



CODE OF CONDUCT

Isabellenhütte Heusler GmbH & Co. KG (Isabellenhütte)

We understand “compliance” as doing what is right and honest. This means that our actions are in line with laws, ethical principles, industry standards, the expectations of our customers and suppliers, as well as our own values and internal regulations. We therefore view compliance management as the quality management of our entire entrepreneurial activity.

Responsible and sustainable conduct has always been an integral part of Isabellenhütte’s corporate culture. As the company continues to grow and become increasingly international, it becomes even more important to actively communicate this culture and to convey it to all employees and business partners.

1. Fundamental Understanding of Socially Responsible Corporate Governance

As a medium-sized company, we bear a special responsibility toward our employees, business partners, society, and the environment. Our actions are characterized by long-term thinking, reliability, and a clear value system that includes integrity, fairness, and sustainability.

This Code of Conduct is based on a shared understanding of socially responsible corporate governance. For us, this means carefully weighing the impact of our decisions and actions from economic, technological, social, and environmental perspectives and striving for a balanced reconciliation of interests.

With this Code of Conduct, we establish a binding framework for responsible behavior within our company and in dealings with third parties. It serves as a guide, highlights our shared values, and contributes to building a trustful, respectful, and future-oriented environment.

Within our scope of influence, we voluntarily contribute to the well-being and sustainable development of the global community at our locations. In doing so, we are guided by universal ethical values and principles – especially integrity, honesty, and respect for human dignity.

We are convinced: Sustainable business and entrepreneurial success go hand in hand.

2. Scope of Application

2.1 This Code of Conduct (CoC) applies worldwide to all branches and business units of Isabellenhütte.

2.2 Isabellenhütte is committed to promoting the principles of this CoC also among its suppliers and sales partner and throughout the entire supply chain – within its



capabilities and in compliance with all legal requirements, especially the German Supply Chain Due Diligence Act (LkSG).

3. Key Aspects of Socially Responsible Corporate Governance

Isabellenhütte actively ensures that the values and principles listed below are respected and upheld at all times.

3.1 Compliance with Laws

Isabellenhütte complies with the applicable laws and regulations in all countries in which it operates. In countries with weak institutional frameworks, the company carefully assesses which best practices from its home country should be applied in supportive manner for responsible corporate governance.

3.2 Integrity and Corporate Governance

3.2.1 Isabellenhütte aligns its actions with general ethical values and principles, in particular with integrity, honesty, respect for human dignity, openness, and non-discrimination based on religion, belief, gender, or ethnic origin.

3.2.2 Corruption and bribery are strictly rejected, in accordance with Article 2 of the UN Convention against Corruption. Isabellenhütte promotes transparency, integrity, and responsible leadership and oversight within the company.

3.2.3 Isabellenhütte is committed to fair and recognized business practices and to competitive and professional behavior. The company maintains cooperative and trust-based relationships with regulatory authorities and adheres to the ZVEI's published guide: *"Guidelines for Our Association Work – Notes on Antitrust-Compliant Conduct in the ZVEI."*

3.3 Consumer Interests

When addressing consumer interests, Isabellenhütte adheres to consumer protection laws and fair sales, marketing, and information practices. Special attention is given to vulnerable groups, such as children and adolescents.

3.4 Communication

Isabellenhütte communicates openly and in a dialogue-oriented manner about the requirements of this CoC and its implementation with employees, customers, suppliers, and other stakeholders.

All documents and records are properly created, not improperly altered or destroyed, and stored appropriately. Trade secrets and business information of partners are treated with the utmost care and confidentiality.



Isabellenhütte's information security management system (TISAX) protects the confidentiality, integrity, and availability of customer, supplier, and employee data.

3.5 Human Rights

Isabellenhütte actively promotes and respects human rights, guided by the UN Charter of Human Rights and in particular the following agreements:

- United Nations Convention against Corruption (2003, in force since 2005)
- Universal Declaration of Human Rights (UN Resolution 217 A (III), 1948)

3.5.1 Privacy

Isabellenhütte respects and protects the privacy of all employees and business partners.

3.5.2 Health and Occupational Safety

The company ensures a safe and health-promoting working environment to prevent accidents and injuries.

3.5.3 Protection from Harassment

Employees are protected from corporal punishment as well as from physical, sexual, psychological, or verbal harassment and abuse.

3.5.4 Freedom of Expression

Isabellenhütte respects and protects the right to freedom of opinion and expression.

3.6 Working Conditions

Isabellenhütte is committed to complying with the core labor standards of the International Labour Organization (ILO) and ensures fair working conditions.

3.6.1 Child Labor

The employment of persons under the age of 15 is prohibited unless local regulations provide for higher age limits or exceptions.

3.6.2 Forced Labor

All forms of forced labor are strictly rejected.

3.6.3 Fair Compensation

Wages meet legal requirements and ensure fair remuneration in accordance with applicable labor standards.

3.6.4 Employee Rights

Isabellenhütte respects the rights of employees to freedom of association, assembly, and collective bargaining, as far as legally permissible.



3.6.5 Non-Discrimination

All employees are treated equally regardless of gender, origin, religion, belief, or other personal characteristics.

3.6.6 Occupational Health and Safety

Occupational safety is a key component of our compliance policies. It plays a supportive role by identifying risks, recommending safety measures, and raising employee awareness.

The company ensures compliance with all legal regulations and other safety-related requirements through the appointment of an occupational safety officer.

3.7 Working Hours

Isabellenhütte complies with applicable working time regulations and respects the maximum permissible working hours as defined by law.

3.8 Environmental Protection

Isabellenhütte complies with environmental protection laws and standards applicable to its operations and acts in an environmentally responsible manner at all locations.

It also handles natural resources responsibly, in accordance with the principles of the Rio Declaration on Environment and Development (1992).

3.9 Civic Engagement

Isabellenhütte actively supports the social and economic development of the regions in which it operates. It also encourages and supports the voluntary engagement of its employees in social, cultural, and charitable initiatives.

4. Implementation and Enforcement

Isabellenhütte undertakes all reasonable and appropriate efforts to continuously implement and uphold the principles and values described in this Code of Conduct. The effectiveness of implementation is tracked using a system of key performance indicators with defined targets and reported in the sustainability report.

Upon request and on the basis of reciprocity, business partners may be informed about key measures taken to ensure compliance. However, there is no entitlement to access business or trade secrets, competition-sensitive or otherwise confidential information.

All employees are required to familiarize themselves with the contents of this policy and to comply with the defined principles. Any violations must be reported immediately to the appropriate bodies. Isabellenhütte offers a whistleblower system via its website www.isabellenhuetten.com.



Whistleblower protection is ensured in accordance with legal requirements. Isabellenhütte reserves the right to take appropriate measures in response to violations.

This policy is reviewed regularly and updated as needed to reflect current developments and requirements.

The core orientation of Isabellenhütte has always been a cornerstone of its long-standing corporate history. Innovation based on tradition means being a reliable and competent partner – yesterday, today, and in the future. Reliability is our trademark – for over 500 years, we have kept our promises.

Dillenburg, 31.10.2025

Thilo Gleisberg
Managing Director

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