

SUPPLIER CODE OF CONDUCT

BUILTECH GROUP

1. Introduction

The Builtech Group is committed to responsible conduct and sustainable business practices in order to make a positive contribution to society and the environment. As an internationally operating company, we see it as our duty to play an active role in shaping the future; ecologically, socially, and economically.

Our goal is to build a resilient, inclusive, and sustainable value chain in close collaboration with our business partners. This is based on transparency, efficient use of resources, fair working conditions, and ethical business practices. These principles are firmly anchored in our corporate culture and shape our performance, reputation, and responsibility.

Our business activities are guided by internationally recognised standards and frameworks, including:

- The Universal Declaration of Human Rights of the United Nations
- The United Nations Guiding Principles on Business and Human Rights
- The Core Labour Standards of the International Labour Organization (ILO)
- The OECD Guidelines for Multinational Enterprises

This Supplier Code of Conduct defines the binding minimum requirements that the Builtech Group places on its suppliers, service providers, and other business partners. It is an integral component of all contractual agreements.

This Supplier Code of Conduct applies to all organisations of the Builtech Group, including their direct and indirect subsidiaries, both domestic and abroad. It is part of the Group-wide sustainability and compliance strategy and is used by all companies within the group as a binding component in contractual relationships with suppliers and business partners.

We know that our responsibility extends beyond our own operational boundaries and that our social and ecological impact expands along the entire value chain. Therefore, we rely on trusting partnerships with our suppliers, service providers, and business partners to collectively shape a sustainable future. We expect our business partners to acknowledge our principles, commit to their implementation, and take concrete measures to realise our shared vision of a sustainable future.

Thank you for your support and your participation in responsibly pursuing this path together with the Builtech Group.

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2. Ethics and Working Conditions

2.1 Human Rights and Diversity

Our suppliers commit to fully respecting internationally recognised human rights. The basis for this includes the Universal Declaration of Human Rights of the United Nations, the Core Labour Standards of the ILO, and the principles of the UN Global Compact.

Any form of forced, bonded, or involuntary labour, slavery, or human trafficking is strictly prohibited. Child labour is prohibited, especially any of the "Worst Forms of Child Labour" according to the ILO definition. This includes sexual exploitation, illicit activities, or recruitment as child soldiers. Nobody below the legally permissible minimum age may be employed.

Discrimination based on gender, age, ethnic origin, religion or belief, sexual orientation, disability, political conviction, or social background will not be tolerated. Our suppliers, service providers, and other business partners should promote diversity, inclusion, and equal opportunities for all individuals. A respectful, safe, and harassment-free work environment must be ensured. Any form of bullying, intimidation, sexual harassment or abuse is prohibited.

Furthermore, freedom of association and the right to collective bargaining must be respected, including the right to organise in a trade union or join other forms of employee representation. Discrimination on the basis of union activities or membership in employee representation is not permitted.

2.2 Fair and Safe Working Conditions

Fair and safe working conditions are a fundamental requirement for any cooperation with the Builtech Group. Our business partners commit to complying with the following standards:

- **Working Hours:** Working hours must comply with the respective applicable legal requirements. Excessive working hours and unpaid overtime are not permitted. Working hours must be documented completely, correctly, and transparently.
- **Compensation:** Compensation must, at a minimum, meet the legal or collective bargaining requirements and must be paid without undue delay. Furthermore, we expect the payment of wages that enable a decent standard of living ("Living Wage"), where legally and economically feasible.
- **Work Environment:** Suppliers and business partners must provide safe and hygienic workplaces. Regular training in occupational safety must be provided, with appropriate personal protective equipment available.
- **Health and Safety:** Risks in the workplace must be systematically identified and minimised through effective preventive measures. Safety-relevant incidents must be documented, reported, and processed to allow for continuous improvements.
- **Leadership Culture:** Leadership teams bear special responsibility for the corporate culture. They act based on values, transparently, and actively involve employees in decision-making processes.

3. Environment

3.1 Environmental Standards

Builtech Group's business partners are obligated to comply with all applicable environmental laws, regulations, and official requirements. This includes, specifically the timely acquisition, maintenance and renewal of all necessary permits, licences and environmental clearances.

Environmentally relevant activities must be transparently documented to enable verifiable audits and continuous improvement. Compliance with legal limits for emissions, wastewater, waste, and the handling of chemical substances is a prerequisite for a business relationship with the Builtech Group.

Our suppliers, service providers, and other business partners are also encouraged to take measures that exceed the legal minimum requirements to reduce their ecological footprint, for example, through resource efficiency improvements, investment in the circular economy, and the use of environmentally friendly technologies.

3.2 Climate Protection

The Builtech Group considers climate protection to be an integral part of our corporate responsibility. We expect our business partners to actively and continuously contribute to the reduction of greenhouse gas emissions.

The calculation of annual greenhouse gas emissions ("CO₂ balance") and the establishment of science-based reduction targets according to the "Science Based Target initiative" (SBTi) are recommended. Business partners should implement concrete measures to reduce their ecological footprint, including:

- The use of energy-efficient technologies
- Switching to renewable energies
- Optimisation of logistics and transport processes
- The introduction of climate-friendly manufacturing methods

The Builtech Group welcomes initiatives for climate neutrality and supports business partners in developing long-term strategies for decarbonisation.

3.3 Circular Economy and Biodiversity

Responsible and resource-efficient management of natural resources is crucial in order to avoid environmental impacts and the exploitation of ecosystems. Our business partners are obligated to use materials, water, and energy in an efficient and sustainable manner.

Manufacturing processes and workflows must be designed to systematically reduce material losses, waste, and emissions. The integration of recycled materials and circular systems into daily operations is explicitly supported. Packaging must be limited to the necessary minimum, and single-use materials must be avoided where technically possible.

The principles of the circular economy should be gradually implemented in all phases of the value chain. This includes in particular:

- Extension of product lifespans
- Reuse and recycling of materials
- Consistent reduction of waste streams

Furthermore, the protection of sensitive ecosystems is of central importance. Our business partners commit to not undertaking any direct or indirect interventions in ecosystems under protection. The loss of biodiversity must be prevented by suitable measures. Activities in natural habitats require careful risk assessment and, if necessary, consultation with affected local communities. We understand the preservation of biodiversity as a long-term corporate responsibility and a contribution to the stability of global ecosystems.

4. Business Integrity

4.1 Corruption, Bribery, and Money Laundering

The Builtech Group pursues a zero-tolerance policy towards any form of corruption, bribery, extortion, or unjust advantage. Business partners and their employees must neither directly nor indirectly – for example, through third parties – offer, promise, demand, or accept any monetary or other benefits to influence business decisions. This applies especially to public tenders, contract negotiations, and official approvals.

Verifiable, orderly, and truthful accounting is mandatory. Practices such as fictitious invoices, manipulated business documents, or concealing transactions are strictly prohibited. Suspicious business transactions must be transparently recorded and disclosed to Builtech upon request.

Our business partners are obliged to comply with all applicable laws and regulations regarding Anti-Money-Laundering, Counter-Terrorist Financing and trade and export controls. In the case of international transactions, embargo requirements, sanctions lists, and authorisation requirements must be observed and documented in full.

4.2 Competition, Antitrust Law, and Conflicts of Interest

Fair and legally compliant business conduct is the foundation for the partnership between the Builtech Group and its business partners. Business partners must adhere to all applicable national and international Competition and Antitrust Laws. Specifically, the following conduct is strictly prohibited:

- Agreements on pricing, markets, customer allocation, or bids/tenders.
- Abuse of a market-dominant position or other anti-competitive practices.

Conflicts of interest must be avoided. As soon as personal or economic interests of employees or business partners could potentially influence business decisions, this must be openly and proactively communicated to the Builtech Group. This includes, among other things:

- Family or personal relationships with employees of the Builtech Group
- Interests in competing companies
- Conflicts of Interest that could impair objectivity or independence

The early disclosure of such situations is essential to ensure integrity and trust in the working relationship.

4.3 Confidentiality, Data Protection, and Intellectual Property

The protection of sensitive data, confidential innovations, and Intellectual Property (IP) forms the basis of every business relationship with the Builtech Group.

Personal data, as well as confidential information of the Builtech Group and third parties, must be protected in accordance with the applicable data protection regulations. Access to such data must be limited to authorised individuals and secured by appropriate technical and organisational measures. The use of data beyond the contractually agreed purpose is not permitted.

All IP rights must be respected and protected. This includes, but is not limited to, patents, trademarks, copyrights, trade secrets, technical drawings, and software. Any unauthorised use, disclosure, reproduction, or imitation is strictly prohibited.

Our business partners are obliged to take measures to ensure the permanent protection of these rights and to report violations immediately.

5. Compliance and Implementation

5.1 Audits and Complaint Procedures

The Builtech Group reserves the right to conduct regular or reasonable ad-hoc audits to verify compliance with this Supplier Code of Conduct. These audits may include document reviews, site inspections, and confidential discussions with the employees of our business partners. They will take place after reasonable notice and during normal business hours.

Our business partners are obligated to grant unrestricted access to relevant documents, facilities, and employees. If necessary, a reasonable contribution to the audit costs may be required.

The Builtech Group recommends that its business partners establish a trustworthy whistleblower system that enables internal and external stakeholders to report violations of laws, regulations, or this Supplier Code of Conduct anonymously and without fear of retaliation. The reporting channels should be clearly communicated, easily accessible, and available in the respective local language.

Incoming reports must be examined in a timely, independent, and confidential manner. The results must be documented, appropriate follow-up measures taken, and disclosed to the Builtech Group upon request.

5.2 Supply and Value Chain

The Builtech Group expects its business partners to implement the requirements defined in this Supplier Code of Conduct along their entire supply and value chain. This includes a comprehensive understanding of their own supply chains as well as an awareness of the origin and production conditions of the purchased goods and services.

Business partners should actively manage their supply chains and identify and address risks regarding human rights, the environment, and compliance at an early stage. Complete and verifiable information about direct suppliers and customers must be provided upon request—especially if required by regulatory requirements. The Builtech Group values transparency, traceability, and responsible sourcing along all stages of the value chain.

5.3 Remedial Measures

If the Builtech Group identifies a violation of this Supplier Code of Conduct, the business partner concerned will be informed in writing. The partner is obliged to take appropriate remedial measures immediately or, if short-term measures are not possible, to submit a binding action plan including a clearly defined timeframe.

In spirit of trustful cooperation, the Builtech Group supports its business partners in developing and implementing appropriate corrective measures, where necessary and possible.

Should a business partner fail to comply with their obligations set out in this Supplier Code of Conduct, or only comply insufficiently, the Builtech Group reserves the right to assert contractual legal remedies. These include, but are not limited to, the suspension or termination of the business relationship and the pursuit of claims for damages.

Maurice Frhr. von Dalwigk

CEO

Confirmation

The signatory confirms on behalf of the business partner:

- To have read and understood the content of this Supplier Code of Conduct in full
- To comply with all requirements contained therein and to integrate them into their own business processes
- To establish appropriate processes to pass on the obligations along the entire supply and value chain and to effectively monitor their fulfilment
- To immediately inform the Builtech Group if a violation is found or suspected.

This confirmation becomes legally binding upon the date of signing. Changes or additions must be made in writing.

Name in capital letters

Role, Title

Signature

Place, Date

Company

Company Seal



BETTER BUILDINGS

