Schunk Group
Code of Conduct

Guiding principles of the Schunk Group

Schunk is a globally active technology group. Our expertise in the fields of materials and mechanical engineering provides a major boost for industries around the world. Schunk pursues profitable growth as well as independence and thinks long-term. We are characterized by diversity and mutual respect: As a team, we succeed.

Passion for technology. We are competent and idea driven. This makes us an innovative technology leader and keeps us one step ahead.

We are pragmatic. We provide rapid solutions and deliver efficient results. In doing so, our approach is entrepreneurial and collaborative.

Focus on the customer. We empower our customers on their road to success. Together, we make a significant contribution towards a sustainable future.

Preamble

- This Code of Conduct sets out fundamental principles of behavior which determine the actions of the management and all employees of the Schunk Group in our day-to-day business as a company.
- The trust that our business partners – including customers, suppliers, visitors, government authorities and the public – place in us is paramount to the Schunk Group. That's why a sense of responsibility, legal compliance, and moral integrity run through all of Schunk's actions.

A. Validity

- In addition to and independently of this guideline, the business activities of the Schunk Group and the conduct of all employees are subject to the applicable local laws and regulations.
- Where additional rules of conduct are set down for individual companies, organizational units, or groups of people in separate guidelines (such as corporate standards), these guidelines apply without limitation alongside with this Code of Conduct.

B. Compliance with laws and regulations

1. Compliance with applicable law

- Observing all applicable laws and regulations is an essential basis of all actions of the Schunk Group.
- All employees and corporate bodies of the Schunk Group are obligated to obtain information on the laws and regulations that apply to their areas of responsibility within the company and, in case of doubt, to consult the responsible bodies within the Schunk Group for advice.
- Schunk complies with its statutory obligations to prevent money laundering and does not participate in any money laundering activities. All employees are required to report unusual financial

transactions, particularly those involving cash or cash equivalents, that could give rise to a suspicion of money laundering to the relevant finance department.

- ¬ Schunk does not give any financial benefits or perquisites, particularly donations or sponsoring, to political parties, individual public officials, or candidates for political office.
- ¬ Schunk presents its business activities in a transparent manner and documents them properly in its financial reports.
- ¬ Schunk respects the Five Freedoms for animals as defined by the World Organization for Animal Health (OIE) with regard to animal welfare.

2. Fair Competition

- ¬ Rules to protect fair competition are an essential element of a free market economy. These rules concern the following in particular:
    - prohibition of agreements between competitors regarding prices, terms, division of territory, customer groups, or production volumes,
    - prohibited price maintenance or price fixing involving our sales partners,
    - prohibition of abuse of a dominant position, and
    - control of corporate mergers

  in order to prevent dominant positions from arising.
- ¬ Promoting fair competition is in line with the Schunk Group's business policies. For this reason, Schunk observes all applicable antitrust laws.
- ¬ Agreements between market participants with the aim of restricting competition are prohibited in particular.
- ¬ Informal discussions or understandings or even concerted practices are also prohibited where these express agreement on, or the intention to implement, a measure restricting competition.
- ¬ Confidential information regarding prices and/or upcoming price changes or customer/supplier relationships must not be shared during any discussion with competitors.

3. Corruption/granting and accepting benefits and perquisites

- ¬ All Schunk employees pledge to do everything in their power to prevent corruption within their sphere of influence. Corruption means offering, giving, or accepting a gift, loan, commission, reward, or any other benefit or perquisite to or from a person or entity as an incentive to do something that is dishonest or illegal or represents a breach of trust.
- ¬ Personal benefits or perquisites must not be requested, accepted, offered, or granted in exchange for preferential treatment during preparations for, awarding of, or execution of a contract.
- ¬ The distribution or acceptance of gifts is not allowed in principle. The only exceptions are customary token or promotional gifts or gifts that are in keeping with customary practice and rules of courtesy in a certain country and are compatible with the relevant statutory provisions.
- ¬ Providing or accepting products or other objects on loan for an indefinite period can also take on the nature of a prohibited gift or acceptance or granting of a benefit or perquisite and is therefore also prohibited.

4. International trade

- Schunk is a global company, and in its worldwide business activities, it is obliged to observe rules and regulations that restrict the free movement of goods.
- With this in mind, the companies of the Schunk Group observe all export and/or import bans, export controls, economic sanctions, embargoes, and reservations of government approval that apply based on national or international law.
- Various national and international laws and embargoes restrict or prohibit the import or export of, or domestic trade in, goods with regard to products, technologies, and software, provision of technical support, and intermediary actions, as well as movements of capital and monetary transactions involving certain countries, persons, and/or organizations. These restrictions and prohibitions may be based on the particular nature of the goods in question, the intended purpose, the country of origin or destination country, or the person of the other party to the transaction.
- The national and international export control regulations are of particular importance.
- All employees are required to comply with these control provisions whenever goods or services are purchased, brokered, produced, or put into circulation or technologies are transferred or received.
- No goods falling within the scope of Article 12g of Council Regulation (EU) No. 833/2014 may be sold, exported or re-exported directly or indirectly into or for use in the Russian Federation.

  Customers and suppliers will take reasonable measures to ensure that this purpose is not frustrated by third parties in the supply chain, including possible resellers. Any violation constitutes a material violation of this Code of Conduct
- Whether government authorization is required must be reviewed accordingly before any such action is taken. All companies of the Schunk Group must take the necessary organizational precautions and designate responsible persons who ensure that the aforementioned rules are observed.

C. Prevention of conflicts of interest

- All of the corporate bodies and employees of the Schunk Group are required, as part of their affiliation with the company, to prevent any conflicts between their personal interests (direct or indirect, through related persons or companies) and those of the Schunk Group.
- To prevent conflicts of interest, employees must report any intention to

  - accept a role or position at another enterprise,
  - begin any secondary employment or similar activity, paid or unpaid, or
  - begin any entrepreneurial activity

  to their relevant supervisor or the responsible Human Resource department and obtain this person's or body's approval.

D. Respect for human rights; prohibition of discrimination

1. Fair working conditions

- Schunk pledges to uphold the principles of social responsibility. For this reason, it is in the company's interest for fair working conditions to apply worldwide throughout the Schunk Group.
- Compliance with all local legislation concerning minimum wages, social benefits, overtime, working hours, and working conditions is a matter of course for Schunk.
- The requirement of fair working conditions includes zero tolerance for forced labor or any form of modern slavery or human trafficking and rules out any and all forms of discrimination against employees. In particular, the rights of indigenous peoples and local communities should be respected, promoted and protected throughout the supply chain.
- The Schunk Group believes it goes without saying to treat its employees with respect all over the world, in compliance with all locally applicable labor, employment, and human rights standards and laws.
- The Schunk Group recognizes its employees' freedom of association and assembly and their right to join unions or associations of employees.
- Schunk will not hire or use private or public security forces if, in the use of these security forces

  a) the prohibition of torture and cruel, inhuman or humiliating treatment is disregarded,

  b) injury to life or limb; or

  c) the freedom of association and freedom of organization are impaired.
- The Schunk Group also expects its employees to treat each other, and of course also customers and suppliers, with respect. Other colleagues' privacy must be respected. We have zero tolerance for any and all forms of harassment, especially sexual harassment and bullying.

2. Child labor

- The Schunk Group rejects all forms of child labor, including among its business partners, customers, and suppliers. The minimum age for employment within the Schunk Group is observed at all times, in keeping with the relevant local regulations.

3. Prohibition of discrimination

- All employees of the Schunk Group and all business partners have a right to fair, polite, and respectful treatment from managing directors, executives, other employees, and colleagues.
- The Schunk Group does not tolerate harassment or discrimination targeting anyone based on ethnic origin, skin color, nationality, descent, sex or gender, sexual or gender identity, beliefs or religious affiliation, world view, political views, age, physical constitution, appearance, or any other personal characteristic.

E. Occupational safety and health; environmental protection

1. Occupational safety and health

- Safety in the workplace and the safety of our products are elementary principles for us.

- All employees are expected to observe the relevant safety rules and demonstrate risk awareness and initiative in case of all safety-related activities. This applies to any and all risks or hazards that could arise at the Schunk workplace, on customer or supplier premises, or when our products are used.
- Recognized accidents or potential hazards and near misses must be reported to the responsible manager immediately. All managers are responsible for protecting their employees and must instruct, train, and supervise them accordingly.
- Ensuring a safe, healthy, and ergonomic workplace and providing suitable personal protective equipment for all employees goes without saying for the Schunk Group.
- We are committed to achieving continuous improvement in occupational safety and health, based on both our own experiences and ongoing advances in science and research.

2. Environmental protection

- Schunk is committed to protecting our environment as one of the company's core objectives and has stated that producing our products with minimum resource use is an important goal.
- An indispensable part of environmental protection is compliance with legal regulations. This involves taking into account the prohibition of unlawful eviction and the prohibition of unlawful deprivation of land, forests and waters in the acquisition, construction or other use of land, forests and waters, the use of which secures the livelihood of a person.
- The following guiding principles on environmental protection, ecological sustainability, and maintaining the natural basis for life apply:
    - We protect our environment, use all natural resources sparingly, and minimize the impact of our activities on people and the environment.
    - We take the aspect of preserving the natural environment into account during development and design, manufacturing, packaging, and shipping of our products and when improving procedures and introducing new facilities, equipment, and products.
- Should any incident that could result in environmental impact occur, the appropriate bodies within the company must be notified right away and in detail and must, for their own part, cause the reports required by law to be made to the authorities.
- All employees are tasked with preventing risks to people and the environment, minimizing environmental impact, and using resources sparingly.
- We are committed to an integrated and forward-looking environmental protection and to the continuous improvement of our environmental and energy management system, environmental and energy-related performance, and energy efficiency.

F. Data protection, confidential information, plagiarism and intellectual property

1. Protecting business and trade secrets

- Our inventions, products, and know-how are crucial to our company's long-term success.

- This means promoting the creative and innovative expertise of our employees is of strategic importance, as is protecting our intellectual property against third parties becoming aware of it or gaining access to it without authorization.
- All employees are therefore required to observe reasonable and necessary security standards, both in personal contact and in their electronic communications with third parties. The same applies to confidential information that is made accessible to us by third parties.
- All security guidelines issued by the central Schunk IT department must be observed.
- Without approval employees are not permitted to participate in public discussions (such as presentation events, Internet forums, etc.) or to make company-related information public (on the Internet, for example) in their function as persons associated with Schunk.

2. Handling of company property

- Employees are obligated to treat company equipment, such as machines, tools, and information and communication systems, with care and to use these items only as intended.
- Company property must not be used for personal purposes or removed from company premises without the express consent of the appropriate body within the company.

3. Obligation of confidentiality

- The knowledge and information gained within the Schunk Group is a significant element of our business success. The Schunk Group invests significant personnel and financial resources in developing innovative products and services. Protecting the innovations developed in this way safeguards the Schunk Group's success as a competitor, which is why this represents an asset that merits particular protection.
- All employees and corporate bodies of the Schunk Group are therefore obligated to prevent any knowledge and information constituting business or trade secrets from becoming known outside the Schunk Group, for example through unauthorized dissemination of sensitive information through discussions with third parties, in trade journals, or on the Internet.
- Furthermore, all employees who deal with knowledge and information of this type are obligated to obtain information on the extent to which obtaining industrial property rights for this knowledge and information enters into consideration.
- Business and trade secrets of business partners of the Schunk Group must also be protected against becoming known without authorization.

4. Plagiarism

- The Schunk Group does not approve the use, further processing or marketing of counterfeit products. In the unlikely event that such counterfeits should occur in the company despite quality assurance measures, they will be isolated immediately. Furthermore, any plagiarism detected by Schunk will not be put into circulation, but will be reported to the responsible law enforcement authorities.

5. Personal data protection

- Respect for the individuality and privacy of the employees of the Schunk Group includes protecting their personal data.

- The Schunk Group takes care to ensure compliance with the applicable laws and regulations on data protection and privacy and requires its employees, customers, and suppliers to do the same.

G. Compliance with the Code of Conduct and monitoring

- All companies and organizational units of the Schunk Group are individually responsible for compliance with the rules set down in this Code of Conduct and with further rules and regulations stipulated internally within their own areas of responsibility.
- This Code of Conduct is accessible to all employees and other stakeholders of the Schunk Group at all times on the intranet and on the Schunk Group website.
- Every manager is required to advise his or her employees of the existence of this Code of Conduct and to explain its content to them. Every Schunk employee is called upon to review his or her own conduct based on the standards and actions outlined in this document and to take corrective action whenever it is necessary.
- Managers have a special obligation to act as role models, actively demonstrate integrity in their day-to-day business, and inform employees within their own areas of responsibility of the content of this Code of Conduct.
- Violations of this Code of Conduct will not be tolerated and may bring consequences under civil or criminal law and disciplinary consequences with regard to employees' employment.
- If any employee receives an offer or request for a personal benefit or perquisite, he or she must report the matter to the appropriate specialized department or the executive management.
- All employees are, in general, called upon to consult their manager, the appropriate specialized department, or the executive management for advice and assistance if they have any legal doubts concerning their own behavior or there are any indications of dubious matters in their work environment.

H. Whistleblower system and point of contact for misconduct

We have decided to work with Dr. Rainer Buchert as a commissioned external lawyer to act as an ombudsman (trusted attorney) for the Schunk Group and thus set up a whistleblower system that has proven itself in practice.

Dr. Rainer Buchert is available free of charge at any time to all employees and other internal and external stakeholders who would like to provide confidential information about legal violations and intentional misconduct in relation to the Schunk Group. This also includes evidence of intentional misconduct as far as regulations, guidelines and rules in our company are concerned.

Attorney Dr. Buchert thus acts for the Schunk companies in the European Union (EU) at the same time as a reporting office within the meaning of the EU directive for the protection of people who report violations of EU law (EU whistleblower directive) and as a complaint office according to the German Supply Chain Due Diligence Act.

Due to his legal duty of confidentiality, it is ensured that the identity of whistleblowers is reliably protected and is not disclosed to the Schunk Group.

Contact details of the Schunk Ombudsman (trusted attorney):

Rechtsanwalt Dr. Rainer Buchert
Buchert Jacob Partner Rechtsanwälte PartG mbB
Kaiserstraße 22
60311 Frankfurt am Main
Deutschland

Telefon: +49 69 710 33330 oder +49 6105 921355
Fax: +49 69 710 34444
E-Mail: dr-buchert@dr-buchert.de

Information can also be given electronically and in several languages via a confidential contact form on the Buchert Jacob Partner website: https://report.ombudsperson-frankfurt.de/de?c=SCHUNKGROUP

In case of absence Attorney Dr. Buchert is represented by lawyer Dr. Caroline Jacob from the same law firm.

Heuchelheim, June 1, 2026

Schunk GmbH