

Code of Conduct for Suppliers

of GRUMA Nutzfahrzeuge GmbH and all affiliated companies of GRUMA Nutzfahrzeuge GmbH within the meaning of §15 AktG (German Stock Corporation Act)

A. Preamble

In strategic, ecological and social corporate decisions, the GRUMA Group is guided by the fundamental values of a modern society. Due to its own sense of responsibility towards people and the environment, but also in an obligation to its employees, customers and stakeholders, the GRUMA Group encourages and demands compliance with the following principles of this code of conduct from its suppliers.

For the GRUMA Group, this compliance is the basis for sustainable and long-term business relationships. The GRUMA Group also expects the following values and responsibilities in its procurement chain and from its suppliers. It is the responsibility of the suppliers to check compliance with the principles listed in this code of conduct in their own supply chain and to implement the principles set out below in their company.

The principles listed here are based on national laws and regulations, such as the Supply Chain Due Diligence Act, in German “Lieferkettensorgfaltspflichtengesetz” (LkSG) and the content of the following international conventions and standards:

- Principles of the Global Compact of the United Nations (UN)
- Guidelines for Multinational Enterprises of the Organization for Economic Co-operation and Development (OECD)
- Agreements of the International Labor Organization (ILO)
- Charter for Sustainable Development of the International Chamber of Commerce (ICC)

B. Requirements for our suppliers

1. Social responsibility

The GRUMA Group expects its suppliers to respect human rights and to treat employees with dignity and respect.

This includes the following principles:

1.1 Prohibition of child and forced labor and protection of human rights

Our suppliers comply with national and international occupational safety laws and do not employ children, forced laborers and/or slaves.

Employees must not fall below the minimum age specified by national and international laws and standards. All work must be voluntary and employees must be able to terminate work or employment at any time. In addition, there must be no unacceptable treatment of workers, such as psychological harshness, sexual and personal harassment. Our suppliers should support and respect the protection of internationally proclaimed human rights and ensure that they are not complicit in human rights abuses. The underlying, binding framework here are the core labor standards of the ILO.

1.2 Fair working hours, remuneration and social benefits

Our suppliers grant their employees the right to reasonable remuneration.

Compensation and benefits must conform to the core principles of minimum wages, overtime and statutory benefits.

Working hours must at least comply with applicable laws, industry standards or relevant ILO conventions, whichever is stricter. Overtime should be voluntary and workers should be given at least one day off after six consecutive days of work.

1.3 Freedom of association

Our suppliers maintain open and constructive communication with their employees and employee representatives.

In accordance with legal requirements, our suppliers respect the rights of workers to associate freely, to form and join unions, to appoint employee representatives and to engage in collective bargaining. Our suppliers must not discriminate against employees who act as employee representatives so that they can carry out their duties without fear of reprisals or discrimination.

1.4 Equal treatment and non-discrimination

Our suppliers do not tolerate harassment or unlawful discrimination among their workforce.

In the context of hiring and employment practices, such as promotions and remuneration or access to training opportunities, employees must not be judged on the basis of gender, age, skin color, culture, ethnic origin, sexual identity, disability, religious affiliation or worldview are discriminated against.

1.5 Occupational safety and health protection

Our suppliers ensure that their companies have systems, processes and measures in place to comply with national statutory health and safety regulations.

Potential safety risks are to be determined, evaluated and avoided by taking suitable measures. Employees must be instructed about potential safety risks, correct, safe behavior and protective measures to be implemented accordingly. If appropriate risk control is not possible through such measures, the employees must be provided with appropriate personal protective equipment.

1.6 Complaint mechanisms

In accordance with the provisions of the LkSG, our suppliers must pass on information received from our company about accessibility, responsibility and the implementation of a complaints procedure to their employees in a suitable manner. The complaints procedure must be accessible to employees while maintaining the confidentiality of their identity and effective protection against discrimination. In the absence of a notice, the supplier itself shall be responsible at the plant level for establishing an effective grievance mechanism for individuals and communities who may be affected by adverse impacts.

1.7 Dealing with conflict materials

For the conflict minerals tin, tungsten, tantalum, gold and cobalt, the Gruma Group expects its suppliers to carry out processes in accordance with the Organization for Economic Co-operation and Development (OECD) due diligence guidance to promote responsible mineral

supply chains conflict and high-risk areas. Smelters and refineries without proper, audited due diligence processes should be avoided.

2. Ecological responsibility

The GRUMA Group expects its suppliers to comply with the applicable national environmental laws and to recognize that dealing with the environment in a responsible manner is an integral part of the manufacture of products.

This includes the following principles:

2.1 Energy consumption/efficiency, resource and climate protection

Our suppliers monitor and document their own energy consumption and find economical solutions to improve energy efficiency and minimize energy consumption. Natural resources such as water, air, energy sources or raw materials are used sparingly in order to preserve them. Negative effects on the environment and climate caused by our suppliers themselves or within their supply chains should be minimized or prevented at the point of origin. Circular economy principles such as material reduction and substitution, as well as return, sharing, maintenance, reuse, remarketing, remanufacturing, remanufacturing and recycling should be taken into account. Our suppliers should be committed to the development and use of environmentally and climate-friendly products, processes and technologies and ensure continuous ecological improvements with the help of clear goals and improvement strategies. This includes, for example, reducing the consumption of raw materials and energy, emissions, wastewater, noise emissions, waste and dependence on natural resources and hazardous substances.

2.2 Treatment and discharge of industrial wastewater

Our suppliers monitor wastewater from operations, manufacturing processes and sanitary facilities prior to discharge or disposal.

In addition, measures are continuously identified and tracked to reduce wastewater generation.

2.3 Waste and emissions

Our suppliers ensure safety and compliance with regulations in the handling, storage, transport, disposal, recycling and reuse of waste, exhaust gases and effluents.

Activities that may have negative effects on human health or the environment are managed, measured and controlled in an appropriate manner. The release of hazardous substances is minimized. Special caution is required for active substances.

2.4 Chemical management and product safety

Our suppliers comply with product safety and labeling legislation and properly communicate requirements for handling their products.

Chemicals or other materials that pose a hazard if released into the environment must be identified and managed in a manner that ensures safe handling, transportation, storage, use or reuse, and disposal. If required, the applicable documentation is made available with all the necessary safety-related information on all hazardous substances. These include product information, safety data sheets, registration and approval confirmations, uses and exposure scenarios. Our suppliers proactively and transparently share information on the health, safety and environmental aspects of their products with all relevant parties.

3. Ethical business conduct

The GRUMA Group expects its suppliers to adhere to ethical principles for fulfilling social obligations and for a successful positioning on the market.

This includes the following principles:

3.1 Fair competition

Our suppliers comply with international and national laws to ensure fair competition.

These include the provisions on unfair competition and antitrust laws. Agreements with competitors about prices, terms of sale, quantity restrictions, division of territory or bids in public tenders, etc. are strictly prohibited.

3.2 Prohibition of corruption

Our suppliers do not tolerate corruption, extortion, embezzlement, misappropriation and money laundering in any form.

In business dealings with business partners or public officials, no bribes or other illegal inducements, such as bribes, may be offered or accepted. As a matter of principle, gifts or hospitality may not be used to influence a business relationship in an unfair manner and may not violate applicable laws or ethical standards.

3.3 Financial responsibility

Our suppliers keep proper records and do not alter entries to obscure or falsify transactions involved.

All records created or received as evidence of a business transaction, regardless of format, must fully and accurately reflect the incident being documented. Records are to be kept in accordance with applicable regulations.

3.4 Conflicts of interest

Our suppliers inform about any situation that could lead to a conflict of interest in the business relationship.

Examples include cases where employees of the GRUMA Group enjoy professional, private or significant financial benefits, or where there are shareholdings in a company of our suppliers.

3.5 Intellectual property

Our suppliers protect and recognize intellectual property of the GRUMA Group and third parties.

Examples include patents, trademarks, copyrights, designs, trade secrets, samples, models and know-how. In particular, our suppliers shall ensure that the products delivered to the GRUMA Group do not infringe the intellectual property of third parties.

3.6 Data protection

Our suppliers protect confidential information and data, manage it appropriately and prevent unauthorized access and use.

Personal information may only be collected and used for legitimate business purposes. Information and data must be protected in accordance with legal security requirements and retained only as long as necessary and permitted by law.

3.7 Disclosure of information

Our suppliers disclose information on business activities, structure, financial situation and performance exclusively in accordance with the relevant regulations and standard industry practices.

Falsifying records and misrepresenting conditions and practices in the supply chain are not tolerated.

3.8 International trade controls

Our suppliers comply with export control regulations applicable to their business and provide accurate and truthful information to customs and other authorities as required.

3.9 Plagiarism

Our suppliers develop and maintain effective procedures and processes to minimize the risk of introducing counterfeit parts and materials in their products.

Recipients of counterfeit products are notified when appropriate evidence is provided and counterfeits are removed from the products supplied.

3.10 Whistleblower protection

Our suppliers shall promote and ensure communication channels for their employees to lodge complaints or report possible unlawful conduct without fear of repression, intimidation or harassment.

Each communication shall be treated confidentially and, if necessary, appropriate measures shall be taken to improve the situation.

3.11 Reporting of tips and violations

We expect our suppliers to report possible violations of our code of conduct to us. This includes possible violations committed by employees of the GRUMA Group. Our reporting office for information and complaints applies to our own employees as well as to the employees of business partners and other external persons.

A notification can be made at any time

- verbally during the usual business hours of the law firm (Brienner Str. 5, 80333 Munich),
- by telephone at +49 89 242158-91 or by fax at +49 89 242158-99
- as well as in writing to our external reporting office <https://weigell.de/vertrauensanwalt/> or directly to the law firm W&R Weigell Rechtsanwälte Partnerschaft at meldestelle@weigell.de.

Confidentiality and data protection are ensured at all times through anonymization. The whistleblower is generally protected from discriminatory or disciplinary measures. Any retaliatory action against them will not be tolerated.

C. Implementation of the requirements

We expect our suppliers in relation to its supply chains and own suppliers that they identified risks within these and take appropriate measures if necessary. In the event of suspected violations and to safeguard supply chains with increased risks, the supplier will inform the Gruma Group promptly and, if necessary, regularly about the identified violations and risks, as well as the measures taken.

If a violation of the regulations of this Code of Conduct is identified, we will inform the supplier immediately and set him an appropriate grace period to bring his behavior in line with these regulations.

If it is not possible to remedy the situation in the foreseeable future, the supplier shall notify us immediately and, together with our company, draw up a concept with a timetable for ending or minimizing the violation. If the grace period expires fruitlessly or if the implementation of the measures obtained in the concept does not bring about a remedy after the expiry of the time schedule and no milder remedy is available, our company may terminate the business relations and cancel all contracts. A statutory right to extraordinary termination without granting a grace period, in particular in the case of violations that are to be considered very serious, shall remain unaffected, as shall the right to claim damages.

D. Acknowledgment and consent of our suppliers

This Code of Conduct is published and announced on our website. With each successful business transaction, the supplier acknowledges this Code of Conduct even without an explicit signature and agrees to act responsibly and to comply with the principles and requirements set out in this Code of Conduct.