

BEYER® - Group  
– CODE OF CONDUCT –  
as of May 2024



The BEYER® - Group companies are as follows:

**Mittelrheinische Metallgießerei  
Heinrich Beyer GmbH & Co. KG**  
Koblenzer Straße 69, 56626 Andernach  
GERMANY

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**Brohler Metall GmbH & Co. KG**  
Koblenzer Straße 22, 56656 Brohl-Lützing  
GERMANY

▪

**BEYER CNC GmbH & Co. KG**  
Auf dem Junker 3, 53844 Troisdorf  
GERMANY

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## **1. Introduction / Preamble**

The BEYER - Group companies admit to ethical business practices and ecologically and socially responsible management. We expect the same behaviour from our business partners. We also expect our employees to observe the principles of ecological, social, and ethical behaviour and to integrate them into business culture. Furthermore, we strive to continuously optimise our entrepreneurship and products in terms of sustainability and ask our business partners to contribute as part of a holistic approach.

The Code of Conduct is based upon national laws and regulations as well as international agreements such as the Universal Declaration of Human Rights (UDHR), the guidelines on Children's Rights and business principles, the UN Guiding Principles on Business and Human Rights and the international labour standards of the International Labour Organization (ILO).

## **2. Social Responsibility**

### **▪ Exclusion of Forced Labour**

Forced labour, slave labour or comparable labour as such, are prohibited. All work must be done voluntarily, and employees have the right to terminate their work or contract of employment at any time. In addition, the unacceptable treatment of employees, such as mental hardship, sexual and personal harassment, is not tolerated.

### **▪ Prohibition of Child Labour**

Child labour is prohibited in every stage of production. Business partners are prompted to abide by the ILO Recommendation on the minimum age for the employment of children. Accordingly, the minimum age must be not less than the age at which mandatory school ends and in any case not under the age of 15. If children are encountered at work, the business partner shall document the steps it takes to provide relief for the children which enables them to attend school. The rights of young employees are to be protected and special safety precautions must be observed.

### **▪ Fair Remuneration**

Our employees receive fair remuneration for work done which is significantly above the industrial standards and also well above the national statutory minimum wage. The employees are granted all benefits specified in law. Deductions in remuneration as disciplinary measures are not permitted. It is ensured that employees receive transparent, detailed, and written information on the composition of their remuneration on a regular basis.

### **▪ Fair Working Hours**

Working hours comply with applicable laws or industrial standards. Employees must be given at least one day off following every six consecutive days of working. The regular work week shall not exceed 48 hours.

- **Freedom of Association**

The right of employees to establish and join organizations of their choice and to engage in collective bargaining is respected. In cases, where freedom of association and the right of collective bargaining is legally restricted, alternative ways for independent and free association for the purpose of collective bargaining are granted to all employees. Employee representatives are protected from discrimination. They are given free access to their colleague's workplaces to ensure that they can exercise their rights in an orderly and peaceful manner.

- **Prohibition of Discrimination**

Any discrimination against employees and also job applicants is prohibited. This applies to discrimination on the grounds of e.g. gender, race, caste, skin colour, disability, ideology, political opinion, ethnic and national origin, religion, age, pregnancy, or sexual orientation. The personal dignity, privacy and right of every individual is respected.

- **Health Protection**

We are responsible for a safe and healthy workplace. By establishing appropriate systems that guarantee a safe and healthy working environment, necessary preventive measures are taken against potential accidents and damage to health in connection with the activities. Furthermore, employees are regularly informed and educated about current health and safety standards and measures.

- **Complaints Mechanism**

We ensure establishing an effective complaints mechanism at company level for individuals and communities who may be affected.

- **Conflict Minerals**

For conflict minerals such as tin, tungsten, tantalum, and gold as well as for other raw materials such as cobalt, we have established processes in accordance with the terms of the Organization for Economic Cooperation and Development (OECD) to ensure the fulfilment of due diligence requirements in favour of promoting responsible supply chains for minerals originating from conflict and high-risk areas and expect the same from our suppliers. Smelters and refineries without adequate and audited processes shall be avoided.

### **3. Ecological Responsibility**

- **Treatment and Disposal of Industrial Wastewater**

Waste water from operating processes, manufacturing processes and sanitary facilities is typified, monitored, checked and, if required, treated before disposal. Furthermore, measures are taken to reduce the generation of wastewater.

- **Handling Air Emissions**

General emissions of operational processes (air and noise emissions) as well as greenhouse gas emissions are typified, routinely monitored, checked and, if required, treated before release. In addition, waste gas cleaning systems are monitored, and we aim to find efficient economical solutions to minimise any emissions.

- **Handling Waste and Dangerous Substances**

We pursue a systematic approach to identify, manage, reduce, and responsibly dispose or recycle waste. Chemicals or comparable materials which pose a serious threat when released into the environment are recorded and managed in a way that when handling these materials, transporting, storing, using, recycling, or reusing and when disposing, safety is guaranteed at any time.

- **Reduce Consumption of Raw Materials and Natural Resources**

During production, the use and consumption of resources and the generation of waste in all forms, including water and energy, are to be reduced or avoided. It happens either at the place of origin or by appropriate procedures and measures e.g., by changing the production and maintenance processes or workflows within the company, using alternative materials, cost savings, recycling, or reuse of materials.

- **Handling Energy Consumption and Efficiency**

Energy consumption is monitored and recorded. We strive to find economical solutions to improve energy efficiency and minimise energy consumption.

#### **4. Ethical Business Behaviour**

- **Fair Competition**

Standards of fair business activities, fair advertising and fair competition are observed. Antitrust laws, which prohibit especially agreements and other activities that have any impact on prices and conditions when dealing with competitors, apply at any time. Furthermore, these regulations prohibit agreements between customers and suppliers by which customers are to be restricted in their freedom to autonomously determine their pricing policy and other trading conditions at the time of resale.

- **Confidentiality / Data protection**

We undertake to comply with the adequate expectations of clients, suppliers, customers, consumers, and employees with regard to the protection of private data. We observe all applicable data protection and information security regulations, statutory or official, when collecting, storing, processing, transmitting, or transferring personal data.

- Intellectual Property

Intellectual property rights will be respected. Technology and know-how transfer are made in a way intellectual property rights and customer information are protected hereof.

- Integrity / Bribery, Taking Advantage

For all business activities, the highest standards of integrity apply. We pursue a zero-tolerance policy for all forms of bribery, corruption, extortion, and embezzlement. Methods for monitoring and enforcement of standards are applied to ensure compliance with anti-corruption laws.

## 5. Compliance and Monitoring

The BEYER - Group will acquaint employees with the contents stipulated within the Code of Conduct and will clarify the obligations resulting from the Code. We will regularly monitor the contents for validity and their compliance by our employees. Violations against the Code of Conduct and legal provisions may, depending on the severity, give rise to consequences under liability or employment law.

Please report any violations which are covered by the Whistleblower Protection Act to the following competent registration office:

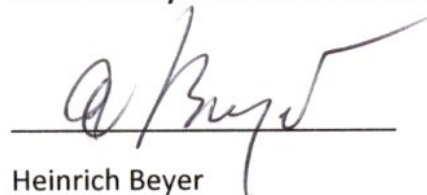
vem.consult GmbH  
Meldestelle  
Ferdinand-Sauerbruch-Straße 9  
56073 Koblenz  
telephone: +49 261 40406-11  
e-mail: [meldestelle@vemconsult.de](mailto:meldestelle@vemconsult.de)

Any other internal complaints which are not covered by the Whistleblower Protection Act and which shall not be addressed to supervisors or the works council may be reported via e-mail to [compliance@mmhb.de](mailto:compliance@mmhb.de) or by phone via 02632/4004-26.

Independent second opinions and additional information on our ESG risk management may be obtained via the platform IntegrityNext ([www.integritynext.com](http://www.integritynext.com)).

### Mittelrheinische Metallgießerei

#### Heinrich Beyer GmbH & Co. KG



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Heinrich Beyer

Managing Director / Owner



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Carsten Becking

Executive Manager