision-making process. In all activities, the aim is to offer its own workforce secure and long-term employment.

a. Working conditions

ZÖLLER-KIPPER is committed to fair and social working conditions. Essential components of the social responsibility strategy and the economic orientation are fair and equitable wages, equal pay for work of equal value, the right of freedom of association as well as to collective agreements and social benefits within the framework of the respective applicable rights and laws. If freedom of association and collective bargaining are not permitted, appropriate compromises are sought with the employees. Further, employees are always informed clearly, in detail and regularly about the composition of their salary. ZÖLLER-KIPPER supports its own workforce wherever possible with flexible working time models and work-life balance-related subjects, such as granting family-related leave. Compliance with maximum permissible working hours as well as contiguous rest periods in accordance with applicable laws and regulations are implicit. Likewise, ZÖLLER-KIPPER pays attention to adequate advance notices for changes in working hours, such as weekend work or shift changes. Access to drinking water in sufficient quantity as well as access to clean sanitary facilities for employees forms the minimum standard of social facilities. The privacy of its employees is respected and actively protected. Regular trainings as well as frequent reviews of the qualification levels of the employees are established in the human resources development. When terminating employment, attention is paid to social compatibility. Special protection in all topics is given to underage workers and vulnerable groups.

b. Child labour / forced labour / slavery

The prohibition of and measures against child labour as well as any form of forced or compulsory labour and modern slavery (slavery, servitude and forced or coerced labour and human trafficking) as well as the rejection of non-ethical recruitment form a minimum standard for ZÖLLER-KIPPER in the protection of working conditions and human rights. Special reference is made to ILO Convention No. 138 as well as ILO Convention 182. Proof of age is requested and documented for each employment. All work must be voluntary, and it must be possible to terminate the employment relationship.

c. Discrimination and harassment

ZÖLLER-KIPPER has a strict zero-tolerance policy on discrimination and harassment within the framework of nationally and internationally applicable rights and laws. There is no discrimination based on race, ethnic origin, skin colour, gender, sexual orientation, gender identity, disability, age, religious affiliation, political opinion, national or social origin. Employees shall be protected against physical, psychological, sexual, and verbal harassment. ZÖLLER-KIPPER actively promotes equal rights and equal treatment. Vacancies are advertised in accordance with applicable agreements. The company lives social and cultural openness and diversity. This also includes the inclusion of people with disabilities in the operational process. Particularly vulnerable groups require a special level of protection. ZÖLLER-KIPPER is particularly committed to these groups.

5. Health protection and occupational safety

ZÖLLER-KIPPER is committed to preventive health protection and occupational safety measures to safeguard the health of employees as well as other potentially present persons such as suppliers or customers. Regular instructions are conducted on a rotational basis. The legal requirements as binding obligations form the basis and are to be understood as minimum requirements. It is the company's highest task to ensure and continuously improve the safety and health of employees and potentially other persons present during work. Accordingly, ZÖLLER-KIPPER has committed itself to respecting and upholding the following principles in health protection and occupational safety. The principles cover the following core subject areas: Personal protective equipment, workplace ergonomics, machine safety, incident and accident management, handling of chemical and biological substances, fire protection and emergency preparedness.

The following key points of health protection and occupational safety are observed in the design and procurement of machinery, plant, and other equipment as well as in the design of workplaces:

a. Machine safety

Machinery, plant, and equipment are purchased and operated in accordance with the latest state of the art. This also includes the applicable protection standard. The company is committed to ensure the safety of machinery, plant, and equipment.

b. Workplace ergonomics

The design of processes and workplaces is a collaborative process in which employees are involved with their needs. Ergonomic aspects are fully taken into account and implemented according to the current state of scientific knowledge.

c. Personal protection

If hazards cannot be excluded by technical or organisational measures, employees are provided with personal protective equipment. This is selected according to the circumstances and the results of the analysis and is made available to the employees free of charge.

The company also regulates the handling of chemical and biological substances with the aim of ensuring that they are managed in a way that is not harmful to health and that exposure is adequately controlled. Special protection is given to particularly vulnerable groups, such as pregnant women or underage employees. In addition, an accident and incident management system has been set up at the locations. An essential component of accident and incident management is emergency preparedness. First aiders are trained in accordance with the minimum legal requirements. The company is also committed to active fire protection and compliance with fire protection regulations. For this purpose, fire protection

assistants are trained, and evacuation assistants are designated and appointed in accordance with the minimum requirements. Emergency situations are simulated at regular intervals and correct behaviour is trained.

6. Environment, Energy and Climate Protection

In accordance with applicable laws and international standards, ZÖLLER-KIPPER undertakes to protect the environment, to minimise negative effects on the environment, to pursue a sustainable and resource-saving handling of materials and products, and to continuously improve activities for environmental and climate protection. These commitments cover the following topics: Greenhouse gas emissions reporting, decarbonisation, energy efficiency, use of renewable energy, water, air and soil quality, land use, deforestation and noise emissions, animal welfare, biodiversity, responsible chemicals management, sustainable resource management, waste prevention, reuse and recycling. The so-called LEAP procedure is used for the initial classification of all topics.

ZÖLLER-KIPPER is particularly committed to climate protection and the reduction of greenhouse gas emissions with the goal of decarbonisation in accordance with the latest Climate Protection Act as a minimum target. To this end, primarily renewable energies are to be used and energy efficiency is to be continuously increased. Accordingly, the company regularly reports on greenhouse gas emissions.

When making investment decisions in plant and machinery, the best available state of the art is sought for the application requirements. For raw materials, consumables and supplies as well as for all purchased parts or services, the specific CO₂e (CO₂-equivalents) per unit mass [kg, tkm] shall be requested based on the Greenhouse Gas Protocol (GHG), including the emission factor and its source.

In addition, the company strives for a continuous reduction of water consumption and sustainable water management. The minimum goal is to maintain water quality and availability depending on local conditions. The company is also committed to reduce emissions to a minimum and tracking measures to maintain air quality.

In order to preserve biodiversity and ecology, the company pursues the goal of sustainable land use, including soil unsealing, and is opposed to deforestation measures. The company also follows up on measures to ensure soil quality. In addition, the company undertakes to continuously reduce noise and light emissions in connection with economic activities, whether caused directly or indirectly by the company. ZÖLLER-KIPPER is committed to animal welfare and the preservation of biodiversity.

Responsible chemicals management, sustainable use of resources and the topics of the circular economy are elementary components of the company's corporate strategy. The company strives to achieve these goals through a product creation process designed according to circular principles, consistent waste avoidance and the use of resources for reuse and recycling.

ZÖLLER-KIPPER is also committed to complying with the Stockholm Convention on Persistent Organic Pollutants and the Minamata Convention, which aim to limit emissions and releases of quicksilver and quicksilver compounds.

All employees are sensitised to environmental protection, and training are provided.

7. Handling conflict materials

ZÖLLER-KIPPER takes due diligence measures to avoid the use of conflict minerals in products to prevent human rights violations, corruption and financing of armed groups or similar.

8. Consumer interests

As far as consumer interests are concerned, ZÖLLER-KIPPER complies with consumer protection regulations and appropriate sales, marketing, and information practices. Particularly vulnerable groups receive increased attention.

9. Supply chain

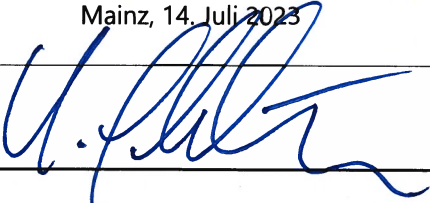
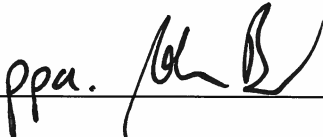

ZÖLLER-KIPPER undertakes to pass on social and ecological sustainability requirements to the same extent to suppliers, service providers as well as other business partners in accordance with the sustainability policy and to develop these with the aim of a sustainable and responsible continuation of the company. ZÖLLER-KIPPER strives for a harmonious cooperation with all business partners and wants to ensure its corporate due diligence along the entire value chain.

10. Implementation and enforcement

ZÖLLER-KIPPER makes appropriate and reasonable efforts to continuously implement, document and apply the principles and values described in this Sustainability Policy. All employees are sensitised to the contents of the Sustainability Policy and trained on relevant topics as required. Violations of the policy will not be tolerated and may lead to consequences under labour law. Communication about the requirements of this policy and its implementation to employees, customers, suppliers and other interested parties or stakeholders is open and dialogue oriented. Employees and business partners are offered access to a protected process to confidentially report possible violations of the principles of this Sustainability Policy.

Name of the department	Compliance
Contact details (Mail address, Telephone number)	compliance@zoeller-kipper.de, +49 (0) 6131 887-270

11. Signature

Place, Date	Mainz, 14. Juli 2023
Signature	
Name of authorised signatories	Volker Schröder
Signature	
Name of authorised signatories	ppa. Johannes Benner
Company address / Stamp of the company	 <p>ZÖLLER KIRCHHOFF GRUPPE</p> <p>ZÖLLER-KIPPER GmbH Hans-Zöller-Straße 50 – 68 DE- 55130 Mainz</p>