



PTS PROTOTYPENTEILE UND SYSTEM TECHNIK GmbH
FORMING WHAT MOVES THE WORLD

Code of Conduct for suppliers

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Preamble

PTS Prototypenteile und System Technik GmbH (hereinafter "PTS") is committed to ecologically and socially responsible corporate management. We expect our suppliers to integrate the principles of sustainability into their corporate policies.

This policy is an integral part of all purchasing terms and supply contracts.

Specific Customer Requirements:

Where PTS products are intended for specific end customers (e.g., Mercedes-Benz AG), we expect our suppliers to comply with the respective customer-specific standards (e.g., the "Mercedes-Benz Responsible Sourcing Standards" and the "Sustainability Requirements for Suppliers").

PTS reserves the right to verify compliance with the standards set forth in these guidelines as well as with specific customer requirements (e.g., Mercedes-Benz Responsible Sourcing Standards) at any time.

This may be done through self-assessments, written documentation, or on-site audits at the supplier's facilities as well as those of its sub-suppliers (Tier-n).

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Labour Standards

Prohibition of Child Labor

The exploitation of children will not be tolerated. The minimum age for employment must not be less than 15 years (or the age at which compulsory education ends).

Prohibition of Forced Labor

Any form of forced or compulsory labor, serfdom, debt bondage, or modern slavery, as well as human trafficking, is strictly prohibited.

Wages, Social Benefits, and Working Hours

Compensation and working hours must at least comply with applicable national laws and industry standards.

Freedom of Association

The right of employees to organize in trade unions is respected.

Free Choice of Employment

Every employment relationship must be voluntary. Employees must have the right to freely terminate their employment relationship subject to a reasonable notice period. It is prohibited to withhold employees' identification documents, passports, or work permits as a condition of employment.

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Labour Standards

Health and Safety

The supplier ensures occupational safety and health protection in accordance with applicable national regulations. The supplier implements an appropriate occupational safety management system (e.g., risk assessments, fire safety, protective equipment) to prevent accidents and work-related illnesses.

Whistleblowing and Protection against Retaliation

We expect our suppliers to implement mechanisms that allow employees to report misconduct or risks without fear of retaliation. In addition, PTS GmbH provides a publicly accessible complaint mechanism on its website through which external third parties can also submit reports.

Human Rights

Human rights are relevant to the economic, social, and environmental aspects of responsible business conduct. PTS Prototypenteile und System Technik GmbH supports and respects the protection of human rights and recognizes that respect for the human rights of individuals who interact with our company and/or act on its behalf is an integral part of being a good corporate citizen. We insist that all our partners and suppliers apply and adhere to the same comprehensive human rights standards as set forth in this policy.

This policy is based on the United Nations Guiding Principles on Business and Human Rights, which include a commitment to respect human rights as set forth in the International Bill of Human Rights, the Universal Declaration of Human Rights, and the Declaration on Fundamental Principles and Rights at Work. We all fully support the global goal that respect for the rights of all minorities, including the rights of indigenous peoples and women, is fundamental to the observance of human rights.

Our policy is communicated internally and externally to our business partners and employees.

Compliance with International Humanitarian Law

We strictly reject any form of war crimes, crimes against humanity, and genocide. We ensure that our business activities do not contribute to the financing or support of armed conflicts and comply with the applicable provisions of international humanitarian law.

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Responsible Sourcing & Due Diligence

To fulfill human rights due diligence obligations in the supply chain (in accordance with OECD Guidelines), the following binding provisions apply:

- **Procurement Provisions:** We expect our suppliers to comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals.
- **Risk Management:** We expect our suppliers to establish a system for identifying and assessing human rights risks along their raw material supply chains (especially for conflict minerals and critical raw materials such as nickel).
- **Supply Chain Transparency (Tier-N):** We expect our suppliers to make efforts to identify sub-suppliers (Tier-N) and to document these internally. Origin and sources of supply (e.g., nickel supply chain) must be disclosed to PTS upon request.
- **Remedial Measures:** In the event of identified deviations in the supply chain, binding action plans must be created and their progress documented.
- **Reporting:** We expect regular internal reporting to management regarding the strategies and measures for implementing due diligence obligations in the raw material supply chains.

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Environmental Standards

Environmental Responsibility

The precautionary principle applies. The supplier is expected to support a precautionary approach to environmental challenges, undertake initiatives to promote greater environmental responsibility, and encourage the development and diffusion of environmentally friendly technologies.

Eco-friendly Production & Products

The supplier shall ensure an optimal level of environmental protection in all phases of production. This includes a proactive approach to avoid or minimize the consequences of accidents that could have a negative impact on the environment. Particular importance is attached to the application and further development of energy- and water-saving technologies, characterized by strategies for emission reduction, reuse, and recycling.

Hazardous Substances & Chemicals

All products manufactured along the supply chain must meet the environmental standards of their respective market segment. Substances that are restricted by law must be identified. A hazardous materials management system must be established to ensure the safe handling, transport, storage, use, and disposal of such substances.

Energy Consumption and Greenhouse Gas Emissions

All parties along the supply chain should aim to further reduce the company's energy consumption, thereby protecting the climate and conserving valuable resources. At the same time, efforts should be made to continuously reduce greenhouse gas emissions during production and delivery by upgrading and/or expanding production sites or delivery fleets. When procuring energy, optimization measures should ensure that the demand for low-carbon energy is balanced.

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Environmental Standards

Improving Water Quality, Water Use, and Air Quality

Our suppliers must comply with all applicable national and international environmental regulations and align their production and services with sustainability principles. This includes, in particular, providing the best possible protection for the environment, using resources carefully, and conserving energy. Our suppliers are expected to reduce impacts on water and air quality to the absolute minimum and to promote good water and air quality to the greatest extent possible.

Avoiding hazardous substances

Substances whose release poses a risk to people and the environment must be avoided. The suppliers of PTS maintain a hazardous substances management system that complies with at least the applicable state laws, ensuring safe use, transport, storage, recycling, reuse, and disposal. Our suppliers practice responsible chemical management based on the principle of minimal use.

Responsible Raw Material Sourcing

The suppliers of PTS support initiatives that ensure responsible raw material sourcing. The procurement and use of raw materials obtained illegally or through ethically reprehensible or unacceptable means must be avoided. The use of raw materials such as conflict minerals, which are subject to embargoes or other import restrictions, must be excluded. We require our suppliers to identify these raw materials in manufactured products within the supply chain and to disclose the origin and sources of the raw materials they use. The use of renewable resources is to be preferred wherever possible.

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Environmental Standards

Prevention and Reduction of Environmental Impact

All emissions (water, air, noise, greenhouse gases) must be reduced to a minimum using state-of-the-art technology. Polluting emissions and substances must be treated before being released into the environment (air and soil). The overall volume of waste must be reduced to a minimum, reuse must be promoted, and the maximum use of recycled products must be pursued.

Decarbonization

Our suppliers should support the “European Green Deal” (a climate-neutral Europe by 2050) to the greatest extent possible, prioritize the use of low-carbon energy, and minimize the use of fossil fuels. This should be implemented in the industrial, transportation, and building sectors to reduce unnecessary CO2 emissions.

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Ethics

Anti-Corruption

Any form of corruption, bribery, extortion, or embezzlement is strictly prohibited. The supplier must ensure that no personal dependencies or obligations to third parties arise through gifts, invitations, or other benefits.

Discrimination & Equal Opportunity

Suppliers must promote equal opportunity and prevent any form of discrimination. No employee may be disadvantaged, favored, or harassed based on gender, age, skin color, culture, ethnic origin, sexual identity, disability, religion, or worldview. This includes, in particular, the payment of equal compensation for work of equal value.

Data Protection and Confidentiality

Personal data of employees, former employees, business partners, and other affected parties is strictly confidential and is handled with the utmost care. When collecting, processing, and using personal data (e.g., addresses, names, contact information, phone numbers, dates of birth, etc.), we always ensure compliance with applicable laws and regulations. The IT systems used in day-to-day business operations are protected by appropriate security measures to ensure the best possible protection of personal data and intellectual property at all times. All employees are obligated to protect the IT systems available to them from internal and external misuse. Furthermore, existing obligations regarding information, reporting, and disclosure to supervisory authorities and data subjects are strictly adhered to.

Ethical Use of Data and Artificial Intelligence (AI)

In addition to compliance with legal data protection requirements, we expect our suppliers to use data responsibly and ethically. When using artificial intelligence, it must be ensured that such use is non-discriminatory, transparent, and subject to human oversight. The intellectual property of third parties and privacy must always be protected during algorithmic processing.

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Conflicts of Interest

Our personal relationships and private interests do not influence our business decision-making in our day-to-day operations. For this reason, we avoid any interactions with our suppliers and business partners that could lead to a conflict or potential conflict with our obligations. This may be the case, in particular, when financial, personal, or family relationships exist with a supplier, customer, or business partner. Every employee in our company must disclose any potential conflict of interest to management.

Safety & Quality

All products and services must meet the contractually specified quality and safety criteria upon delivery and must be safe to use for their intended purpose.

Information & Communication

This policy must be posted in the local language at the business partners' facilities or made available to employees in some other manner. Upon request, the information specified must be disclosed.

Intellectual Property Protection and Counterfeits

Our suppliers fully respect the intellectual property rights of third parties in accordance with all applicable laws. Counterfeit goods must not be distributed or purchased.

Export Controls and Economic Sanctions

The company conducts its business in compliance with export control criteria and in accordance with existing economic sanctions to ensure safe trade. The company does not engage in trade that violates these regulations.

Anti-Money Laundering

Our suppliers are committed to complying with all applicable laws and regulations regarding the prevention of money laundering and terrorist financing, and strictly reject any form of involvement in such activities.

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Fair and Free Competition

Compliance with antitrust laws, other competition regulations, and competition protection laws, as well as the rejection of any form of corruption, extortion, bribery, and unfair competition, are principles upheld by our suppliers and are in line with their corporate policies.

We conduct our business at all times in accordance with the applicable legal framework. We are committed to fair competition in all business relationships. You ensure that no anti-competitive agreements regarding prices are made with competitors, customers, or suppliers. This applies in particular to tenders. Decisions are made without exchanging sensitive information with competitors.

Our management and employees will not demand any benefits for themselves or a third party, nor will they accept any consideration in return.

Gifts or invitations may be given or accepted provided they remain within reasonable limits and do not violate legal regulations.

Financial Responsibility and Disclosure of Information

We expect our suppliers to maintain accurate accounting records. Financial reporting must comply with legal requirements and generally accepted accounting principles. Information must be provided in a transparent, accurate, and timely manner and communicated in accordance with applicable laws and other guidelines.

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Management Systems

Safety & Quality:

The supplier shall implement management systems that ensure compliance with the principles listed here and shall have these systems certified according to recognized standards within a reasonable period of time. PTS Prototypenteile und System Technik GmbH will give preference to suppliers who actively operate a quality management system in accordance with DIN ISO 9001 and IATF 16949, as well as an environmental management system in accordance with DIN ISO 14001.

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Supplier relationships

Subcontractors

We expect our Tier 1 suppliers not only to communicate these sustainability standards to their subcontractors (Tier 2 through Tier n), but also to actively monitor compliance through appropriate control mechanisms (e.g., audits or self-assessments). The supplier is responsible for ensuring that the entire supply chain, all the way back to the mine or the source of the raw material, complies with human rights and environmental due diligence obligations.

Schutz geistigen Eigentums und Plagiate

Unsere Lieferanten respektieren den Schutz geistigen Eigentums Dritter in vollem Umfang der gesetzlichen Bestimmungen. Plagiate dürfen weder in den Umlauf gebracht noch erworben werden.

Continuous Improvement

Innovation and improvement are important to us. That is why we are committed to continuously improving environmental protection, energy efficiency, occupational health and safety, and social responsibility. In doing so, our company seeks out and encourages innovative ideas from our suppliers.

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