

Agreement to Code of Conduct for suppliers of the senata Group

The companies of the senata Group** (hereinafter "senata") are committed to socially, ecologically and ethically responsible corporate governance. As an international group of companies, senata is a safe and reliable partner in several business areas. In order to be able to supply our customers sustainably and safely with innovative products, we source raw materials, goods and services worldwide.

To ensure responsible and sustainable corporate governance, we also expect our suppliers to act responsibly to uphold social, environmental and ethnic due diligence obligations.

In this Supplier Code of Conduct, we have clearly formulated the expectations towards our suppliers. The Supplier Code of Conduct is based on the principles of the United Nations Global Compact and the United Nations Universal Declaration of Human Rights.

Our aim is to work only with suppliers who adhere to the principles set out in this Code of Conduct and who comply with nationally applicable laws in this context. If a supplier violates the principles laid down in this Code of Conduct and does not take remedial action, we reserve the right to re-examine the future cooperation and, if necessary, to terminate the cooperation.

senata expects from its suppliers:

Laws and regulations

Compliance with all applicable laws, rules and regulations in the countries in which the Supplier operates or is located and appropriate measures to ensure compliance with such laws, rules and regulations.

Human and workers' rights

Compliance with the International Bill of Human Rights of the United Nations, taking into account the laws and legal forms applicable in the various countries and locations, the fundamental labour rights of the respective applicable national legislation, as well as the recognition of the core labour standards of the International Labour Organisation (ILO). Respect for the rights of third parties, any impairments are to be kept as low as possible in compliance with all international standards.

Child labour

Compliance with the ILO core labour standards; any kind of child labour that violates these standards is to be prohibited and refrained from in the company.

Forced labour

Prohibition of the employment of persons in forced or compulsory labour or trafficking of human beings in the company, as well as participation therein. All activities must be on a voluntary basis. Workers must be free to separate from their employer in accordance with the legal notice periods. Forced labour refers to all forms of bonded labour, slavery, slave-like practices, servitude or other forms of oppression. Suppliers are also prohibited to apply surveillance measures, such as withholding identification documents, passports, proof of education, work permits or deposits as a condition of employment.

Occupational health and safety

Compliance with the applicable national health and safety laws and ensuring humane working conditions.

Application of appropriate occupational health and safety management (e.g. according to ISO 45001) in order to prevent accidents and work-related illnesses in the best possible way. This includes the identification, assessment and reduction of actual and potential accident and health risks, the recording and investigation of incidents, the training and instruction of employees in a form they can understand, the provision of appropriate work equipment and protective gear, and appropriate emergency preparedness and response measures.

Freedom of association

The rights of employees to form employee representatives, to bargain collectively, and to form or join trade unions shall be respected, as shall the right of trade unions in the place of employment to operate in accordance with national legislation.

Discrimination

Any discrimination is to be prevented. No employee of the supplier may be disadvantaged, favoured or harassed based on characteristics such as gender, skin colour, religion, nationality, political or other convictions, ethnic origin, disability, age, sexual orientation and identity or other characteristics.

Working hours and remuneration

The applicable national law on working time shall be complied with. If there is no national legal regulation, the international standards of the ILO shall apply.

The remuneration of the employees must comply with the applicable national laws and guarantee the legally valid and guaranteed minimum income and social benefits.

Protection of freedom of expression, personal rights and privacy

The right to freedom of expression and the protection of personal rights and privacy of employees shall be respected.

Fair treatment of external staff

The applicable national law as well as human and labour rights must also be observed when employing external staff, irrespective of the type of contract, e.g. contract for work or temporary work.

Environmental protection

Compliance with the respective applicable national energy and environmental laws, regulations and standards. Use resources such as energy, water and raw materials responsibly. Establish and apply an appropriate environmental and energy management system to minimise the impact on the environment, especially in the following areas: greenhouse gas emissions, circularity, chemicals and hazardous substances, waste, other emissions to air, water and soil, energy consumption and water use.

Conflict minerals and high-risk raw materials

Comply with due diligence to promote responsible commodity supply chains and all applicable conflict minerals legislation. Minerals such as tin, tantalum, tungsten, gold (Tin, Tantalum, Tungsten, Gold: 3TG) or cobalt containing components and the corresponding ores and metals must be acquired conflict-free. Depending on the position in the supply chain, compliance with and reporting on the OECD Due Diligence Guidelines for Promoting Responsible Supply Chains for Minerals from Conflict and High-Risk Areas. Ensure traceability of all supplies in its 3TG and cobalt supply chain down to smelter or refinery level. Comply with the Minemata Convention's prohibitions on the production of mercury-added products, the use of mercury and mercury compounds, and the treatment of mercury waste. Compliance with the ban on the production and use of chemicals of the Stockholm Convention on Persistent Organic Pollutants.

Waste

Environmentally sound handling, collection, storage and disposal of waste. Compliance with the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal and the prohibitions contained in the Basel Convention.

Prohibition of corruption and bribery

Ensure compliance with the United Nations (UN) and Organisation for Economic Co-operation and Development (OECD) conventions on combating corruption and relevant anti-bribery laws, including those dealing with bribery abroad. Rejecting any form of corruption, bribery, theft, embezzlement, fraud or extortion, illegal payments or granting of any other advantage to an individual, company or public official with the aim of influencing decision-making processes. Not granting or accepting, either oneself or through third parties, bribes, kick-backs or other illegal payments, favours or other advantages or benefits of value for the realisation of business opportunities, to accelerate or facilitate an official act (bribes or acceleration payments) or in any connection with the business activities of senata companies.

Invitations and gifts

Invitations and gifts may not be misused to influence business contacts, customers or public officials. Invitations and gifts to senata employees or persons close to them are only granted, if the occasion and scope are appropriate, i.e. they are of low value and can be regarded as an expression of generally accepted local business practice. Similarly, suppliers do not request unreasonable benefits from senata employees.

Fair competition / compliance with applicable antitrust and competition law

No involvement in agreements with competitors that violate antitrust law or abuse of a dominant position or other anti-competitive business practices.

Data protection and information security

Protection of personal data and compliance with all applicable data protection laws. No personal data may be processed without a legal authorisation. This includes appropriate management and technical protection against unauthorised access.

Prevention of money laundering and terrorist financing

Compliance with all applicable legal obligations for the prevention of money laundering and terrorist financing; no involvement, either directly or indirectly, in money laundering activities or terrorist financing.

Foreign trade law

Consistent compliance with the respective applicable international and national regulations of foreign trade law, in particular export control and embargo regulations; no legally inadmissible business activities with sanctioned persons, companies or organisations.

Supply chain and due diligence requirements

The respective applicable national requirements for supply chains and due diligence must be complied with. Appropriate measures shall be taken to ensure that all principles and requirements described herein are complied with and recognised within the company and in the affiliated companies. Furthermore, reasonable efforts shall be made in the supply chain to ensure that upstream suppliers comply with the basic principles of this Supplier Code of Conduct.

For the purposes of this declaration, "affiliated companies" shall mean companies which are directly or indirectly beneficially owned by the supplier to the extent of at least fifty percent (50 %) or over which the supplier directly or indirectly exercises voting rights to the extent of at least fifty percent (50 %).

An appropriate risk management system shall be established within the enterprise and its affiliates, the measures of which enable the identification and minimisation of human rights and environmental risks and the prevention, cessation or minimisation of the extent of violations of human rights or environmental obligations, where the enterprise has caused or contributed to such risks or violations within the supply chain.

Compliance with the senata Supplier Code of Conduct and impact on the business relationship

senata requires suppliers to accept this Supplier Code of Conduct, answer the self-assessment questionnaire based on the Supplier Code of Conduct or provide an equivalent alternative in order to establish a business relationship. Supplier compliance with the principles and requirements is regularly monitored by senata as part of a due diligence process to identify, reduce and prevent risks in the supply chain. Any breach of the principles and requirements set out in the senata Supplier Code of Conduct will be considered as a material impairment of the contractual relationship on the part of the suppliers. In the event of suspected non-compliance with the principles and requirements of the senata Supplier Code of Conduct (e.g. negative media reports), senata reserves the right to request information on the relevant facts. Furthermore, senata has the right to terminate without notice individual or all contractual relationships with suppliers who demonstrably do not comply with the senata Supplier Code of Conduct or who do not strive for and implement improvement measures, after they have been given a reasonable period of time to do so by senata.

We recognise the "Code of Conduct for Suppliers of the senata Group" and undertake to comply with the requirements in the context of all business relationships with the companies of the senata Group**.

senata and the respective company in the senata Group with which we have a business relationship are entitled to demand compliance with the principles and requirements of this Code of Conduct and to assert the rights, up to and including termination of the business relationship.

**senata GmbH, Gute Änger 11, 85356 Freising and her daughter companies:

- ABM Greiffenberger Antriebstechnik GmbH, Friedenfelser Straße 24, 95615 Marktredwitz, Germany
- ABM Greiffenberger Polska Sp. z.o.o., Erazma Plewińskiego 18, 20-277 Lublin, Poland
- LMS Landshuter Metall- und Schweißtechnik GmbH, Untere Sonnenstrasse 6, 84030 Ergolding, Germany
- Qantos GmbH, Am Forst 13, 92637 Weiden in der Oberpfalz, Germany
- RCS GmbH, Rail Components and Systems, Höckendorfer Str. 91, 01936 Königsbrück, Germany
- Mitras Materials GmbH, Friedrich- Ochs-Str. 2, 92637 Weiden in der Oberpfalz, Germany
- Optiplan GmbH, Am Johannisberg 9-13, 08606 Oelsnitz, Germany
- ZSO Zerspanungs- und Systemtechnik GmbH, Im Moos 2, 87534 Oberstaufen, Germany
- Menzolit S.r.l., Via Isonzo 39, 22078 Turate 22078, Italy
- Menzolit Vitroplast S.L. Pol. Ind. Coll de la Manyà Cami de Can Guri 18-22 08403 Granollers, Spain
- Menzolit Ltd. Baxter Works, Farrington Road, Rossendale Road Industrial Estate, BB11 5EZ Burnley, United Kingdom
- Mitras Automotive (UK) Ltd. Navigation Park, Road One, Winsford Industrial Estate, Winsford, Cheshire, CW7 3RL, United Kingdom

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Business partner/company/address

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Name of the signatory

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Legal function of the signatory

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Place/Date

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Signature