# CODE OF CONDUCT

## STANDARD

EMPL Kaltenbach and its subsidiary  believe in long-term quality, social and environmental responsibility and in the principles of ethical behaviour among employees, towards our business partners and towards the public. We expect an unprejudiced attitude from each other as well as respectful interaction with each other and with business partners.

In addition to complying with the relevant legislation and regulations, ethical behaviour means adopting a general attitude where negative actions are omitted and positive actions are reinforced. All this always with regard to ourselves, to society and to our environment, now and in the future.

We all have a certain amount of freedom in how we handle our daily work, and that is why the actions of every individual are crucial! Positive actions support the long-term development of EMPL, the relationships with business partners and the confidence and the reputation from customers and the public.

The following principles apply throughout the company:

**a)** **Human rights and working conditions**
Based on the understanding of the Declaration of Human Rights (UN) and the Fundamental Principles and Rights at Work (ILO), EMPL offers everyone the same rights and opportunities, fair and just contracts and a stable and secure social work environment. We protect the health and freedom of each individual, as well as the freedom of association and assembly and the adherence to the collective agreements to meet the basic needs of each individual. All forms of discrimination and harassment, especially the violation of women‘s rights, as well as all forms of forced and child labor are condemned.

**b)** **Adhering to applicable regulations and local customs**
We ensure adherence to applicable laws and regulations and to regulations for taxes and levies, and we respect any special local customs. The books and documents are prepared, managed and disclosed in compliance with applicable law.

**c)** **Respectful, fair competition**
EMPL and its employees work against any form of abuse of power, fraud, money launder-ing, corruption and bribery and are committed to creating and safeguarding conditions for fair competition and long-term partnerships. The selection of business partners and business decisions are made exclusively on the basis of comprehensible economic aspects in order to avoid conflicts of interest.

**d)** **Responsible handling of information and data**
EMPL and its employees support the responsible handling of information and data, whether with regard to privacy and data protection or when handling sensitive/classified information. Company and business secrets and confidential information must be protected from internal misuse. EMPL also expects its business partners to protect confidential information, to respect intellectual property and to adhere to any agreements made (e.g. confidentiality agreements).

**e)** **Respecting the environment as an integral component of all work processes**
EMPL aligns its objectives to ensure integration of environmental issues as an essential component of all work processes and areas. A certified environmental management system is in place for this purpose, closely linked to the integrated management system at EMPL.

EMPL uses appropriate products that are „compliant“ with the Minamata Convention to reduce environmental exposure to mercury. In addition, compliance with the Conflict Minerals Regula-tion (and cobalt) is ensured in accordance with Annex II of the OECD Guidelines with regard to due diligence to promote responsible supply chains of tin, tantalum, tungsten, their ores, gold and cobalt. Furthermore, the ban on the production and use of chemicals („persistent organic pollutants“) in accordance with the Stockholm Convention is complied with, as is the ban on the import/export of hazardous waste in accordance with the Basel Convention.

EMPL focuses on responsible procurement throughout the entire supply chain, the protection of employees, customers and the environment with regard to hazardous substances, the careful use of energy and active measures for energy saving.

**f)** **Adherence to the Code of Conduct**
Together with our employees, Empl strives for continuous improvement with regard to environmental and social standards. Compliance with this Code of Conduct is an integral part of successful cooperation.

The current version of the Code of Conduct can be downloaded from the intranet.

Kaltenbach, August 2025

The Management

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