



CODE OF CONDUCT

April, 2026



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CODE OF CONDUCT

Preamble

Acting responsibly and conducting business with integrity is a top priority for KRONPRINZ. To this end, KRONPRINZ has established binding principles for ethical behavior in its Code of Conduct.

The KRONPRINZ Code of Conduct applies to all Employees, regardless of their position or function within the organization. In line with its commitment to sustainability, KRONPRINZ acknowledges its responsibility for the economic, environmental, and social impacts of its business activities.

KRONPRINZ expects these principles to be upheld equally by its Suppliers and Business Partners (in the following: Business Partners), particularly with regard to human rights, occupational health and safety, tax and trade compliance, environmental protection, and anti-corruption.

Business Partners are a vital part of KRONPRINZ's value chain and make a significant contribution to the company's sustainable business success. KRONPRINZ therefore aims to establish trusted, long-term partnerships based on close cooperation and the creation of sustainable mutual value.

The following requirements specify KRONPRINZ's expectations regarding the conduct and business practices of its Business Partners and form the basis for a successful and responsible business relationship.

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1. Objectives and Scope - Let us shape the future today

The KRONPRINZ Code of Conduct (CoC) is a strategic roadmap.

By embracing and adhering to this CoC, Business Partners join us on a transformative journey towards a greener future. It serves as a clear set of guidelines and expectations, harmonizing our collective efforts to drive sustainable practices throughout our supply chain.

The CoC underscores our commitment to environmental stewardship, ethical conduct, social responsibility, and the respect for and protection of human rights. By adopting and complying with the CoC, Business Partners actively contribute to our mission of creating a positive impact on the environment and society.

Through this mutual dedication to responsible practices, we pave the way for a more sustainable tomorrow.

The CoC outlines the principles that guide our partnership and sets the tone for our shared journey towards a greener, more ethical, and socially conscious future.

Together, we can create meaningful change and forge a path into the era of responsible and sustainable business practices.

KRONPRINZ's corporate philosophy: Passion since 1897

KRONPRINZ is a leading supplier of wheels for the European commercial vehicle industry, headquartered in Solingen, Germany. The company's product portfolio includes commercial vehicle wheels made of steel and aluminum. KRONPRINZ was founded in 1897 by Rudolf Kronenberg and Carl Prinz in what is now the Solingen district of Ohligs. KRONPRINZ – Passion since 1897.

KRONPRINZ Vision – Mission – Values

VISION



MISSION

We aim to be the leading global strategic partner for wheel solutions and be recognized as quality, technology and eco-efficient leader. We want to be a place where people are proud to work at.

VALUES

We are committed to being customer centric, technology & quality leaders, cost competitive & profitable, CO₂ neutral by 2039 and safe - respectful - transparent - ambitious.

Financial Responsibility at KRONPRINZ

KRONPRINZ is fiscally conservative and committed to responsible financial management, transparency, and compliance, ensuring long-term stability and sustainable growth.

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2. Fundamental Sustainability Requirements

KRONPRINZ considers compliance with sustainability requirements to be essential and fundamental to its business relationships.

KRONPRINZ expects the values underlying these sustainability requirements to be integrated into the Business Partner's day-to-day operations through structured, competent, and effective management. The management of Business Partners must identify, assess, and address applicable legal and other relevant requirements and ensure that Employees are adequately trained to comply with these requirements.

Business Partners are required at all times to comply with applicable laws and regulations. Where KRONPRINZ's sustainability requirements exceed the requirements of applicable law, these additional requirements must also be observed.

KRONPRINZ encourages responsible and sustainable business conduct based on internationally recognized principles:

Human Rights

Compliance with the Voluntary Principles on Security and Human Rights, as established by the Voluntary Principles Initiative (2000), where applicable. In addition, respect for human rights in accordance with the Universal Declaration of Human Rights of the United Nations of 1948, as well as relevant subsequent resolutions, must be ensured.

Environmental Protection

The Paris Agreement (2015), as an internationally legally binding treaty, provides the foundation for corporate action in the area of environmental protection.

Employees Rights, Health and Safety

The applicable conventions of the International Labour Organization (ILO), in particular the fundamental principles and rights at work, together with all relevant national, regional, and local laws.

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3. Environmental Protection

KRONPRINZ doesn't just consider them self a business entity; we consider ourselves stewards of the environment and champions of sustainable practices.

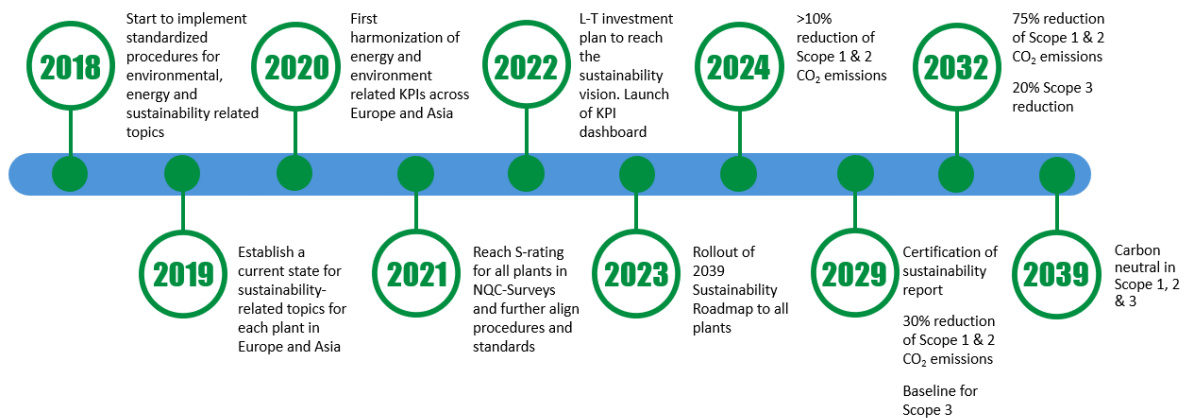
As we embark on this journey towards a greener future, we extend these deeply ingrained commitments to you, our valued Business Partners. We are acutely aware that the global challenges of environmental degradation and resource depletion require collaborative action from every facet of our society.

Every touchpoint within the supply chain carries immense significance in collectively shaping a world that thrives sustainably. Thus, with unwavering conviction, we articulate our expectations for our Business Partners in terms of environmental responsibility and resource management, which are integral components of our shared vision.

Greenhous Gas Emissions – KRONPRINZ Sustainability Roadmap 2039

The KRONPRINZ Sustainability Roadmap 2039 outlines the clear commitment to sustainable practices that transcend mere compliance. KRONPRINZ is dedicated to making measurable progress towards environmental and social goals, setting a benchmark for responsible business conduct. We encourage our Business Partners to align their operations with KRONPRINZ` Sustainability efforts, collectively working towards a brighter and more sustainable future.

2039 Roadmap



KRONPRINZ encourages its Business Partners to follow this approach and to implement appropriate measures to reduce air emissions that pose risks to the environment and human health, including greenhouse gas emissions.

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Resource Efficiency

Business Partners are expected to implement appropriate measures to ensure efficient use of energy, water, and raw materials, increase the use of renewable resources, and minimize environmental and health impacts.

Control of substances and raw materials

Business Partners shall implement appropriate measures to avoid or eliminate the use of substances and materials that have adverse effects on the environment or human health, such as carcinogenic, mutagenic, or reprotoxic substances, in compliance with applicable laws and regulations and in consideration of applicable internal requirements.

Business Partners are required to act in accordance with relevant international conventions and other legal instruments governing the production, use, handling, and disposal of certain substances. This includes, in particular, the Minamata Convention on Mercury of October 10, 2013, and the Stockholm Convention on Persistent Organic Pollutants (POPs) of May 23, 2001, as well as the associated applicable national and supranational implementing regulations. When sourcing tin, tungsten, tantalum, and gold from smelters and refiners, Business Partners may only use raw materials that comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and that have been audited by the Responsible Minerals Initiative (RMI) or comparable organizations.

Furthermore, Business Partners shall take appropriate and reasonable measures to exclude raw materials sourced from deep-sea mining from their supply chains.

Circular Economy

Business Partners commit to implementing appropriate and reasonable measures to prevent waste, promote the reuse of resources, support recycling, and ensure the safe and environmentally sound disposal of residual waste, chemicals, and wastewater.

Such measures shall be applied throughout the entire product life cycle, in particular during development and production, throughout the period of use, and in connection with recycling and disposal processes at the end of the product's life.

Business Partners are required to comply with all relevant international agreements governing the transboundary movement of hazardous waste, in particular the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal of March 22, 1989, as well as all applicable national and supranational implementing regulations.

Water Management

Business Partners commit to implementing appropriate and reasonable measures to minimize water consumption at their own sites and/or across their supply chains, with particular priority given to water-scarce and water-stressed regions. The human right to water must be respected at all times.

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Biodiversity and Soil Quality

The protection of natural ecosystems, in particular the preservation of endangered habitats of wild fauna and flora, as well as the sustainable use of natural resources, must be ensured.

Business Partners are expected to make reasonable efforts to ensure that their operations and supply chains are free from deforestation and land conversion, in compliance with applicable laws and international regulations on biodiversity. Such international frameworks include, for example, the decisions and recommendations on biodiversity issued by the Convention on Biological Diversity (CBD) and the International Union for Conservation of Nature (IUCN).

Animal welfare

Business Partners ensure and support the ethical and species-appropriate treatment and care of animals.

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4. Human Rights and Labor Standards

KRONPRINZ holds the well-being of people, the quality of working conditions, and the highest standards of safety in the highest regard.

These topics are integral to our core values and are non-negotiable aspects of our operations.

We understand that the success of our business is inseparable from the welfare of our Employees, Partners, and the Communities we engage with.

We support, among other things, the United Nations ("UN") Declaration on Human Rights and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

Zero tolerance for child labor and protection of young workers

Business Partners are required to comply with applicable minimum age requirements for employment in their business activities and throughout their supply chains. They shall ensure that the minimum age for admission to employment is determined in accordance with applicable law and, in all cases, is not lower than the minimum age defined in the ILO Minimum Age Convention of 1973 (No. 138).

Business Partners shall further ensure that prohibited child labor and the exploitation of children do not occur. This includes, in particular, the prevention of the worst forms of child labor as defined in the ILO Convention on the Worst Forms of Child Labour of 1999 (No. 182).

Zero tolerance for modern slavery, human trafficking, and unethical recruitment

Business Partners shall take appropriate and reasonable measures to prevent and eliminate debt bondage, forced labor, and compulsory labor in accordance with applicable federal, state, and local laws, as well as in line with the ILO Forced Labour Convention of 1930 (No. 29) and the ILO Convention on the Abolition of Forced Labour of 1957 (No. 105). Forced labor includes any work or service that is exacted from a person under the threat of a penalty and that the person has not offered voluntarily, subject only to the exceptions set out in ILO Convention No. 29 and the International Covenant on Civil and Political Rights (ICCPR).

In addition, Business Partners shall take appropriate measures to eradicate all forms of modern slavery and human trafficking within their own areas of responsibility and/or throughout their supply chains. Business Partners shall ensure that employment relationships are based on voluntary participation and that employees are free to terminate their employment of their own accord, subject to a reasonable notice period.

At the time of recruitment, Employees of Business Partners shall receive an employment contract that complies with applicable law, is properly documented (e.g., in written or electronic form), is drafted in a language they understand, and accurately and clearly sets out their rights and obligations.

Furthermore, Business Partners shall not mislead prospective Employees about the nature or conditions of the work; shall not charge recruitment fees or unreasonable transportation costs; and shall not confiscate, destroy, conceal, withhold access to, or otherwise interfere with Employees' passports or other government-issued identification documents.

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Business Partners shall also refrain from restricting Employees' freedom of movement or requiring Employees, without legitimate business necessity, to reside involuntarily in employer-provided accommodation.

Protection of physical integrity; prohibition of corporal punishment

Business Partners commit to the comprehensive protection of physical integrity and take appropriate measures to ensure respect for this legally protected right. Any direct or indirect involvement in torture or in cruel, inhuman, or degrading treatment or punishment, as defined by the International Covenant on Civil and Political Rights (ICCPR), is strictly prohibited.

Within their own operations and throughout their supply chains, Business Partners shall ensure that any form of participation or complicity - including assistance or involvement - in abductions, torture, killings, or comparable acts is excluded. Furthermore, Business Partners shall ensure that no corporal punishment is used as part of disciplinary or corrective practices.

In addition, Business Partners shall take appropriate measures to ensure that other serious human rights violations and abuses, including sexual violence, as well as war crimes, crimes against humanity, genocide, or other grave breaches of international humanitarian law, are prevented and excluded within their own areas of responsibility and along the supply chain.

Safeguarding health and safety in the workplace, including comprehensive fire protection and fire safety measures

Business Partners shall comply with all applicable labor, occupational health and safety, and fire safety laws and regulations. They shall establish and maintain processes designed to continuously reduce work-related health and safety risks and to promote ongoing improvements in workplace safety, occupational health protection, and fire prevention. Measures taken to protect occupational health and safety shall be provided to Employees at no cost.

Wages

Business Partners shall ensure that their Employees receive fair and adequate remuneration. Such remuneration shall at a minimum comply with the statutory minimum wage applicable under relevant laws and regulations and shall otherwise be determined in accordance with the legal requirements of the place of employment. Wherever possible, wages shall be sufficient to meet Employees' basic needs and to provide a decent standard of living for Employees and their Families (living wage).

Business Partners are further obligated to pay wages directly, in full, and in a timely manner.

Working Hours

Business Partners shall ensure that working hours comply with all applicable national, regional, and local laws and regulations and/or with the relevant sector-specific national standards. In all cases, working hours must be in line with the applicable standards of the International Labour Organization (ILO).

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Working and Living Conditions

Business Partners shall provide Employees with access to sanitary facilities and clean drinking water. All facilities made available for the preparation, consumption, and storage of food shall comply with applicable minimum hygiene standards. Where the nature of the work requires the provision of sleeping accommodations, Business Partners shall ensure adequate space, cleanliness, and safety. Access to such facilities shall not be restricted in an unreasonable manner.

No Adverse Impact on Land, Water, and Air

Business Partners shall ensure that their activities do not result in harmful soil degradation, water pollution, air pollution, hazardous noise emissions, or excessive water consumption that could significantly impair the natural resources required for food production and access to drinking water or adversely affect human health.

No Forced Evictions

Business Partners shall respect the prohibition of unlawful forced evictions and the illegal deprivation of land, forests, and water resources in connection with the acquisition, development, or any other use of land, forests, and water bodies.

Freedom of Association and Collective Bargaining

Business Partners acknowledge and respect the right of all Employees to establish and join trade unions or other forms of Employee representation of their choosing. In this context, Business Partners commit to maintaining neutrality and to refraining from any form of discrimination, intimidation, or retaliation related to lawful trade union activities.

Furthermore, Business Partners recognize the right to collective bargaining and the right of trade unions to operate freely and in accordance with the laws of the place of employment. This includes the right to take collective action, including the right to strike.

Non-Discrimination and Harassment

Business Partners shall ensure that all forms of discrimination, intimidation, harassment, or unfair treatment of Employees or within the workplace are strictly prohibited. In particular, no unequal treatment shall occur on the basis of ethnic or social origin, skin color, gender, gender identity or expression, sexual orientation, nationality, migration status, veteran or military status, language, religion or other beliefs, physical or mental disability, health status, age, social background, marital status, pregnancy or parenthood, trade union membership, or political views - provided such views are based on democratic principles and tolerance of differing opinions - or any other characteristic protected by applicable law, unless objectively justified by the requirements of employment.

Unequal treatment shall include, in particular, the payment of unequal remuneration for work of equal value, which must be avoided.

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Use of Security Forces

Business Partners shall prioritize the protection of people when implementing security measures and shall ensure that the engagement or deployment of security forces does not result in human rights violations. Security personnel are required to respect the protection of health, physical integrity, and life, as well as the rights to freedom of association and organization, and must refrain from any form of torture or cruel, inhuman, or degrading treatment.

Business Partners shall further ensure that they do not directly or indirectly support public or private security forces that unlawfully exercise control over extraction sites, transportation routes, or upstream actors within the supply chain.

Minorities, Vulnerable Groups, and Indigenous Peoples

Business Partners respect the rights of minorities, vulnerable groups, and local communities to live under dignified conditions. This includes, in particular, respect for rights related to land, access to water and other natural resources, as well as the right to preserve and practice their cultural traditions.

Diversity, Equity and Inclusion

KRONPRINZ recognizes that the strength of our business lies in the diversity of our workforce and partners.

Our commitment to diversity, equity, and inclusion is unwavering. We value and respect the unique perspectives, backgrounds, and identities that every individual brings to the table.

We expect our Business Partners to share in this commitment, fostering inclusive environments that celebrate differences and promote equality.

Diversity, Equity, and Inclusion (DEI) form the pillars of a transformative movement dedicated to reshaping our societies and workplaces into spaces that embrace everyone, irrespective of their backgrounds or identities.

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5. Business Ethics and Data Safety

At KRONPRINZ, ethical business conduct is not merely a choice; it's at the core of who we are.

We are deeply committed to cultivating a business environment that places a premium on transparency, fairness, and integrity.

This commitment to ethical standards is not a mere slogan but an integral part of every decision we make.

It forms the foundation of our corporate culture, fostering an atmosphere of trust and mutual respect among our team members.

In today's digital age, data safety is an essential component of ethical business conduct.

We understand the significance of safeguarding personal and sensitive information.

It's not just about legal compliance; it's about respecting the privacy and trust of our Customers, Employees, and Stakeholders.

Avoidance of Conflicts of Interest

Business Partners shall make decisions solely on the basis of objective and professional criteria and shall not allow improper interests, personal relationships, or other undue influences to affect their judgment.

Prohibition of Corruption

Business Partners reject and actively prevent all forms of corruption, including so-called facilitation payments (i.e., payments made to expedite routine governmental actions). Business Partners shall ensure that their Employees, Subcontractors, and Representatives neither offer, promise, grant, nor accept bribes, kickbacks, improper donations, or any other unlawful payments or benefits to or from customers, public officials, or other third parties.

This prohibition also applies to any inappropriate advantages granted directly or indirectly in the form of gifts, hospitality, entertainment, or invitations intended to improperly influence third parties. Business Partners shall neither request nor accept such benefits.

In dealings with governments, authorities, and public institutions, Business Partners shall strictly comply with all applicable laws and regulations. When participating in public tenders or procurement procedures, they shall adhere to legal requirements and the principles of free and fair competition.

Business Partners shall engage consultants or agents only in accordance with applicable laws. In particular, they shall ensure that such consultants or agents are compensated solely for legitimate services actually rendered and that all remuneration is appropriate, transparent, and proportionate.

Fair Competition

Business Partners shall comply with the principles of fair and free competition as well as all applicable competition and antitrust laws. In particular, they shall not enter into any anti-competitive

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agreements, arrangements or concerted practices with Competitors, Suppliers, Customers or other third parties, nor shall they abuse any dominant market position.

Business Partners shall ensure that no exchange of competition-sensitive information takes place and that no conduct occurs that unlawfully restricts or may restrict competition.

Import and Export Controls

Business Partners shall strictly comply with all applicable laws and regulations governing the import and export of goods, services and information. Applicable sanctions, embargoes and restricted party lists must be observed at all times.

Business Partners shall further ensure that all taxes, duties and license fees related to the extraction, trade and export of minerals from conflict-affected and high-risk areas are paid in accordance with applicable laws and regulations.

Prohibition of Money Laundering

Business Partners shall conduct business only with third parties whose integrity is beyond doubt. They shall ensure compliance with all applicable anti-money laundering laws and regulations within their business operations.

Intellectual Property Rights

Business Partners shall respect intellectual property rights and adequately protect intellectual property and related data from unauthorized use, disclosure or infringement.

Protection of Confidential Information

Business Partners shall ensure that sensitive information, including trade secrets and personal data, is collected, processed, stored and deleted in a lawful, secure and appropriate manner. Employees shall be instructed and obligated accordingly.

Confidential information may not be disclosed to third parties or otherwise made accessible without proper authorization and must be protected by appropriate safeguards.

Use of Artificial Intelligence

Data protection and information security are fundamental requirements for the use of artificial intelligence (AI). Business partners shall ensure that all AI-related developments and applications comply with applicable laws and regulatory requirements.

AI systems shall be designed to be reliable, transparent and free from discrimination. Human oversight and control over AI applications shall be ensured at all times.

No Support of Armed Groups

Business Partners ensure that their business activities do not directly or indirectly contribute to the support of non-state armed groups.

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Disclosure and Transparency

Business Partners document their business activities, operating practices, and occupational health, safety, and environmental protection measures. Upon request, they provide KRONPRINZ with relevant information, provided that such disclosure does not conflict with applicable legal requirements. Business Partners publish business information and report on their activities truthfully and in compliance with applicable laws.

Data Protection

Business Partners comply with all applicable laws and regulations governing the protection of personal data relating to employees, customers, suppliers, and other affected parties.

Handling of Company Assets

Business Partners respect KRONPRINZ's tangible and intangible assets and use them solely for legitimate business purposes. They ensure that their Employees and any third parties engaged in the business relationship (such as Subcontractors or Agents) neither damage nor misuse KRONPRINZ assets, nor use them in a manner contrary to KRONPRINZ's interests.

Product Safety

Business Partners comply with all applicable legal requirements and regulations relating to product safety. This includes, in particular, requirements concerning product safety, labeling, and packaging, as well as regulations governing the use of hazardous substances and materials.

Security of the International Supply Chain

Business Partners ensure that business premises and loading, storage, and shipping areas where products for KRONPRINZ are manufactured, stored, prepared, loaded, or transported are protected against unauthorized access and secured as part of a safe and secure supply chain.

Plagiarism: Upholding Originality and Innovation

Originality and innovation drive progress.

We are steadfast in our commitment to upholding intellectual property rights and preventing plagiarism.

Our Business Partners are urged to respect these principles, fostering a culture of creativity and integrity that enriches our collaborative efforts.

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6. Reporting Misconduct

An open culture of error is at the core of how we act at KRONPRINZ. It provides the basis for a fair, transparent, and trusting relationship with our Business Partners and Employees.

A prerequisite for this is our corporate culture, which recognizes, discusses, and rectifies misjudgments. Each and every individual is responsible for contributing to a working environment in which Employees do not hesitate to raise potential errors. As an organization, we embrace an open, fair, and accountable error culture.

Handling Violations

Violations of laws, guidelines, or other requirements can have serious economic, legal, and reputational consequences for KRONPRINZ and its Employees, including the loss of permits or access to national markets. To prevent harm and ensure fair interaction, any misconduct must be identified at an early stage.

Whistleblower Protection System

For the prompt review of reports concerning potential violations of rules, please use the KRONPRINZ whistleblowing system “Der Hinweis”, accessible via the following internet address: <https://kronprinz.derhinweis.de/>

Through our whistleblower protection system, this portal provides the opportunity to submit or disclose a confidential report regarding a violation within the meaning of Section 2 of the German Whistleblower Protection Act (Hinweisgeberschutzgesetz – HinSchG).

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Certification Form

CODE OF CONDUCT - CERTIFICATION FORM

This will confirm that I have received, recently read, and understand the KRONPRINZ Germany GmbH Code of Conduct, which includes the following:

- Guidelines for Fundamental Sustainability Requirements
- Guidelines for Environmental Protection
- Guidelines for Human Rights and Labor Standards
- Guidelines for Business Ethics and Data Safety
- Guidelines for Reporting Misconduct

I acknowledge that I am responsible for understanding, complying with and implementing these policies as they apply to my position and area of accountability.

To the best of my knowledge, I have been and currently am in compliance with these Guidelines.

Name (Print)

Company

Signature

Location, Date

Please forward the completed form to: sustainability@kronprinz.de

Contact

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Quality Management
Weyerstrasse 112 – 114
42697 Solingen
Germany

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