



PIERON

TECHNISCHE FEDERN | TECHNICAL SPRINGS



Code of Conduct for Business Partner

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Introduction

Since 1925, Pieron GmbH has been manufacturing technical springs for almost all industrial sectors. The focus is on the automotive, electrical and sporting goods as well as furniture industries. The range of services offered by Pieron GmbH extends to the "design and manufacturing of technical springs, winding-/ stamp-bending products and components".

As a reliable partner in the spring industry, we always keep an eye on sustainability and the future in addition to the crucial topics such as quality, technical know-how, innovation and flexibility in production. Therefore, we are committed to our social, ecological and economical responsibility in the context of our business activities.



With regard to a common set of values, we also expect this from our business partners and therefore want to face this challenge together.

This Code of Conduct for Business Partner (hereinafter referred to as the "Code of Conduct") therefore highlights important standards that are in line with Pieron's corporate values and represents Pieron's expectations for each Business Partner as the basis for successful and long-term cooperation.

With this in mind: Let's make a difference together!

Bocholt, June 2024



Purpose and scope

This Code of Conduct applies to all suppliers, service providers and other business partners (hereinafter referred to as "Business Partner") of Pieron GmbH.

The expectations and requirements are valid worldwide and include topics such as human rights, labour, the environment and the fight against corruption. In doing so, they are guided by the guiding principles of the UN Global Compact (UNGC), the conventions of the International Labour Organization (ILO) or the principles described in the German Sustainability Code (DNK).

The Business Partner recognises the standards in this Code of Conduct and aligns its business activities with it.

The Supplier is familiar with the business practices of its suppliers and subcontractors and communicates the expectations and requirements to these parties to comply with this Code of Conduct, either directly or through its own Code of Conduct.

Compliance with laws

The Business Partner will comply with all applicable laws, rules and regulations in the countries in which it operates and to which it delivers and will establish and maintain a system to monitor compliance with such laws, rules and regulations.

Social responsibility

I. Human rights

The Business Partner treats all people with respect and fairness and respects the fundamental internationally recognized human rights, such as those enshrined in the United Nations Universal Declaration of Human Rights and the United Nations Declaration of Principles concerning Multinational Enterprises and Social Policy.

No form of threat, violence or intimidation against human rights or environmental activists by the business partner will be tolerated.

II. Forced labor

Human trafficking and any form of modern slavery, i.e. forced or forced work, are inadmissible. The employment relationship between the business partner and his employees is based on a correspondingly documented contract that truthfully sets out the rights and obligations. For example, employees must always have the freedom to terminate the employment relationship at their own discretion and with a reasonable notice period.

III. Ethical recruiting

No recruitment fees or other costs may be charged for the initiation of an employment relationship. In addition, the retention of identity documents to restrict the freedom of movement of employees is prohibited.

IV. Child labor

Child labor must not be used at any time. This also applies along the supply chain of the business partner. The ILO conventions on the minimum age for admission to employment and the prohibition of child labor must be observed.

Young workers are considered to be particularly vulnerable, so that safety and health must not be compromised by the work to be done and the circumstances. Overtime or night shifts are not permitted.

V. Equal opportunities

The Business Partner maintains a work environment in which there is no reprisal and which is free from discrimination, harassment and other improper behaviour based on gender, age, skin colour, ethnic or national origin, nationality, religious beliefs, language, physical or mental disability, sexual orientation or other characteristics protected by law.

Accordingly, the business partner is required to develop and promote an inclusive culture to ensure this diversity, equality and inclusion. The same applies to the protection of women's rights.

VI. Freedom of association

The business partner observes and respects the legally guaranteed fundamental rights of employees to freedom of association and collective bargaining.

For example, an open dialogue between management and employees regarding working conditions must be guaranteed and any resulting discrimination must be excluded.

VII. Wages, working hours and social benefits

The supplier shall ensure that employees are adequately remunerated and that they are remunerated in a manner that respects equal treatment for the work performed. Of course, this also includes the maximum working hours stipulated by collective bargaining agreements and the law.

Minimum wage regulations and overtime regulations correspond to the applicable legal regulations. This ensures a comprehensible and living wage payment. Any deductions due to disciplinary measures are not permitted.

Employees must be guaranteed access to sufficiently sized and clean social rooms/facilities as well as to toilets.

VIII. Occupational health and safety and physical integrity

The business partner strives to manufacture safe products and provide services and provide a safe working environment that is conducive to accident prevention and minimizes health risks for its employees. This includes consistent emergency and risk management.

Identified hazards and the associated preventive or corrective measures to minimise risk must be brought closer to employees in an informative manner.

First aid and emergency care must be ensured at all times. Appropriate protective equipment and protective clothing are provided for the prevention of work-related health hazards.

The involvement of the business partner in kidnappings, killings or involvement in bodily integrity (such as sexualised violence, corporal punishment or violations of international humanitarian law) must be categorically excluded.

IX. Assignment of private or public security forces

The assignment of private or public security forces must be controlled and it must be ensured that the deployment does not lead to human rights and bodily injuries such as torture and cruel, inhuman or degrading treatment.

X. Rights of minorities and indigenous people

The business partner respects applicable local, national, international and traditional land, water and resource laws. In particular, the rights of indigenous peoples should be respected and protected throughout the supply chain in accordance with the "United Nations Declaration on the Rights of Indigenous Peoples".

To ensure this, no harmful soil changes, water pollution or air pollution must be caused, which would deprive the people living there of the basis for a healthy life.

Furthermore, there is a strict ban on unlawful forced eviction or the unlawful confiscation of land, forests and water.

Ecological responsibility

I. Environmental responsibility and resources efficacy

The business partner complies with applicable environmental laws and regulations and is committed to environmental protection to the fullest extent possible.

The efficient use of resources such as energy, water and raw materials is a permanent goal for the business partner. The business partner should maintain a correspondingly sustainable resource management system within the scope of its possibilities in order to reduce negative environmental impacts. Helpful in dealing with this topic, but not mandatory (unless required by law), can be the establishment of a certified management system according to ISO 14001 or EMAS.

II. Decarbonisation and green house gas emissions

To reduce emissions that are hazardous to the environment and health, such as green house gas emissions, the business partner must take appropriate measures.

The business partner should be able to provide information on total energy consumption and CO₂ emissions (Scope 1, 2 and 3) on request. The use of renewable energies plays a major role here and is to be strengthened and expanded.

III. Water

The protection of air and water quality is also a goal to be achieved. Water consumption should be used and reduced as efficiently as possible. This can be done, for example, by recycling to maintain water quality.

IV. Noise emission

The business partner takes appropriate measures to minimise harmful noise emissions that endanger the environment.

V. Animal welfare, biodiversity, land use and deforestation

Animal welfare, for example through animal experiments (unless required by law), must not be negatively impaired by entrepreneurial activities.

The protection of natural ecosystems is expected by the business partner, so that it does not contribute to change, deforestation and damage to natural forests and lands and thus to a negative impact on biodiversity and soil quality.

VI. Material- and substance conformity, waste management

If applicable, the business partner is required to comply with applicable regulations regarding material and substance conformity (e.g. Reach, RoHS, Conflict Minerals) and, if necessary, to be able to provide information on this in the sense of responsible chemicals management. The points listed in this Code of Conduct should also be used for responsible sourcing of materials.

It is expected that measures will be taken to realize waste prevention, resource reuse and recycling, and safe and environmentally friendly disposal of residual waste, chemicals, and wastewater.

Economical responsibility

I. Transparency and disclosure of informationen

Upon request, the business partner shall provide open and transparent information on the points listed in this Code of Conduct in order to be able to identify and minimise possible sustainability risks.

The business partner has a financial responsibility and thus the obligation to keep accurate financial records accountable to authorities and offices, so that Pieron can be confident that he has a reliable business partner.

II. Intellectual property and business secrets

The business partner is obliged to treat all information that is not openly accessible (commercial and technical details that come to his knowledge through the business connection with Pieron) as a trade secret and thus as confidential information. If necessary, a separate non-disclosure agreement will be concluded to protect intellectual property rights.

III. Data protection und information security

The business partner is expected to comply with the applicable data protection laws and to process sensitive data in an appropriate and purposeful manner.

In order to ensure the protection goals of confidentiality, availability and integrity, an adequate information security system should be or will be established.

IV. Compliance with competition and antitrust law

In the spirit of fair competition, the business partner ensures that its business practices are compatible with applicable antitrust law and other laws and regulations that deal with e.g. monopolies, unfair competition, restrictions on trade and competition, and relationships with competitors and customers. The business partner shall not enter into any agreement with competitors or engage in any other manner that could unfairly prejudice competition. These include, among other things, price fixing and the sharing of markets.

V. Corruption and conflict of interest

The Business partner complies with applicable anti-corruption laws and regulations, including those involving bribery of public officials.

Any form of corruption, bribery, theft, embezzlement or extortion will be rejected by the business partner, nor will it tolerate illegal payments, in particular payments or other benefits to an individual, company or public official with the aim of influencing decision-making processes, regardless of whether this violates applicable laws or not.

The Business partner shall not, under any circumstances, offer, grant, demand or accept bribes, illegal payments, kickbacks, incentives, gifts, entertainments, favors or any other benefit or gratuity of value for the realization of business opportunities or in any connection with Pieron's business activities. The aim is to avoid conflicts of interest among employees and business partners that are not in accordance with this Code of Conduct.

VI. Money laundering

In the course of its business operations, the business partner shall ensure that the applicable legal provisions against money laundering are complied with.

VII. Import and export regulations

The Business Partner complies with all applicable import and export control laws, including, but not limited to, all economic sanctions, embargoes, and other laws, regulations, government ordinances, and guidelines regulating the transportation or shipment of goods and technology.

VIII. Plagiarism

In order to minimise the risk of plagiarism or counterfeit materials being imported, the business partner is required to establish appropriate identification measures.

IX. Complaints system

The business partner must ensure that any form of complaint or whistleblowing can be addressed by employees in a confidential manner. Care must be taken to ensure that the issues raised are also treated in a spirit of trust, without fear of negative repercussions in the form of retaliation due to the complaint. The same applies to the business partner's supply chain.

Violation against the Code of Conduct

The business partner is encouraged to report violations of the Code of Conduct to Pieron. Contact details can be found on Pieron's website (www.pieron.de). A dialogue will be initiated between Pieron and the Business Partner in order to comply with the requirements and expectations set out in this Code of Conduct.

In the event of non-compliance with the remedial measures initiated or repeated violations of this Code of Conduct by the Business Partner, Pieron reserves the right to terminate the business relationship in compliance with the applicable laws.

Confirmation

By signing below, the Business Partner confirms that he has received, understood and is committed to this Code of Conduct.

Company name

address

name & function

place, date

signature & stamp