

Dynamit Nobel Defence GmbH
General Code of Conduct

Summary

1	Fundamental Understanding	2
2	Compliance with Laws	3
3	Integrity and Compliance / Conduct in the Business Environment.....	3
3.1	Corruption and Bribery	3
3.2	Invitations and Gifts	3
3.3	Fair Competition / Competition Law / Disclosure of Information	4
3.4	Money Laundering Prevention	4
3.5	Avoidance of Conflicts of Interest	4
3.6	Protection of Information and Intellectual Property	4
3.7	Data Protection	4
3.8	Whistleblowers and Protection against Retaliation	5
3.9	Export Controls and Economic Sanctions	5
4	Respect for Human Rights / Treatment of Employees	5
4.1	Working Conditions	5
4.2	Child labor / Forced Labor / Slavery / Human Trafficking.....	6
4.3	Discrimination / Harassment / Equal Opportunity / Inclusion / Diversity	6
4.4	Health Protection and Occupational Safety	7
5	Environment, Energy and Climate Protection	8
6	Handling of Conflict Minerals.....	9
7	Consumer Interests.....	10
8	Supply Chain.....	10
9	Implementation and Enforcement.....	10

1 Fundamental Understanding

Dynamit Nobel Defence GmbH is committed to its societal and social responsibilities. Building on this commitment, Dynamit Nobel Defence GmbH assumes responsibility within its business activities toward its own organization, employees, direct suppliers, service providers, and other business partners along the value chain. To fulfill this responsibility, the company considers the impact of its business decisions and actions from legal, economic, technological, as well as social and environmental perspectives. The goal is to contribute to the social, economic, and ecological development of the countries and regions in which Dynamit Nobel Defence GmbH operates.

The Code of Conduct is an integral part of the company's policy and serves as a foundation for ensuring long-term business success while promoting sustainable corporate development.

All actions are grounded in full compliance with applicable legal regulations. Dynamit Nobel Defence GmbH is guided by ethical values and principles, particularly integrity, honesty, and respect for human dignity, as reflected in the principles of the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the Core Labour Standards of the International Labour Organization (ILO), the ILO Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights, and the Human Rights Charter.

This also includes the integration of individuals within their own workforce and throughout the value chain, as well as measures to remedy any adverse human rights impacts. Dynamit Nobel Defence GmbH is committed to respecting the rights of affected communities, particularly minorities and indigenous peoples, to protecting their cultures. This commitment also extends to upholding land, forest, and water rights and ensuring protection against forced evictions.

This Code of Conduct is binding for all employees within the company's workforce and is actively enforced. Furthermore, Dynamit Nobel Defence GmbH expects its direct suppliers, service providers and other business partners as well as all individuals associated with Dynamit Nobel Defence GmbH, to share the same fundamental understanding. This provision does not establish any rights in favor of third parties.

The provisions of this Code of Conduct apply to all branches and business units of Dynamit Nobel Defence GmbH.

The Code of Conduct is developed in collaboration with the relevant departments and is reviewed regularly and updated as necessary. The primary responsibility for the Code of Conduct lies with the executive management.

Whenever reference is made to the company's workforce or employees, this includes not only directly employed staff but also non-employed individuals, such as temporary agency workers.

2 Compliance with Laws

Compliance with applicable laws and regulations in the countries where Dynamit Nobel Defence GmbH operates is essential. Where local laws and regulations are less stringent, actions will be guided by the principles of this Code of Conduct. In cases where mandatory local law directly conflicts with the principles of this Code, local law shall take precedence. Nevertheless, Dynamit Nobel Defence GmbH strives to adhere to the provisions of this Code of Conduct.

3 Integrity and Compliance / Conduct in the Business Environment

3.1 Corruption and Bribery

Dynamit Nobel Defence GmbH does not tolerate corruption, bribery, or extortion and is committed to complying with the conventions of the United Nations (UN) and the Organisation for Economic Co-operation and Development (OECD) on combating corruption, as well as all applicable anti-corruption laws. Any benefits that are intended to, or could appear to, improperly influence business decisions or secure any other undue advantage shall neither be promised, offered, granted, requested, nor accepted in business dealings, nor will Dynamit Nobel Defence GmbH allow such promises to be made on its behalf. A particularly strict standard applies when dealing with individuals subject to special criminal or liability regulations (e.g., public officials).

3.2 Invitations and Gifts

Dynamit Nobel Defence GmbH regulates the acceptance of invitations and gifts. Invitations and gifts may only be accepted if their scope and purpose are considered appropriate and comply with the locally applicable value limits in business practice. Furthermore, it is strictly prohibited to solicit any benefits exceeding these value limits.

3.3 Fair Competition / Competition Law / Disclosure of Information

Dynamit Nobel Defence GmbH is committed to fair and equitable competition within a free market economy, acts in compliance with national and international competition and competition laws, and does not engage in price-fixing, market or customer allocation, or bid-rigging arrangements. In line with this commitment, Dynamit Nobel Defence GmbH cooperates with authorities in the investigation of suspected violations and is dedicated to the disclosure of relevant information. This disclosure also includes financial matters. In line with its financial responsibility, Dynamit Nobel Defence GmbH is committed to transparent and proper accounting practices and maintains detailed records of all financial transactions.

3.4 Money Laundering Prevention

Dynamit Nobel Defence GmbH rejects any form of money laundering in accordance with applicable legal obligations. Dynamit Nobel Defence GmbH verifies and monitors the identity of customers, suppliers, service providers, and other business partners and is committed to conducting business exclusively with reputable partners.

3.5 Avoidance of Conflicts of Interest

During its business activities, Dynamit Nobel Defence GmbH avoids both internal and external conflicts of interest that could improperly influence business relationships. Where such conflicts cannot be avoided, they will be transparently disclosed.

3.6 Protection of Information and Intellectual Property

Dynamit Nobel Defence GmbH safeguards confidential information and rejects the unlawful appropriation of intellectual and scientific property (plagiarism) as well as its subsequent publication. The transfer of technology and know-how must be conducted in a manner that protects intellectual property rights, customer information, trade secrets, and non-public information. Applicable laws for the protection of trade secrets are strictly observed, and confidential information of business partners is handled accordingly.

3.7 Data Protection

Dynamit Nobel Defence GmbH processes, stores, protects, and deletes personal data in compliance with legal requirements. All statutory data protection regulations are observed. Personal data is collected confidentially, solely for legitimate, predefined purposes, and in a transparent manner. Furthermore, personal data is only processed when it is safeguarded

against loss, alteration, unauthorized use, or disclosure through appropriate technical and organizational measures that meet the highest standards of data security.

3.8 Whistleblowers and Protection against Retaliation

All activities are based on the EU Whistleblower Protection Directive 2019/1937 of November 26, 2019. Dynamit Nobel Defence GmbH is committed to complying with the Whistleblower Protection Act and provides all employees with a secure and confidential channel to report potential legal violations or misconduct without fear of retaliation. Reports can be submitted anonymously under the whistleblower protection procedure and are always treated confidentially to safeguard against any retaliatory measures.

3.9 Export Controls and Economic Sanctions

In terms of export controls, Dynamit Nobel Defence GmbH is committed to complying with all relevant legal requirements - particularly licensing obligations, export restrictions, and support prohibitions - when transferring or exporting goods.

4 Respect for Human Rights / Treatment of Employees

The treatment of the company's workforce is based on the Core Labour Standards of the International Labour Organization (ILO), considering the applicable laws and legal frameworks of the various countries and locations. For Dynamit Nobel Defence GmbH, it is a matter of course to include the interests, views, rights, and expectations of its (actual and potential) significantly affected workforce in decision-making processes. Across all activities, the goal is to provide employees with secure and sustainable employment opportunities.

4.1 Working Conditions

Dynamit Nobel Defence GmbH is committed to fair and socially responsible working conditions. Fair and equitable wages (salaries), equal pay for work of equal value, the right to freedom of association, collective bargaining, and access to social benefits in accordance with applicable rights and laws are essential components of its social responsibility strategy and overall business approach.

Where freedom of association and collective bargaining are not legally permitted, appropriate compromises will be sought with the workforce. Employees are always provided with clear, detailed, and regular information regarding the composition of their remuneration.

Where possible, Dynamit Nobel Defence GmbH supports its workforce with flexible working arrangements and initiatives related to work-life balance, such as family leave. Compliance

with maximum working hours and consecutive rest periods, as prescribed by applicable laws and regulations, is a matter of course. Similarly, reasonable notice is provided for changes in working hours, such as weekend shifts or schedule changes.

Ensuring access to an adequate supply of drinking water and clean sanitary facilities for employees represents the minimum standard for social facilities. The privacy of the workforce is respected and actively protected. Continuous employee development and regular qualification assessments are integral parts of human resources development. When terminating employment relationships, Dynamit Nobel Defence GmbH strives to ensure socially responsible measures. Special protection is provided to young workers across all employment matters.

4.2 Child labor / Forced Labor / Slavery / Human Trafficking

The prohibition of and measures against child labor as well as any form of forced or compulsory labor, modern slavery (including slavery, servitude, forced or compulsory labor and human trafficking), and unethical recruitment practices constitute a minimum standard for Dynamit Nobel Defence GmbH in safeguarding working conditions and human rights.

Particular reference is made to ILO Convention No. 138 and ILO Convention No. 182. During every hiring process, proof of age is required and documented. All employment must be voluntary, and individuals must have the ability to terminate their employment freely.

4.3 Discrimination / Harassment / Equal Opportunity / Inclusion / Diversity

Dynamit Nobel Defence GmbH maintains a strict zero-tolerance policy toward discrimination and harassment in accordance with applicable national and international laws and regulations. No individual shall face disadvantage based on race, ethnicity, color, gender, sexual orientation, gender identity, disability, age, religion, political opinion or national or social origin. The workforce must be protected from physical, psychological, sexual, and verbal harassment.

Dynamit Nobel Defence GmbH actively promotes equality, fair treatment, and equal opportunities. Announcement of vacancies are made in accordance with applicable collective agreements. The company embraces social and cultural openness and diversity, which also includes the inclusion of individuals with disabilities in operational processes.

Where applicable, Dynamit Nobel Defence GmbH adheres to specific political commitments related to inclusion or affirmative measures to support groups within its workforce that may be particularly vulnerable.

4.4 Health Protection and Occupational Safety

Dynamit Nobel Defence GmbH is committed to implementing preventive health protection and occupational safety measures to safeguard the health of employees and other potentially present individuals (such as suppliers, customers, etc.). Regular training sessions form the foundation of these measures. Compliance with statutory requirements serves as a binding obligation and represents the minimum standard.

It is Dynamit Nobel Defence GmbH's highest priority to ensure and continuously improve the safety and health of employees and other potentially present individuals during work activities. Accordingly, Dynamit Nobel Defence GmbH is committed to upholding the following core principles of health protection and occupational safety: personal protective equipment, workplace ergonomics, machine safety, incident and accident management, handling of chemical and/or biological substances, fire protection, and emergency preparedness.

- **Machine Safety:** Machines, systems, and equipment are procured and operated based on technical specifications in line with the latest state of the art. This also includes compliance with applicable safety standards. Dynamit Nobel Defence GmbH is committed to ensuring the safety of all machines, systems, and equipment.
- **Workplace Ergonomics:** The design of processes and workplaces is a collaborative effort that actively involves employees and their needs. Ergonomic considerations are fully considered and implemented in line with the latest scientific standards.
- **Personal Protective Equipment:** When hazards cannot be eliminated through technical or organizational measures, employees are provided with personal protective equipment. This equipment is selected based on specific conditions and risk assessment results and is supplied to employees free of charge.

Dynamit Nobel Defence GmbH further regulates the handling of chemical and/or biological substances with the aim of ensuring safe practices that protect health and adequately control exposure risks. Special protection measures are in place for particularly vulnerable groups (e.g. pregnant employees or young workers).

Additionally, an incident and accident management system is established at all sites, with emergency preparedness forming an essential part of this system. In accordance with statutory minimum requirements, first aiders are trained. Furthermore, Dynamit Nobel Defence GmbH is committed to active fire protection and full compliance with fire safety regulations. Fire safety wardens are trained, and evacuation assistants are designated as required by law. Emergency situations are regularly simulated to train and improve response behavior.

5 Environment, Energy and Climate Protection

Dynamit Nobel Defence GmbH is committed, in accordance with applicable laws and international standards, to protect the environment, minimize negative environmental impacts, promote sustainable and resource-efficient use of materials and products, and continuously improve its environmental and climate protection efforts.

These commitments essentially cover the following areas: reporting of greenhouse gas emissions, climate change adaptation, decarbonization, energy efficiency, use of renewable energy, environmental pollution, water pollution, water management, water quality, water sourcing, withdrawal, discharge, usage, and treatment, air pollution and air quality, soil pollution and soil quality, land use and changes in terrestrial, freshwater, and marine ecosystems, management of marine resources, deforestation, noise emissions, animal welfare, biodiversity, invasive alien species, direct exploitation, responsible chemical management, handling and phasing out substances of concern and particularly hazardous substances, sustainable resource management, waste management and waste prevention, reuse, and recycling.

Dynamit Nobel Defence GmbH is particularly committed to climate protection and the reduction of greenhouse gas emissions, aiming for decarbonization in line with the most recent Climate Protection Act as a minimum target. To achieve this, renewable energy sources are to be used, and energy efficiency is to be continuously improved. Accordingly, Dynamit Nobel Defence GmbH regularly reports on its greenhouse gas emissions.

When making investment decisions regarding equipment and machinery, the best available state-of-the-art technology is a prerequisite. For raw materials, auxiliary and operating supplies, as well as all purchased components or services, the specific CO₂ equivalent per unit of mass [kg, tkm] must be requested in accordance with the Greenhouse Gas Protocol (GHG), including the emission factor and its source.

In addition, Dynamit Nobel Defence GmbH strives for the continuous reduction of water consumption and sustainable water management. The minimum objective is to preserve water quality and availability, taking into account local conditions. This also includes issues related to water and marine resources in the design of products and services.

Dynamit Nobel Defence GmbH is likewise committed to minimizing air emissions and monitoring measures aimed at maintaining air quality.

To preserve biodiversity, biological diversity, and ecological balance, Dynamit Nobel Defence GmbH pursues the goal of sustainable land use (including the prevention of excessive soil sealing) and acts against deforestation, as well as ensuring soil quality. In addition, Dynamit Nobel Defence GmbH is committed to continuously reducing noise and light emissions associated with its business activities, whether caused directly or indirectly. The company is dedicated to animal welfare and the preservation of biodiversity.

Furthermore, Dynamit Nobel Defence GmbH considers the impacts on species health and population status, the extent and condition of ecosystems, and the state and dependencies of ecosystem services.

Responsible chemical management, sustainable resource utilization, and circular economy principles are integral components of Dynamit Nobel Defence GmbH's corporate strategy. To achieve these goals, wherever possible the company aims to:

- Implement a product development process designed according to circular economy principles (durability, reusability, reparability, disassembly, refurbishment, reconditioning, recycling), wherever active influence is possible.
- Raise awareness for rate of circular material usage.
- Minimize the use of primary raw materials and increase the share of secondary materials.
- Consistently avoid waste generation.
- Optimize waste management in accordance with the waste hierarchy.
- Procure sustainably and use renewable resources.
- Utilize resources in a way that promotes reuse and recycling.

All employees are made aware of environmental protection practices, and necessary training sessions.

6 Handling of Conflict Minerals

Dynamit Nobel Defence GmbH takes all necessary due diligence measures to avoid the use of conflict minerals in its products, thereby helping to prevent human rights violations, corruption, and the financing of armed groups or similar activities.

7 Consumer Interests

Where consumer interests are affected, Dynamit Nobel Defence GmbH adheres to consumer protection regulations as well as fair sales, marketing, and information practices. Special attention is given to particularly vulnerable groups (e.g., minors or pregnant individuals).

8 Supply Chain

Dynamit Nobel Defence GmbH is committed to passing on social and environmental sustainability requirements, as outlined in this Code of Conduct, to its suppliers, service providers, and other business partners to the same extent, with the aim of fostering sustainable and responsible business practices.

Dynamit Nobel Defence GmbH expects immediate notification of any violations of the obligations associated with this Code of Conduct. This requirement, as far as possible, must also be passed on by the company's suppliers, service providers, and other business partners as a standard throughout the supply chain.

9 Implementation and Enforcement

Dynamit Nobel Defence GmbH undertakes appropriate and reasonable efforts to continuously implement, document, and apply the principles and values described in this Code of Conduct. All employees are made aware of its contents and are provided with targeted training on relevant topics as needed. Violations of the Code of Conduct will not be tolerated and may lead to disciplinary action. Communication regarding the requirements and implementation of this Code is conducted openly and in a dialogue-oriented manner with employees, customers, suppliers, and other stakeholders. Employees and business partners are provided with access to a protected mechanism that allows them to confidentially report any potential breaches of the principles outlined in this Code of Conduct.

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Place, Date



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