



CODE OF CONDUCT

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Dear Business Partners, Dear Employees,

the essential principles and basic rules governing the conduct of the CFH Group as well as our conduct towards business partners and the public are bindingly set out in this Code of Conduct.

Respectful and cooperative collaboration as well as the conscious assumption of social responsibility form the basis for the long-term, modern and sustainable corporate success of the CFH Group, a medium-sized family-owned company.

Within the CFH Group, this understanding has a long-standing tradition. We consider equal opportunities and fair remuneration adapted to local standards to be a matter of course. Remuneration and social benefits correspond at least to the respective national and local legal standards or to the level of the national economic sectors.

The Code of Conduct of the CFH Group is binding on all employees of the participating companies. In addition, it also applies to all other service providers, consultants, representatives and authorized agents acting on behalf of the companies of the CFH Group. The Code of Conduct applies to all business activities of the company and likewise provides a framework for guidance on the following topics.

Marl, 01.04.2026


Dr.-Ing. Reinhold Both
Managing Partner


Alexander Graf von der Schulenburg
Executive Vice President

Compliance with Laws and Regulations

Compliance with laws and regulations is an essential fundamental principle of our conduct. We comply at all times with applicable legal prohibitions and obligations, with local laws in the case of international companies, as well as with authorization requirements in the area of customs and export control.

The CFH Group rejects doing business with sanctioned companies, countries or persons. In doing so, all companies of the CFH Group also take into account the respective applicable international sanctions lists.

Before a business relationship is entered into, all customers, suppliers and business partners are reviewed by the compliance specialists within the CFH companies.

In addition, the CFH Group provides a whistleblower system on its website through which information on potential violations of laws and regulations can be reported confidentially.

Avoidance of Conflicts of Interest

All companies and employees of the CFH Group avoid conflicts of interest. A conflict of interest exists when personal, private and professional interests overlap improperly. Employees of the CFH Group are prohibited from offering or accepting monetary amounts of any value, gifts, loans, discounts or valuables.

Any remuneration or benefits from third parties to employees, their relatives or their associates are unacceptable. Any secondary employment of an employee must be approved by management before it begins.

Private benefits from business transactions may not be used. Exceptions are minor gifts and invitations that fall within the scope of customary business hospitality, customs and courtesy. Gifts received must be handed over to the secretariat for the annual employee raffle. In case of doubt, the Compliance Officer must be consulted on a binding basis as to how the situation is to be handled.

The CFH Group pursues a zero-tolerance policy with regard to conflicts of interest. This includes:

- **Transparency:** All business relationships and transactions must be transparent and traceable. Employees are required to disclose relevant information.
- **Approval Requirement:** Any secondary employment or business relationship that could constitute a conflict of interest must be approved in advance by management.
- **Sanctions:** Violations of these guidelines will be strictly sanctioned and may result in termination of employment.
- **Training:** Regular training to raise awareness of conflicts of interest and compliance.
- **Internal Reviews:** Scheduled audits to ensure compliance with the guidelines.

Fair Competition

The companies of the CFH Group commit to fair business conduct in compliance with all applicable competition and antitrust legislation. Corruption and price-fixing agreements with competitors are not tolerated (Zero Tolerance) and result in sanctions against the persons concerned.

Money Laundering Prevention

The companies of the CFH Group comply with their legal obligations to prevent money laundering and refrain from any money laundering activities. Every employee is requested to report unusual financial transactions to their supervisor without delay.

Internal Equal Treatment and Non-Discrimination

A culture of equal opportunities, mutual trust and mutual respect is of great importance to the employees of the CFH Group. We promote equal opportunities and prevent discrimination in the hiring of employees as well as in promotion or the granting of education and training opportunities.

The companies of the CFH Group respect the dignity of every person. We also expect this conduct from all our employees and consistently enforce this standard.

Human and Labor Rights

The CFH Group is committed to complying with and promoting international human rights and labor rights in all business areas. These include:

- The commitment to respect and protect human rights in all business processes and supply chains, including the core conventions of the International Labour Organization (ILO).
- The strict rejection of child labor and forced labor, which are excluded from all business processes and supply chains. The CFH Group conducts regular reviews to prevent these practices.
- The promotion of an inclusive and respectful working environment in which any discrimination, harassment or disadvantage based on ethnic origin, gender, religion, disability, age, sexual identity or family circumstances is not tolerated.
- Ensuring fair working conditions that meet at least national and local legal standards, including fair wages, reasonable working hours and safe working environments.
- The promotion of dialogue and cooperation with employee representatives and labor unions through regular meetings and open communication.
- Regular training and awareness campaigns for employees on human rights and labor rights to strengthen awareness of these topics.

Cooperation with Employee Representatives

We recognize the right of all employees to form labor unions and employee representative bodies on a democratic basis within the framework of national regulations.

For the CFH Group, trusting and close cooperation with employee representatives is a key component and proven cornerstone of corporate policy. The basis is an open and constructive dialogue characterized by mutual respect.

Occupational Health and Safety

The safety and health of all employees in our companies are, alongside the quality of our products and economic success, an equally important corporate objective. Occupational safety and health protection are an integral part of all operational processes and are taken into account in all technical, economic and social considerations of the companies from the planning stage onwards.

Every employee promotes safety and health protection in their working environment and is obliged to comply with occupational health and safety regulations.

Sustainable Environmental and Climate Protection

Sustainable environmental and climate protection as well as resource efficiency are priority corporate objectives. Both in the development of new products and services and in the operation of our production facilities, we ensure that all resulting impacts on the environment and climate are kept as low as possible and that our products make a positive contribution to environmental and climate protection.

Every employee bears personal responsibility for treating natural resources with care in order to protect the environment.

Public Conduct and Communication

The CFH Group respects the right to freedom of expression as well as the protection of personal rights and privacy.

Every employee is aware that they may also be perceived in their private life as part of and a representative of the CFH Group and is therefore expected, through their conduct and public appearance, especially in dealings with the media, to uphold the reputation of the CFH Group.

Data Protection and Confidentiality

The CFH Group observes data protection and confidentiality. Confidential business information or trade secrets may not be disclosed to unauthorized persons either during or after termination of employment.

At the same time, we respect the confidentiality of information belonging to our customers and suppliers and treat it with the same confidentiality with which we protect our own information.

Protection of Company Property

We use the company's property and resources properly and carefully and protect them against loss, theft or misuse. This also applies to our company's intellectual property, which is particularly worthy of protection.

Our employees, together with their supervisors, are responsible for ensuring that the nature and scope of business travel are always proportionate to the respective purpose of the trip and that they are planned and carried out economically, taking time and cost considerations into account.