



SUPPLIER CODE OF CONDUCT OF THE HERRENKNECHT GROUP

The wording in this document predominantly uses the masculine form of address. This is solely for readability and does not imply any form of inequality.

**PIONEERING
UNDERGROUND
TOGETHER**





Dear suppliers,

Our tunnelling technology and the reliability of the company Herrenknecht are held in high regard worldwide. Our reputation as a trustworthy partner goes hand in hand with the integrity of the company. By maintaining that integrity, we protect our good name as a family business, established over four decades, for the future. Our values are described both in the Herrenknecht Code of Conduct ([link to Code of Conduct](#)) and in our Policy Statement on Respecting and Protecting Human Rights and the Environment ([link to Policy Statement](#)).

Trusting cooperation with our suppliers is an integral part of our success. The prerequisite for this cooperation is that our suppliers act with integrity, comply with statutory provisions, respect human rights and take care of the environment. This Code of Conduct describes the values that underpin our cooperation with suppliers. It is based on internationally recognized standards on human rights and responsible corporate governance, such as the core labor standards of the International Labor Organization (ILO).

As a supplier to the Herrenknecht Group, we expect you to adhere to these principles of conduct as a binding basis for our business relationship and thank you for the trust you have placed in us.

Schwanau, June 2025

The Board of Management

Dr.-Ing. E.h. Martin Herrenknecht
Chairman of the Board of Management

Michael Sprang
Vice Chairman of the Board of Management, CFO

Ulrich Schaffhauser
Member of the Board of Management

Martin-Devid Herrenknecht
Member of the Board of Management



A. APPLICATION AND IMPLEMENTATION

The following principles apply to all Herrenknecht supplier relationships and form the basis of our cooperation. Suppliers within the meaning of this Code of Conduct are all third parties who provide goods or services to Herrenknecht. This includes suppliers, subcontractors, consultants, agents, contractors and freelancers.

As a matter of principle, Herrenknecht adheres to all legal requirements and the values and guidelines set out in our Code of Conduct. Accordingly, we expect our suppliers to adhere to applicable laws and this Code of Conduct in the course of their business activities with Herrenknecht and to work to ensure that this Code of Conduct is adhered to by third parties they engaged to fulfill contracts with Herrenknecht. Suppliers are therefore expected to take measures to promote and require adherence to these principles in their own business and within their supply chain. The following requirements apply subject to any conflicting local statutory provisions.

If you have any questions regarding this Supplier Code of Conduct, please do not hesitate to contact the Compliance Department of Herrenknecht AG (compliance@herrenknecht.de).



B. BASIS OF THE BUSINESS RELATIONSHIP

Human rights

The supplier is called upon to take measures to protect the rights of their employees and to act in accordance with internationally recognized human rights, such as the principles of the International Labor Organization (ILO). They undertake to give their employees the opportunity to express complaints confidentially and without fear of reprisals.

Appropriate working conditions and a safe workplace

The supplier must ensure that working conditions comply with national laws and industry standards. Working hours must not jeopardize the health of employees, regardless of local statutory requirements. The supplier pays remuneration and social benefits that at least meet the statutory standards. The applicable regulations on working hours and leave are complied with. Remuneration and working hours must be agreed in writing at the time of hiring.

The supplier undertakes to comply with the statutory provisions and standards applicable under national law and to protect the health and safety of their employees and third parties employed in the workplace.

The supplier undertakes to refrain from using private and public security forces if their deployment poses a risk of torture, degrading treatment, injury to life or limb or impairment of the freedom of association and the right to organize.

Prohibition of discrimination

The supplier must treat all employees without discrimination. Age, gender, skin color, ethnic or social origin, sexual identity, disability, religion or political opinion may not

justify discrimination. This includes equal remuneration for work of equal value. Insults, humiliation and harassment of any kind in the workplace must not be tolerated.

Prohibition of child labor and forced labor

Herrenknecht does not tolerate any form of child labor. The supplier is committed to a zero-tolerance policy toward child labor in their own business and at their subcontractors. This includes following the relevant conventions of the International Labor Organization:

- The prohibition of the employment of children under the age at which compulsory school attendance ends according to the law of the place of employment, whereby the employment age may not be less than 15 years (ILO 138)
- The prohibition of the worst forms of child labor (ILO 182)

The supplier must not tolerate forced labor in their operations or at their subcontractors. This also includes extreme economic exploitation.

Freedom of collective bargaining and association

The supplier must respect the right of employees to join trade unions or employee representative bodies and to engage in collective bargaining. Employees who work within the scope of their freedom of association may not be discriminated against on the basis of their activities.

Sustainable practices

The supplier is committed to the careful use of natural resources. They take the social impact of their economic activities into account in their considerations and minimize the negative effects of their actions. They are responsible for implementing adequate toxic and hazardous materials management in their own business and supply chain and for ensuring compliance with conflict minerals requirements.

Protection against forced eviction and land seizure

The supplier undertakes not to carry out any unlawful forced evictions. They undertake not to unlawfully expropriate land, forests and waters through acquisition, development or other use.

Fair and equitable competition

The supplier undertakes to strictly reject unfair agreements and other business practices incompatible with free competition and to comply with applicable antitrust and competition law. This includes the prohibition of unlawful price fixing and/or market sharing/allocation of customers as well as abusive behavior in the case of a dominant market position.

Prohibition of corrupt practices

The supplier undertakes to refrain from any form of corruption and not to obtain or grant contracts or other benefits by improper means. The supplier will not tolerate, make or demand inducements intended to call into question the free decision-making



or professional independence of the recipient and inappropriately influence decision-making processes.

Conflicts of interest

The supplier undertakes to base decisions relating to their business activities with Herrenknecht solely on objective criteria. Conflicts of interest due to commercial, private (including relatives and close associates) or other activities will not be tolerated. Potential conflicts of interest in the cooperation with Herrenknecht must be reported to Herrenknecht immediately.

Prevention of money laundering & the financing of terrorism

The supplier implements measures to ensure the legitimate origin of their operating resources and supports global measures to combat money laundering and the financing of terrorism.

Import and export control

The supplier undertakes to comply with all applicable trade restrictions, embargoes and restrictions relating to the import and export of goods, services and information. Furthermore, the supplier undertakes to inform Herrenknecht immediately if they, their beneficial owners, their representatives or the subcontractors used in connection with the business relationship with Herrenknecht are included on sanctions lists.

Tax and customs duties

The supplier must always ensure compliance with their tax obligations in connection with the business relationship with Herrenknecht.

Responsible handling of information

In the course of our cooperation, we share business information of a technical and financial nature, personal data and valuable know-how ("information") with our supplier. Data loss and misuse as well as the infringement of intellectual property rights can have serious consequences. The confidential, legally compliant and secure handling of such information is therefore of vital importance to us.

The supplier undertakes to use all information received from Herrenknecht during the relationship in accordance with the statutory requirements, to treat it confidentially and to use it exclusively for the contractually intended purpose. Information is protected from access by third parties by means of appropriate security measures and using the latest IT security precautions, treated in accordance with the "need to know principle" and only passed on to persons contractually obliged to maintain confidentiality. Information received from Herrenknecht shall be deleted immediately in compliance with statutory requirements as soon as it is no longer needed for the contractually intended purpose. The supplier shall inform Herrenknecht immediately if there are indications that information has been lost. The supplier further undertakes not to obtain trade secrets through improper means or to infringe the intellectual property of Herrenknecht or third parties.

G. RISK MINIMIZING MEASURES

Violations of this Code of Conduct may have adverse consequences for the supplier and for Herrenknecht. For this reason, compliance with the Code of Conduct is an essential basis of the business relationship.

To minimize the risk of violations, Herrenknecht reserves the right to take further measures. These may include, for example, a personal commitment of the supplier's management to the principles of the Code of Conduct, responding to questionnaires or submitting appropriate documentation on compliance. Herrenknecht reserves the right to identify potential areas for improvement through discussions or training. Furthermore, in the event of concrete indications of violations of these principles, Herrenknecht may demand proof of compliance with these regulations or the performance of (on-site) audits. These measures will be coordinated with the supplier.

H. COMPLAINTS PROCEDURE



The supplier shall provide their employees and subcontractors with the opportunity to report violations of this supplier Code of Conduct confidentially to Herrenknecht via the following link: [Link to Herrenknecht whistleblower system](#)

The supplier shall immediately inform Herrenknecht of any indications of violations of the principles described here in their own business or in the supply chain in connection with Herrenknecht-relevant projects and shall assist in investigating and remedying the matter.