



ALANOD GmbH & Co. KG

CODE OF CONDUCT

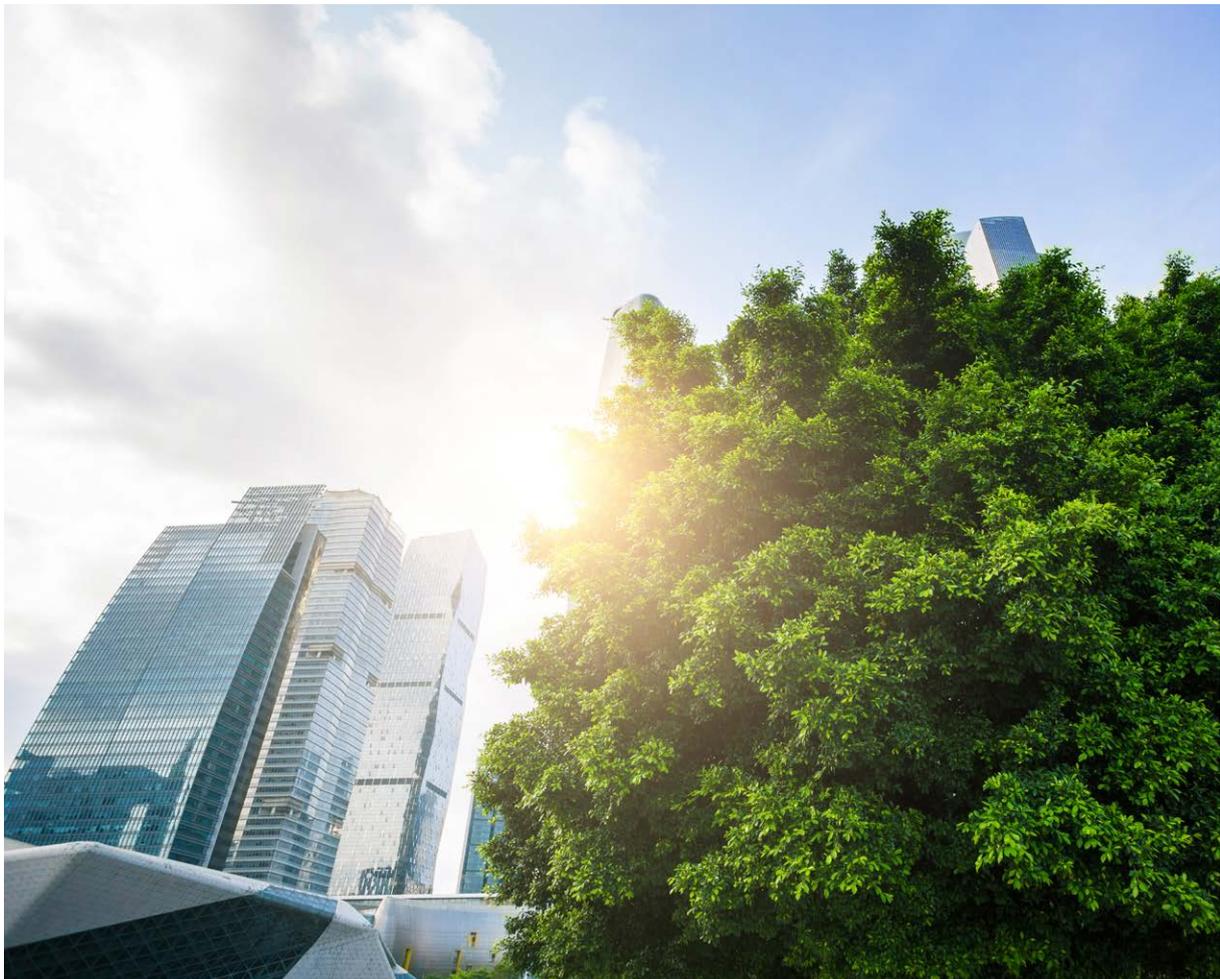
VERHALTENSCODEX

Foreword

The ALANOD Code of Conduct describes our values, principles, and standards of behavior. It serves as a binding framework for all employees and business partners. The following contents have been revised and expanded to include new topics in order to meet current requirements and expectations.

We act to protect and with respect to our environment

- We are committed to continuously improving our environmental performance by constantly raising environmental protection, minimising unavoidable environmental pollution, complying with emission limits and protecting natural resources
- The guideline „**as much as necessary - as little as possible**“ applies to the use of resources and energy.
- We strive for longterm climate neutrality and are committed to sustainable procurement and production processes.



Our requirements for maintaining an environment as a top employer

- **Open communication**

We maintain an open communication climate based on trust. Our employees are free to express their opinions and ideas without fear of negative consequences. We expect and give each other regular, sincere and constructive feedback and resolve conflicts in a consensus-orientated manner.

- Enough freedom and flexibility
- We trust our employees. Depending on the position, we offer scope for independent work and decision-making, allow flexibility in the organisation of working hours and enable mobile working.
- Education and Training
- We challenge and support our employees. In particular, we provide younger people with training opportunities and jobs within the scope of our possibilities.
- Career opportunities
- We do not make false promises. We help our employees to develop their full potential and offer committed employees opportunities for advancement within the scope of possibilities and conditions.
- Positive working atmosphere
- We cultivate a contemporary and traditional management style, are respectful and professional, but also friendly and tolerant towards one another. We generate performance from culture.
- We promote Diversity, Equity & Inclusion (DEI)
- We actively promote Diversity, Equity & Inclusion and view diversity as an enrichment to our corporate culture.



We actively pursue prevention in occupational health and safety

Occupational health and safety has a very high priority in our responsibility towards our employees.

- We work actively to assess the risks in accordance with the applicable legal regulations, to design working conditions and to optimise them in a people-friendly manner.
- As an employer, we recognise that the satisfaction and well-being of our employees is closely linked to the success of ALANOD.
- We take measures so that our employees can work in a positive and supportive working environment.
- Regular risk assessments, occupational safety audits, and continuous improvements are mandatory.
- We promote both physical and mental health (stress prevention, work-life balance, prevention programs).
- Regular training for employees and managers on occupational safety and emergency management.
- Clear responsibilities: safety officers, company doctors, and managers assume defined roles.
- Documentation and reporting of work accidents, near misses, and preventive measures.
- Involvement of employees through safety representatives, committees, and feedback channels.

We protect data and intellectual property

- We protect our inventions, products, know-how and the innovative expertise of our employees, as they are of particular importance for the longterm success of our company.
- Protecting our intellectual property from third parties and against unauthorized access by third parties is a high priority. All employees are therefore required to comply with the necessary security standards both in personal contact and in electronic communication with third parties. The same also applies to information that is made available to us by third parties as confidential.
- We ensure that all personal data of employees, contractors and/or third parties is processed in accordance with the applicable laws, including the General Data Protection Regulation (EU2016/679).
- Cybersecurity is a key concern. All employees are responsible for complying with IT security policies (e.g. password management, phishing prevention).

We respect human rights and are committed to fair working conditions

- We respect and promote compliance with internationally recognised human rights, including the rights of minorities and indigenous peoples, based on the fundamental principles set out in the United Nations Global Compact.
- In recognition of the standards of the International Labour Organization (ILO), our commitment to fair working conditions includes the consistent prevention of forced labour as well as all forms of modern slavery and human trafficking and consistently excludes discrimination against employees.
- We fully comply with the legal regulations on minimum wages, social benefits, overtime, working hours and working conditions.
- We grant all our employees the right to freedom of association and assembly, as well as the right to join trade unions or labour associations, and we respect collective bargaining and collective agreements.
- We strictly reject all forms of child labour and are committed to compliance with ILO Conventions C138 (Minimum Age) and C182 (Worst Forms).
- We ensure equal pay for work of equal value regardless of gender (ILO C100).
- Non-discrimination (ILO C111): prohibition of any disadvantage based on gender, colour, race/ethnic origin, religion, political opinion, national or social origin, age, disability, sexual identity or orientation.
- Zero tolerance of violence and (sexual) harassment in the workplace (in line with ILO C190): clear reporting channels, protection against retaliation, consistent action.
- We expect all partners and suppliers to comply with the German Supply Chain Due Diligence Act (LkSG) and all ILO core principles, verified through risk-based audits.

Our local social commitment - Reichert-Alanod foundation

The foundation, which focuses on Ennepetal and the surrounding area, pursues exclusively and directly the promotion of charitable and benevolent purposes as well as the awarding of scholarships which are laid down in the statutes as follows:

- Combating diseases, in particular cancer diagnosis and cancer therapy
- Aid for the elderly and charitable retirement homes
- Youth welfare, education and occupational training
- Children's and youth sports and the promotion of talent

We act with integrity and honesty

- **We say what we mean and mean what we say.** We expect the same transparency and honesty from all employees and everyone with whom we are doing business.
- We practice ethical behaviour in our dealings with customers, suppliers and business partners. We manage our business in an open, honest and ethical manner. Our principles are based on fair business behaviour and integrity.
- We give ALANOD our full business loyalty. We respect the company's property and treat its facilities with care. We keep business information confidentially.
- We actively avoid conflicts of interest and require employees to disclose them transparently (e.g. secondary employment, family connections).

We categorically reject bribery and corruption

- We do not bribe and we do not tolerate bribery.
- We never offer or give money, gifts or other benefits in order to obtain unlawful favours or advantages for ALANOD.
- We do not demand personal advantages from business partners.
- We categorically reject any personal advantage if it could influence our business decisions.
- We select our suppliers only on a competitive basis and taking price, quality, performance and suitability into account with regard to the products and services offered.

We act in agreement with fair competition in the open market

- We are committed to honesty, integrity and fairness in our business activities.
- We also expect our suppliers and business partners to adhere to these values.
- We comply with all competition and antitrust laws and commit ourselves to compete on basis of our performance and offer prices that result from free competition.
- We respect the legitimate interests of our customers and suppliers.
- As a globally active company we are aware that our worldwide business activities are subject to regulations that restrict free movement of goods.

We meet legal requirements and our own requirements

- We are committed to compliance with the applicable legal requirements, our own specifications to which we have committed ourselves and other requirements that apply in connection with our customers, suppliers and all interested parties in the context of our organisation.

Our compliance and monitoring measures

- Across all levels of our organisation our employees and external service providers must take all appropriate and reasonable effort to carry out their activities in awareness of our sustainability guidelines.
- We are committed to implementing the contents of this guideline and actively working to promote them among our suppliers and in the wider value chain within the scope of our respective possibilities and scope of action.
- We encourage all employees to report potential and actual violations of the company guidelines in good faith. This can be done via the respective superior, the works council, the HR department or anonymously via our independent whistleblower system where every report is treated and processed in strict confidence.
- Our employees, who report potential or actual violations in good faith and not in an abusive manner, are fully protected against reprisals, discrimination or disciplinary measures. Even if the report subsequently turns out to be unjustified.
- Consequences of violations: disciplinary measures up to and including legal action.
- Introduction of mandatory training and regular renewals.
- Annual reporting with key performance indicators (KPIs) on compliance with the Code of Conduct.

Milan Krumbé
CEO

Works Council

Version / History

index	MM.JJ	Description	Date
001	07.24	Establishment	09.07.2024
002	08.25	New logo, additions (DEI, Cybersecurity, Supply Chain, Conflicts of Interest, Sanctions, Training, Reporting, Occupational Safety)	26.08.2025