



SUPPLIER CODE

Revision: 02

Effective as of: 01.04.2026

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Partners for the future

Dear Business Partners,

The CFH Group (German subsidiaries: CFT, CFH Immobilien, WAT, DFT, Korfmann) has committed itself in its compliance guidelines to supporting and applying the fundamental principles of human rights, fair working conditions, environmental protection, and the fight against corruption.

The CFH Group also wishes to engage its business partners in these principles and share these values with them. For the purposes of this Supplier Code of Conduct, the term **“business partner”** refers to procurement-related business partners, such as suppliers, service providers, licensors, and licensees.

The CFH Group expects its business partners to comply with the relevant legal and organizational standards as well as EU guidelines, such as the OECD Guidelines, the UN Guiding Principles on Business and Human Rights, the ILO Conventions, and the principles of the UN Global Compact.

The CFH Group’s business partners commit to monitoring and actively promoting compliance with the aforementioned standards and the fundamental principles set forth in this Supplier Code at all locations and in all activities, as well as those of their agents.

This forms the foundation for a partnership characterized by shared innovative strength, a passion for change, and a consistent commitment to excellence.


Dr.-Ing. Reinhold Both
Managing Partner


Alexander Graf von der Schulenburg
Executive Vice President

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Corporate strategy

One of the criteria in the CFH Group's business partner selection process is compliance with the standards and guidelines set forth in this Supplier Code of Conduct.

Business partners of the CFH Group may not pay or accept bribes or other illegal inducements in the course of their business relationships with companies or government agencies. Bribery, extortion, and embezzlement are prohibited.

Our business partners conduct their business in accordance with the principles of fair competition and in compliance with all applicable regulations.

Business partners of the CFH Group must ensure the confidentiality of information disclosed during the course of their collaboration that constitutes a trade secret under Section 2 of the German Trade Secrets Act (GesGehG) and must ensure its proper use (unless there is a legal or regulatory obligation to disclose it). They must also ensure that the data protection rights of the company, its employees, and its customers are protected and that, in the course of the collaboration, the relevant data protection regulations are generally complied with.

Our business partners take appropriate measures to protect the internal information of their business partners that has been agreed upon as "confidential," to maintain its confidentiality (unless there is a legal or regulatory obligation to disclose it), and to use such information only for the purposes agreed upon within the framework of the respective contractual relationship.

Health and safety

Our business partners must ensure occupational safety and health protection for their employees in accordance with applicable laws and regulations. All hazards and resulting health risks to which employees are exposed are objectively and accurately assessed by the business partner, and the necessary protective measures are taken. In addition, employees receive ongoing training on general safety regulations.

Environment

Business partners are required to fully observe and comply with the relevant international standards and legal requirements for environmental and climate protection, and to take measures to minimize environmental impact and continuously improve environmental and climate protection.

This includes the prevention of emissions and waste, as well as processes and systems that ensure waste is safely handled, transported, stored, recycled, reused, or managed. The generation and disposal of waste and emissions, as well as discharges into water that may adversely affect human health or the environment, are minimized in accordance with the state of the art, properly managed, controlled, and/or treated prior to release into the environment.

Required environmental permits, licenses, and restrictions are obtained, and relevant operational and reporting requirements are complied with.

Business partners have processes and systems in place to ensure the sustainable use of all relevant resources, such as energy, water, and materials, at all times.

Working conditions

The business partner must recognize and support the United Nations (ILO) Universal Declaration of Human Rights and ensure that business partners are not involved in human rights violations.

Business partners shall not tolerate child labor, forced labor, or any other form of involuntary labor, in accordance with the conventions of the International Labor Organization (ILO). Every employee shall be treated with respect and dignity.

The business partner commits to respecting and protecting human rights in all business processes and supply chains. This includes:

- The strict rejection of child labor and forced labor, which are prohibited in all business processes. Regular audits of the supply chain are required.
- The promotion of an inclusive work environment in which discrimination, harassment, or disadvantage based on ethnic origin, gender, religion, disability, age, sexual identity, or family status is not tolerated.
- Ensuring fair working conditions that meet at least national and local legal standards, including fair wages, reasonable working hours, and safe work environments.
- Promoting dialogue with employee representatives and labor unions through regular meetings and open communication.
- Regular training for employees on human rights and labor rights to ensure compliance with standards.

Working hours must be structured in accordance with applicable laws. Employees should receive employment contracts that specify working hours, compensation, and all relevant legal requirements. All compensation must be paid without delay and in accordance with applicable laws and contractual agreements.

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Our business partners respect their employees' right to freedom of association and collective bargaining within the framework of applicable laws and ILO conventions.

Compliance

Business partners are prohibited from offering CFH Group employees any amount of money, gifts, loans, discounts, or valuables that could induce employees to act in violation of their duties.

Exceptions are gifts and invitations that fall within the scope of customary business hospitality, etiquette, and courtesy and are valued at no more than EUR 30.00.

The CFH Group is committed to conducting business solely through quality and integrity. Therefore, the CFH Group maintains a zero-tolerance policy regarding bribery, conflicts of interest, and all other forms of corruption.

We also expect our business partners to unconditionally prevent and, where necessary, sanction corruption, bribery, and other unethical conduct of this nature.

Business and personal interests are strictly separated at the CFH Group. Individuals must not abuse their position within the company for their own benefit or for the benefit of their family or friends. All employees are required to disclose any suspected or actual conflicts of interest to their supervisor and the Compliance Department.

Similarly, the business partner undertakes to ensure that these decisions, as they relate to its business activities with companies of the CFH Group, are made exclusively on the basis of objective criteria.

The business partner agrees to avoid conflicts of interest by:

- Transparency: All business relationships must be transparent and traceable.
- Approval Requirement: Secondary employment or business relationships that could pose conflicts of interest must be approved in advance.
- Sanctions: Violations will result in legal action and the termination of contractual relationships.
- Training: Regular awareness training for employees on conflicts of interest.
- Internal reviews: Scheduled audits to ensure compliance with the guidelines.

The CFH Group supports fair competition and complies with competition and antitrust laws. Therefore, the business partner also agrees to act fairly in competition and to operate within the applicable antitrust limits.

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Voluntary commitment and monitoring

The business partner has all necessary and adequate internal procedures and measurement methods in place to ensure compliance with all of the principles listed above.

The CFH Group recognizes that achieving the standards set forth in this Code is a dynamic process and encourages the business partner to continuously improve its processes. If necessary, CFH supports the establishment of milestones and the implementation of systems to ensure the continuous improvement of practices.

The business partner shall communicate the principles set forth in this Supplier Code to its subcontractors and other business partners and shall also ensure their compliance, insofar as the performance of contractual relationships with the CFH Group is concerned. It shall require its business partners to base their conduct on the same standards in all other respects as well.

The business partner authorizes the companies of the CFH Group to verify compliance with these principles through audits (including regular audits) or to have such compliance verified by a third party agreed upon by both parties (whereby the business partner may reject proposals from the CFH Group only for good cause, such as objective unsuitability). In the event of a culpable breach by the business partner of its obligations under this Supplier Code, and following a formal warning that has gone unheeded with a reasonable grace period granted, the companies of the CFH Group may withdraw from the unfulfilled portion of any contract without compensation or, in the case of continuing obligations, terminate such obligations immediately and without compensation.

Any culpable violation of the principles and requirements set forth in the Supplier Code of Conduct shall be considered a material breach of the contractual relationship on the part of the business partner, i.e., one that triggers legal consequences. The CFH Group is entitled, in the event of suspected non-compliance by the business partner with the principles and requirements described in the Supplier Code of Conduct (e.g., in the event of negative media reports), to request information from the business partner regarding the relevant facts. Irrespective of this, the CFH Group provides a whistleblower system via its website through which employees, business partners, and other third parties can confidentially report potential violations of legal requirements or of the principles set forth in this Supplier Code of Conduct. Further information and access to the whistleblower system can be found on the CFH Group's website.

Furthermore, the companies of the CFH Group have the right to terminate individual or all contractual relationships with business partners in the case of continuing obligations without notice or to withdraw from the unfulfilled portion of a contractual relationship without compensation if the business partner has demonstrably and culpably failed to comply with its obligations under the Supplier Code of Conduct, following a formal warning with a reasonable grace period issued by a CFH Group company, which has proven to be ineffective.

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Related links

For more information, click here:

OECD Guidelines:

https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html

10 UN Guiding Principles:

<https://www.unglobalcompact.org/what-is-gc/mission/principles>

UN Supplier Code:

<https://www.un.org/Depts/ptd/about-us/un-supplier-code-conduct>

ILO (International Labour Organization) Conventions:

<http://www.ilo.org/global/lang--en/index.htm>