

## CODE OF CONDUCT

### PREAMBLE

We as KLINGEL medical metal GmbH acknowledge our social, environmental and economical responsibility. KLINGEL medical metal GmbH undertakes to ensure that the codified values and principles of the following code of conduct are followed in the long term. This Code of Conduct does justice to the outstanding role and to the special responsibility we have as a German producer and manufacturer of valuable key elements in a globalized world.

### AREA OF APPLICATION

This Code of Conduct applies to all subsidiaries worldwide. As a company group, we commit ourselves to promote this Code of Conduct among our suppliers as well as our customers – if possible.

### A. BASIC PRINCIPLES OF BUSINESS ETHICS

KLINGEL medical metal GmbH economical and social activities are therefore conducted in accordance with generally recognized ethical and humanitarian principles.

Our activities and our products contribute to prosperity, while at the same time adverse impacts on future generations have to be avoided or at least to be kept to an absolute minimum. Fundamental human rights, cultures and customs must be respected and strictly observed – regarding the employees and those who are affected by the activities of the KLINGEL medical metal GmbH.

#### 1. HARD LABOR, CHILD LABOR AND EXPLOITATION

We as KLINGEL medical metal GmbH support the protection and preservation of human rights. The use of forced labor, child labor and all forms of exploitation and inhumanity will be outlawed.

#### 2. DISCRIMINATION

The KLINGEL medical metal GmbH does not tolerate discrimination based on race, gender, ethnic or social origins, religion, age, disabilities or sexual orientation. We commit to protect our employees from physical, psychological, sexual or verbal harassment and to punish such occurrences.

#### 3. FREEDOM OF SPEECH

The right to freedom of opinion and expression is granted and protected.

#### 4. FREEDOM OF ASSOCIATION

In order to maintain and promote working and economic conditions, KLINGEL medical metal GmbH tolerates its employees founding, joining and merging of trade unions and work associations. Disregarding the freedom of association is outlawed.

## CODE OF CONDUCT

### B. COMPLIANCE WITH EXISTING LEGISLATION

The KLINGEL medical metal GmbH commits to obey general laws and regulations as well as specific laws that protect fair competition and to support their further development.

#### 1. GENERAL MINIMUM WAGE

KLINGEL medical metal GmbH is aware of all requirements from the relevant regulations of the General Minimum Wage Act (MiLoG). All relevant legal requirements are complied with at all times within the group of companies. In addition, the suppliers and service providers we use are carefully selected, taking into account the provision of the General Minimum Wage Act.

#### 2. CORRUPTION

The KLINGEL medical metal GmbH takes appropriate measures to stop corruption.

#### 3. CREATING HARMFUL SOIL MODIFICATIONS, WATER AND AIR POLLUTION, NOISE EMISSIONS OR EXCESSIVE WATER CONSUMPTION

KLINGEL medical metal GmbH prevents the bringing about of harmful soil changes, water and air pollution, noise emissions, which damages a person's health, impairs the preservation and production of food, denies access to impeccable drinking water and impedes or destroys access to sanitary facilities. Causing excessive consumption of water is not reimbursed by KLINGEL medical metal GmbH.

#### 4. ENGAGEMENT AND USE OF PRIVATE OR PUBLIC SECURITY GUARDS

KLINGEL medical metal GmbH commissioned private and public security guards are adequately instructed and checked before deployment. The disregard of any form of exploitation, human contempt and human injury or the freedom of association, which is associated with commissioned private and public security guards, is outlawed. KLINGEL medical metal GmbH takes appropriate precautions to prevent this.

#### 5. EVICTION AND DEPRIVATION OF LAND, FORESTS AND WATERS

KLINGEL medical metal GmbH prohibits unlawful eviction and unlawful deprivation of land, forests and waters in the acquisition, construction or other use of land, forests and waters, the use of which secures a person's livelihood. Disregard is outlawed.

#### 6. CONFLICT MINERALS

On the part of KLINGEL medical metal GmbH appropriate measures are taken to prevent financing of terrorist activities in connection with the conflict mineral business (gold, titanium, tin, tungsten). These measures include the support of international activities to find out the facts about the origin of conflict minerals from the Democratic Republic of Congo (DRC) and adjoining countries. The goal is to prevent that conflict minerals from DRC and adjoining countries and their export may contribute to financing terrorism and armed conflicts.

#### 7. DANGEROUS SUBSTANCES

The KLINGEL medical metal GmbH supports that chemicals are fabricated and applied in a way that avoids or minimizes adverse impacts on human health and environment. We therefore check whether parts manufactured by our suppliers contain particularly dangerous substances in a concentration of more than 0.1 percent weight by weight according to REACH regulation (EG) N° 1907/2006. We ensure that chemicals in our production processes are handled properly and used safely and disposed in an environmentally friendly manner. We support the substitution of particularly dangerous substances.

#### 8. PRODUCTION, USE AND TREATMENT OF MERCURY, MERCURY COMPOUNDS AND MERCURY WASTE

KLINGEL medical metal GmbH complies with the manufacture of mercury-added products as defined in article 4 paragraph 1, the use of mercury and mercury compounds in manufacturing processes as defined in article 5 paragraph 2 and Annex B, and the treatment of mercury waste in accordance to the provisions of article 11 paragraph 3 of the Minamata Convention. Failure to comply with the obligations and prohibitions of the Minamata Convention is outlawed.

#### 9. IMPORT AND EXPORT OF HAZARDOUS WASTE

The rules regarding the import and export of hazardous waste in accordance with the Basel Convention are complied at KLINGEL medical metal GmbH.

#### 10. HANDLING, COLLECTION, STORAGE AND DISPOSAL OF WASTE

The rules regarding the handling, collection and disposal of waste in accordance with the POPs Convention are complied at KLINGEL medical metal GmbH.

## CODE OF CONDUCT

### C. SUSTAINABILITY

The KLINGEL medical metal GmbH produces unique high-valued products which are of vital importance for modern life. These products are key-elements for innovation and technical progress, for environmental protection and for energy-saving. The KLINGEL medical metal GmbH bases all its entrepreneurial actions on the principles of sustainability.

#### 1. RESOURCES

The KLINGEL medical metal GmbH ensures through continuous innovation, that the production processes always correspond to the current technical standards and therefore environmental impact is kept as low as possible.

At the same time we look for continuous improvements which make it possible to keep the specific amount of resources in products as low as possible while maintaining the performance.

#### 2. ENVIRONMENTAL PROTECTION AND HEALTH CARE

The KLINGEL medical metal GmbH obeys the rules in the environmental and health care sector. We pay special attention to the environment and health care of our employees.

#### 3. ENERGY SAVING

The KLINGEL medical metal GmbH is in compliance with all the energy policy regulations.

Energy consumption as well as energy efficiency constitute considerable criteria in the procurement of energy services, products, facilities and energy.

#### 4. SOCIAL RESPONSIBILITY

The KLINGEL medical metal GmbH contributes to economic growth and prosperity. We provide employment in the supply industry. In some regions the precision metal industry is the main source of income. We are fully aware of our responsibility and we particularly declare our support to secure these jobs. The KLINGEL medical metal GmbH also contributes to social progress, for example by supporting non-profit projects.

### D. IMPLEMENTATION AND ENFORCEMENT

The KLINGEL medical metal GmbH shall take appropriate and proportionate efforts to continually implement and apply the principles and values set out in this CoC.

Pforzheim, July 2023



**Ralf Petrawitz**  
Managing Director