

Code of Conduct

Hartmetall-Werkzeugfabrik Paul Horn GmbH,

1. Preamble and Mission Statement

Hartmetall-Werkzeugfabrik Paul Horn GmbH is committed to environmentally, socially and ethically responsible corporate governance.

This Code of Conduct describes the fundamental principles and values that guide our business activities. It serves as a binding framework for the Hartmetall-Werkzeugfabrik Paul Horn GmbH, its management, executives and all employees.

Our actions are guided by the applicable national and international laws and regulations, as well as by recognized international principles. These, in particular, include the United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the Guidelines on Children's Rights and Business, the international labor standards of the International Labor Organization (ILO), and the principles of the United Nations Global Compact.

Compliance with applicable law is, for us, a fundamental minimum requirement. To the extent that this Code of Conduct sets forth principles that go beyond these legal requirements, we view them as an expression of our corporate identity.

2. Social Responsibility and Human Rights

2.1 Respect for human rights

We respect internationally recognized human rights and work within our sphere of influence to prevent human rights violations.

We respect the dignity, privacy and personal rights of every individual. This applies both within our company and in our dealings with business partners and other third parties.

2.2 Prohibition of forced labor

We reject any form of forced labor, slave labor, or comparable involuntary labor.

All work must be voluntary and employees must be able to terminate the work or employment at any time in accordance with applicable legal and contractual provisions.

Any form of inhuman or degrading treatment - in particular physical or psychological violence, sexual harassment, personal harassment, intimidation or other abuse, will not be tolerated.

2.3 Prohibition of child labor

We strongly oppose child labor and comply with the applicable legal regulations and the relevant standards of the International Labor Organization (ILO) regarding the minimum age for employment. Accordingly, the minimum age for employment shall not be lower than the age at which compulsory education ends and, in any case, shall not be less than 15 years.

2.4 Fair remuneration

We provide our employees with appropriate remuneration that meets, at a minimum, the applicable legal requirements. This includes, in particular, the legal requirements regarding the minimum wage.

Pay deductions as a disciplinary measure are not permitted.

The composition and calculation of remuneration are made transparent to employees on an ongoing basis through clear and understandable pay stubs.

2.5 Fair working hours

We ensure fair working conditions and working hours – regardless of whether our employees work in shifts, in the office, or in the field. We respect the maximum permitted working hours as well as the legally mandated rest and recovery periods.

If overtime is worked, it is performed in accordance with applicable legal, contractual and company regulations. This also applies to its remuneration or other forms of compensation.

We take care to structure working hours and workloads in a way that safeguards the health and safety of our employees.

2.6 Freedom of association

We respect our employees' right to freedom of association, to join trade unions, and to be members of company employee representative bodies in accordance with local laws.

Employees may raise their concerns with supervisors and company management at any time, openly and without fear of discrimination, retaliation, or harassment.

2.7 Prohibition of discrimination

Discrimination has no place here – neither against employees nor against job applicants. This applies at all levels of the organization and equally to how we interact with one another.

We oppose any form of direct or indirect discrimination, unless different treatment is objectively justified and legally permissible.

In particular, we do not discriminate against anyone on the basis of gender, ethnic or social origin, skin color, nationality, disability, health status, political beliefs, worldview, religion, age, pregnancy, sexual orientation or other legally protected characteristics.

We attach particular importance to the protection and equality of women. We do not tolerate any form of discrimination, harassment, intimidation or inappropriate behavior toward women, and we are committed to fostering a work environment in which their dignity, safety and personal boundaries are fully respected and in which they have equal opportunities to develop their skills and potential and to develop professionally.

2.8 Rights of local communities, minorities and indigenous peoples

We respect the legitimate rights of local communities, minorities and indigenous peoples. This includes, in particular, their rights in relation to adequate living conditions, land, water and natural resources and –where applicable – the right to free, prior, and informed consent (FPIC).

We neither endorse nor support forced evictions or the unlawful seizure of land, forests, or waterways.

When private or public security forces are deployed, we work within our sphere of influence to ensure that human rights are respected and upheld at all times.

2.9 Occupational health and safety

We ensure a safe and healthy work environment. Through appropriate measures and adequate occupational safety systems, we take the necessary precautions to prevent, to the best of our ability, accidents and health hazards that may arise in connection with work activities.

We regularly inform and train our employees about the applicable health and safety regulations and the corresponding protective measures. At the same time, we expect all employees to comply with applicable occupational health and safety regulations and to contribute to the protection of their own health and safety, as well as that of others, through responsible behavior.

For us, a safe and healthy work environment also includes access to sufficient drinking water and clean sanitation facilities.

2.10 Notes and complaints

A digital whistleblower system is available to our employees, as well as our business partners and other third parties, to provide information about possible violations of laws, internal regulations or this Code of Conduct. Reports can also be submitted completely anonymously.

You can access the HORN whistleblower system via: <https://horn-group.whistleblower-system.de/>

Reported matters will be treated confidentially and appropriately investigated by us. If necessary, we will take appropriate measures. Persons who in good faith provide indications of possible violations need not fear any disadvantage or reprisals as a result of their reporting. Deliberately false or abusive reports, on the other hand, are not tolerated and may result in appropriate consequences.

2.11 Handling conflict minerals

We emphasize responsible sourcing of conflict minerals such as tin, tungsten, tantalum and gold, as well as other raw materials such as cobalt, insofar as these are important for our business activities. In doing so, we align our processes with the applicable legal requirements and the *OECD Guide to Due Diligence to Promote Responsible Supply Chains for Minerals from Conflict-Affected and High-Risk Areas*.

Within the scope of our influence, we work to ensure that smelters and refineries have appropriate, audited due diligence processes.

We expect our suppliers and other relevant business partners to also take appropriate measures for responsible sourcing of conflict minerals within their respective responsibilities.

3. Environmental Responsibility

3.1 Principle

Protecting the environment and using natural resources responsibly are integral parts of our business operations.

We comply with all applicable environmental regulations and strive to continuously reduce our environmental impact within the limits of our operational and economic capabilities.

To systematically fulfill our environmental responsibility, we maintain a certified environmental management system in accordance with ISO 14001 and a certified energy management system in accordance with ISO 50001.

We also expect our business partners to handle the environment and natural resources responsibly. Within the scope of their respective business activities, they should implement appropriate environmental and energy management systems, guided by the principles of ISO 14001 and ISO 50001 or comparable standards.

3.2 Wastewater management

To the extent that wastewater is generated as part of our business operations, we treat and dispose of it responsibly and in compliance with applicable legal requirements. Where necessary, the wastewater generated is monitored prior to discharge or disposal and treated accordingly if required.

In addition, we take appropriate measures within our capabilities to reduce overall generation of wastewater and to promote the careful use of water.

3.3 Emissions and climate protection

We manage responsibly the air, noise and greenhouse gas emissions resulting from our business activities, respecting applicable legal requirements.

Within the limits of our technical and economic capabilities, we take appropriate measures to limit and continuously reduce these emissions.

For this we use, among other things, our certified environmental management system in accordance with ISO 14001 and our certified energy management system in accordance with ISO 50001.

3.4 Waste and hazardous substances

We also take a systematic approach to the collection, reduction, recovery and disposal of waste. We strive to avoid and reduce waste as much as possible and to reuse or recycle suitable materials.

We handle chemicals and other substances that may pose a risk to humans or the environment responsibly and in compliance with applicable legal requirements. We label, store, use, transport and dispose of hazardous substances in a manner that minimizes risks to people and the environment as much as possible.

3.5 Conservation of resources

We use raw materials, materials and natural resources conscientiously and as efficiently as possible.

In our operational procedures and processes, we take care to reduce material and resource consumption within the limits of our technical and economic capabilities and, where appropriate, to use materials that conserve resources.

3.6 Energy efficiency and decarbonization

We systematically document and monitor our energy consumption and continuously work to improve our energy efficiency and reduce energy consumption. Our energy management system is ISO 50001 certified.

Within our technical and economic capabilities, we strive to expand the use of renewable energy, promote energy-efficient and environmentally friendly technologies and thus contribute to the decarbonization of our business activities.

4. Ethical Business Conduct

4.1 Integrity and compliance with the law

Integrity is the foundation of our business. We act honestly, responsibly and in accordance with the laws and regulations governing our business. We make our business decisions according to objective criteria and in compliance with ethical principles.

We expect our managers and employees to act with integrity and in accordance with the law in their respective areas of activity and responsibility. We will not tolerate illegal or unfair business practices – even if they supposedly serve the economic interest of our company.

4.2 Fair competition and antitrust law

We stand for free and fair competition and adhere to the applicable competition and antitrust regulations.

In particular, we do not participate in any unlawful agreements or concerted practices with competitors, customers or suppliers regarding prices, conditions, the division of markets, customers, territories or other matters relevant to competition.

4.3 Anti-corruption

We have a zero-tolerance policy towards bribery, corruption, extortion, embezzlement and other improper granting of benefits.

Employees and managers may not offer, promise or grant any undue advantages to business partners, public officials or other third parties. Likewise, no improper benefits may be demanded or accepted.

Gifts, invitations and other contributions may only be granted or accepted if they are reasonable and legally permissible and do not aim at or give the impression of unduly influencing business decisions.

4.4 Conflicts of interest

Business decisions must not be guided by personal, family, financial or other extraneous interests.

Employees and managers are encouraged to avoid situations in which such interests may conflict with the interests of our company. Actual or potential conflicts of interest must be disclosed to the responsible manager and handled in accordance with internal guidelines.

4.5 Export control and sanctions

As an internationally active company, we observe the applicable regulations on the import and export of goods, technologies and services, as well as the applicable regulations on economic sanctions and embargoes.

In cross-border business activities, we take into account, in particular, existing restrictions and licensing requirements with regard to countries, business partners, goods, technologies and services. We will not conduct any transactions that violate applicable import, export control or sanction regulations.

4.6 Proper accounting and documentation

We properly comply with our tax obligations and keep our books in accordance with applicable legal requirements. Business and tax-relevant transactions are documented completely, correctly and comprehensively. We keep the related documents, documents

and supporting documents in accordance with applicable legal and internal requirements. We properly and timely comply with existing reporting and disclosure requirements.

Employees and managers are responsible for providing complete and truthful information in their respective areas of activity and responsibility and for properly documenting and submitting necessary evidence. This also applies, for example, to travel expense reports and the supporting documents.

We will not tolerate deliberately false, misleading or incomplete information, records or statements.

4.7 Data protection and data security

We attach great importance to the responsible handling of personal data. When processing personal data, we consistently ensure that the applicable data protection regulations be complied with and the processing is carried out for a specific purpose and on a lawful basis.

Through appropriate technical and organizational measures, we protect personal data from loss, misuse, unauthorized access, unauthorized disclosure, or other improper disclosure.

To implement our data protection and data security requirements, we have an IT security concept as well as corresponding internal regulations and work instructions.

Employees and managers are obliged to treat personal data carefully and to comply with applicable internal data protection and information security requirements.

4.8 Confidentiality

Confidential information and trade secrets are kept confidential by us. This applies to confidential information and trade secrets of our company as well as those of our customers, suppliers and other business partners.

Confidential information and trade secrets may only be used for the intended business purposes and may not be disclosed or otherwise disclosed without authorization. Employees and managers are obliged to comply with the applicable internal confidentiality requirements.

The obligation of confidentiality continues –to the extent provided for by law or contract– even after the termination of an employment or business relationship.

4.9 Intellectual property

We respect the rights of third-party intellectual property.

We only use patents, trademarks, copyrights, technical know-how and other intellectual property within the framework of the legal and contractual provisions applicable at the time. We do not use or share third-party intellectual property without authorization.

Likewise, we expect our business partners to respect and protect the intellectual property and confidential know-how of Hartmetall-Werkzeugfabrik Paul Horn GmbH.

5. Principles of our Business Relationship

We understand long-term and trusting business relationships as an essential part of our entrepreneurial success. A common understanding of fundamental values is of particular importance for this purpose. Therefore, we expect our business partners to comply with applicable law, respect the basic principles described in this Code of Conduct and take appropriate account of them in the course of their respective business activities.

To the extent that customers or other business partners use their own codes of conduct or supplier codes, this Code of Conduct shall be used as an expression of the principles and standards of Hartmetall-Werkzeugfabrik Paul Horn GmbH.

Deviating or additional obligations require separate examination and agreement by the authorized bodies of Hartmetall-Werkzeugfabrik Paul Horn GmbH.

6. Implementation

6.1 Role Model Function

Together we ensure that this code of conduct is communicated and practiced within Hartmetall-Werkzeugfabrik Paul Horn GmbH. It applies to all employees as well as at all hierarchical levels and in all business areas.

Our company management and all managers have a special role model function in this regard. They live out the principles of this Code of Conduct in their respective areas of responsibility, promote their implementation and contribute to a corporate culture based on respect, integrity, a sense of responsibility and lawful action.

In the event of any ambiguity or questions, managers are available to their employees as contact persons and support them in implementing this Code of Conduct in their daily work.

6.2 Responsibility of Staff

All employees are obliged to comply with the legal provisions relevant to their area of activity and the principles of this Code of Conduct.

In case of uncertainty about the correct course of action, employees should involve their manager or the responsible internal body in a timely manner.

We expressly encourage our employees to report any possible violations of legal regulations or this Code of Conduct through the internal reporting and communication channels provided for this purpose.

7. Dealing with Violations

If we find that the principles of this Code of Conduct are not being respected, we will take reasonable measures to end the violation and prevent a recurrence.

Guilty breaches of this Code of Conduct may result in consequences within the framework of the applicable legal provisions and depending on the nature and seriousness of the breach. This applies to all employees – regardless of position or hierarchy level.

8. Final Provisions

This code of conduct is valid from **09/01/2026** for Hartmetall-Werkzeugfabrik Paul Horn GmbH and all its employees.

We regularly review this Code of Conduct and develop it further as necessary, particularly when legal requirements or essential frameworks of our business activities change.



Markus Horn
Managing Director



Matthias Rommel
Managing Director