

# Business partners Code of Conduct

## Contents

Preamble .....	3
1. Employee responsibility .....	4
1.1. Human rights .....	4
1.2. Respectful interaction with one another .....	4
1.3. Protection of children .....	4
1.4. Fair working conditions .....	4
1.5. Occupational safety .....	5
2. Compliance with laws .....	5
2.4. Prevention of corruption .....	5
2.5. Free competition .....	5
2.6. Conflicts of interest .....	5
2.7. Prohibition of money laundering .....	6
2.8. Customs, export control and sanctions .....	6
2.9. Data protection .....	6
2.10. Consumer protection .....	6
3. Sustainability .....	6
4. Responsibility and implementation of the Code of Conduct .....	7
5. Process for compliance violations .....	7

## Preamble

erfal GmbH & Co. KG (hereinafter referred to as 'erfal') sees itself as part of an internationally interconnected economy and, as a company, is part of the society in which erfal operates. erfal adheres to the basic principles of 'honourable business practices' and is committed to its responsibility as a company.

erfal monitors the direct and indirect effects of its business activities on the environment and society and strives to strike an appropriate balance between economic, ecological and social concerns. We expect the same behaviour from all our business partners.

Furthermore, we strive to continuously optimise our business activities, products and procurement in terms of sustainability and encourage our business partners to contribute to this in the spirit of a holistic approach.

We actively participate in the fight against corruption, for example by recognising the United Nations Global Compact. Compliance with applicable anti-corruption laws in all our business activities is essential.

At erfal, we respect the values of the Universal Declaration of Human Rights and are committed to good corporate governance. We are committed to complying with nationally and internationally recognised social standards, in particular to protecting the legal positions laid down in the German Supply Chain Due Diligence Act. In particular, the core labour standards of the International Labour Organisation (ILO) serve as a basis for this.

erfal stands for the goals and content of the erfal Business Partner Code of Conduct and will make every appropriate and reasonable effort within its legal and actual capabilities to continuously comply with this voluntary commitment.

If existing regulations conflict with the contents of the erfal Business Partner Code of Conduct or if it is impossible to comply with it, erfal will seek ways to uphold the requirements of the erfal Business Partner Code of Conduct as far as possible.

Our business partners within the meaning of the erfal Business Partner Code of Conduct are all third parties who act for, on behalf of or in conjunction with erfal. These include suppliers, distribution partners, consultants, brokers, subcontractors, commercial agents and freelancers.

## 1. Employee responsibility

### 1.1. Human rights

Our business partners respect the dignity of every human being.

Just like us at erfal, our business partners adhere to recognised labour and social standards as well as applicable legal regulations.

In all its business activities, erfal endeavours neither to cause nor contribute to human rights violations. erfal expects the same from its business partners. Where necessary and possible, erfal supports its business partners in this regard.

Tolerance towards those who think differently and the preservation of democratic and constitutional principles form the basis of our cooperation.

### 1.2. Respectful interaction with one another

Like us at erfal, our business partners do not tolerate any form of discrimination, harassment, bullying or intimidation.

All employees are treated fairly, considerately and with respect; discrimination and harassment have no place here.

National and ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or worldview and marital status play no role in this. erfal and its business partners stand for a trusting and respectful working environment.

### 1.3. Protection of children

Our business partners do not tolerate child labour and comply with the applicable legal minimum age for employment. Internships are organised in accordance with legal requirements.

erfal expects its business partners to have adequate means of determining age in order to prevent child labour. If child labour is detected, all necessary measures must be taken immediately, focusing on the welfare, protection and development of the child.

Our business partners respect the rights of young workers under the age of 18; 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 detrimental to their development. Their safety and health must be protected by appropriate measures.

### 1.4. Fair working conditions

We expect our business partners to behave in accordance with the law and to observe appropriate social and legal standards.

Any form of forced labour, i.e. any work that is required of a person against their will and under threat of punishment, as well as forms of modern slavery and human trafficking, is strictly rejected by erfal and its business partners.

All employees have the freedom to terminate their employment relationship subject to reasonable notice.

Wages, salaries and social benefits granted shall at least meet or exceed the respective national legal minimum standards. Working hours at our business partners must also comply with applicable laws, industry standards or the core labour standards of the International Labour Organisation. Our business partners shall ensure that there is no unequal treatment.

### 1.5. Occupational safety

Our business partners ensure health and safety in the workplace and take the necessary measures at all workplaces to prevent accidents at work and occupational illnesses, whether physical or mental. This is achieved, among other things, through appropriate safety standards in the provision and maintenance of the workplace, the workstation and the work equipment.

If private or public security forces are employed for protection, our business partners must ensure that the fundamental rights of employees are upheld through instruction and monitoring. Furthermore, freedom of association and collective bargaining must not be impaired.

## 2. Compliance with laws

### 2.4. Corruption prevention

erfal pursues exclusively legal business objectives and practices and only maintains business relationships with reputable partners.

Our business partners do not bribe and do not accept bribes, either in their dealings with public officials or in their business dealings with customers and suppliers. They make business decisions for objective and comprehensible reasons in the interests of the company and avoid even the mere appearance of inappropriate influence, for example through gifts or other benefits.

This also applies to so-called facilitation payments, which are made for the processing of routine transactions without discretionary decisions by public officials.

Our business partners do not accept gifts or other benefits (e.g. invitations) that could unduly influence their decisions. Conversely, they do not offer benefits in order to unduly influence their business partners or other contacts in their favour.

### 2.5. Free competition

We are committed to the principles of a free market economy and open competition. Our business partners therefore comply with antitrust law. They do not enter into any agreements or make any other arrangements with competitors, suppliers or other companies that could impair fair competition. In particular, they do not enter into any agreements on prices, the division of markets or other market behaviour and corporate strategies. Our business partners do not call for unfair boycotts and take care not to engage in anti-competitive discrimination – neither in the sale nor in the purchase of goods and services.

### 2.6. Conflicts of interest

When dealing with conflicts of interest, we expect our business partners to act in an ethically irreproachable manner. A conflict of interest exists when private activities or relationships lead to or could give the impression that the activity can no longer be carried out independently and objectively.

Relevant relationships that could lead to conflicts of interest include, for example, family relationships, partnerships with business partners and competitors, or shares or investments in their companies.

#### 2.7. Prohibition of money laundering

Our business partners refuse to conduct transactions involving money that has been obtained through criminal means and is intended to be introduced into the normal economic cycle. We expect our business partners to comply with the applicable laws and regulations on combating terrorist financing. We do not tolerate transactions with individuals, companies or organisations that are associated with terrorism or drug trafficking or whose funds originate from criminal activities.

#### 2.8. Customs, export control and sanctions

In the spirit of responsible and ethically sound business practices, our business partners always act in accordance with legal regulations and international conventions. In all regions and countries, they comply with the applicable laws and regulations on export controls, sanctions and customs clearance. These do not only apply to the movement of goods. They can also have an impact on financial transactions, the use of technologies, purchasing or the hiring of personnel, for example.

#### 2.9. Data protection

erfal respects the personal rights of its employees and business partners and complies with the applicable legal requirements when handling personal data. erfal expects the same from its business partners.

Our business partners ensure that all information and documents that are not suitable or intended for disclosure to third parties are treated as strictly confidential and protected against unauthorised access and misuse.

#### 2.10. Consumer protection

Our business partners continuously take appropriate measures to ensure the safety and quality of their products and services. They ensure that the products and services comply with the relevant consumer protection regulations.

In the context of information and sales activities, our business partners take consumer interests into account by applying the legal requirements for fair business, marketing and advertising practices and consumer education.

## 3. Sustainability

Sustainability is a core corporate value at erfal. We use resources responsibly and are committed to protecting the environment. Our business partners are expected to take appropriate measures to avoid or mitigate environmental risks.

Our business partners ensure that optimal environmental protection is guaranteed through economy, reusability and sustainability in all phases of production.

Our goal is to minimise the impact of our work on people and nature. We expect the same attitude from our business partners. Land, forests and water, which serve as the basis of all life, must not be unlawfully evicted or withdrawn for the purpose of acquisition, development or other use.

## 4. Responsibility and implementation Code of Conduct

We make our erfal Business Partner Code of Conduct an integral part of the contractual agreements with our business partners. Our business partners guarantee the implementation of and compliance with our Business Partner Code of Conduct in their contractual relationship with erfal. In this context, our business partners pass on the Business Partner Code of Conduct to all contributors who work for us and ensure compliance.

We reserve the right to check compliance with the erfal Business Partner Code of Conduct. To this end, our business partners must provide information upon request and, if necessary or if risks are identified by erfal, actively participate in the development of remedial measures.

## 5. Process for compliance violations

Violations of laws, guidelines and other regulations must be identified in a timely manner. If our business partners become aware of a violation of this erfal Business Partner Code of Conduct, they must report this to erfal immediately. They shall cooperate in any subsequent investigations.

erfal expects its business partners to enable their employees to raise concerns and report grievances without fear of disadvantage or retaliation.

Possible responses to identified violations include requests to remedy the violation, claims for damages and even termination of contracts.

erfal reserves the right to terminate the business relationship in accordance with contractual or legal provisions in the event of a serious violation of our erfal Business Partner Code of Conduct.

## Contact

**Compliance Officer**  
Marcel Görner  
[compliance@erfal.de](mailto:compliance@erfal.de)

Falkenstein, September 2025

