Code of Conduct

Preamble

prometho GmbH adheres to the fundamental principles of the 'honourable businessman' and is committed to its responsibilities as a company.

- We monitor the direct and indirect impacts of our business activities on the environment and society, and strive to strike an appropriate balance between economic, environmental and social considerations.
- We act in accordance with generally accepted values and principles, conduct ourselves in compliance with the law and, in particular, observe internationally recognised human rights and labour standards, as set out below.
- We stand by the objectives and provisions of this Code of Conduct and will, within the limits of our respective legal and practical capabilities, make every appropriate and reasonable effort to comply with this voluntary commitment on an ongoing basis.

Should existing national regulations conflict with the provisions of this Code of Conduct, or should the domestic context make it impossible to comply with it in full, we will nevertheless seek ways to uphold the requirements of this Code of Conduct as far as possible.

1. Ethical / moral commitment and integrity

We pursue exclusively lawful business objectives and practices and maintain business relationships only with reputable partners. We treat business partners and customers fairly and with respect, and take into account different legal, economic, social and cultural backgrounds, as well as the specific circumstances of the countries and regions in which we operate. In doing so, we observe the laws and regulations of the countries and regions in which our business activities take place.

We always base our business conduct on universally recognised ethical values and principles, including integrity and respect for human dignity. We are committed to free and fair global trade.

2. Corruption, Trade Controls, Money Laundering

We reject all forms of bribery and corruption. To this end, we avoid even the appearance of such conduct – whether in the form of offering or accepting improper advantages. We act in accordance with the applicable import and export control regulations and comply with the legal requirements for the prevention of money laundering.

3. Fair competition

We are committed to free and fair competition. We do not tolerate anti-competitive agreements and ensure that the company acts in accordance with applicable competition laws. We reject any competitive advantage gained through unfair business practices.

4. Handling of personal data, protection of confidential information and intellectual property

We respect the personal rights of our employees, business partners and customers, and when handling personal information, we comply with the applicable legal and regulatory requirements regarding the processing of personal data and information security.

We protect trade secrets and other confidential information entrusted to us by our business partners and customers from unauthorised access, use and disclosure, at least in accordance with the relevant legal provisions on the protection of trade secrets.

We respect the intellectual property of our business partners, customers and other third parties and, when exchanging know-how and technologies, ensure that adequate precautions are taken to protect intellectual property rights.

5. Safeguarding consumer interests

Where our products and services affect the interests of consumers, appropriate measures are taken to ensure the safety and quality of the products or services. In doing so, we ensure that the products or services comply with the relevant statutory consumer protection provisions.

In our information and sales activities, we take consumer interests into account by applying the legal requirements for fair business, marketing and advertising practices, as well as consumer education.

6. Environmental Responsibility and Commitment

The protection and preservation of the natural environment concern and oblige us all. With this in mind, we conduct our business activities in an environmentally responsible manner and are committed to the goal of a climate-neutral future.

7. Protection of the environment and climate

We fulfil our environmental responsibilities by complying with applicable legal requirements and recognised standards for the protection of the environment and climate. We are committed to continuously reducing the negative impact of our business activities on the environment and climate.

We comply with applicable law and take appropriate measures based on legal and internationally recognised standards, covering, amongst other things, the following areas:

- Proper, professional and responsible handling of hazardous substances, chemicals and waste, including their disposal
- Measures to reduce or prevent waste
- Minimising emissions from operational processes (e.g. waste water, exhaust air, noise, greenhouse gases);
- Conservation of natural resources, for example through measures to save water, chemicals and other raw materials, and the promotion of the circular economy
- Use of climate- and environmentally-friendly technologies, processes, raw materials and products;
- Measures to increase energy efficiency and the share of renewable energy in energy consumption at the company's sites.

8. Human Rights and Labour Standards

Human dignity is inviolable. We therefore respect the internationally recognised human rights set out in the United Nations Universal Declaration of Human Rights.

We adhere to the internationally recognised labour standards of the International Labour Organisation (ILO), as set out below in the Code of Conduct. In all our business activities, we endeavour neither to cause nor to contribute to human rights violations. We expect the same of our business partners. Where necessary and possible, we support our suppliers in this regard.

9. Employment Relationships

We treat our employees with respect. We reject any form of unlawful punishment, abuse, harassment, intimidation or other undignified treatment of employees.

We apply the relevant labour law to all employment relationships and expect the same of our contractual partners. At the start of the employment relationship, employees must be provided with clear information on the key terms and conditions of employment, including their rights and obligations, working hours, remuneration, and payment and payroll arrangements.

We respect and protect the right of employees to terminate their employment in accordance with the applicable notice period.

10. Rejection of child labour and protection of young workers

We do not tolerate child labour and comply with the applicable statutory minimum age for entry into employment. In any event, we do not employ anyone under the age at which compulsory schooling ends under the law of the place of employment, nor anyone under the age of 15. Work placements are organised in accordance with statutory provisions.

We expect our contractual partners to have appropriate means of verifying age in order to prevent child labour. Should child labour be detected, all necessary measures must be taken immediately, prioritising the child's welfare, protection and development.
In the case of persons under the age of 18, the rights of young workers must be observed; they may only be employed if it is ensured that the working and employment conditions do not pose a risk to their health, safety or morals, nor are they detrimental to their development.

11. Rejection of forced labour

We reject forced or compulsory labour in any form. This also applies to any form of debt bondage, serfdom, slavery or slavery-like practices, human trafficking, and extends to all forms of involuntary labour and services that are incompatible with internationally recognised labour and social standards.

12. Principles of Remuneration

We apply the statutory provisions or – where applicable – the provisions of collective agreements when remunerating work. We ensure that the pay we offer our employees does not fall below the applicable statutory minimum wage or, where applicable, the minimum wage set by collective agreement or customary in the sector. In countries or regions without a statutory or collective agreement wage framework, we ensure that the wage paid for regular full-time work is sufficient to meet employees' basic needs. We do not tolerate wage deductions that are not permitted by law, including wage deductions as a disciplinary measure.

13. Working Hours

We apply the statutory or applicable collective agreement provisions on working hours, including overtime, rest breaks and annual leave.

We ensure that

- the regular weekly working hours, plus the maximum permissible overtime, are not exceeded,
- working time regulations are complied with

14. Freedom of association

We respect employees' right to freedom of association and freedom of assembly, as well as the right to collective bargaining and collective agreements, insofar as this is legally permissible and feasible in the respective country of employment. Where this is not permissible, we seek appropriate compromises for our employees.

15. Diversity and inclusion, prohibition of discrimination

We value the diversity of our employees and promote a working environment that fosters inclusion. We are therefore committed to equal opportunities and reject any form of discrimination or unequal treatment on the grounds of national or ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or belief.

We uphold the principle of equal pay for male and female workers for work of equal value.

16. Health and Safety at Work

We comply with national and international occupational health and safety standards and ensure a safe and healthy working environment (preventing accidents, injuries and work-related illnesses) in order to safeguard the health and safety of our employees and third parties.

Bonefeld, 1. October 2026