

Supplier Code of Conduct

June 26, 2025

We, NOMOS Glashütte/SA Roland Schwertner KG (NOMOS Glashütte), are committed to conducting business responsibly, placing great importance on adhering to ethical principles and values as well as sustainability in the manufacturing of our products. Consequently, we expect our business partners to uphold comparable standards in their activities. Our expectations towards our suppliers in this regard are defined in this document. Repeated and material non-compliance with this Code of Conduct may jeopardize the business relationship with NOMOS and may potentially result in its termination.

This Supplier Code of Conduct is based on the principles of the ten UN Global Compact (UNGC), the conventions of the International Labor Organization (ILO), the Universal Declaration of Human Rights, the UN Conventions on the Rights of the Child, the Convention on the Elimination of All Forms of Discrimination Against Women, the OECD Guidelines for Multinational Enterprises, the European Regulation and Directives on Corporate Sustainability Due Diligence (CSDD) and the UN Sustainable Development Goals (SDGs).

As a supplier of NOMOS, you commit to complying with the following principles and regulations:

1. Compliance with Laws and Regulations

- 1.1** Ensure compliance with all applicable laws and regulations, with particular attention paid to international standards relating to Environmental, Social, and Governance (ESG) responsibilities.

2. Anti-Corruption

- 2.1** Business actions and purchasing decisions shall be made free of improper considerations and private interests. The supplier and its employees may not offer any personal advantages to public officials to gain benefits for themselves or third parties or to unlawfully expedite official decisions.

Monetary values or personal advantages (such as cash payments, gifts, travel, sponsorships or donations, benefits, discounts, hospitality and entertainment, expenses or any other items or actions of value, including intangible benefits) as compensation for preferential treatment in business dealings may neither be offered, promised, granted, nor approved, nor may they be demanded or accepted by individuals, their representatives, family members, or close associates.

Ensure compliance with the highest standards of integrity when making political donations or when third parties are engaged to interact with government entities.

- 2.2** All applicable laws and regulations for combating money laundering and the financing of illegal activities and terrorism must be observed. All export and import laws and regulations related to products, goods, and services, particularly those regarding economic sanctions, trade restrictions, and affected countries and persons, must be observed.

3. Fair Competition

- 3.1** Applicable laws that protect and promote fair competition, especially the applicable antitrust laws, must be followed.

4. Conflict of Interest

- 4.1** Avoid any situation in which the supplier's interests conflict or might conflict with NOMOS's business interests. Any personal interest (family-related, financial, associative, political, etc.) that could significantly interfere with the impartial and objective performance of a collaborator's duties must be avoided.

5. Ethics, Labor, Health & Safety

- 5.1** Forced Labor: Any form of forced labor, slavery, or human trafficking is strictly rejected. Any person acting on behalf of the supplier must refrain from participating in or contributing, directly or indirectly, to situations of forced labor. Forced labor is understood as: *"any work performed against a person's will and/or under threat or coercion, such as violence, intimidation, debt manipulation, withholding of wages, or threats of denunciation."*
- 5.2** Child Labor: In accordance with the provisions of the International Labor Organization (ILO), Employees may only be employed if they have reached the minimum legal working age, have completed compulsory schooling, and are at least 15 years old.
- 5.3** Discrimination: Equal opportunities and equal treatment of employees must be promoted, regardless of their religion, skin color, gender, age, political beliefs, social background, or sexual identity. The personal dignity, privacy, and individual rights of each person shall be respected. Unacceptable treatment of employees, such as physical punishment, threats, or the use of physical or mental violence to maintain discipline and order, as well as sexual or personal harassment, is not tolerated.
- 5.4** Occupational Safety, Labor Rights, and Health Protection: Workplace safety and health protection must be ensured in accordance with national regulations. Employees must be trained in workplace safety, particularly in handling hazardous substances. To protect employee health, suppliers must take preventive measures to avoid accidents and occupational illnesses. This includes identifying and eliminating potential hazards. The right to freedom of association and compliance with working hours must be respected. The prohibition of unlawful evictions and land seizures must be upheld
- 5.5** Remuneration and Social Benefits: Suppliers must ensure fair remuneration and provide the legally required national minimum wage. Equal pay for equal work must be observed, along with the provision of legally mandated national social benefits.

6. Environment

- 6.1** Environmental and climate protection must be observed in accordance with national regulations and laws, especially the ones concerning the prohibition or restriction of particular substances in manufacturing.

The following prohibitions must be observed:

- The ban on manufacturing mercury-containing products under the Minamata Convention,
- The ban on exporting hazardous waste in accordance with the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes, and
- The ban on the production and use of chemicals covered by the Stockholm Convention on Persistent Organic Pollutants.

Obtain the necessary authorizations and permits in cases where polluting substances are used in manufacturing processes.

6.2 Environmental impacts must be minimized, and environmental protection should be continuously improved. In this regard, suppliers must seek to reduce pollutants and waste emissions at the source through methods and programs that are best suited to their specific realities and constraints. Nonetheless, we encourage the implementation of a greenhouse gas reduction target in line with the Science Based Targets initiative (SBTi).

6.3 To measure and reduce greenhouse gas (GHG) emissions, suppliers are encouraged to develop a GHG emission reduction plan in line with the Greenhouse Gas (GHG) Protocol (Scopes 1 to 3).

6.4 Sustainable resource use and environmentally friendly production must be ensured. Suppliers must take steps to limit and then reduce their consumption of natural resources, particularly through changes in practices, materials, and methods that have a lower environmental impact.

6.5 If the supplier:

- is located in a region with a high risk of water stress,
- uses significant volumes of water in its production processes,
- uses pollutants in its processes that may enter the water supply system,

It must establish a water management system that:

- documents and measures water withdrawal, use, and discharge in its production,
- includes a water conservation and consumption reduction plan,
- describes control and treatment methods for wastewater in compliance with applicable rules and legislation.

6.6 Establish a waste management system that:

- measures the amount of waste generated,
- sets up a sorting and recycling program for physical waste,
- and engages in efforts to reduce the use of non-recyclable materials, particularly plastic.

NOMOS specifically requests that plastics used for packaging, storage, transportation, and preservation of goods intended for NOMOS be minimized or replaced with alternative materials offering properties of a similar quality.

- 6.7 Establish an environmental policy that outlines all the company's commitments and addresses issues to ensure the implementation of sound environmental practices and the reduction of its negative impacts.

7. Animal Welfare

- 7.1 Suppliers must respect animal welfare and work progressively towards adopting healthy and humane practices regarding animals based on the best available standards.

8. Supply Chain

- 8.1 In accordance with industry standards and applicable laws, the supplier must disclose to NOMOS the material characteristics as well as health and safety information of the product supplied.
- 8.2 As far as possible and while respecting manufacturing confidentiality, the supplier commits to disclosing the origin and sources of the components as well as the raw materials of the product delivered to NOMOS.
- 8.3 Depending on the industry in which the supplier operates and taking into account the environmental risks associated with the manufacturing processes and materials used (especially precious metals, metals, leather, and wood), NOMOS considers it desirable that the supplier holds or seeks to obtain appropriate certification. Such certification can help transparently demonstrate ethical and sustainable business practices.
- 8.4 The supplier commits to promoting and implementing the principles of this Supplier Code of Conduct with its own suppliers and subcontractors. In this regard, the supplier ensures that all parts of its value chain are informed of and comply with the principles of this Code of Conduct (e.g., by sharing it with its own suppliers). The supplier is required to take the necessary measures to enable the tracking and monitoring of data related to the various principles addressed throughout this Code to ensure a proper control process.

9. Local Impact

- 9.1 Commit to minimizing the risk of negatively impacting local communities through its activities.
- 9.2 Strive to have a positive economic and social impact on the region and population in which the supplier operates, notably through a local hiring policy, partnerships, civic engagement, or donations.

10 Tax Avoidance

- 10.1 The supplier commits to a responsible approach in tax matters and to strict compliance with tax laws and regulations in all countries where it operates.
- 10.2 The supplier must refrain from any involvement in the creation or implementation of systems designed for tax evasion that aim to divert or conceal profits.

- 10.3 It also commits to applying the principle of tax transparency, which includes cooperation with tax authorities and the provision of all necessary information to ensure the effective and fair application of tax laws.
- 10.4 These commitments to cooperation, transparency, and compliance with tax obligations must also be reflected in the company's risk management systems and policies.

11 Compliance with the Code of Conduct and Verification

- 11.1 The supplier must be able to provide the information and documentation necessary to ensure compliance with this Code of Conduct.
- 11.2 To ensure strict compliance with this Code of Conduct, the supplier must agree to be subject, at any time, to audits conducted by external auditors and must grant access to all relevant data, premises, and production facilities.
- 11.3 The supplier shall provide NOMOS with the necessary documentation and information for verifying compliance with this Code of Conduct.
- 11.4 The supplier shall also provide NOMOS with evidence of proper compliance with the required regulations.

12 ESG-Management and Risk Reduction

- 12.1 NOMOS is aware of the challenges that small and medium-sized enterprises may face when implementing an Environmental, Social & Governance (ESG) management system. Nevertheless, the transition toward a sustainable society requires the commitment of all stakeholders.
Therefore, we ask our suppliers to establish a Code of Conduct or policies aimed at reducing their ESG impacts, and to implement a management system ensuring compliance with the commitments, laws, and standards applicable to their activities — including this Code of Conduct. This system should also include a process for identifying and reducing the risks of non-compliance.
- 12.2 The supplier must provide NOMOS with a statement of compliance with the requirements of this Code of Conduct, signed by the responsible executive (with the approval of the Board of Directors) or by the relevant member of the Board of Directors. This must be accompanied by an action plan and a timeframe outlining the necessary steps to achieve full compliance with the Code.
- 12.3 An effective grievance mechanism must be implemented, allowing employees to understand the procedures and to provide feedback on potential violations of the practices and procedures outlined in this Code without fear of retaliation.
- 12.4 The supplier must report to NOMOS any complaints or other incidents related to the topics covered in this Code that may harm NOMOS or the business relationship between NOMOS and the supplier.

NOMOS

GLASHÜTTE

This Supplier Code of Conduct shall serve as the foundation for an honest, cooperative, and ethically valuable collaboration. By signing this document, the supplier declares that they have received the NOMOS Glashütte Supplier Code of Conduct and agrees, in addition to the obligations of any existing contracts with NOMOS Glashütte, to comply with the principles and requirements of this Supplier Code of Conduct and to report any changes.

NOMOS commits to its suppliers:

- to promote and facilitate long-term collaboration,
- to encourage innovation,
- to support procedures aimed at reducing negative environmental and social impacts,
- to ensure transparency and confidentiality in all interactions.

NOMOS Glashütte/SA
Roland Schwertner KG

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Place: Glashütte Date: 25/06/25

Supplier

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Place: Date: