# Code of Conduct

# Protektorwerk Florenz Maisch GmbH & Co. KG



# Preface.

Protektor is a family-owned, mid-sized company in the construction industry, focused on profiles for modern building. For many years we have held firm to our responsibility to the environment and to society.

This Code of Conduct is our guide for how we act and how we make our day-to-day decisions. It reflects our values and principles and our commitment to acting in an economic, ecological and ethical way, combining our own high standards with the law and general regulations.

In everything we do, we comply with the law, protect human and workers' rights, champion equal opportunity, and prevent discrimination and exploitation of every kind. Fighting corruption and protecting the environment and climate are at the heart of how we think and operate.

Where we have the evidence, data or certifications to back it up, we make specific statements about particular measures, products or sites.
Our management, the Managing Directors and the heads of our business divisions take responsibility for putting this into practice.

Gaggenau, 21 September 2026

Dr. Christof Maisch Dr. Jörg Böllhoff Dr. Andreas Metzger



**Dr. Christof Maisch**
Managing Partner, Chairman of the Management Board



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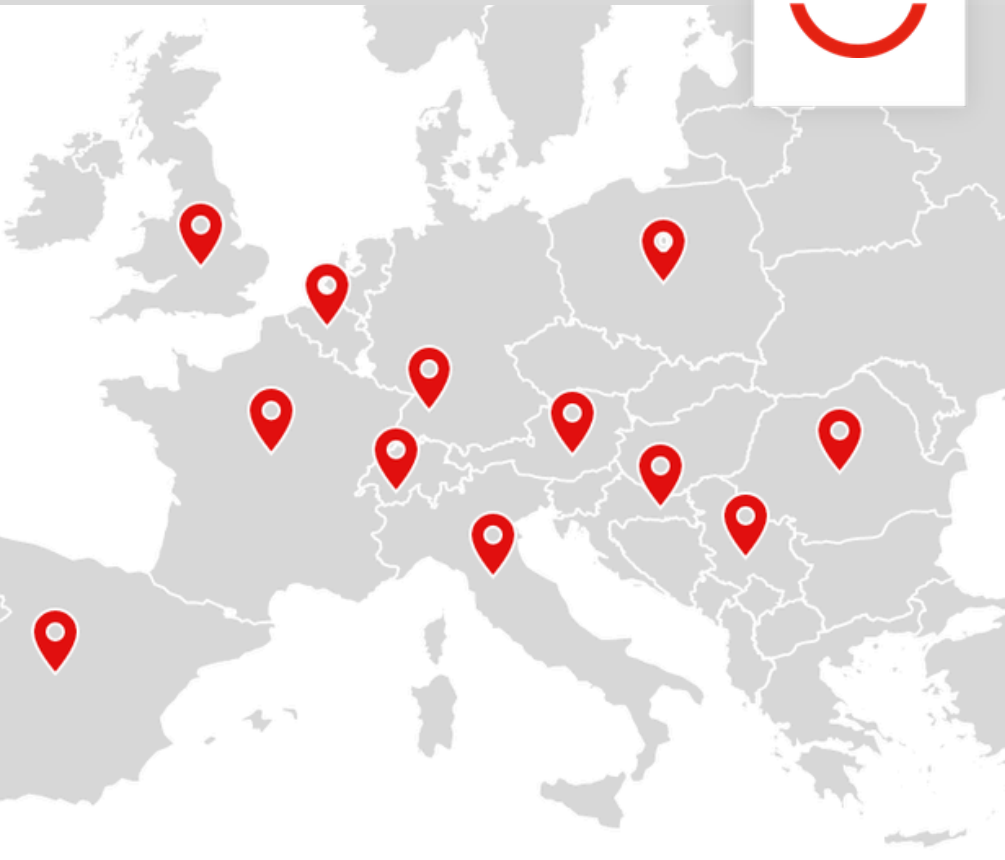



# About Protektor.

As a **leading manufacturer of construction profiles**, Protektor is **present in more than 35 countries**. We offer a wide range of high-quality construction profiles, including **plastering and drywall profiles, subframes and suspended ceilings, profiles for façades, screed and concrete, as well as lightweight steel construction and roof drainage products**. As a market leader and a **family business**, we value innovation highly and we are proud to be a partner to the trade and the crafts, a problem-solver on site, and a supplier to industry.

Our global presence and our **in-house training academy** let us act locally as an **advisor and problem solver**. Alongside our production site in Gaggenau, Germany, we run two more in the **United Kingdom and Switzerland**. In addition, we operate external warehouses in Itzehoe and Kirchheim, near Munich, as well as a logistics platform in Collégien, near Paris, **France**. Our affiliated logistics subsidiary, **Benk**, ensures fast, reliable delivery to our customers.

Our **long history, our ability to innovate and our commitment to the highest quality** are the cornerstones of our success. We see sustainability-related issues as part of our corporate development. In selected processes we look at how we can use resources more efficiently, choose materials more carefully and reduce our environmental impact.



*Our presence in Europe*

# Our guiding principles.

We align with the **UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct**. We take into account the relevant conventions and recommendations of the **International Labour Organization (ILO)** and the labour and social standards that apply to us, and we uphold the principles enshrined in the **EU Charter of Fundamental Rights**. We reject all forms of forced and child labour, and, within our sphere of influence, we act against breaches of occupational health and safety rules, against attacks on freedom of association, and against discrimination of any kind, including on the grounds of sex, age, skin colour, ethnic origin or religion. As part of our due diligence, we identify human rights risks and, where necessary and proportionate, take steps to address them in our own business and across our sphere of influence.

That includes, in particular, the applicable requirements and prohibitions under the **Minamata Convention on Mercury, the Stockholm Convention on Persistent Organic Pollutants (POPs) and the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal**, in their applicable forms.

Our conduct is grounded in compliance with the legal and regulatory requirements that apply to our business, including the related reporting and documentation obligations in Germany and the European Union. We expect our suppliers to meet the environmental regulations that apply to their own operations, in particular the legal requirements in force where they work.



# Our guiding principles.

- We respect **human rights and workers' rights** in everything we do.
- We protect our people's health through **occupational safety and health measures** that meet the applicable legal requirements and our own operating standards.
- We take the relevant economic factors into account when making **financial decisions**.
- We fight **corruption** with proper organisational and control measures. Violations are investigated under the applicable legal and internal rules and sanctioned where needed.
- In our **business decision-making**, we consider the interests of the stakeholders affected, to the extent relevant to the decision.
- We take relevant environmental aspects into account in our **products and services**, based on the information available. When we make claims about the environmental impact, improvements or characteristics of our products, processes or activities, those claims must be specific, understandable and supported by appropriate evidence.
- We foster **innovation and continuous improvement** at every level of the company, and we involve our people, and where relevant other stakeholders, in development and improvement.
- We make **business decisions** with an eye to the long-term development and financial stability of the company.
- We drive **innovation in products, services and operating processes**.



# Protektor and KLIMAWIN.

## CLIMATE AND ENVIRONMENT

Principle 1 — Climate protection:
“We set a climate target and report on it. We use renewable energy and keep raising our energy efficiency.”

Principle 2 — Climate adaptation:
“We act to adapt to the consequences of climate change.”

Principle 3 — Resources and circular economy:
“We use (natural) resources more sparingly and work towards a circular economy.”

Principle 4 — Biodiversity:
“We actively work to protect and preserve biodiversity.”

Principle 5 — Product responsibility:
“We take responsibility for our services and products by looking at our value-creation process and product life cycle through a sustainability lens and being transparent about it.”

## SOCIAL RESPONSIBILITY

Principle 6 — Human rights and the supply chain:
“We respect and protect human rights and workers’ rights, champion equal opportunity, and prevent discrimination and exploitation of any kind across our value chain.”

Principle 7 — Employee rights and well-being:
“We respect, protect and promote the well-being and interests of our people.”

Principle 8 — Stakeholders:
“In our processes we consider all stakeholders and their interests.”

## ECONOMIC SUCCESS, GOVERNANCE

Principle 9 — Company success and jobs:
“We secure the long-term success of the company and provide jobs in the region.”

Principle 10 — Regional value:
“We create value in the region where we operate.”

Principle 11 — Transparency:
“We are an open company. We prevent corruption and report transparently on our financial decisions.”

Principle 12 — Incentives for transformation:
“At every level we create incentives to change the way we think and act, and we involve our people and all other stakeholders in an ongoing drive to make the business more sustainable.”

**We take part in Klimawin BW, we have committed to putting its principles into practice, and we report regularly on our activities under the programme.**

*Certificate of membership*

# Governance.

**At Protektor we know that change has to start at the top if it is to take hold. Our governance sets the foundation for transparent decision-making and responsible conduct. We are convinced that an engaged leadership is what drives positive change, in our industry and beyond.**



# Our supply chain.

When we choose and work with suppliers, we take human rights, social and environmental risks into account, guided by the legal requirements that apply to us and by recognised principles of responsible business.

We expect our suppliers to meet the legal rules that apply to them and the requirements in our Supplier Code of Conduct. That includes, above all, the prohibition of child and forced labour and of improper discrimination, compliance with occupational health and safety, pay and working conditions, respect for freedom of association, and legal environmental requirements.

Depending on the risk assessment, we may check that our suppliers meet these requirements through appropriate measures, and we may bring in external providers to do so. Where we identify significant risks or gaps, we assess them and, where proportionate and within our power, look at and implement suitable preventive or corrective action.

We run a company-wide risk management system. Under it, we identify, assess and monitor the company's key risks according to set processes, and we report significant risks to the decision-makers in charge.

Where we supply companies that carry legal supply-chain due-diligence duties, we support the processes those duties require, to the extent the requirements apply to us and within the scope of our influence.

# Our leadership culture.

Our leadership culture is built on integrity, transparency and respect. Every leader is a role model and owns the job of creating a workplace founded on trust and teamwork. We help our people grow, personally and professionally, by giving them real responsibility and a workplace they can trust. We also commit to open communication: we want everyone to be kept in the loop on the things that matter in the business, so they can act, decide and share information freely.

### Conflicts of interest

Our people should steer clear of potential conflicts of interest. Business decisions must not be driven by personal interests, but by what is best for Protektor. A conflict of interest arises when personal interests could sway how decisions are made here. To keep that risk low, we work with a high degree of transparency and speak openly about such situations. That means every employee must raise a conflict of interest with their line manager of their own accord, and report such situations, or situations that might turn into one, without delay.

### Freedom of expression

Everyone is free to share their own views. In doing so, they should make sure that what they say and how they behave in public never damages Protektor’s standing or reputation. Personal opinions must be clearly marked as such and kept distinct from how Protektor presents itself outwardly, so they are not read as the company’s own.

### Anti-corruption

We do not tolerate corruption, bribery or any other improper influence. Our people, and anyone acting on our behalf, must not offer, promise, give, demand or accept improper advantages. That applies especially to cash, gifts, invitations and other benefits that could improperly sway a business or official decision. We comply with the anti-corruption laws that apply to us and use suitable internal rules and measures to spot corruption risks and prevent breaches. Business decisions should be made objectively and free of improper influence. Where we find a breach, we handle it under the legal and internal rules and sanction it where appropriate.

# Our conduct.

### Fair competition

We commit to fair, ethical competition. We believe fair competition is the bedrock of innovation, quality and trust in the economy, so we hold ourselves to these principles:

- **Honesty and transparency:** We market our products and services honestly and openly. Misleading advertising and false claims are unacceptable.
- **No unfair practices:** We take no part in price-fixing, market manipulation or any other unfair practice that could distort competition.
- **Compliance with legal requirements:** We strictly follow all applicable laws and regulations and work with the relevant institutions and authorities to make sure they are upheld.
- **Responsibility and integrity:** We always act in the best interests of our customers, partners and society, and we foster a culture of integrity and respect.

By sticking to these principles, we help create a fair, open business environment that benefits our customers and the economy as a whole. Every employee must comply with competition and cartel law, step away from any doubtful situation at once, and report breaches to management.

### Money laundering

We actively fight money laundering and comply with all national and international laws and regulations. We only do business with partners whose integrity we can stand behind. Our employees must report any suspicious activity and take every measure needed to stop money laundering.



# Our conduct.

**Donations and sponsorship**
Donations and sponsorship, that is voluntary contributions with no expectation of anything in return, are made transparently and in line with company policy. The purpose, the recipient and the recipient's acknowledgment are documented and verifiable. We support charitable organisations and projects that match our values, and we avoid any conflict of interest.

**Export control**
We comply with the export-control and foreign-trade rules that apply to us, including any applicable sanctions and embargoes. That covers restrictions on specific goods, technologies, countries, business partners and end uses.
Within their areas of responsibility, our employees must follow the applicable internal review and approval processes. Deals that require approval, or that are prohibited, must not go ahead without the required authorisation. When in doubt, the relevant internal team must be consulted before the deal proceeds.

**Import control**
We comply with the import, customs and foreign-trade rules that apply to us. That covers the proper declaration and tariff classification of goods, the correct determination of origin and customs value, compliance with import bans and restrictions, and the proper settlement of duties and other import charges.
People handling imports must follow the applicable internal review and approval processes and take the required authorisations and certificates into account. Goods may only be imported once the applicable legal and regulatory requirements are met. When in doubt, the relevant internal team must be consulted before the import goes ahead.



# Our data protection.

**Data protection**
Protecting the personal data of our customers, employees and business partners is a top priority. We commit to handling all personal data responsibly and in line with the data protection laws that apply. We collect and process personal data only lawfully, and we tell people transparently how their data is used. We collect only the data we need and use it only for the purposes we set in advance. We store personal data only as long as is necessary for those purposes or as the law requires. We protect that data with suitable technical and organisational measures against unauthorised access, loss or destruction. We respect people's data rights, including the right to access, correct and delete their data and to object to its processing.

**Confidentiality**
Confidential information, such as business and trade secrets, is protected and must not be shared without authorisation. Our people must keep sensitive data secure and use it only for legitimate business purposes.

**Company information**
All company information, internal and external, must be accurate, truthful, clear and complete. Our people must take the greatest care when creating and sharing information and make sure no false or misleading statements are made.

# Our Code of Conduct.

We want to build a workplace defined by integrity, respect and responsibility. Every employee, whatever their role, helps keep our company successful and trustworthy.

**Integrity**
For us, integrity means always acting honestly and openly. We follow the law and our internal guidelines, and we expect the same of our partners and suppliers, to whom we make our code of conduct clear. Everyone looks out to make sure that following these principles never puts anyone at a disadvantage, and that breaches are reported.

**Respect**
Our respect shows in how we treat one another. We foster a culture of openness and mutual respect in which every person is valued. Discrimination and harassment have no place here. Every manager makes sure the people in their team know and follow the code of conduct.

**Responsibility**
We take responsibility for how we run our business. That means meeting the requirements that apply to us and putting the principles and measures in this code into practice. We encourage employees and business partners who become aware of a possible breach of this code to report it through the channels provided. Reports are handled in line with our internal rules and the law.

<u>The following channels are available:</u>

- The HR department
- The whistleblowing system on our website
- Your line manager
- The Management Board
- The Works Council

# Our Code of Conduct.

We make sure every report we receive in this area is treated in strict confidence. Whistleblowers' identities are protected, and no one who reports in good faith faces retaliation. Every report is carefully reviewed and investigated. We make sure each one is handled properly and that the steps needed are taken to fix the problem and prevent it from happening again.



# Social.



**We are a family business, and our people are the heart of Protektor.**





# Our principles.

**Social values**

Social values are a core part of how we operate and of our company culture. We are committed to a workplace defined by respect, equal opportunity, freedom of association and fair working conditions.

Our leaders carry a special responsibility to embody these values and to foster a respectful, safe and appreciative workplace. When conflicts, reports or complaints arise, they are expected to act appropriately, fairly and promptly, while respecting the rights and dignity of everyone involved.

Every employee is asked to help uphold these principles. Breaches of these values can be reported through the channels provided. No one who raises a concern or a tip in good faith should suffer any disadvantage or retaliation as a result.

Consistently living our social values builds a workplace founded on trust, teamwork and mutual appreciation.

**Respect and dignity**

We treat every person with respect and uphold their dignity. Everyone is entitled to fair, respectful treatment. We foster a company culture in which diversity and mutual appreciation are lived, and in which people feel respected regardless of personal characteristics or role. Harassment, bullying, intimidation, discrimination and other disrespectful or inappropriate behaviour are not tolerated.

We expect every employee to behave professionally and respectfully towards colleagues, customers, business partners and anyone else we work with.

Respect and a regard for every person’s dignity are the foundation of trustworthy collaboration and of a workplace in which everyone can bring their full ability and contribute to the company’s development.

# Our principles.

**Equal opportunity and non-discrimination**

We champion equal opportunity and a diverse, respectful and inclusive workplace. Disadvantage or discrimination on the basis of personal characteristics, in particular sex, age, ethnic or social origin, religion or belief, disability, sexual orientation or any other legally protected characteristic, is not tolerated. Staff decisions, especially on hiring, pay, training and career development, are made on objective, explainable criteria. What matters most is the qualifications, skills, experience and performance relevant to the role, and the demands of the job.

We foster a company culture in which different perspectives, experiences and backgrounds are respected and valued, and in which everyone has the chance to bring their skills and keep developing.

**No child or forced labour**

We respect human rights and reject all forms of child labour, forced labour, modern slavery and human trafficking, in our own business and in the expectations we set for suppliers and partners, within the limits of our influence.

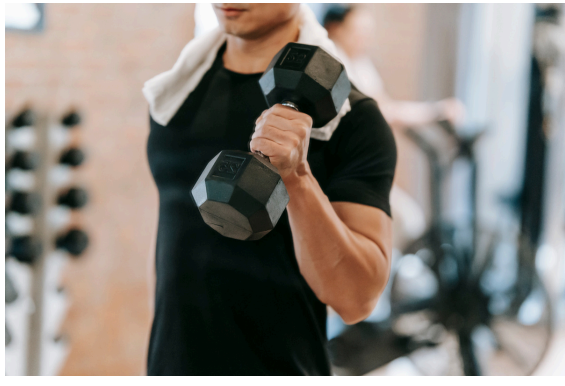
Child labour that breaches applicable law or recognised international standards is not tolerated. In particular, children must not be harmed in their health, safety, development or education by work.

We likewise tolerate no form of forced or compulsory labour. Work should, in principle, be voluntary. No one may be coerced into work through violence, threats, intimidation, improper restriction of movement, withholding of identity documents or any other form of coercion.

We expect our suppliers and partners to meet the applicable legal requirements and the principles in our Supplier Code of Conduct on protecting human and workers' rights. Where necessary and proportionate, we take steps to support compliance and to respond appropriately to any breaches we find.

# For our employees.

We are committed to safe, healthy and fair working conditions. A well-designed workplace protects our people, supports their well-being and makes for better teamwork.



**Safety and health at work**
Keeping our people safe and healthy is a core part of what we do. We meet the applicable legal requirements and occupational safety standards, and we keep developing our measures. Every employee is asked to follow safety rules, report hazards and help make the workplace safe.

**Employee representation and co-determination**
We respect our people's right to representation and co-determination, and we work with the Works Council in a spirit of trust and in a constructive way. Where the law requires participation or co-determination, the Works Council is involved accordingly. Employees may turn to the Works Council or to the Youth and Trainee Representatives without facing any disadvantage.




**Fair pay, working hours and benefits**
We comply with the applicable rules on pay, working hours, rest and leave. Overtime is paid, or made up with time off, in line with the applicable legal, contractual and company rules.



# For our employees.

**Career development and training**
We support our people’s career development and continuous learning. Training, further education and development opportunities are tailored to individual potential and the needs of the business. The aim is to strengthen skills and to link personal and professional growth with the company’s goals.

**Work-Life Balance**
Balancing work and private life matters to us. Within what the business allows, we support this with suitable working-time models and take family needs into account. Our goal is a workplace that, over the long term, contributes to well-being, motivation and good teamwork.



# Environment.




**We see sustainability-related issues as part of our corporate development. In selected processes we look at how we can use resources more efficiently, choose materials more carefully and reduce our environmental impact. Where we have the evidence, data or certifications to back it up, we make specific statements about particular measures, products or sites.**

Protektor. Governance. Social. Environment.

PROTEKTOR®

# Home of Loyalty.