

FUCHS GROUP

FUCHS

Supplier Code of Conduct

MOVING YOUR WORLD



FUCHS Supplier Code of Conduct

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Dear Suppliers, Dear Business Partners and Stakeholders,

We, FUCHS SE and its subsidiaries (hereinafter referred to as "FUCHS"), are an internationally operating corporation that meets the challenges of global competition head-on and assumes entrepreneurial as well as social responsibility.

This responsibility covers legal, social, environmental, and ethical aspects that we as a company need to consider to be successful. We are committed to conducting our business in a fair, responsible, and transparent manner and ensure that our activities in all the countries that we work in are founded with respect to legal, ethical and social standards.

FUCHS respects and considers human rights and supports the United Nations Universal Declaration of Human Rights, the International Labor Organization (ILO) Declaration of Fundamental Principles and Rights at Work, and the initiative for sustainable and responsible corporate governance (United Nations Global Compact).

Based on compliance with local, national and international laws and in accordance with the basic principles of the United Nations Global Compact

Mannheim, November 2025



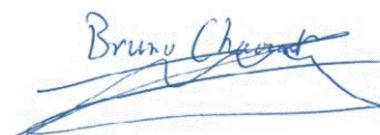
Mathieu Boulardet
Chief Technology Officer, FUCHS SE

agreement, FUCHS expects its suppliers, service providers, subcontractors and business partners with intermediary function (hereinafter referred to as "Suppliers"), to monitor and ensure compliance with these requirements. The success of the partnership is based on trust, transparency, reliability and fairness.

The FUCHS Supplier Code of Conduct is based on our jointly developed values and outlines the FUCHS Group's expectations towards its Suppliers and describes the minimum standards (such as adherence to labor standards, business ethics and compliance, as well as environmental protection and safety) and conditions for a long-term and sustainable cooperation. In addition, basic corporate due diligence obligations in the supply chain are listed that Suppliers are expected to respect and comply with.

The goal of FUCHS is to create a resilient, stronger and more sustainable supply base. We work with those of our Suppliers who do not meet our standards while trying to enable them to comply with the requirements of the FUCHS Supplier Code of Conduct.

The FUCHS Supplier Code of Conduct applies to all



Bruno Chaouat
Vice President Global Procurement, FUCHS SE

FUCHS Suppliers worldwide. We expect our Suppliers to make reasonable efforts to implement these standards in their upstream supply chains as well, meaning their Suppliers and subcontractors.

Suppliers are expected to:

- know and follow the FUCHS Supplier Code of Conduct.
- accept the invitation to register on the IntegrityNext platform and complete their profile and keep it up to date.
- enforce an appropriate Code of Conduct and require that subcontractors and Suppliers do the same.
- remediate and monitor any non-compliance.
- share sub-tier supply chain information in the event of actual risks or violations if these affect the FUCHS supply chain.
- operationalize and document compliance.
- provide evidence of adequate internal controls upon FUCHS request.

1 Social Responsibility

FUCHS is aware of the responsibility towards society and carries out all business activities without exception based on this responsibility. We are committed to respecting human rights in everything we do. It is a central part of our mission to contribute towards building a better world and future in which everyone can develop freely.

Suppliers are urged to respect and to promote the observance of internationally recognized human rights. In all business activities within Suppliers own sphere of influence, Suppliers must ensure that they themselves, their business partners and their Suppliers do not commit or participate in human rights violations.

We treat all employees, regardless of whether they are permanent employees, part-time employees, temporary workers, trainees or working students, with fairness, humanity, respect and dignity. As a Supplier and business partner of FUCHS we expect Suppliers you to do the same.

1.1 Child Labor

FUCHS does not tolerate any form of child labor at any stage of production or processing.

In accordance with the ILO Minimum Age Convention (No. 138), all Suppliers are required to comply with the minimum working age in the region in which they operate and to prohibit the employment of people under the age of 15, regardless of whether this is permitted by local law. The only exceptions to this requirement are government-approved vocational

training programs that clearly benefit participants.

Children must not be inhibited in their development, and their safety and health must not be impaired.

Suppliers are required to prevent workers under the age of 18 from performing work that could endanger their health or safety, including night shifts, overtime or hazardous work in accordance with the ILO Worst Forms of Child Labor Convention (No. 182). This includes all forms of slavery or slavery-like practices such as sale of trafficking of children, debt bondage and servitude, and forced or compulsory labor, including forced or compulsory recruitment of children for use in armed conflicts. It is also prohibited to use, offer, or provide children for prostitution, to produce pornography or for pornographic performances, as well as for illicit activities, in particular for the extraction and trafficking of drugs. In addition, work which, by its nature or because of the circumstances in which it is performed, is likely to be harmful to health, safety or morals of children is not permitted.

If national regulation on child labor provides for stricter standards, Suppliers shall observe these as a matter of priority.

Suppliers must establish an appropriate mechanism to verify that the age of workers complies with the ILO Minimum Age Convention (No. 138) and provide evidence of this validation mechanism upon request. In addition, Suppliers must ensure that all worker recruitment efforts, including third party recruitment, include mechanisms or verify that the age of potential applicants complies with the ILO Minimum Age

Convention (No. 138).

The Supplier must terminate the employment of a child and take appropriate action to place the child in a remediation and/or education program if child labor is detected in the Supplier's sphere or in any part of the supply chain.

1.2 Forced Labor, Slavery and Free Choice of Employment

FUCHS does not tolerate any form of forced labor or slavery. Suppliers are therefore absolutely prohibited from using involuntary labor under threat of punishment, including forced overtime, debt bondage, forced labor in prisons, slavery or servitude.

We require all Suppliers to:

1. confirm that employment is on a voluntary basis. Employees must have the opportunity to terminate the employment relationship with reasonable notice.
2. not participate in activities that are clearly aimed at restricting the free movement of workers.
3. not permit any treatment that is physically or psychologically humiliating, inhumane or degrading.
4. work actively to abolish any form of forced labor and slavery within the own business area but also wherever Suppliers can influence, for example through cooperative efforts and collaboration with non-governmental organizations.

1.3 Equal Opportunities/Non-Discrimination

Suppliers are required to maintain equal employment opportunity and refrain from any discrimination or harassment. For example, employees must not be subject to discrimination based on origin, nationality, skin color, religion, ideology, political and trade union activity, gender, sexual orientation, age, disability, illness, status of health, payment of unequal salary for equal work or pregnancy. Furthermore, we do not tolerate any form of harassment, sexual or moral. This applies to violence and harassment in the work environment that occur during, in connection with or because of work. The prevention and elimination of such behavior must be ensured by appropriate measures and is a requirement for ensuring well-being at work.

We insist that Suppliers support diversity and women's rights, and that employment relationships are built on equal opportunity principles.

1.4 Freedom of Association and Right to Collective Bargaining

Suppliers shall respect the fundamental right to freedom of association and the right to collective bargaining within the framework of national laws and shall ensure that this is not impaired. Whenever national laws restrict any forms of collective bargaining or the right to freedom of association, Suppliers shall enable and permit the free and independent association of employees for the purpose of conducting negotiations.

We require all Suppliers to:

1. collaborate with employee representatives to advance the interests of employees.
2. avoid discriminating against or disadvantaging any employees, including those who are members of a trade union.
3. offer employees and external stakeholders the opportunity to have their voices heard, even in the absence of union representation.

1.5 Wages, Working Hours and Social Benefits

Suppliers shall establish the payment of at least living wages and ensure compliance with national laws referring to working hours, wages and social benefits.

Hours of work and overtime must be performed in accordance with all applicable laws, including maximum hours and minimum rest laws. Overtime work must be agreed upon in advance, possibly compensated at a higher than regular hourly rate – or, to the extent legally permissible, agreed upon in advance with time off in lieu of the higher hourly rate. A proper work-life balance must be facilitated by the employer.

1.6 Occupational Health and Safety at the Workplace

It is a matter of concern to FUCHS to prevent accidents at work and work-related illnesses.

Therefore, it is necessary to create a work environment that meets or exceeds industry standards and local, regional and national safety, occupational health and fire regulations. Employee exposure to hazards must be limited, and continuous improvement of working conditions and occupational health and safety must be promoted. Being certified according to ISO 45001 (or comparable) is highly recommended.

Referring to ILO Hours of Work Convention (No. 1) and ILO Weekly Rest Convention (No. 14), Suppliers shall define working hours (including overtime, maximum working hours, rest periods, working time schedules, parental leave, sick leave, leave for family reasons, paid overtime) in such a way that occupational accidents due to physical and mental exhaustion are prevented and the health of employees is maintained.

Whenever an injury or illness or near misses and unsafe situations occur, Suppliers have an obligation to investigate and take corrective and preventive action. All employees should have knowledge of every incident and near miss, understand the importance of prevention and corrective actions, and practice it in their daily work. Furthermore, suitable protective measures must be in place to prevent exposure to chemical, physical, or biological substances. If protective equipment is required, the Supplier is obliged to provide it for the employees free of charge.

Suppliers have an obligation to implement an effective fire safety management system and emergency plan at each Supplier site that protects employees and other individuals by providing an adequate number of clearly marked and unobstructed emergency exits and evacuation routes, and by providing first aid supplies and medical support/procedures to employees.

Supported by regular training of employees in health and safety, the management of health and safety in the workplace is to be continuously improved. Employees should be encouraged to openly address health and safety concerns, and precautions must be taken against retaliation.

1.7 Destruction of the Natural Basis of Life Through Environmental Pollution

Suppliers must ensure that no harmful soil alteration, water pollution, air pollution, harmful noise emissions, or excessive water consumption interferes with natural resources for the preservation and production of food, deny, obstructions, or destructions, or access to drinking water and sanitary facilities, or harms human health.

1.8 Illegal Violation, Land Rights, and Respect of Indigenous People

FUCHS expects all suppliers to respect all applicable rights concerning land, water, and resources.

Therefore, unlawful eviction and unlawful taking of land, forest and water in the acquisition, development or other use of land, forest and water, the use of which ensures the livelihood of human beings is prohibited. Suppliers are encouraged to respect the rights of indigenous people and local communities.

1.9 Usage of Private or Public Security Forces

The use or engagement of private or public security forces to protect the company's projects without proper supervision is inadmissible if the prohibition of torture and cruel, inhuman or degrading treatment is disregarded, life and limb are violated, or freedom of association and labor are impaired.

1.10 Community Involvement

Suppliers shall support the well-being and development of local communities by facilitating access to basic services and protecting and respecting their civil, social, and economic rights. Community involvement and development shall include actively facilitating the

improvement of quality of life, supporting educational advancement and skills development of their local communities.

1.11 Animal Welfare

FUCHS respects the five animal freedoms formalized by the World Organization for Animal Health concerning animal welfare.

Therefore, the 3Rs principle (Reduction, Refinement, Replacement) must be applied to animal studies. If clinical studies and/or animal testing must be performed, FUCHS expects Suppliers to comply with all applicable international and local laws and guidelines. The aim is to replace animal testing with scientifically valid and regulatory approved in vitro methods.

2 Environmental Responsibility

The protection of people and the environment is a core component in FUCHS corporate policy. A main value for FUCHS is sustainable and responsible management in harmony with our environment.

Suppliers are expected to minimize environmental impact, to observe and continuously improve environmental and climate protection regarding applicable international standards and legal requirements. This includes acting on the precautionary principle to maintain air quality, reduce energy and water consumption and waste generation, and ensure the responsible use of chemicals. In addition, initiatives are to be taken to promote environmental responsibility and to encourage the development and dissemination of environmentally friendly technologies. FUCHS ask the suppliers to implement suitable and traceable measures and management systems according to ISO 14001, ISO 50001 (or others conformant) to ensure protection of the environment and the climate.

2.1 Reducing the Impact on Climate Change

FUCHS is committed to protecting the environment and minimizing the effects of climate change by striving for NET ZERO by 2050. Therefore, Suppliers are asked to support us in our mission:

FUCHS expects Suppliers to have a clear roadmap in place including a target year until when the corporate emissions shall be reduced to "NET ZERO" including all applicable emissions from GHG-Protocols Scopes 1, 2 and 3.

If such a commitment is not yet put in place, FUCHS expects Suppliers to develop a climate protection strategy aiming at Net Zero emissions, based on globally accepted frameworks, such as Science-based-target Initiative or comparable standards.

2.2 Renewable Energy

FUCHS expects Suppliers to use energy based on renewable sources such as solar power, wind power, hydropower, green hydrogen, etc. For those Suppliers who have not yet switched to green energy supply a roadmap towards implementation of renewable energy is expected.

2.3 Environmentally Friendly Production

FUCHS requires Suppliers to develop and manufacture the products as well as their packaging and transport in a safe and environmentally compatible manner. Suppliers are expected to ensure optimum environmental protection at all stages of production and transportation. This includes a proactive approach to avoid or minimize the consequences of accidents that could have a negative impact on the environment. Emphasis is placed on the application and further development of energy and water-saving technologies. The goal must be to produce in an emission-neutral manner.

2.4 Environmentally Friendly Products

All products manufactured along the supply chain must meet the environmental standards of their market segment. This includes the entire product lifecycle and all materials used. Chemicals and other substances that may pose a risk when released into the environment must be identified and handled appropriately. Materials having less toxicity in the manufacturing process must be used.

FUCHS expects Suppliers to identify and track Substances of High and Very High Concern (SHC / SVHC) and to develop and execute strategies to continuously reduce these substances in materials offered to FUCHS.

The increased usage of recycled and renewable materials wherever possible is required and furthermore the use of single-used plastics should be avoided throughout the manufacturing process.

FUCHS expects from Suppliers to calculate and report the CO2 emissions for each product delivered to FUCHS (Product Carbon Footprint or PCF) according to the FUCHS PCF Methodology and ISO 14067. Both the Supplier's PCF Methodology and its calculation process shall be certified by an independent third party. Suppliers shall recalculate PCF values at regular intervals and proactively inform FUCHS about updates. In addition to assessing Climate Change impact (PCF), in the midterm, suppliers will also be required to consider and report other environmental impact categories, resulting in a comprehensive Product Environmental

Footprint evaluation according to ISO 14040/44.

To successfully implement land protection and promote biodiversity, suppliers are expected to avoid sourcing from areas with high biodiversity value or protected ecosystems. All applicable regulations, including relevant environmental laws, must be followed. FUCHS asks suppliers to implement practices that protect natural habitats and promote sustainable land use. Furthermore, impacts on biodiversity and land use should be monitored and reported where applicable.

2.5 Deforestation

FUCHS requires that all raw materials and products delivered by Suppliers are not sourced from areas affected by deforestation or forest degradation after December 2020. Deforestation is defined as the conversion of forest to agricultural use, regardless of whether the change is human induced. Forest degradation includes structural changes to forest cover, such as the transformation of primary or naturally regenerating forests into plantation forests, other wooded land, or planted forests. Furthermore, all products must be produced in full compliance with applicable legal requirements in the country of origin. FUCHS expects its Suppliers to maintain transparent sourcing practices and to provide verification of compliance upon request.

2.6 Defossilization

To achieve FUCHS' Net Zero goal by 2050, we must gradually transition our raw material base to non-fossil sources, such as from recycling/waste streams and/or biomass.

FUCHS expects from Suppliers that strategies to move away from fossil sources and feedstocks are being developed and put in place. Where this is not yet entirely possible, measures to actively remove CO₂ should be evaluated (e.g. Carbon Capture), so that Suppliers can support FUCHS Net Zero targets by offering low PCF-raw material alternatives instead of current fossil-based material in competitive pricing. To avoid burden-shifting to other environmental categories, Suppliers are asked to perform Life-Cycle-Assessments according to ISO 14040 and ISO 14044 and have them 3rd-party certified to be shared with FUCHS.

2.7 Dealing with Specific Raw Materials

Mercury

When the Suppliers activity involves mercury, mercury compounds, mercury-related products or mercury waste, Suppliers are required to act in accordance with Article 4(1), Article 5(2), Article 11(3) of the Minamata Convention.

Persistent Organic Pollutants

When the Suppliers operation includes chemicals, chemical waste and stockpiles, Suppliers are required to comply with the Stockholm Convention on

Persistent Organic Pollutants in accordance with Article 3(1) (a), Article 6(1) (d) (i) and (ii).

Rare Earths

FUCHS expects that any raw material or packaging that is supplied is free of intentionally added substances known as "rare earths" in the supply chain. In case that substances known as "rare earth" are included the material, the supplier declares it as required e.g. in the respective questionnaires that must be filled.

2.8 Waste, Recycling and Emissions

FUCHS expects that Suppliers have a process and system in place ensuring safe handling, transportation, storage, recycling, reuse, and management of raw materials, materials, and wastes. Further, Suppliers are expected to foster and contribute to a circular economy: Waste avoidance must have highest priority, thermal recycling, disposal, and landfill of waste must be reduced to the benefit of enforcing processes of material recycling to produce new raw materials.

If production of a Supplier's activity or disposal of waste releases any substances into the air or water that could have a negative impact on human health or the environment, they must be reduced to the greatest extent possible. Substances must be properly handled, controlled and/or treated before they are released into the environment.

Suppliers are required to prevent or minimize accidental or diffuse leakage or release of shipped substances.

When the Supplier's activity involves the shipment of hazardous and other waste as defined in the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, Suppliers are required to comply with Articles 4(2), 5 and 8 of the Convention.

2.9 Process Safety

It is expected that Suppliers implement a management system to control work processes that are in compliance with recognized safety standards. If needed, specific risk analysis for plants must be carried out. To prevent incidents such as chemical spills and/or

explosions, suppliers are expected to implement appropriate preventive measures and risk controls.

3 Product Responsibility

3.1 Product Safety

All legal requirements and country-specific laws must be complied with. Suppliers are obliged to provide FUCHS in sufficient time before delivery/service with all relevant product information, in particular on the composition, use (processing or assembly instructions as well as occupational safety measures) and, where applicable, on the disposal of its products. Complete documentation for compliance with statutory regulations such as safety data sheets, labeling regulations, etc. is expected. Information provided by FUCHS must be included in the relevant documents.

All products and services supplied to FUCHS by Suppliers must meet the contractually agreed criteria for quality and safety at the delivery time and must be able to be used safely in accordance with their intended purpose as specified by FUCHS.

3.2 Responsible Sourcing and Conflict Minerals

FUCHS expects Suppliers to undertake activities that ensure responsible sourcing of raw materials. The procurement and use of raw materials that have been obtained illegally or through ethically reprehensible or unreasonable measures must be avoided. The use of raw materials such as conflict minerals that are affected by embargoes or other import restrictions must be excluded. Suppliers are, therefore, obliged to exclude these raw materials from manufactured products in the supply chain and to disclose the origin to sources of supply of the raw materials they use.

We expect Suppliers to have the same understanding of the protection of human rights and the environment and therefore the same level of care for their supply chain and proof that they only source or process conflict-free raw materials. FUCHS requires Suppliers to

ensure that the used minerals are sourced only from traceable and certified sources such as the Responsible Minerals Initiative's (RMI).

In accordance with the US SEC Dodd-Frank Wall Street Reform and Consumer Act, Section 1502 and the European Conflict Minerals Regulation (EU) 2017/821, raw materials, summarized as "3TG" must be specifically reported and handled. As such, FUCHS expects its suppliers to supply us with raw materials and packaging that are free of conflict minerals in the supply chain of the product or service delivered to FUCHS.

3.3 Product Related Emissions

All requirements as already outlined in Chapter 2 and section 2.2; 2.4 and 2.7 will also be considered as part of product responsibility by our suppliers.

4 Business Ethics and Compliance

4.1 Compliance with Laws/Anti-Corruption

FUCHS expects the highest level of integrity in all business activities and relationships. Suppliers are required to refrain from any form of criminal offence including *inter alia* fraud or embezzlement, insolvency offences, money laundering, extortion, corruption, and bribery. Suppliers are obliged to comply with all laws and regulations applicable to them and the business relationship with FUCHS.

4.2 Fair Competition and Avoidance of Conflicts of Interest

Competition and anti-trust laws ensure fair and genuine competition. Therefore, the laws that protect and promote competition, in particular anti-trust laws, must be respected. This includes *inter alia* the prohibition of fixing/coordination of prices or other commercial conditions as well as exchanging relevant information with competitors. Also, when dealing with business partners, these must not be unduly restricted in their activities, market dominant positions must not be abused. Suppliers must respect fair competition and comply with the applicable anti-trust laws and refrain from any other measures that hinder the free market.

4.3 Financial Behavior, Disclosure of Information

Like FUCHS is practicing, we expect our suppliers to accurately record, maintain and report business documentation. This should include, but not limited to, financial accounts, quality reports, time records, expense reports and submissions to customers or regulatory authorities, when appropriate. This financial and non-financial information is expected to be disclosed according to industry practices and all applicable regulations. Additionally, disclosures should be published regularly and according to all regulations as applicable and be made available upon request.

4.4 Intellectual Property and Protection of Business Secrets

FUCHS expects all Suppliers – including those in the onboarding or evaluation phase – to respect applicable intellectual property rights. These cover inventions, designs, trademarks, copyrights, and other creative assets used in commerce. Any confidential information or know-how shared must be safeguarded against unauthorized use or disclosure and may only be used as permitted by contract and relevant laws.

4.5 Export Compliance

Suppliers are expected to monitor and adhere to export controls and economic sanctions as they are in place or might occur. This includes restrictions on the export of goods, software, services and technology. Additionally, this includes applicable restrictions on trade involving certain countries, regions, companies or entities and individuals. To successfully implement controls, suppliers shall perform relevant due diligence in their own supply chain.

4.6 Gift and Hospitality Policy

We expect that Suppliers adhere at least to the rules we have set for our own: Offering, promising, and accepting gifts and hospitalities (in the following “advantages”) are only allowed if these comply with the applicable laws, are socially adequate, do not infringe any policy of the person receiving such advantages, and business decisions are not and do not appear to be influenced by such advantages. In any case, requesting, granting and receiving cash and cash equivalents (such as gift cards or vouchers) are prohibited.

4.7 Whistleblower Protection

We expect Suppliers to provide their employees with channels for raising legal or ethical issues or concerns without fear of retaliation. We expect Suppliers to take action to prevent, detect, and

correct any retaliatory actions against whistleblowers. We expect that Suppliers have implemented a procedure which secures objective, independent, and fair investigations of any whistleblowing irrespective of the persons involved. In the event of proven misconduct, we expect

Suppliers to sanction the individuals involved appropriately and, in the case of general misconduct, to take appropriate remedial action to ensure compliance for the future.

5 Implementation of the Standards and Requirements

5.1 Implementation

Suppliers are expected to inform their employees and direct suppliers about the general expectations of the FUCHS Supplier Code of Conduct to ensure compliance. If a supplier has its own Code of Conduct that aligns with FUCHS' standards, it must adhere to it. Otherwise, the supplier should commit to and follow the FUCHS Code. FUCHS also expects suppliers to actively share these requirements throughout their upstream supply chains.

5.2 Information and Communication

The current version of the FUCHS Supplier Code of Conduct is available for everyone at any time to view and download from the FUCHS homepage at: <https://www.fuchs.com/group/the-company/corporate-governance/guidelines/>

For details on the FUCHS complaint mechanism, please see 5.5 below.

5.3 Monitoring

FUCHS reserves the right to verify compliance with the aforementioned requirements either by FUCHS itself, by independent third parties, by means of certificates and statements or topic-specific audits on site if there is a given reason, such as identified risks or existing violations.

5.4 Sanctions and Remedial Measures

Every substantial violation of the above-mentioned obligations is considered as a material breach of contract and will be legally evaluated in each individual case.

Whenever possible, suppliers must promptly remediate any violation and implement appropriate corrective measures without undue delay. All violations, remediations and corrective measures must be reported to FUCHS.

Furthermore, FUCHS reserves the right to claim damages and may, as a last resort, terminate the

business relationship if Suppliers ultimately fail to comply with the FUCHS Supplier Code of Conduct.

5.5 Complaint Mechanism

FUCHS has established a complaint mechanism. Suppliers can find the contact details and more information here: <https://www.fuchs.com/group/the-company/corporate-governance/compliance/>

For human rights issues, the following e-mail address can also be used to contact FUCHS: [hre-supplychain\(at\)fuchs.com](mailto:hre-supplychain(at)fuchs.com)

Suppliers must not hinder their employees and business partners from contacting FUCHS via these channels. Any form of retaliation against individuals using these channels is strictly forbidden.

FUCHS takes the protection of personal data seriously. For more information, please see our data privacy statement, which can be found here: <https://www.fuchs.com/group/data-privacy/>

Imprint

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