



[A member of **LG**]

CODE OF CONDUCT

Version May 2026

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BRIGHT MINDS, BRIGHT LIGHTS.



FOREWORD

At ZKW, we believe that how we work is just as important as what we achieve.

We are a global company, but our strength comes from something very simple: people doing the right thing, every day, in every part of the business. Acting with integrity, respect, and responsibility is not an additional expectation - it is the foundation of how we work together and how we earn trust.

Our employees are at the center of this. Their professionalism, judgment, and commitment shape our culture and define our reputation far more than any process or policy ever could. We value this deeply, and we know that trust, whether from colleagues, customers, or partners, is built through everyday behavior.

Because of this, each of us plays a role. The way we collaborate, the decisions we make, and how we show up for one another all contribute to the culture we

create together. Even individual actions matter, because they reflect not only on us, but on the company as a whole.

The Code of Conduct is here to support us in this. It is not meant to be complicated or distant from daily work. Instead, it provides a shared understanding of what good looks like, and helps us navigate situations with clarity and confidence, wherever we are in the world.

We expect everyone at ZKW to take these principles to heart, not just follow them as rules, but truly live them in practice. For leaders, this responsibility goes further. They are expected to set the tone through their own behavior - creating an environment where people feel respected, where speaking up is safe, and where integrity is consistently demonstrated, not just expected.

In this way, we build a culture in which people can trust, feel proud of, and want to be part of.

Wonyong Hwang
Chief Executive Officer

Andreas Nix
Chief Operations Officer

Sangbo Sim
Chief Financial Officer

1 OUR COMPANY VALUES & GOVERNANCE

[1. OUR COMPANY VALUES & GOVERNANCE]

CORPORATE PHILOSOPHY

1.1 The Corporate Mission Statement defines who we are as a company. It provides a shared framework that guides all our business activities and decision-making.

It helps us work together across teams, engage meaningfully with customers and stakeholders, and shape the character of our company. It also forms the foundation for how we lead, make decisions, and grow responsibly.

CODE OF CONDUCT

1.2 This Code of Conduct forms the foundation of our shared values and principles. It sets clear expectations for lawful, fair, responsible, and ethical behavior for all employees worldwide. At the same time, we recognize that local laws and everyday situations may differ, and it is not possible to address every individual scenario in detail.

For this reason, the Code establishes a common minimum standard. Where appropriate, this standard may be further specified by national laws and regulations. In cases where local laws, regulations, or other applicable requirements differ from the principles set out in this Code or other internal or international laws and regulations, the stricter standard will apply.

If any situation feels unclear or is not fully covered by the Code, employees are encouraged to seek guidance from the local or Group Compliance Department.

LEADERSHIP

1.3 We are all responsible for applying the principles and rules set out in this Code of Conduct in our daily work.

Managers have a particular role as role models for others. They are expected to act with integrity in everything they do and to support their teams in doing the same.

Through open, respectful and accountable leadership, they help ensure that decisions are understood - what has been decided, how it will be implemented, and why it matters - so that everyone can work in line with the agreed standards.

The Management Board sets the tone at the top and fosters a culture where integrity and compliance are part of how we work every day. By staying engaged and informed, the Board helps ensure that our values are consistently reflected in our actions. It regularly reviews key compliance topics, including significant risks, relevant incidents, and insights from our reporting channels. This ongoing attention helps guide the organization, encourages open dialogue, and reinforces our shared commitment to doing the right thing.

INTERNAL MANAGEMENT SYSTEM

1.4 To support and strengthen our values, we maintain an integrated management system. This system is built on the key pillars of quality, environmental responsibility, occupational health and safety, and compliance with all applicable legal requirements.

Depending on the specific needs and circumstances of our sites, we implement and, where appropriate, certify management system standards such as ISO 9001, IATF 16949, ISO 14001, ISO 27001, ISO 45001, and ISO 50001 - either in part or as a whole.

2 COMPLIANCE & RESPONSIBLE CONDUCT

[2. COMPLIANCE & RESPONSIBLE CONDUCT]

COMPLIANCE WITH LAWS

2.1 We operate within the laws and regulations of every country where we do business. We also work in good faith with authorities when required.

Intentional or grossly negligent unlawful conduct is not tolerated. This includes, but is not limited to, fraud, financial misconduct, embezzlement, human rights violations, and any action that causes or contributes to harm to the company.

The same commitment applies to our business partners.

PERSONAL RESPONSIBILITY

2.2 Each of us is responsible for complying with applicable laws, internal policies, and guidelines. This means taking the time to understand the rules that apply to our work and applying them carefully in our day-to-day decisions.

By taking responsibility for our own actions, we maintain trust and integrity within the company and with our business partners and external stakeholders.

Managers have a special role in leading by example, ensuring respectful and effective communication and supporting compliance within their teams.

ACCOUNTABILITY

2.3 Violations of the Code of Conduct will give rise to appropriate consequences.

It is important that any concerns or breaches are reported to the Compliance Department, so they can be addressed promptly and appropriately.

SPEAKING UP

2.4 We encourage a culture where employees feel safe to speak up and raise concerns.

We are committed to resolving conflicts and complaints internally and amicably, while learning from mistakes. Employees can file complaints or report observed or suspected violations with their direct supervisor or directly with our Compliance Department.

If the suspected or observed violation concerns the Code of Conduct, other compliance policies, or law,

Compliance Department must be notified without undue delay.

All employees, as well as third parties, can submit a complaint concerning the company via our whistleblowing website, also anonymously if desired, at: <https://zkw-group.com/whistleblowing/>. This website is accessible in the main languages of our workforce.

Investigation of any grievances must be objective, and personal grievances must also be handled confidentially, protecting the identity of the complainant.

No employee raising concern or filing a whistleblowing report in good faith should suffer intimidation or retaliation in relation to their report.

Once the Compliance Department initiates an investigation, all necessary support and resources across the company should be provided to ensure prompt and thorough resolution.

3 EMPLOYEES & HUMAN RIGHTS

[3. EMPLOYEES & HUMAN RIGHTS]

COMMITMENT TO HUMAN RIGHTS

3.1 We respect internationally recognized human rights and are committed to conducting our business in line with applicable laws and internationally recognized standards.

Our approach is guided by the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

We comply with all applicable laws and regulations in the countries where we operate. Where national law and international standards differ, we seek to uphold the higher standard, provided this does not conflict with local law.

RESPECTFUL AND INCLUSIVE WORKPLACE

3.2 We treat everyone with dignity, courtesy, respect, and fairness.

We do not tolerate any forms of disrespectful behavior, abuse, or harassment – whether verbal, physical, or psychological.

This includes harsh or inhumane treatment, violence (including gender-based violence), sexual harassment and abuse, corporal punishment, mental or physical coercion, bullying, mobbing, public shaming or verbal abuse among or against employees, business partners or other persons.

EQUAL OPPORTUNITY AND NON-DISCRIMINATION

3.3 We are committed to equal opportunity for everyone.

We comply with applicable national anti-discrimination laws and do not tolerate discrimination based on any grounds, including but not limited to ethnic or national origin, race, skin color, gender, age, disability, health status, pregnancy, childbirth, or circumstances related to pregnancy outcomes, religion or belief, political opinion, citizenship, social origin or status, immigration status, language, sexual orientation, marital or family status, or any other characteristic tied to human dignity.

We also recognize that fairness sometimes requires removing barriers. Where needed, we take equitable measures and provide reasonable accommodations, so that everyone has a genuine opportunity to thrive.

SAFE WORKING CONDITIONS

3.4 A safe and healthy workplace is essential. We follow all applicable occupational health and safety laws and continuously work to improve our standards.

Employees receive regular training and are expected to act responsibly to protect themselves and others.

We do not allow work under the influence of substances that impair safety or judgment.

Anyone who identifies a risk or unsafe situation is expected to speak up immediately, and we act quickly to prevent harm.



[3. EMPLOYEES & HUMAN RIGHTS]

FAIR EMPLOYMENT CONDITIONS

3.5 We are committed to fair, transparent, and lawful employment practices wherever we operate. This includes working hours, overtime, breaks, benefits, leaves, and minimum wage regulations.

At the same time, we recognize that certain employment conditions, such as flexible work arrangements, leave entitlements, including sick days, must reflect market practices. Therefore, these conditions may vary by country.

We comply with all legal employment conditions under respective national laws.

We are committed to providing fair compensation in line with legal standards and local living conditions.

Disciplinary rules are transparent, and all disciplinary processes are conducted objectively, treated confidentially, and documented in writing.

We recognize and support the specific needs of certain groups of employees, such as pregnant women, nursing women, apprentices, interns, working students, or employees with disabilities, in line with legal requirements and good practice.

COLLABORATION, DEVELOPMENT & WELLBEING

3.6 We believe that the company's value is created by its employees and the right leadership. We put great value on collaborative approach where employees proactively help and support each other in fulfilling their duties, as it fosters a supportive environment, strengthens team performance, and drives better results for everyone.

We support professional development of our employees through education, internal hiring and promotions.

We want our employees to be satisfied and the organization to work well. For that purpose, we regularly survey the employee satisfaction, to offer room for feedback and suggestions for improvement.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

3.7 We respect the rights of employees to freedom of association, join or participate in trade unions, negotiate collectively, or refrain from such activities.

We are committed to open and constructive dialogue with democratically elected employee representatives, including both union and non-union representatives where applicable.

We treat unionized and non-unionized workers equally.

NO FORCED OR CHILD LABOR

3.8 We do not engage in any form of forced, involuntary, or exploitative labor - including prison, indentured, bonded (including debt bondage), trafficked, or slave labor - nor do we use products produced under such conditions.

We do not engage in child labor and comply with the minimum age requirements set by applicable national laws and International Labor Organization (ILO) conventions.

Where a higher minimum working age applies in the country in which a supplier operates its permanent establishment, that stricter standard shall prevail.

We condemn these practices and require the same commitment from our business partners.

HUMAN RIGHTS DUE DILIGENCE

3.9 We actively identify and assess human rights risks in our operations and supply chains.

When we identify issues, we take steps to prevent and reduce them, and where necessary, remedy harm.

We also monitor progress and, where appropriate, share information on how we are addressing these impacts.

4 CUSTOMERS, SUPPLIERS, & RESPONSIBLE PROCUREMENT

[4. CUSTOMERS, SUPPLIERS, & RESPONSIBLE PROCUREMENT]

CUSTOMER APPROACH

4.1 We aim to build long-term relationships with our customers based on trust, openness, and mutual respect. Our focus is on understanding customer needs and providing solutions that are safe, reliable, and create lasting value.

We conduct our business in line with our values and applicable laws, and we only engage in relationships that are consistent with these principles, as this is essential to maintaining trust and integrity.

QUALITY OF OUR PRODUCTS

4.2 We are committed to high standards of quality, safety, and reliability. Quality management is an integral part of everything we do, and we continuously work to improve our products and services.

Continuing our company's tradition, we are always working to improve and further develop our products.

Every employee knows how important their role is and contributes with care and responsibility to meeting our quality expectations.

FAIR HANDLING OF CUSTOMER COMPLAINTS

4.3 We handle customer complaints and quality concerns promptly, fairly, and in accordance with applicable rules and regulations. We review each case carefully and objectively.

Our goal is always to find constructive and amicable solutions with our customer.

SUPPLIER RELATIONSHIPS

4.4 Our suppliers are important partners in delivering quality products and services to our customers.

We treat suppliers fairly and with respect and expect the same in return. We aim to build relationships that are transparent, reliable, and beneficial for both sides. We expect our suppliers to demonstrate strong capabilities in quality, cost, innovation, and reliability.

We also expect our suppliers to act in line with principles consistent with our Code of Conduct and our Code of Conduct for Business Partners.



[4. CUSTOMERS, SUPPLIERS, & RESPONSIBLE PROCUREMENT]

RESPONSIBLE PROCUREMENT

4.5 Selecting the right business partners is essential to maintaining the integrity and success of our company. When choosing suppliers, employees base their decisions on objective criteria such as quality, cost, reliability, innovation, and sustainability.

Employees involved in procurement must disclose any potential conflicts of interest.

All procurement activities are conducted transparently, documented appropriately, and in line with internal policies.

We do not knowingly source raw minerals, including conflicting minerals (tin, tantalum, tungsten, and gold) that are linked to human rights abuses, conflict financing, or environmental harm, including materials associated with illegal or unregulated mining. We actively work to improve traceability and accountability across our mineral supply chain in alignment with internationally recognized standards, such as the OECD Due Diligence Guidance.

EXPORT CONTROLS AND TRADE RESTRICTIONS

4.6 We comply with all applicable export control laws, sanctions, and trade restrictions. This includes regulations on goods, software, technology, and dual-use items that can be used for civilian or military purposes.

Employees ensure that nothing is exported, transferred, or shared in violation of legal requirements. We also follow company procedures designed to prevent prohibited transactions, including checks to ensure compliance with applicable restrictions.

If there is any doubt or uncertainty, employees should seek guidance from the Compliance Department before proceeding.

[4. CUSTOMERS, SUPPLIERS, & RESPONSIBLE PROCUREMENT]

COUNTERFEIT PARTS

4.7 We are committed to ensuring the integrity, safety, and reliability of our products and services.

Employees must not knowingly use, procure, or accept counterfeit or non-conforming parts in any company activity.

Any suspected cases of counterfeit parts must be reported promptly through the appropriate internal reporting channels.



5 BUSINESS INTEGRITY & ANTI-CORRUPTION

[5. BUSINESS INTEGRITY AND ANTI-CORRUPTION]

AFFILIATED ENTITIES

5.1 As part of LG Group, we regularly work with other affiliated entities. We approach these relationships with the same integrity and transparency as we do with external partners.

Intra-group transactions are based on fair and appropriate commercial terms and are clearly reflected in our records. We comply with applicable legal and regulatory requirements, as well as internationally recognized principles such as the arm's-length standard.

BUSINESS PARTNERS AND COMPETITORS

5.2 We take conflicts of interest seriously and require employees to promptly disclose any actual or potential conflicts in writing to their supervisor and the Compliance Department.

Employees must always act in the best interests of the company and maintain objective and impartial relationship with business partners.

Employees should avoid situations where personal, private, or financial interests could conflict, or appear to conflict, with their professional duties and business decisions. This includes relationships with the Group's business partners or competitors, outside employment or activities that could create a conflict of interest, as well as membership of a governing body, or any other situation that could improperly influence decision-making.

The assumption of such external mandates may also lead to conflicts of interest and is therefore subject to prior approval in accordance with internal policies.

Employees must not use their position for personal gain or accept any undue advantage from business partners.

INVITATIONS AND GIFTS

5.3 All employees must not, directly or indirectly, encourage, offer, give, request, or accept gifts, invitations or other benefits in connection with business activities.

This does not apply to occasional gifts or invitations of low value that are reasonable, appropriate, and consistent with customary business practices, provided they are not intended to improperly influence decisions.

Cash and cash equivalents, such as vouchers or securities, must not be offered or accepted under any circumstances.

Gifts or invitations that exceed reasonable value, are received repeatedly, or raise any doubt as to their appropriateness must be disclosed to the Compliance Department. Where in doubt, employees should seek guidance from the Compliance Department.

Additional requirements apply when dealing with public officials, government employees, or employees of state-owned entities, as set out in the section on public officials.

CORRUPTION AND BRIBERY

5.4 We are committed to the highest standards of integrity and ethical conduct in all our business dealings. Our success is built on the quality, innovation, and reliability of our products, not on improper influence or advantage.

We have zero tolerance for any form of corruption, including promising, offering, giving, or accepting bribes, facilitation payments, or any other undue advantage - whether directly or through third parties such as consultants, brokers, or intermediaries. Extortion or abuses of influence are equally unacceptable.

PUBLIC OFFICIALS

5.5 Interactions with public officials require special care, as they carry a higher risk of corruption or perceived improper influence. All dealings with public officials must be transparent, properly documented, and fully compliant with applicable laws and internal policies. Any request for an improper advantage must be refused and immediately reported to the Compliance Department.

We require the same commitment to integrity and compliance from all our business partners.

6

FAIR COMPETITION

FAIR COMPETITION

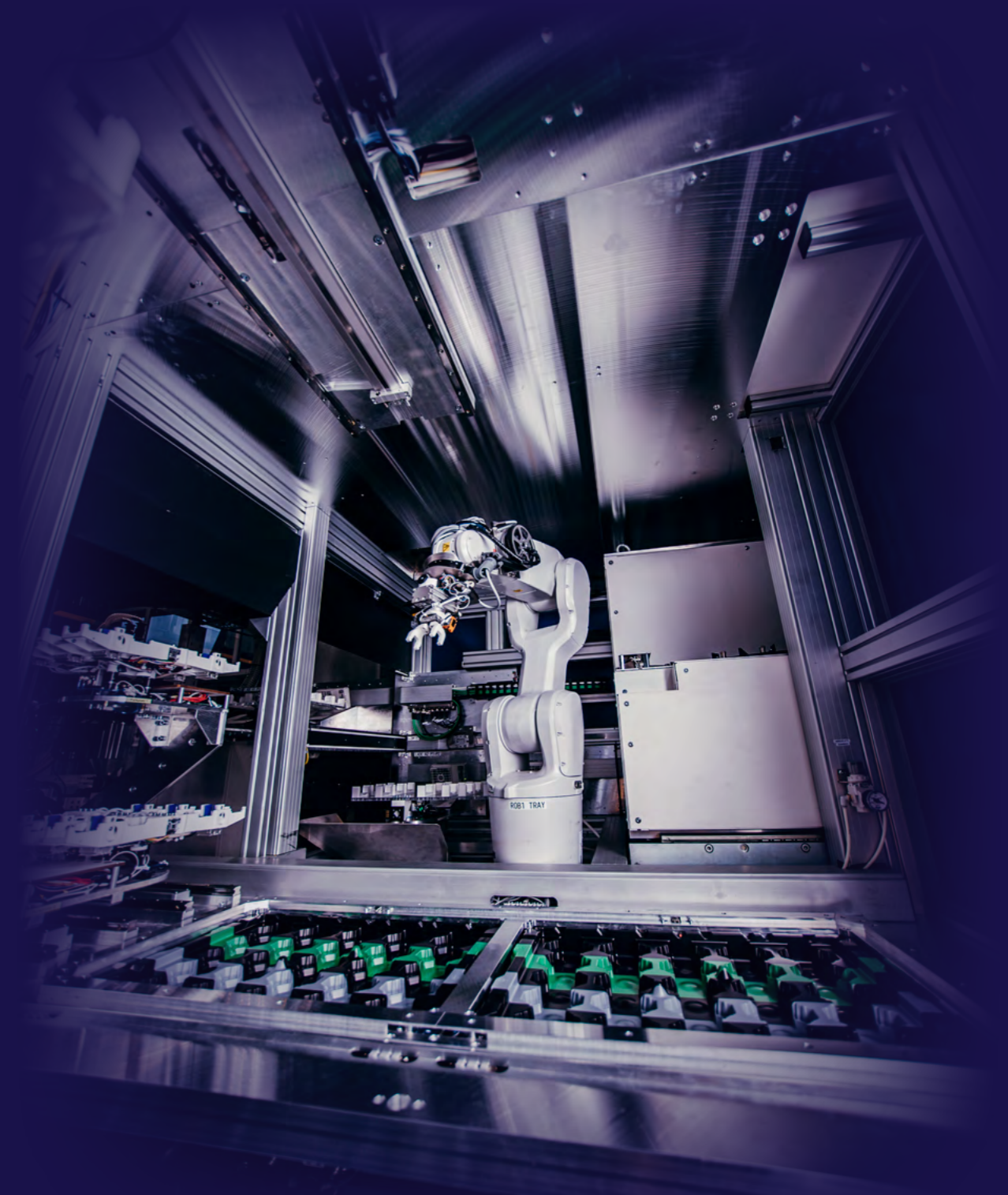
5.1 We are committed to fair competition and comply with all applicable competition and antitrust laws.

We do not engage in or tolerate any anti-competitive practices, including agreements or understandings with competitors or suppliers that may restrict competition, such as price fixing, market allocation, or bid rigging.

We regularly train employees, particularly those in customer- and supplier-facing roles, to ensure awareness of these rules and their consistent application in daily business.

Antitrust risks can arise in a variety of everyday business situations, such as interactions with competitors, industry events, or cooperation with other market participants. We therefore expect all employees to act carefully and to seek guidance whenever there is uncertainty.

We obtain information about competitors and their business practices only through lawful and appropriate means. Any improper or illegal methods are strictly prohibited.



7 INTEGRITY IN FINANCE & COMPANY RESOURCES

[7. INTEGRITY IN FINANCE AND COMPANY RESOURCES]

TRANSPARENT REPORTING

7.1 We are committed to maintaining financial integrity and protecting the long-term value of our company. All financial and business activities are conducted transparently, responsibly, and in full compliance with applicable laws, accounting standards, and internal policies.

We ensure that our reporting is accurate, complete and objective, providing stakeholders with the information they need to make sound decisions.

Our reporting is transparent and reliable, providing a fair view of our business and supporting sound decision-making.

This applies equally to financial data and to other important records such as quality and compliance documentation.

USE OF COMPANY PROPERTY AND RESOURCES

7.2 We handle company property responsibly, carefully and sustainably.

We use company resources, including materials, equipment, facilities, and other assets carefully and only for official business purposes.

We are mindful about avoiding waste.

Misuse of company property must be reported to the Compliance Department without undue delay.

PREVENTING FINANCIAL CRIME

7.3 We are committed to preventing money laundering, terrorist financing, and other forms of financial crime, and to upholding the highest standards of integrity and transparency.

Money laundering involves attempts to conceal the illegal origin of funds or make them appear legitimate. We do not accept, support, or facilitate such activities in any form.

To ensure transparency and compliance, payments for goods and services should generally be made through traceable banking

channels. We do not normally accept cash, traveler's checks, third-party payments, or money orders. Customers should make payments directly from a bank account in their own name, matching the billing details.

Similarly, payments made by the company to suppliers or other third parties must be made to bank accounts registered in the name of the contracting party. Any exceptions require prior written approval to ensure full transparency and adherence to regulations.

Every employee plays a role in maintaining these standards and should seek guidance from the Compliance Department whenever there is uncertainty.



8

INFORMATION & KNOWLEDGE PROTECTION

[8. INFORMATION AND KNOWLEDGE PROTECTION]

INTELLECTUAL PROPERTY

8.1 Our know-how, inventions, designs, software, and other intellectual property are essential to maintaining our competitiveness.

We respect the intellectual property of others, including competitors, customers, and business partners, and comply with all applicable legal and contractual requirements.

We strictly protect our own as well as third parties' intellectual property from unauthorized access, use, loss, or disclosure. We require the same from our business partners.

CONFIDENTIALITY

8.2 In principle, all internal information is confidential and must not be shared with third parties unless there is a legitimate business need or a legal requirement to do so.

This includes any information that is not publicly available, or whose nature or context is confidential (whether or not formally marked as confidential) is also treated as confidential and is protected against unauthorized access, use, loss, or disclosure.

Customer-related information is subject to strict confidentiality and must never be shared or discussed without proper authorization. In particular, customer-related project information prior to the Start of Production (SOP) is subject to the highest level of confidentiality.

We protect trade secrets with particular care, as they often include valuable developments such as new products, concepts, inventions, or software.

We expect the same level of care from our business partners.

DATA PROTECTION

8.3 We respect the privacy of our employees, customers, and business partners, and protect personal and sensitive information from unauthorized access, use, loss, or disclosure.

We collect, store, and process personal information only, when necessary, in compliance with applicable laws, contractual obligations, and legitimate business purposes.

INFORMATION SECURITY

8.4 We are committed to protecting the security of all company information, IT systems, data, and processes through appropriate technical and organizational measures.

We follow the TISAX standard, established by the German Association of the Automotive Industry (VDA), which defines requirements for information security and prototype protection. Our compliance is verified through certification by accredited audit companies every three years.

Every employee plays an important role in safeguarding data and information security. We therefore expect all employees to exercise a fundamental duty of care when handling information and using company systems and remain vigilant against accidental disclosure or misuse.



9 EXTERNAL COMMUNICATION

EXTERNAL COMMUNICATION

9.1 As a global company, we recognize that external communication requires a careful and consistent approach.

Any media inquiries or requests for statements received internally must be forwarded to the Group Communications Department. Employees are not permitted to respond independently on behalf of the company.

We are committed to providing the public with accurate and truthful information, particularly regarding our products, services, career opportunities, and public reporting.

PRIVATE STATEMENTS

9.2 We respect the right of employees to free expression of opinion.

At the same time, employees are expected to exercise care when making public statements, including on social media, and to avoid statements that are defamatory or could reasonably harm the reputation of the company, its employees, customers, or business partners.

We provide guidance on social media use to support responsible and mindful communication.

When participating in public discussions in a personal capacity, employees must not represent or imply that they are speaking on behalf of the company.

10 ARTIFICIAL INTELLIGENCE

AI GOVERNANCE AND RESPONSIBLE USE

10.1 We embrace the opportunities that artificial intelligence (AI) offers for improving our products, services, and ways of working. AI is already part of some of our processes and will play an even greater role in the future.

We are equally mindful of the responsibilities that come with these technologies. Every use of AI must follow our ethical and legal principles to ensure it is fair, transparent, safe, and respects privacy. Decisions supported by AI are guided by

humans, and we make sure they do not discriminate or cause harm.

In line with the potential risks associated with certain AI applications, we apply appropriate safeguards under our internal policies, particularly where AI is used in sensitive contexts. We comply with applicable laws and regulations and follow our internal governance for the responsible use of AI systems.

All employees are expected to use AI responsibly and speak up if something doesn't feel right, so AI serves people, not the other way around.



11 SUSTAINABILITY

[11. SUSTAINABILITY]

CORPORATE CITIZENSHIP

11.1 We see donations as part of our commitment to society and the common good. They are always voluntary, made transparently, and never with the expectation of receiving anything in return. Every donation has a lawful and appropriate purpose, and the recipient is clearly identified.

In line with our principles, we do not make donations to political organizations, parties, or individual politicians.

Sponsoring is distinct from donations, as it involves a clear exchange of value and often supports communication or marketing activities for the company. All sponsoring activities must be transparent, formally agreed in writing, and based on a fair balance between the cost and the agreed benefit.

ENVIRONMENTAL RESPONSIBILITY

11.2 We aim to run our business in a way that respects the environment and steadily reduces our impact. This includes using energy, water, and materials efficiently, and reducing emissions and waste across our operations and product life cycle.

Environmental and climate responsibility are integral to our decisions, growth, and the way we work every day.

By measuring our impact and continuously improving, we work to reduce resource use over time as outlined in our [Sustainability Strategy](#).

ANIMAL WELFARE

11.3 We respect animal welfare and aim to avoid unnecessary harm in our operations and supply chain.

Animal testing is not conducted unless legally required, and alternatives are used wherever possible.

Animal-derived materials are used only where necessary, and we require our suppliers to meet the same standards for responsible sourcing and humane treatment.

LAND STEWARDSHIP

11.4 We are committed to ethical stewardship of land and natural resources.

We avoid practices that cause or contribute to illegal deforestation, land degradation, biodiversity loss, or unlawful land acquisition.

We respect the rights of Indigenous peoples and local communities and require meaningful engagement where sourcing or operations may affect their lands or livelihoods, consistent with principles of the United Nations Declaration on the Rights of Indigenous Peoples, including free, prior, and informed consent.



LEGAL NOTICE

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