

## **ENERTRAG Supplier Code of Conduct (Version 2.0 dated May 4, 2026)**

### **1. Preamble**

ENERTRAG is committed to responsible corporate governance. We expect the same conduct from our suppliers. Therefore, for future cooperation with our suppliers, we agree on the applicability of the following fundamental human rights, environmental and ethical requirements, as well as due diligence and information obligations.

The Code of Conduct is based on relevant laws and regulations, in particular the German Supply Chain Due Diligence Act (LkSG) in its current version, and the human rights and environmental risks listed therein.

### **2. Requirements for Suppliers**

As a general principle: Just as compliance with all applicable laws and regulations in the countries in which we operate is a given for us, we expect the same from our suppliers.

#### **(1) Responsibility for Human Rights**

##### **a) Exclusion of Forced Labor**

No forced labor, slavery, or comparable forms of labor shall be used. All work must be voluntary and performed without threat of punishment. Employees must be able to terminate their work or employment relationship at any time. Furthermore, no unacceptable treatment of workers, such as psychological hardship, sexual harassment, or humiliation, may occur. The hiring or use of security forces must be avoided if their deployment results in inhumane or degrading treatment or injury to persons or impairs freedom of association

##### **b) Prohibition of Child Labor and Special Protection for Young Workers**

Suppliers are required to comply with the recommendations of the ILO conventions on the minimum age for employment of children. Young workers under the age of 18 must not be used for work that is harmful to the health, safety, or morality of children.

##### **c) Fair Remuneration**

Employees are entitled to appropriate remuneration in accordance with the laws of the place of employment. Compensation for regular working hours and overtime must correspond to at least the national statutory minimum wage or the minimum standards customary in the industry, whichever is higher. Employees must be granted all legally required benefits. Wage deductions as punitive measures are not permitted.

##### **d) Fair Working Hours**

Working hours must comply with applicable laws or industry standards. Appropriate measures must be taken to prevent excessive physical and mental fatigue, particularly through proper work organization with regard to working hours and rest breaks

##### **e) Freedom of Association**

Where legally permissible at the local level, the right of workers to form and join organizations of their choice, to engage in collective bargaining, and to strike must be respected. Employees must not be subject to discrimination for forming, joining, or being a member of such an organisation. Employee representatives must be granted free access to their colleagues' workplaces to ensure that they can exercise their rights in a lawful and peaceful manner.

##### **f) Non-Discrimination**

Unequal treatment of employees in any form is not permitted unless it is justified by the requirements of the employment. This applies, for example, to discrimination based on gender, national, ethnic or social origin, skin color, disability, health status, political opinion, worldview, religion, age, pregnancy, or sexual orientation. The personal dignity, privacy, and personal rights of each individual are respected.

g) Health Protection and Safety in the Workplace

The supplier is responsible for a safe and healthy working environment. By establishing and applying appropriate occupational health and safety systems, necessary precautionary measures are taken to prevent accidents and health damage that may arise in connection with work activities. In addition, employees are regularly informed and trained on applicable health and safety standards and measures. Employees must have access to sufficient drinking water and to clean sanitary facilities.

h) Preservation of Livelihoods

The supplier must not unlawfully deprive persons of land, forests, or waters whose use secures their livelihood. Harmful soil changes, water and air pollution, noise emissions, and excessive water consumption must be avoided if they harm the health of persons, significantly impair the natural resources for food production, or prevent access to clean drinking water or sanitation.

i) Handling of Conflict Minerals

If the supplier imports or uses to a material extent so-called conflict minerals such as tin, tungsten, tantalum, and gold (3TG), as well as cobalt, it shall establish processes in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and shall expect the same from its suppliers. Smelters and refiners without appropriate, audited due diligence processes must be avoided.

(2) Environmental Responsibility

a) Treatment and Discharge of Industrial Wastewater

Wastewater from operational processes, manufacturing processes, and sanitary facilities must be categorized, monitored, inspected, and, if necessary, treated prior to discharge or disposal.

b) Handling of Emissions

General emissions from operations (air and noise emissions) as well as greenhouse gas emissions must be categorized, routinely monitored, inspected, and, if necessary, treated prior to release. The supplier is also responsible for monitoring its exhaust gas treatment systems.

c) Handling of Waste and Hazardous Materials

The supplier follows a systematic approach to identify, handle, reduce, and responsibly dispose of or recycle solid waste. The prohibitions on the export of hazardous waste under the Basel Convention of March 22, 1989, as amended, must be observed. Chemicals or other materials posing a hazard when released into the environment must be identified and handled in a way that ensures safety during handling, transport, storage, use, recycling, reuse, and disposal. Mercury must be used in accordance with the prohibitions of the Minamata Convention of October 10, 2013, as amended, and persistent organic pollutants in accordance with the Stockholm Convention of May 23, 2001, as amended.

(3) Ethical Business Conduct

a) Fair Competition

Applicable antitrust laws must be complied with, which prohibit agreements and other activities with competitors that influence prices or conditions.

b) Data Protection, Information Security, and Confidentiality

The supplier must comply, where applicable, with the General Data Protection Regulation (GDPR) of the European Union as well as locally applicable data protection and information security laws and regulations when collecting, storing, processing, transmitting, and sharing data and information.

The supplier undertakes to adequately protect all confidential company information – including trade secrets and operational and safety-critical information – and to prevent unauthorized access, disclosure, or dissemination.

c) Intellectual Property

Intellectual property rights must be respected; technology and know-how transfers must be carried out in such a manner that intellectual property rights are protected.

d) Anti-Corruption

The supplier must pursue a zero-tolerance policy against all forms of corruption, bribery, extortion, and embezzlement. Procedures to monitor and enforce compliance must be applied to ensure adherence to anti-corruption laws.

e) Sanctions and Export Controls

The supplier ensures that no goods, services, technologies, or financial transactions are provided that violate applicable sanctions, embargoes, or export, re-export, and import control regulations of the European Union, the United Nations, or other applicable jurisdictions.

### 3. Due Diligence and Information Obligations

We expect our suppliers, with regard to their operations and supply chains, to comply with the due diligence and information obligations set out below concerning the requirements in Section 2. Intentional or negligent failure to fulfil these obligations in connection with a serious violation of the requirements in Section 2 constitutes a breach of this Code. Serious violations are characterized by their scale, scope (severity of consequences), and irreversible nature.

- a) Risks of and violations of the requirements in Section 2 must be identified. Appropriate measures for prevention and remediation or, where not otherwise possible, corrective action plans must be implemented.
- b) ENERTRAG is regularly informed about identified risks and preventive measures, for example as part of the annual sustainability reporting.
- c) In the event of a credible or confirmed indication of a serious violation of the requirements of Section 2 at its sites, the supplier shall inform ENERTRAG within a reasonable period and subsequently on a regular basis about the facts of the case and, if necessary, about the implemented remedial measures. Indications may arise, in particular, from reliable audits, the supplier's or ENERTRAG's whistleblowing system, or substantiated third-party investigations.
- d) The supplier undertakes to contractually pass on the requirements and the due diligence and information obligations of this Code to its direct suppliers. If there is concrete evidence of a serious violation at a sub-supplier, the supplier shall promptly obtain relevant information on the facts and request appropriate remedial measures. It shall inform ENERTRAG within a reasonable period about the facts and the requested remedial measures.
- e) ENERTRAG reserves the right to verify compliance with the requirements and due diligence obligations set out in this Code by means of a self-assessment questionnaire and, where appropriate, audits at the supplier's sites. The supplier agrees that ENERTRAG may conduct such audits at its own

expense in cases of concrete and justified suspicion of a serious breach of this Code. To minimize disruptions, such an audit will take place during normal business hours, with reasonable prior notice, and in coordination with the supplier, by persons appointed by us. The supplier may object to individual audit measures if these would violate mandatory data protection regulations.

#### **4. Acknowledgment and Consent of the Supplier**

The supplier undertakes to act responsibly and to comply with the listed requirements (Section 2) as well as the due diligence and information obligations (Section 3).