

CORPORATE POLICY

(APPENDIX TO MHB | CHAPTER 5)

BASIS:

DIN EN ISO 45001:2022

DIN EN ISO 14001:2015

DIN EN ISO 9001:2015

DIN EN ISO 27001:2022

PREAMBLE

Paul Vahle GmbH & Co. KG – hereinafter referred to as the *VAHLE Group* – is an internationally active company that, together with its subsidiaries, stands for comprehensive system solutions for energy and data transmission. The corporate policy of the VAHLE Group forms the basis for an integrated management system that encompasses all activities worldwide.

Our aim is to consistently align entrepreneurial actions with the principles of occupational health and safety (OHS), environmental protection, quality, and information security. We are committed to complying with all relevant legal, regulatory, and customer-specific requirements and strive for continuous improvement in all of these areas.

Through a shared understanding of responsibility, quality, and sustainability, we ensure the future viability of our processes, products, and services – across all sites and entities.

This corporate policy is binding for all companies and employees of the VAHLE Group worldwide.

1. OCCUPATIONAL HEALTH AND SAFETY (OHS)

The Vahle Group considers occupational health and safety to be an essential part of its corporate responsibility. By systematically embedding health and safety measures in all business processes, we create a working environment that protects and promotes the health and safety of our employees. This policy serves as a binding framework for our commitment and the ongoing development of our safety and health management system.

Ensuring resource availability

The Vahle Group is committed to providing safe and healthy working conditions that are suitable for preventing work-related injuries and illnesses. Our responsibility for the health and safety of all employees is an integral part of our business activities and is systematically embedded in all business processes. This commitment takes into account the size, purpose, and context of our company and is tailored to our specific risks and opportunities.

Compliance with internal and external requirements

We are committed to fully complying with all relevant legal requirements and other binding obligations that we have entered into with employees, authorities, and other involved parties. The identification, evaluation, and compliance with these requirements are an integral part of our management system.

Assessment and improvement of OHS performance

A key objective of our activities is the continuous improvement of our performance in the area of health and safety. We continuously improve the effectiveness of our management system to promote a safe working environment and effectively implement our OHS objectives. Prevention is our top priority: hazards are systematically identified and reduced with the aim of eliminating them or, if this is not possible, implementing appropriate protective measures.

Involving employees

We promote a culture in which occupational health and safety are actively practiced. Vahle Group employees receive ongoing training and information to integrate health and safety practices into their daily work. Their participation is essential to us. That is why we ensure that they are consulted and involved in all relevant aspects of the OHS management system – either directly or through their elected representatives.

2. ENVIRONMENTAL POLICY

Our products make a significant contribution to sustainability worldwide and thus also contribute to global environmental protection. Starting with the electrification of ERTGs in large container ports, which means that the diesel engines of ERTGs can be shut down, and extending to the sensitive control/monitoring technology in current collectors – our Smart Collector. Wear is detected at an early stage, thereby reducing environmental impact.

Corporate responsibility

Compliance with all legal and official regulations, whether in environmental protection or occupational safety, is standard practice for us. We expressly undertake to comply with all binding obligations applicable to us, such as legal regulations, official requirements, standard requirements, and contractual and voluntary commitments that are taken into account within the framework of our environmental management system. We are aware of our responsibility and all the associated effects on the environment and society that our actions entail. So we make sure the water and air are clean and we keep waste to a minimum.

Active environmental protection

We are committed to actively protecting the environment, in particular by avoiding and reducing environmental pollution, such as greenhouse gas emissions, waste of resources, or pollutant emissions. This principle applies to both our products and our processes and is reflected in our promotion of environmentally friendly technologies and use of renewable energies.

Informing and raising awareness among all employees

All employees in our company are responsible for caring for the environment. We encourage all employees to take responsibility for actively protecting the environment in their workplaces. To promote this, we consistently raise awareness, inform, and train our employees so that they act in accordance with our environmental protection policy and can actively support environmental protection measures.

Reducing environmental impact

We implement measures to reduce environmental pollution (e.g. no release of greenhouse gases or decarbonization) with regard to our products and processes - within the scope of commercial possibilities and extending beyond the legal requirements. It goes without saying that we also take into account the requirements and interests of our customers, suppliers, and other parties. The use of renewable energies is constantly being expanded.

Conserving resources through sustainable resource management

The efficient use of energy and materials is not just a factor in our profitability, but also part of our environmental management. The efficient use of resources such as water and electricity, as well as the raw materials we process, is a key factor in our efforts to minimize our environmental impact. Our aim is to use existing materials or products in their existing form in order to reduce waste (reuse). If waste is generated, we make sure that it can be converted back into raw materials (recycling).

Identifying and realizing potential for improvement

The Vahle Group's environmental policy is regularly reviewed with regard to the implementation of our environmental objectives. We use this as a basis for systematically identifying potential improvements, implementing corrective measures, and continuously optimizing our environmental performance. For us, the environment and its protection are not a static state, but an ongoing development process. That is why we are committed to continuously optimizing our environmental management system. We do not see sustainability and innovation as opposites, but rather as key drivers for future-oriented and responsible action.

Open communication

We seek open dialogue with our customers and the public on all issues relevant to the environment. We work closely with authorities and other institutions in this regard. We provide information about current events and planned projects within our company, enabling us to respond promptly to any concerns or fears that may arise among the parties involved.

3. QUALITY POLICY

The quality policy of the VAHLE Group, guided by the principle: “We provide our customers with high-quality products and services that fully comply with the state of the art and their requirements!”, is summarized in the following four binding principles.

Market-oriented quality

In order to maintain and expand the competitive position of the VAHLE Group, the quality of its products and services must meet both the specifications agreed with the customer and their legitimate demands on a technology leader. No product may pose a risk to humans or the environment.

Economic quality

As a profit-oriented company, quality must be defined and ensured, taking into account the available material, human, and financial resources – i.e., within a reasonable price/performance ratio that is also recognized by the customer.

Responsibility for quality

High quality places high demands on all employees. Quality management is the responsibility and obligation of managers at all levels. Every employee of the VAHLE Group must be informed, motivated, and trained by management. In order to promote quality awareness, the training and further education of all employees must be given the highest priority. Every employee is responsible for the quality of their work.

The following applies to each and every one of our employees: **“QUALITY STARTS WITH ME.”**

Process-oriented quality assurance

Close cooperation between sales, development, production, and customer service is regulated by defined processes and activities within each location and between locations, and the respective responsibilities and accountabilities are clearly defined. Continuous improvement of technology and processes ensures that the effectiveness of our work and the quality of our services are constantly being optimized.

Meeting requirements and continuous improvement

We are committed to meeting all applicable requirements, including legal and regulatory requirements, customer requirements, and internal standards. In addition, the continuous improvement of our quality management system is an integral part of our corporate strategy. We regularly review our processes, structures, and results to achieve sustainable improvements and continuous development.

4. INFORMATION SECURITY POLICY

The Vahle Group considers information security to be an integral part of its corporate strategy and an essential building block for trust, stability, and sustainable success. The protection of information –

whether digital, physical or exchanged with business partners – is of paramount importance to us. Our information assets must be protected at all times against loss, unauthorized access, manipulation, and interruption.

Our Information Security Management System (ISMS) ensures that information is systematically protected and risks are controlled, taking into account its confidentiality, integrity, and availability. In doing so, we take into account the context of our company, our strategic orientation, and the requirements of internal and external involved parties.

Appropriateness for the company's purpose

Our ISMS is tailored to the purpose, size, processes, and IT-dependent services of the Vahle Group. It takes into account both technological developments and industry-specific requirements and supports our business, contractual, and legal obligations.

Information security objectives and target framework

This policy forms the basis for setting specific information security objectives. These are regularly derived, formulated in measurable terms, monitored, and assessed as part of management reviews. They support the continuous improvement of information security in all company divisions.

Obligation to comply with applicable requirements

We are committed to complying with all relevant legal, contractual, and regulatory requirements, as well as industry-specific standards and internal regulations relating to information security. These include, in particular, requirements for data protection, data security, and the protection of business-critical information.

Informing and raising awareness among all employees

Information security is a permanent objective of our company and an integral part of how we work. The safety awareness of our employees is our top priority. To ensure this, all employees receive regular training and are kept aware of the issues.

Commitment to continuous improvement

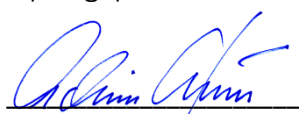
Our aim is to continuously improve the effectiveness of the information security management system. To this end, we conduct regular assessments, audits, training courses, and risk analyses, derive measures, and implement them consistently. Technical, organizational, and personnel aspects are given equal consideration.

5. CONCLUSION

This corporate policy is regularly reviewed for appropriateness and effectiveness, adjusted as necessary, and communicated to all employees and relevant involved parties. It provides a binding basis for our daily actions and forms the framework for setting and evaluating our corporate objectives.

Kamen, May 2025

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