

# Code of Conduct



Härterei

# Carl Gommann

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Härterei Carl Gommann GmbH

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Code of Conduct / Code of Conduct

## I Foreword

Harding Plant Carl Gommann GmbH, based in Remscheid, Dreieckstraße 29, is a medium-sized family business with currently around 130 employees. The hardening shop offers heat treatment of machine components and tools made of various steel grades for a wide range of applications as a service to a large national and international clientele. The company specializes in two processes:

- plane-parallel hardening of sheet metal in hardening coating machines
- Nitriding (gas plasma, gas nitrocarburizing and stress relief annealing)

## Company History

The roots of Harding Plant Carl Gommann go back to 1860, when Carl Gommann began manufacturing saws and knives for wood processing. His son Alfred specialized in hardening and tempering - a know-how he acquired in England and used to build his own hardening furnaces.

In the 1920s, the most modern circular saw tempering furnace of its time is built. From 1935, the company offers heat treatment services for external companies and develops into a specialist in this field.

In the decades that followed, the company continued to set technical standards - from the first continuous furnace in the 1940s to the world's largest gas nitriding furnace in 1960 and innovative large-scale systems for quench hardening in the 1980s.

With the introduction of plasma nitriding technology in 1996 and continuous expansions, such as new halls and modern systems, the company remains at the cutting edge of technology.

Since 2000, the fifth generation - business lawyer Julia Raabe - has been leading Harding Plant Carl Gommann into the future together with an experienced management team.

This Code of Conduct sets out the basic expectations of Harding Plant Carl Gommann GmbH towards its Suppliers, service providers and other business partners (hereinaf-

ter also referred to as "Suppliers") with regard to lawful, ethical and sustainable behavior. Compliance with this Code of Conduct is a contractual component of the business relationship.

## II General Rules of Conduct

### 1. Compliance with Laws, Standards and Guidelines

Our Suppliers undertake to comply with all applicable national laws, regulations and ordinances. They also support the most important international standards and principles, such as the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, the UN conventions and the core labor standards of the International Labor Organization (ILO). It is important that these rules and our Code of Conduct are not circumvented by additional agreements.

2. Business Documents, Records or Reports, such as annual or Final Reports, Audit Reports and all other Business Documents must be accurate, complete and truthful.

## III Social Standards

### 1. Human and Labor Rights

Corporate responsibility entails the obligation to comply with the law and all applicable laws. CARL GOMMANN expects Suppliers to comply with the following basic principles in particular:

- Human rights / Free choice of employment
- Prohibition of human trafficking, modern slavery
- All forms of forced and compulsory labor and involuntary prison labor that violates human rights

### 2. Prohibition of Child Labor

No child labor may be used in any phase of production or processing. Suppliers are required to comply at least with the conventions of the International Labor Organization (ILO) on the minimum age for admission to employment and the prohibition of child labor.

No employees will be hired who are not at least 15 years of age, which must be proven by proof of age. In countries that fall under the exception for developing countries in accordance with ILO Convention No. 138, the minimum age may be reduced to 14 years. No employees may be employed for hazardous work if they are not at least 18 years of age in accordance with ILO Convention No. 182.

### 3. Equal Opportunities and Non-Discrimination

CARL GOMMANN Suppliers do not discriminate against anyone on the basis of ethnic, national or social origin, skin color, gender, religion, ideology, age, disability, sexual orientation or political views, provided that these criteria are based on democratic principles and tolerance towards those with different opinions.

### 4. Freedom of Association

The fundamental right of all employees to form and join trade unions and employee representative bodies is recognized. Where this right is restricted by local law, Suppliers shall work to promote alternative, legally compliant means of employee representation.

### 5. Disciplinary Measures and Respectful Treatment

CARL GOMMANN expects its Suppliers to treat all employees with dignity and respect. Disciplinary measures, such as sanctions, fines or other penalties, may only be taken in accordance with applicable national and international standards and recognized human rights. Arbitrary measures are strictly prohibited.

In addition, CARL GOMMANN Suppliers undertake to ensure that no employee is subjected to verbal, psychological, sexual or physical violence, coercion or harassment. For CARL GOMMANN, respectful and fair treatment in the workplace is a basic prerequisite for cooperation based on trust.

## 6 Safety in the Workplace and Working Hours

CARL GOMMANN's Suppliers comply with the applicable legal requirements for health and safety in the workplace. They support the further development and improvement of working conditions. The working hours correspond at least to the respective national legal requirements or the minimum standards of the respective national economic sectors. The Suppliers of CARL GOMMANN also comply with the requirements of the CARL GOMMANN location for health and safety at the workplace if they are active there.

## 7. Minimum Wage

CARL GOMMANN's Suppliers shall ensure that their employees are appropriately remunerated in accordance with the legally applicable and guaranteed minimum wage at. If there are no statutory or collectively agreed regulations, the remuneration shall be based on the industry-specific, local, collectively agreed remuneration and benefits that ensure a reasonable standard of living for the employees and their families.

## IV Environmental and Climate Protection

CARL GOMMANN wants to make a significant contribution to environmental and climate protection. In particular, CARL GOMMANN expects Suppliers to comply with the following basic principles:

### 1. Compliance with Legal Requirements

CARL GOMMANN's Suppliers assume responsibility with regard to environmental protection and comply with all applicable national legal requirements concerning the environment and sustainability.

## 2. Increase in Energy and Resource Efficiency

CARL GOMMANN's Suppliers use natural resources sparingly and minimize the environmental impact of their production processes and products. By taking measures to reduce emissions, reuse and recycle, they contribute to decarbonization and the reduction of energy consumption. They contribute to the reduction of energy consumption and CO2 emissions.

## 3. Reduction of the Environmental Impact

The aim is to reduce the environmental impact through the responsible use of resources (such as energy, input materials, etc.) and the reduction of emissions and energy consumption in order to increase energy efficiency.

Suppliers are obliged to take measures for a sustainable approach to the environment, including measures to reduce emissions, reuse and recycling and to decarbonize and reduce energy consumption.

They are expected to comply with the applicable international standards and legal requirements in environmental and climate protection and to minimize the environmental impact of their processes and products, e.g. through

- Efficient use of resources (energy, water, raw materials, auxiliary and operating materials),
- using environmentally friendly materials,
- avoiding, reducing or recycling emissions and waste,
- Environmentally friendly design of logistics processes,
- Promotion of environmentally friendly technologies.

Chemicals and other materials that pose a risk to the environment must be handled responsibly and safely during processing, storage, transportation or disposal.

#### 4. Improvements and Reporting

Suitable measures are to be taken and systems (e.g. in accordance with ISO 14001, ISO 50001 or comparable standards) are to be operated in order to continuously improve environmental protection. Supplier employees should be informed, motivated and trained in accordance with their environmental protection responsibilities.

Suppliers are obliged to report environmental and climate risks immediately in writing and to disclose the results of legally or officially required investigations. They must promptly respond to and comply with all relevant inquiries and requirements regarding the use of hazardous substances.

In the long term, Suppliers are expected to be able to demonstrate progress in climate protection. This can be done through appropriate documentation, reports or certificates, which are presented on request. The joint commitment to environmental protection helps to minimize environmental impact and promote sustainable business relationships.

#### V Avoidance of Minerals from Conflict and Risk Areas

1. Suppliers shall avoid the use of raw materials originating from smelters and refineries that do not meet the requirements of the OECD Due Diligence Guidance for the Supply Chain of Mineral Resources from Conflict-Affected and High-Risk Areas. At the request of CARL GOMMANN, information on the raw materials used by the Supplier or sub-Supplier must be provided.

The Suppliers shall ensure that no conflict minerals, such as in particular tin, tantalum, tungsten, gold and their derivatives, from conflict and high-risk areas are used. Conflict minerals are, according to the Dodd-Frank Act Section 1502, minerals whose proceeds directly or indirectly support non-state armed groups financially.

2. Suppliers are obliged to provide proof that they source or process DRC conflict-free raw materials.

3. Upon request, Suppliers shall immediately provide an overview of the measures they take to ensure that their products are free of conflict minerals. For this purpose, they use the standardized reporting format of the Conflict-Free Sourcing Initiative (CFS), the Conflict Minerals Reporting Template (CMRT).

## VI Product Safety

All products and services must meet the contractually agreed quality and safety criteria upon delivery and be safe to use for their intended purpose. To ensure the health and safety of the end customer, the relevant national and international regulations on product responsibility (e.g. product liability, take-back obligations, product labeling) must be observed by the Supplier. The Suppliers of CARL GOMMANN shall comply with all applicable product safety regulations and requirements, in particular the legal requirements regarding the safety, labeling and packaging of products as well as the use of hazardous substances and materials.

## VII Business Relationships

### 1. Avoidance of Conflicts of Interest

The highest degree of integrity is expected in all business activities and relationships. The persons acting for the Supplier of CARL GOMMANN make their decisions exclusively on the basis of objective criteria and do not allow themselves to be influenced by personal interests and relationships.

### 2. Prohibition of Corruption

CARL GOMMANN's Suppliers do not tolerate corruption, bribery, threats, extortion or other unfair business practices. They shall ensure that their employees, subcontractors or representatives do not give, offer or accept bribes, kickbacks, improper donations or other improper payments or benefits to or from customers, public officials or other third parties or use or tolerate other unfair business practices. Suspected cases in connection with business activities can be reported via the central reporting office set up for this purpose at [service@gommann.de](mailto:service@gommann.de).

### 3. Gifts, Hospitality and Invitations

CARL GOMMANN Suppliers do not offer CARL GOMMANN employees or third parties any direct or indirect inappropriate benefits in the form of gifts, hospitality or invitations. Nor do they solicit or accept such inappropriate benefits.

Promotional and occasional gifts granted to CARL GOMMANN employees by Suppliers may only be of a minor value and within reasonable limits.

Invitations from Suppliers to meals must serve a business occasion, must not be unreasonably frequent and the hospitality must take place in the context of normal cooperation and be proportionate to the occasion.

### 4. Fair Market Conduct

CARL GOMMANN is a fair and responsible market participant and adheres to contractual obligations. CARL GOMMANN also expects this from its Suppliers, in particular compliance with the following basic principles.

### 5. Free Competition

CARL GOMMANN's Suppliers comply with the applicable antitrust laws. In particular, they shall not enter into any anti-competitive agreements with competitors, Suppliers or customers and shall not abuse any dominant market position that may exist.

### 6. Export Control

CARL GOMMANN's Suppliers shall ensure compliance with all applicable laws, regulations and official requirements for the import and export of goods, services and information. This applies in particular to counter-terrorism regulations, compliance with embargoes as well as prohibitions and licensing requirements in connection with the movement of goods, the use of technologies and the procurement of services.

### 7. Money Laundering

Suppliers shall only maintain business relationships with business partners of whose integrity they are convinced. They shall ensure that the applicable statutory provisions against money laundering are not violated.

## VIII Protection of Data, Business Secrets and Company Assets

Information, whether physical or digital, is a particularly important asset. Confidential data, business secrets and company assets must therefore be protected. CARL GOMMANN expects its Suppliers to comply with the following basic principles in particular.

### 1. Data Protection

CARL GOMMANN's Suppliers shall comply with all applicable laws for the protection of personal data of employees, customers, Suppliers and other affected parties.

### 2. Protection of Know-How, Patents, Trade and Business Secrets

The Suppliers of CARL GOMMANN respect the know-how, patents, trade and business secrets of CARL GOMMANN and third parties. They shall not disclose such information to third parties without the prior express written consent of CARL GOMMANN or in any other unauthorized manner. Disclosure is only permitted for contractual purposes. Suppliers undertake to comply with the Confidentiality Directive (EU) 2016/943 and to implement a minimum standard of protective measures for the operational and transferred know-how of CARL GOMMANN.

### 3. Business Information

CARL GOMMANN Suppliers shall publish business data and report on their business activities truthfully and in accordance with the applicable laws.

### 4. Protection Against Unauthorized Access

CARL GOMMANN's Suppliers must ensure that the operating sites and transportation locations where the goods intended for CARL GOMMANN are produced, stored, processed, loaded and transported are protected against unauthorized access by third parties as part of a secure supply chain and that the personnel employed are reliable.

## IX Whistleblower System

In order to give CARL GOMMANN Suppliers and business partners the opportunity to report possible violations of laws and regulations, to report potential misconduct by employees or violations of the Code of Conduct for Suppliers in our supply chain, CARL GOMMANN has set up the possibility of reporting via a whistleblower system:

- By e-mail to: [service@gommann.de](mailto:service@gommann.de)
- By post to: Harding Plant Carl Gommann GmbH,  
Attn: Data Protection Officer  
Dreiangelstraße 29, D-42855 Remscheid

Information can also be submitted anonymously if this is technically possible. The confidentiality of the information is always guaranteed.

Whistleblowers enjoy protection against discrimination or reprisals in connection with their report.

Reports will be treated confidentially and examined in accordance with legal requirements. This does not affect the statutory right to contact the competent authorities.

CARL GOMMANN reserves the right to request disclosure of identity in individual cases for the purpose of checking the plausibility and substantiating suspected cases and if the whistleblower cannot suffer any disadvantages as a result.

CARL GOMMANN points out that in individual cases and/or insofar as a legal obligation exists, the information to be treated confidentially must be passed on to third parties (e.g. to open an investigation).

## X Legal Consequences of Violations of the Code of Conduct

### 1. Contractual Measures

If a Supplier violates this Code of Conduct, CARL GOMMANN is entitled to

- to terminate the business relationship without notice,
- to terminate current contracts extraordinarily,
- cancel existing orders,
- to claim damages.

### 2. Contractual Penalty

In the event of serious or repeated infringements, CARL GOMMANN may demand an appropriate contractual penalty. The right to claim further damages remains unaffected.

### 3. Obligation to Indemnify

The Supplier shall indemnify CARL GOMMANN against all third-party claims, fines, costs and damages resulting from a culpable breach of this Code of Conduct.

### 4. Rectification

Suppliers can avert sanctions if they immediately and demonstrably initiate appropriate remedial measures and prevent the repetition of violations.

### 5. Monitoring

CARL GOMMANN reserves the right to monitor compliance either itself or through independent third parties.

## XI Final Provisions

This Code of Conduct is an integral part of the contractual relationship between CARL GOMMANN and its Suppliers. It also applies to all subcontractors and other third parties involved in the supply chain.

Valid from: 01.01.2025