



COMPLIANCE MANAGEMENT
CODE OF CONDUCT OF THE
EKW GROUP

STATUS: JULY 2025

EKW GmbH | EKW Group
Bahnhofstraße 16
67304 Eisenberg / Pfalz
Germany

Tel: 06351 409 0
info@ekw-refractories.com
www.ekw-refractories.com

Commercial register: Kaiserslautern Local Court HRB 11014
Managing Director: Dipl. Ing. Michael P. Wiessler

SCOPE OF APPLICATION:

The Code of Conduct of the EKW Group applies to all employees of the EKW Group (EKW GmbH and all companies associated with it – hereinafter: EKW). This policy has been developed with the utmost care and to the best of our knowledge and belief. The Code will be reviewed at regular intervals and revised as necessary.



FOREWORD

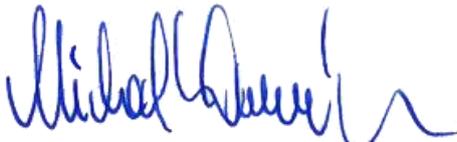
A company's reputation and standing are only as good as the behavior of its employees.

Each one of us contributes to HOW our company and the EKW Group is perceived by its customers, suppliers, investors, the public, and even its own employees.

The following Code of Conduct of the EKW Group combines applicable laws and international standards with operational regulations, obligations from the employment relationship and principles of the EKW Group. It forms a basic understanding of how we want to work together and be successful in the refractory market. It describes the basic understanding, values and principles we share within the EKW Group and thus shows us a target vision. Based on our central guiding principle "**WE are EKW**" we can only achieve this goal together and thus not only sustainably strengthen our business success but also secure it for the future.

Together, we are responsible for the reputation of our company and for our own conduct. We are all required to follow the guidelines of this Code of Conduct in all of our daily activities, tasks, processes and decisions, without exception. Please read and familiarize yourself with the Code of Conduct and let us work together to take responsibility for the future and success of the EKW Group.

Eisenberg, July 2025



Dipl.-Ing. Michael P. Wiessler

Content

- 1 COMMITMENT 5
 - Disclosure of Information 5
- 2 INTEGRITY & BUSINESS CONDUCT 5
 - Competition and Antitrust Law 5
 - Corruption 5
 - Conflicts of Interest | Handling Company Property 6
 - Granting and acceptance of benefits | Gifts | Invitations 6
 - Donations | Sponsoring 6
 - Money Laundering | Trade Controls 6
 - Tax Law 7
- 3 PRODUCTS | SERVICES | QUALITY 7
- 4 INFORMATION | DATA PROTECTION 7
 - Trade and Business Secrets 7
 - Data Protection 8
 - Confidentiality | Duty of Truth 8
- 5 SOCIAL RESPONSIBILITY 8
 - Health and Occupational Safety 8
 - Working Conditions | Equal Opportunities 9
 - Freedom of Association and Right to Collective Bargaining 9
 - Training | Further Education | Equal Opportunities 9
 - Ethical Recruitment | Equal Opportunities 10
 - Diversity 10
 - Inappropriate Behavior | Prohibition of Discrimination 10
 - Human Rights 10
 - Child Labor | Forced Labor 11
- 6 ECOLOGICAL RESPONSIBILITY 11
 - Environment 11
 - Sustainability 11

1 COMMITMENT

This Code of Conduct is constantly under revision.

Our Code of Conduct is based on the [Ten Principles of the UN Global Compact](#), providing a reliable framework that applies equally to all of us. All managing directors, managers and employees within the EKW Group should adhere to these guidelines and principles.

Following the rules of our Code of Conduct as well as with legal regulations, laws and our internal company policies are essential components for our company's appearance as a trustworthy and reliable partner. Therefore, we train and inform relevant parties where necessary or take measures to prevent potential violations.

Violations against the Code of Conduct will result in consequences.

We also expect our suppliers and contractual partners to behave in accordance with the guidelines set out in this code. (See here: **EKW Supplier Code of Conduct**)

Disclosure of Information

If employees become aware of incidents that are not in line with our EKW Code of Conduct, they can confidently approach their managers, the works council, or the EKW Compliance Officer, or report them through the protected EKW reporting system.

Employees always receive the necessary support from the organization. There will be no disadvantages, because the EKW Group protects anyone who seeks advice in good faith or reports misconduct and complies with the rules of this Code of Conduct.

The [EKW reporting system](#) protects the identity of whistleblowers and regulates a structured approach to rule violations. The data will be kept anonymous at request of the whistleblower. No measures will be taken to identify anonymous whistleblowers or those who may abuse the whistleblower system.

2 INTEGRITY & BUSINESS CONDUCT

The EKW aligns its business actions and decisions with generally accepted ethical values, particularly integrity, credibility and respect for human dignity. Integrity is a fundamental value in professional and personal life, encompassing decency, honesty, and reliability. Integrity in professional behavior is essential for professionalism, ethical conduct, and the protection of confidentiality. This accordingly promotes transparency, ensures responsible leadership and control within the EKW.

Competition and Antitrust Law

The EKW respects the rules of fair and open competition and does not make agreements that unlawfully influence competition. Employees of our group are obligated to adhere to the rules of fair competition. In particular, any agreements or concerted practices with competitors on the following topics are prohibited:

- Prices and price components
- Product data and formulations
- Terms and calculations
- Customers and suppliers
- Planned acquisitions
- Planned innovations

We strictly observe antitrust law and the prohibition of cartels and stand for healthy and fair competition in the market, thereby promoting economic growth.

Corruption

The EKW expressly opposes any form of corruption both domestically and abroad and avoids even the appearance of wanting to influence business decisions through unscrupulous business practices. Our business relationships should be based solely on objective criteria. These include, in addition to quality, reliability, and competitive prices, adherence to ecological and social standards as well as the principles of

good corporate governance. None of our employees may exploit the business connections of the EKW and associated companies for their own or others' advantage or to the detriment of the organization. This particularly means that no employee may grant or accept unauthorized private benefits (e.g., money, tangible assets, services, etc.) in business dealings that could influence a proper decision in both professional and private contexts.

Every employee of the EKW is obligated to seek advice or assistance in cases of suspicion or legal doubts regarding the existence of corruption or economic crime.

→ In case of doubt, please contact your manager or the Compliance Officer.

Conflicts of Interest | Handling Company Property

In the context of employment within the EKW, we expect integrity and loyalty from all our employees. We act solely in the interest of the organization. To avoid conflicts of interest, private or potential personal economic interests are always separated from the economic interests of the EKW and the companies within the group. Even in personnel decisions or business relationships with third parties, only objective criteria count. Secondary employment with a competitor is strictly prohibited.

→ Existing or potential conflicts of interest, should be disclosed to your manager or the Compliance Officer and a solution should be sought together.

We expect all employees to protect the company's assets of the EKW, including all tangible and intangible assets. This also includes intellectual property as well as all processes, products, and designs developed by our employees that are used within our group. The company's assets should be used only for corporate purposes. We also respect the granted rights of third parties.

Granting and acceptance of benefits | Gifts | Invitations

Invitations, such as to business meals or events that correspond to established business practices and are appropriate, may be extended or accepted by our employees if they do not serve an impermissible advantage. The same applies to the acceptance or granting of gifts.

→ In case of existing doubts regarding the existence of an objective reason or the appropriateness of a benefit/gift, the manager, Compliance Officer or managing director should always be consulted.

Donations | Sponsoring

Entrepreneurial success also means taking on social and regional responsibility and giving something back. The EKW regularly and thoughtfully contributes to this. Donations are only made on a voluntary basis and without expectation of a return. Donations and sponsorship activities should not be designed to indirectly promote decisions in the interests of the company. Donations must always be transparent.

The recipient of the donation and the specific use by the recipient must be known. The reason for the donation and the purpose-specific use must always be accountable. We refrain from donation-like compensations at EKW. Donation-like compensations are contributions that are only seemingly granted as compensation for a service, but whose value significantly exceeds the actual value of the service.

Money Laundering | Trade Controls

Within EKW, we do not tolerate activities related to money laundering. We orient ourselves to the applicable laws as well as regulations and regularly check our business partners according to the specified criteria.

Our employees are required to report immediately suspicious payment forms or other transactions that may indicate money laundering to the Compliance Officer or the Managing Director. We clear all dutiable goods properly. EKW consistently adheres to the legal requirements for export control and customs in the areas of foreign trade and customs law and ensures their proper implementation.

We expect our suppliers to provide qualified and timely export control and foreign trade data as well as to implement sufficient standards for security in the supply chain within the framework of global customs security programs. (See here: **EKW Supplier Code of Conduct**)

We ensure, in compliance with national and international laws, that transaction with third parties do not violate trade regulations such as economic embargoes, import and export control requirements, or applicable provisions to prevent the financing of terrorism.

Tax Law

As an internationally operating group, we are committed to open markets and fair competition. As EKW, it is important to us that we always comply with national and international legal provisions. We expect the same from our business partners and all other market participants.

EKW prepares tax returns and declarations truthfully, and we expect our employees, our executives, and business partners to fulfill also their tax obligations. Furthermore, we do not tolerate any deliberate assistance in tax evasion or solicitation thereof.

3 PRODUCTS | SERVICES | QUALITY

We are aware of our responsibility as a manufacturer and provider of fireproof products and materials. High product quality and long-term positive customer relationships are essential to achieving our goals. In dealing with current and potential customers, subsidiaries, representatives, dealers, suppliers, and other business partners, we always act straightforwardly and treat everyone honestly, objectively, and based on mutual respect and trust.

Our aim is to deliver refractory products of consistently high quality that are not only reliable and safe but also tailored to the needs of our customers. We ensure that high quality, reliable service is provided after the sale, providing clear, accurate, and helpful information and not allowing false or misleading statements about our products and services.

Complying with all national, European, and international regulations relevant to the construction, refractory, and raw materials industries, as well as mining, with regard to quality and safety, and with self-imposed requirements, is a top priority. This applies to products as well as to work and production processes and associated supply chains at EKW (see here: **EKW Group_ Supplier Code of Conduct**).

The continuous planning, control, optimization, and improvement of our corporate processes are important corporate goals for the EKW and are firmly anchored in the management systems of EKW GmbH and some subsidiaries (**ISO 9001: Quality Management System**).

4 INFORMATION | DATA PROTECTION

EKW attaches great importance to the protection of confidential information. We are also committed to protecting and respecting the privacy of individuals. We comply with the applicable laws and regulations in the respective country.

Trade and Business Secrets

We protect all company information as well as information from and about our business partners and always treat it as confidential. Confidential information is one of our most important assets, and we therefore take care to ensure that trade and business secrets are not disclosed to third parties or made public.

Confidential information includes, for example:

- Unpublished financial and production figures
- Sales figures for products / product and price calculations

- Plans for production processes
- (Planned) acquisitions or disposals of companies or parts of companies as well as investment plans
- Forecasts of earnings and market developments
- Data on employees, payroll and salary documents
- Customer and supplier lists / Negotiated product or supplier prices
- Information about inventions and research results
- Formulas and procedural instructions

Our employees at EKW are obligated to protect confidential information and to maintain confidentiality regarding trade and business secrets and other internal matters. The confidentiality obligation also continues after the termination of the employment relationship with EKW.

Data Protection

The EKW is aware of the high sensitivity of the personal data entrusted to it by its customers, business partners, employees, and shareholders and protects this data through careful and responsible handling.

We respect the informational self-determination and privacy of our employees and business partners as well as the security of data processing. For this reason, we always take all necessary precautions within the EKW Group to ensure that the collection, processing, and use of the personal data entrusted to us is transparent, purpose-bound, traceable, careful, and in compliance with the applicable legal data protection regulations or with the consent of the data subject.

→ In case of existing doubts, please contact your manager or the EKW data protection officer

We commit ourselves to data confidentiality as well as to ensuring an appropriate standard in securing information processing, so that confidentiality, integrity, and traceability of the protected information are ensured, preventing unauthorized use. The commitment of our employees to data confidentiality continues even after the termination of the employment relationship with EKW.

Confidentiality | Duty of Truth

In addition to the technical and organizational measures for data protection, every employee of EKW is obliged to protect the operational interests. For this reason, information from EKW (outside) and about EKW is communicated exclusively to authorized recipients. This applies to both internal and external recipients. We also pay attention to the confidentiality of information and protect our business documents from unauthorized access. All reports and written documentation must be accurate and truthful. This applies regardless of whether the reports are internal or external.

Furthermore, when recording data and other information that may provide insight into business transactions and the financial situation of EKW, we ensure that this information is always complete and accurate. In doing so, we adhere to the principles of proper accounting.

5 SOCIAL RESPONSIBILITY

EKW is aware of its social responsibility as an organization. We orient ourselves here to the guiding idea of CSR (Corporate Social Responsibility), which understands the social responsibility of companies in terms of sustainable economic activity. We as EKW and organization work not only to maximize the value of our group but also for the benefit of our employees and society. Topics such as health, safety, and the environment hold an important position in EKW.

Health and Occupational Safety

EKW values the safety and well-being of its employees, customers, suppliers, visitors, and the public. The protection of all those affected by our business activities is one of our most important areas of

responsibility. We all ensure strict compliance with the applicable safety regulations and occupational health and safety regulations within the companies.

The introduction of appropriate processes to reduce accident risks and improve working conditions within the organization are important corporate goals for EKW and are firmly anchored in the management systems of EKW GmbH and some subsidiaries (**ISO 45001: Occupational Health and Safety Management System**).

We ensure within the group that the applicable laws, regulations, and internal company guidelines on occupational safety and health are accessible to every employee. In addition, regular training on health and safety at work and in the workplace takes place.

→ *All employees are obliged to report violations of safety regulations immediately.
Any irregularities must be remedied without delay.*

Working Conditions | Equal Opportunities

We comply with the labor laws and international standards applicable in the respective countries. In addition, we orient ourselves to the [Ten Principles of the UN Global Compact](#) (here 3 to 6). We ensure that our employees within the EKW Group receive appropriate remuneration and comply with the relevant national and international regulations on minimum wages, overtime, statutory benefits, working hours, and vacation time. The maximum working hours within the companies of the EKW Group are adhered to and respected by all.

Freedom of Association and Right to Collective Bargaining

We respect the right of our employees to freedom of association within the framework of applicable rights and laws and commit to respecting the personal dignity, privacy, and personal rights of each individual and not tolerating unacceptable treatment of our employees, such as physical punishment, sexual and personal harassment, and discrimination.

Training | Further Education | Equal Opportunities

Through an education policy tailored to the needs of EKW, "EKW... educates!" we offer an optimal start to professional life. In addition, we secure our long-term need for skilled workers, live up to our social position and responsibility as a company, and strengthen the future of the entire EKW Group.

In addition, we ensure our skilled workforce needs in the long term, fulfill our societal position and responsibility as a company, and strengthen the future of the entire EKW Group. The further development of our employees significantly contributes to the productivity of EKW. The various measures of our personnel policy relate to the improvement of the skills, knowledge, and abilities of our employees to enhance work performance and professional development.

Personnel development programs include:

- Professional further education (continuing, adjustment, and/or advancement training)
- Online courses
- Workshops
- Refresher courses
- Seminars and conferences
- On-the-job training
- Mentoring and much more

Through our **EKW Talent Management** program, we enable qualified employees to achieve their next career goals in a targeted manner. This ensures that positions relevant to business success within EKW are filled promptly and for the long term with the right people. In addition, high-performing teams can be built, motivation can be promoted, and a culture of continuous growth and innovation can be established within the organization in a sustainable manner.

Ethical Recruitment | Equal Opportunities

EKW is committed to good working conditions and ethical recruitment of employees and ensures compliance with the transparency of the application and hiring process as well as equal treatment of all applicants and employees. We require our business partners to adhere to this as well (see here: **EKW Group_ Supplier Code of Conduct**).

EKW ensures that all employees and applicants have the same opportunities for hiring, promotion, and further education and training and equally access the offered work resources and opportunities within the organization. We promote equal opportunities for our employees and ensure equal participation within the organization, work, and society.

Diversity

As an internationally operating group, the EKW stands for a lived diversity. We respect all people regardless of status, gender, origin, skin color, religion, worldview, age, health impairment, or sexual orientation and support our employees in different life situations and life plans.

We as EKW recognize that all people are different and stand for appreciation, openness, tolerance, and the willingness to learn. We represent this not only through our values but also through implement it specifically in our hiring processes, the EKW talent management, our training, remuneration, and offered working time models.

Inappropriate Behavior | Prohibition of Discrimination

We as EKW prohibit any inappropriate behavior of our employees.

Inappropriate behavior includes:

- Disrespect
- Insults and derogatory remarks
- Sexual harassment and sexualized discrimination (suggestive looks or words, vulgar remarks or jokes)
- Intrusiveness, physical intrusion
- Bullying
- Threats and violence (psychological or physical)

We at EKW also reject any form of discrimination within and outside the organization. This applies in particular to discrimination based on gender, race, disability, ethnic or cultural origin, religion or belief, age, or sexual orientation. We are committed to helping those affected without restriction and with all available means, and to proactively combating inappropriate behavior and discrimination. This is particularly the responsibility of those who hold management and leadership positions within EKW and who are responsible for employees.

All employees who are faced with inappropriate behavior or have been victims of discrimination can confidently contact their supervisor, the works council, or the compliance officer. They will receive the necessary support and the incident will be dealt with. If desired, the incident will be handled anonymously and the employee will not suffer any disadvantages. They are protected by EKW!

Human Rights

EKW and all its employees respect and support internationally recognized human rights.

This is an essential part of our social and corporate responsibility. Every employee of the EKW respects the dignity and personal rights of every other employee as well as third parties with whom the organization is business-related or in a business relationship.

In this context, we are also in constant dialogue with our suppliers to avoid our manufactured products containing raw materials from conflict regions (see here: **EKW Group_ Supplier Code of Conduct**).

Child Labor | Forced Labor

EKW does not accept any form of child labor, forced or compulsory labor. We adhere to all relevant national and international laws, regulations, and provisions that apply in the respective countries, as well as to the applicable international standards of the United Nations on human rights, particularly the rights of children.

EKW identifies with the human rights formulated in [the Charter of Fundamental Rights](#) of the European Union and the fundamental rights principles established by the [International Labour Organization \(ILO\)](#). The EKW complies with the prohibitions on child labor and forced- or compulsory labor in any form.

6 ECOLOGICAL RESPONSIBILITY

The core of EKW's business model is the processing of mineral raw materials into high-quality refractory products. In order to maintain the Group's economic basis in the medium and long term, it is necessary to value the availability of these raw materials and secure them for the long term.

Environment

Sustainable environmental and climate protection as well as resource efficiency are important corporate goals for the EKW and are firmly anchored in the management systems of EKW GmbH and some companies within the group (**ISO 14001: Environmental Management System**).

When developing new products and operating production facilities, we take care to ensure that any impact on the environment and climate are kept to a minimum. All relevant legal and regulatory requirements applicable in the respective country are strictly adhered to by the companies of the EKW Group

→ *Environmental damage discovered or caused by our employees must be reported immediately to their manager or the environmental protection officer.*

Sustainability

Responsible action and future-oriented thinking are considered important parameters for the success of the EKW Group. Within the EKW, we align the strategies and measures of our actions to reduce negative ecological and social impacts in the refractory market. We pay attention to all processes along the entire supply chain wherever possible.

Every employee of the EKW is responsible for acting efficiently, environmentally, and health-consciously. Thus, internal projects and products are completed or developed and produced as quickly and efficiently as possible. We constantly review our activities for relevance and prospects of success so that time and energy are not wasted.

Additionally, as an energy-intensive organization, we focus on the potentials for saving and conserving energy in operations and at the workplace and continuously work to improve these. These are important corporate goals for the EKW and are therefore firmly anchored in the management systems of EKW GmbH and individual companies within the group (**ISO 50001: Energy Management System**).

Eisenberg, July 2025.

