Code of Conduct of the straschu Group*

For the executive bodies and employees of the companies of the straschu Group, it is clear that entrepreneurial success and responsible action are not contradictory but must go hand in hand. With this Code of Conduct (henceforth referred to as the "Code of Conduct"), the companies of the straschu Group define the guidelines for their actions.

Values and norms shape the behaviour of the companies of the straschu Group throughout conducting business. By complying with laws and rules, as well as our ethical values, we want to be a reliable and fair partner both internally and externally. We are aware of our obligations towards future generations and commit ourselves to act accordingly in an economically, ecologically and socially sustainable manner.

This Code of Conduct applies equally to all bodies and employees of the companies of the straschu Group.

1. Compliance with the law

- **National and international laws:**
  We are committed to complying with national and international laws and regulations that are relevant to our business activities.
- **Minimum industrial standards, ILO conventions, UN regulations:**
  Our actions are based on established national and international requirements and conventions such as the principles of the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the relevant conventions of the International Labour Organization (ILO).
- **Trade Regulations:**
  Our company will strictly follow the applicable trade regulations, including import and export regulations, as well as sanctions and embargoes, in accordance with the laws of the respective country in which transactions take place.

1.1 Prohibition of corruption, bribery, and money laundering

- **Corruption and bribery:**
  We consistently reject any form of corruption and conduct that is harmful to the company or unfair business practices by employees or third parties. Our company will not directly or indirectly participate in or tolerate such practices. We are prohibited from granting, offering or promising anything of value to counterparties in the public or private sector in order to influence official actions or gain unlawful advantages. This means that no employees of a straschu Group company may offer, promise or accept incentives, benefits, favours or other advantages in connection with business activities that are aimed at influencing fair, objective and appropriate decisions, or that can only give the appearance of doing so.
- We are committed to combating money laundering, terrorist financing and other criminal acts. We comply with the applicable legal provisions against money laundering and observe all national and international economic sanctions applicable to us in order to combat money laundering and terrorist financing. straschu.de 1 We only build relationships with business partners who, to our knowledge, do not support criminal or terrorist activities.

Code of Conduct of the straschu Group*

- Every employee is required to report unusual financial transactions, in particular including cash, which may give rise to suspicion of money laundering, immediately to the managers, or to have them checked by the compliance officer.

1.2 A level playing field, competition laws and intellectual property rights

- **A level playing field:**
  Our company is committed to acting in accordance with applicable cartel and competition laws. We will not engage in unethical, unlawful or anti-competitive practices such as price fixing, market or customer allocation, market sharing or bid rigging.
- **Respect for intellectual property rights:**
  We recognize the importance of intellectual property rights and will respect and protect the rights of others in relation to patents, copyrights, trademarks and other intangible assets.
- All employees of the companies of the straschu Group are obliged to keep confidential business information, trade secrets and internal reporting information secret. In the case of internal or external disclosure of data and information, it must be checked in advance whether the recipient is entitled to receive them. The duty of confidentiality also applies after the termination of the employment relationship.
- Business relationships are concluded or maintained only on the basis of objective criteria. We convince both internally and externally through our services of the highest quality and not through impermissible advantages. Therefore, the prohibition of accepting or granting advantages applies in business transactions. Gifts, invitations and/or gratuities must comply with business practices and be made in a transparent manner. Gifts and benefits must be courtesies that are legally unobjectionable and socially adequate. The granting and acceptance of financial contributions is generally prohibited.

These principles are fundamental to our ethical actions and are designed to ensure that our company operates with integrity in a transparent and lawful manner.

1.3 Conflict of interest

- Investments in third-party companies of employees or executive bodies are only permitted if they do not have a conflict of interest with the straschu Group.

1.4 Respect for the fundamental human rights of workers

- **Equal opportunities and equal rights:**
  We are committed to equal opportunities and equal rights for employees regardless of characteristics such as skin colour, ethnicity, nationality, social background, disabilities, sexual orientation, physical constitution, appearance, marital status, political, ideological or religious beliefs, gender or age.
- **Respect for personal dignity and privacy:**
  Our commitment includes respect for the personal dignity, privacy and rights of every individual. straschu.de 2 The working atmosphere within the straschu group is characterized by mutual appreciation, understanding for each other and open, polite and fair dealings with each other. All employees have the right to be treated with respect by the organs and other employees of the straschu Group.

Code of Conduct of the straschu Group*

- **Rejection of coercion and discrimination:**
  We refuse to hire or employ anyone against their will and do not tolerate unacceptable treatment such as psychological violence, sexual harassment or discrimination.
- **Fair remuneration and compliance with labour laws:**
  Fair remuneration is self- evident for us, and thus, we adhere to the national statutory minimum wage and the maximum number of working hours set out in the applicable laws. Employees must be granted all legally prescribed benefits and social benefits. Wage deductions as punitive measures are not permitted.
- **Recognition of the right to freedom of association:**
  We recognize the right of employees to freedom of association and do not discriminate against members of workers' organizations or trade associations.
- **Working hours:**
  Working hours must comply with applicable laws or industry standards.

1.5 Prohibition of child labour

- Child labour is prohibited. We respect the recommendation from the ILO conventions on the minimum age for the employment of children. According to this, the age should not be less than the age at which compulsory education ends and, in any case, not less than 15 years. We adhere to national standards for the protection of children and young employees.

1.6 Employee health and safety

- We ensure the maintenance of health and safety at work, in particular, the guarantee of a safe and health-promoting working environment and the implementation of appropriate health and safety measures to prevent accidents and injuries.

1.7 Environmental protection

- **Compliance with legal environmental standards:**
  We act in accordance with the applicable legal standards regarding environmental protection.
- **Compliance with procedures and standards:**
  We comply with applicable procedures and standards for waste management, the handling of chemicals and other hazardous substances, as well as their disposal, emissions and wastewater treatment. Our goal is to refrain from harmful soil modification, water and air pollution, harmful noise emissions or excessive water consumption if this harms the health of people, significantly impairs the natural basis for obtaining and producing food or prevents people from accessing safe drinking water or sanitation.

1.8 Supply Chain

- **Ensuring compliance by Suppliers:**
  Our company will pass on this Code of Conduct to suppliers with the expectation of compliance. We continue to expect our Suppliers to address this Code of Conduct to their suppliers and subcontractors and ensure that their suppliers and subcontractors will also comply with the requirements of this Code of Conduct or comparable regulations that do not fall short of the level of protection provided by the provisions of this Code of Conduct.

Code of Conduct of the straschu Group*

- We reserve the right to carry out appropriate audits of our Suppliers to verify compliance with these standards. Suppliers agree that we, ourselves or through agents, may conduct such audits to verify compliance with this Code of Conduct at Suppliers' facilities during normal business hours upon reasonable notice. Suppliers can object to individual audit measures if they violate mandatory data protection regulations. The Supplier will use reasonable efforts to ensure that its suppliers and subcontractors also grant us appropriate audit rights.
- **Non-discrimination in supplier selection and treatment:** We adhere to the principles of non-discrimination in relation to the selection and treatment of our suppliers.

On this basis, we will continue to successfully overcome the challenges of the future together.

The board of directors of the straschu Group (V-Team):

Thomas Homfeld
Milan Milojevic
Piotr Mlynski
Gerrit Nitsch
Olaf Pannenborg
Henning Pollmann
Roland Wipfler

*The straschu group consists of:

straschu Holding GmbH
straschu Industrie-Elektronik GmbH
straschu Elektro-Vertriebs GmbH
rolf weigel GmbH & Co. KG
straschu Elektro-Dystrybucja Sp. z o.o.
G. Hentschel Vertriebs GmbH & Co. KG

Stuhr, 01.08.2026