

## Code of Conduct

This Code of Conduct sets out the main principles and values to which we feel committed in our daily interaction with employees, customers, suppliers, society and the environment within the context of our global entrepreneurial activities. We act according to an integrated company concept which includes all social, ecological and economical contributions by a company to the voluntary assumption of social responsibility in the long term and beyond standards required by legislation.

In this respect, we are responsible for creating and maintaining a company culture in which consideration of the mentioned legal principles as well as ethical principles are maintained in the best possible way.

### Preamble

This Code of Conduct (CoC) defines principles and rules derived therefrom for the dealing in business transactions, which VULKAN believes it is obligated to observe in its daily interaction with employees, business partners, governmental and multinational institutions and the environment within the framework of global business activities. VULKAN will abide by these rules and expects the same from its business partners.

VULKAN undertakes to comply with all national and international laws, principles and conventions, such as the principles of the UN Global Compact, the OECD guidelines for multinational companies, the General Declaration of Human Rights, the UN Guidelines on Business and Human Rights and the relevant conventions of the International Labor Organization (ILO).

VULKAN sees compliance with this Code of Conduct and the related laws, principles and conventions as the basis of the business relationship, so that if the Code of

Conduct is not complied with VULKAN will suspend or terminate the business relationship.

### Human rights

VULKAN supports and respects the UN Charter of Human Rights and national and internationally recognized human rights standards, and ensures that it conducts its business in a manner that excludes any involvement in the violation of human rights. For VULKAN, respect for the dignity of people, privacy and personal rights has the highest priority. VULKAN respects and protects the globally applicable regulations for the protection of human and children's rights. VULKAN does not tolerate the use of child, forced and compulsory labor or any form of slavery and human trafficking.

VULKAN ensures that all employees are adequately remunerated. Remuneration and other benefits, as well as working hours, comply at least with the respective national and local requirements.

The employment of minors complies with legal requirements. VULKAN also expects its business partners to comply with these principles.

VULKAN recognizes that the right to self-determination also entitles employees to form and join trade unions on a democratic basis within the framework of national regulations.

### Compliance with law and statutes

VULKAN complies with applicable laws and regulations, both at local and national and international levels, in addition to lawful instructions from government agencies. A violation of legal regulations or a violation of this CoC by the Business Partner is generally to be considered a violation of a legal prohibition.

## **Equal treatment**

VULKAN offers the same opportunities for everyone. VULKAN does not tolerate discrimination based on gender, skin color, ethnic origin, age, religion, nationality, physical impairment, pregnancy, sexual orientation, political orientation or trade union activity. Employees are recruited and assessed based solely on their skills, suitability, performance and knowledge. VULKAN expects its business partners to do the same. Furthermore, VULKAN shall ensure that its own employees feel committed to this principle in the management of personnel and observe this principle in the design of the working conditions.

## **Health and safety**

VULKAN assumes responsibility for a healthy and safe work environment for its employees and respects the legal regulations and standards. VULKAN strives to improve working conditions permanently and sustainably so that the best possible preventive measures for health and conditions are created a high level of performance and work satisfaction for all employees. VULKAN expects its business partners to be equally committed to occupational health and safety.

## **Fair competition**

VULKAN does not tolerate any form of corruption or bribery. All employees are prohibited from directly or indirectly requesting, accepting, offering or granting intangible and material benefits. This applies regardless of any local customs that may be perceived.

Payments or other contributions to public officials are likewise not tolerated. This applies in particular if it serves the purpose of accelerating or carrying out an official task, including when it is not restricted by the applicable national law.

In the case of invitations, VULKAN takes strict care to

ensure that the associated benefits are within reasonable limits. Invitations or the application for benefits to employees that raise doubts about the integrity of VULKAN and, in particular, create the appearance of influencing business decisions, will not be tolerated.

Conflicts of interest should be avoided as a matter of principle.

However, in the event of a conflict between the personal and professional interests of VULKAN employees or the business partner, these must be disclosed and clarified immediately. In cases of doubt, VULKAN will reject the business or the business relationship.

VULKAN complies with its legal obligations for money laundering prevention and does not participate in money laundering activities. Every employee is required to have any unusual financial transactions, in particular involving cash that may give rise to a suspicion of money laundering, checked in case of doubt.

## **Environmental protection**

VULKAN understands environmental and climate protection as well as resource efficiency as an important basis for its business activities. VULKAN uses an appropriate environmental management system and regularly reviews the measures for environmental protection; it also implements appropriate improvement measures.

VULKAN complies with all legal requirements for the protection of the environment and sustainability. VULKAN will not tolerate any legal violations in the handling, collection, storage and disposal of waste.

In addition, VULKAN will not tolerate any action that causes harmful soil changes, water or air pollution. VULKAN acquires lands, forests and bodies of water only in compliance with legal requirements. VULKAN shall in no way participate in the unlawful taking of

land or acquire or use land that has been unlawfully taken. The development and use of land, forests and bodies of water is also carried out in compliance with legal requirements.

## **Handling of information**

The protection of personal data of employees, business partners and customers is a matter of course for VULKAN. Personal data will only be collected, processed and used to the extent permitted for clear and lawful purposes.

The security of data is of great importance for VULKAN. Therefore, VULKAN protects data with all available suitable and appropriate technical and organizational means against unauthorized access, unauthorized and misuse, loss and premature destruction. This is done in compliance with the respective legal framework and national laws as well as internal guidelines and regulations.

Sensitive business information and trade secrets will always be treated confidentially. These may include, for example, technical data, financial data, business strategies, or research results.

## **Export control**

As part of its global activities, VULKAN adheres strictly to all regulations on import and export control, as well as applicable embargoes. VULKAN does not tolerate any form of circumventions within its area of responsibility or where respective information is available.