

Code of Conduct for Business Partner

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- CODE OF CONDUCT FOR BUSINESS PARTNERS -

Preface Our Code of Conduct for Business Partners sets the same expectations for our business partners that Xiting imposes on itself. Additionally, Xiting places great importance on the social responsibility of its business partners.

Business Partner refers to all third parties with whom Xiting maintains a business relationship, including but not limited to suppliers, sellers, service providers, dealers, contractual partners, trade representatives, brokers, consultants, and their employees, agents, and representatives.

The Xiting Code of Conduct establishes the rules for the business activities of Xiting's business partners. The fundamental international standards on human rights and working conditions, such as the Universal Declaration of Human Rights by the United Nations, the International Labour Organization (ILO) conventions (particularly ILO conventions 29, 87, 98, 100, 105, 111, 138, and 182), the Protocol of June 11, 2014, to Convention No. 29, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social, and Cultural Rights, form the basis for this code. By communicating our values, we aim to strengthen existing business relationships and establish new ones on a responsible basis. This Code of Conduct outlines Xiting's minimum requirements for all business partners and does not replace any stricter provisions or regulations to which business partners may already be subject.

1. Labour and Human Rights

1.1 Working Conditions, Hours, and Wages

We advocate for fair working conditions and expect our business partners to comply with applicable regulations regarding working hours and vacation policies. The right to fair remuneration is recognized for all employees. Business partners must ensure fair contractual compensation that adheres to legally guaranteed minimum wages and is aligned with national and local legal norms or the level of national economic sectors/industries and regions.

1.2 Harassment and Discrimination

Any discrimination in employment is prohibited. This includes any distinction, exclusion, or preference based on race, colour, gender, age, religion, political opinion, membership in a workers' organization, physical or mental disability, ethnic, national, or social origin, nationality, sexual orientation, or other personal characteristics. Business partners must prevent any form of harassment, such as sexual harassment, sexual abuse, physical punishment, mental or physical coercion, or verbal abuse. Xiting's business partners are also responsible for workers employed through agencies or other intermediaries.

1.3 Freedom of Assembly

We recognize the right of all employees to form unions and workers' representatives on a democratic basis within national regulations. We expect our business partners to allow their employees the opportunity to assemble peacefully and associate, especially in political, labour-related, and civil society contexts. This includes the right, where legally provided, to form unions and engage in collective bargaining to protect their interests.

1.4 Forced Labour and Human Trafficking

Business partners must eliminate all forms of modern slavery, including forced overtime, retention of identification papers, and human trafficking.

1.5 Child Labour and Young Workers

We strictly oppose any form of forced and child labour. We expect our business partners to adhere to the same standards for protecting human rights and commit to not employing children below the legal minimum age (according to ILO Convention 138). Furthermore, business partners are expected to ensure that young workers under 18 do not engage in night work or overtime and are protected from working conditions that are harmful to their health, safety, and development. Business partners should ensure that the tasks of young workers do not interfere with their schooling.

1.6 Health and Safety

Business partners must comply with applicable legal regulations for occupational health and safety to protect the health and safety of their employees. Business partners adhere to internationally recognized standards, actively work to identify, and remedy safety deficiencies, and continuously improve workplace conditions to ensure and protect health and safety.

2. Business Ethics

2.1 Anti-Corruption

We expect our business partners to conduct their business activities with integrity. This includes prohibiting and not tolerating corruption, extortion, embezzlement, and money laundering in any form. If gifts are customary and courteous in a particular country, it should be noted that they do not create obligatory dependencies, and national legal norms are adhered to.

2.2 Data Protection and Data Security

Business partners must comply with applicable data protection laws and regulations in the countries and regions where they operate. In particular, business partners must acquire and use all personal data with prior consent and ensure that personal data is not unlawfully acquired, used, transmitted, disclosed, or transferred. Data must be processed, secured, and deleted appropriately. Business partners also



ensure that technical information systems are adequately secured against cyber threats by adhering to standard practices.

2.3 Fair Competition and Antitrust Law

We expect our business partners to comply with all applicable national and international competition and antitrust regulations and laws. This includes business practices that unlawfully restrict competition, improper exchange of competitive information, and price fixing or bid manipulation.

2.4 Conflict of Interest

We expect our business partners to inform us of any situation that could lead to a conflict of interest. This includes situations where our employees enjoy professional, private, and/or significant financial benefits through collaboration with business partners or have stakes in a business partner's company.

2.5 Material and Intellectual Property

Business partners commit to respecting and safeguarding intellectual property throughout the entire supply chain. This applies equally to the material property of Xiting, which must be protected against loss, theft, or misuse.

2.6 Export Controls and Economic Sanctions

Business partners strictly adhere to compliance with all applicable regulations and laws for the import and export of goods, services, and information, as well as payment transactions. Existing sanctions and embargoes are observed during business activities in accordance with laws and regulations.

2.7 Whistleblowing and Protection against Retaliation

Business partners ensure that employees can express themselves freely and without fear of retaliation if they violate the contents defined in this Code of Conduct.

3. Environmental Protection

3.1 General

Xiting expects business partners to minimize negative impacts on the environment and climate resulting from their business activities and to handle natural resources carefully.

3.2 Compliance with Environmental Laws

Business partners must comply with the applicable national and international environmental standards and laws.

3.3 Consumption of Natural Resources and Air Pollution

Business partners should reduce or avoid the use and consumption of natural resources, including raw materials, water, and energy. Economic solutions should be found to improve energy efficiency and minimize energy consumption. General emissions from operations (air and noise emissions) should be avoided wherever possible. Business partners are also required to continuously work on preventing and reducing environmental impacts.

3.4 Climate Protection and CO2 Reduction

Xiting is committed to climate and environmental protection. Since September 2019, we have successfully aimed to operate as a company that is 100% carbon-neutral, offsetting our emissions through support for reforestation projects that plant trees and reduce greenhouse gas emissions. Our position is based on the scientific reports of the Intergovernmental Panel on Climate Change (IPCC), which Xiting considers a substantial source for the current climate emergency. Sustainability for Xiting means understanding ourselves as part of society, taking ecological and social responsibility, and thus ensuring the long-term public acceptance and economic success of our company. Business partners are encouraged to find economic solutions to minimize greenhouse gas emissions.

3.5 Waste, Wastewater, and Hazardous Substances

Business partners should have measures in place to reduce both waste and wastewater and treat them in accordance with all legal requirements. Waste should be recycled as much as possible. Applicable procedures and standards for waste management, handling of chemicals and other hazardous substances, as well as their disposal, as well as emissions and wastewater treatment, must be followed. Protection and preservation of natural resources must be given special consideration.

4. Promotion of a Responsible Supply Chain

Xiting is committed to a responsible supply chain. We expect our business partners to comply with legal requirements regarding the procurement of raw materials and commit to transparency across the entire supply chain.

5. Complaints Procedure

Xiting commits to living its values and behaving legally and ethically. This is also expected from its business partners. Complaints or reports of violations of this Code of Conduct can be reported to Xiting at any time, even anonymously, to the Xiting Corporate Compliance Officer at compliance@xiting.com.

6. Review, Compliance, and Violations

Xiting requires all its business partners to comply with all applicable legal provisions. The requirements of Xiting in this Code of Conduct may go beyond the applicable legal provisions of the respective country. Business partners are obliged, at the request of Xiting, to conduct an audit regarding compliance with this Code of Conduct in workplaces. This can be done, for example, in the form of questionnaires, assessments, or on-site business partner audits. On-site inspections are always announced in advance and conducted in collaboration with representatives of the



business partner, respecting applicable laws, including data protection regulations, and contractual agreements, including confidentiality obligations.

In the event of deviations from the principles of this Code of Conduct, it will be clarified jointly with the business partner how measures can be implemented sustainably within a reasonable timeframe. The implementation of measures is carried out independently by the business partner and without resulting in costs for Xiting.

7. Legal Consequences for Violations

Violations of the requirements of this code can endanger the business relationship of the business partner with Xiting, extending to the termination of the existing business relationship. The requirements outlined here are considered important by Xiting. A violation of this Code of Conduct may prompt Xiting to take appropriate legal action. Xiting expressly reserves the right to terminate the business relationship in the event of a serious or repeated violation of this code. Waiving such steps may be considered if the business partner credibly assures and proves that immediate countermeasures have been taken to prevent future violations.