



Master Fluid

SOLUTIONS®



Supplier Code of Conduct

Master Fluid Solutions®

At Master Fluid Solutions, we view our suppliers as key partners in our shared mission to drive positive impact. We believe responsible business practices begin with strong values, and we expect our partners to align and uphold to Master Fluid Solutions core values in all areas of their operations.

This Supplier Code of Conduct reflects those shared expectations and sets out the principles we ask our suppliers to follow in their work with Master Fluid Solutions, as well as across their own supply chains.

Compliance with this Code of Conduct is a key consideration in our decision to establish or continue a business relationship. By upholding our shared values and working together, we can contribute to a more responsible and sustainable future for everyone.

M. Dean Frone
Chief Executive Officer

Düsseldorf, June 2025
Master Fluid Solutions WDG GmbH

Environmental



Respect for the environment

Suppliers shall comply with all applicable environmental laws and regulations, including obtaining and maintaining required permits and meeting all reporting requirements. They are expected to actively work toward reducing their environmental impact—both within their own operations and throughout their supply chains—and to demonstrate continuous improvement in environmental performance.

Responsible consumption

Suppliers shall minimize environmental impacts through responsible consumption of resources such as energy, water, and raw materials. Efforts shall be made to reduce greenhouse gas emissions, prevent pollution, and manage waste responsibly through reduction, reuse, and recycling.

Renewable materials

Suppliers shall avoid sourcing materials that contribute to deforestation, ecosystem degradation, or loss of biodiversity, particularly in ecologically sensitive or protected areas.

We encourage our suppliers to develop and continuously improve products using renewable materials and to strive for a reduced product carbon footprint.



Social



Child Labour

Suppliers shall not engage in or benefit from child labour as defined in ILO Convention No. 138. The minimum employment age must not be lower than the age of completion of compulsory education and never below 15 years. Furthermore, in line with ILO Convention No. 182, young workers under 18 shall not be assigned tasks that endanger their safety, health, or morals.

Forced labour

Suppliers must ensure that all employment is based on free choice. In accordance with ILO Conventions 29 and 105, they must not engage in, support, or benefit from any form of forced labour, including slavery, bonded or prison labour, or human trafficking. Practices involving coercion, threats, restriction of movement, or the use of disciplinary measures to compel work are strictly prohibited.

Anti-discrimination

Suppliers shall promote equal opportunity and fair treatment. In line with ILO Conventions 100 and 111, discrimination based on characteristics such as race, gender, religion, political opinion, social or national origin, age, disability, sexual orientation, gender identity or expression, health status, or any other protected ground must not be tolerated.

Health and Safety

Suppliers shall provide a safe and healthy working environment in compliance with applicable occupational health and safety laws. This includes protection against fire hazards, accidents, exposure to harmful substances, and other occupational risks. Suppliers must implement effective health and safety policies, conduct regular risk assessments, apply preventive and protective measures, and ensure employees receive adequate training on workplace safety.

Fair Working Conditions

Suppliers shall ensure a work environment free from harassment, abuse, or threats—whether physical, verbal, sexual, or psychological—and must comply with all applicable laws and industry standards regarding fair wages and employee benefits.

Freedom of association

Suppliers shall respect the right of workers to freely associate, join unions, and engage in collective bargaining, in accordance with ILO Conventions 87 and 98 and applicable local laws. Any form of interference, discrimination, or obstruction against worker representatives or union activity is prohibited.



Governance

Fair Competition / Anti-Trust

Suppliers shall conduct their business in compliance with all applicable competition and antitrust laws. Engaging in practices such as price fixing, bid rigging, or the exchange of commercially sensitive information with competitors is prohibited.

Anti-Corruption

Suppliers shall comply with all applicable anti-corruption laws and must not engage in, tolerate, or benefit from any form of bribery or corrupt practice. This includes offering or accepting payments, kickbacks, gifts, or other undue advantages intended to improperly influence business decisions.

Money Laundering

Suppliers must not engage in or facilitate money laundering, terrorism financing, or conduct business with individuals or entities involved in such illegal activities.

Conflicts of interest

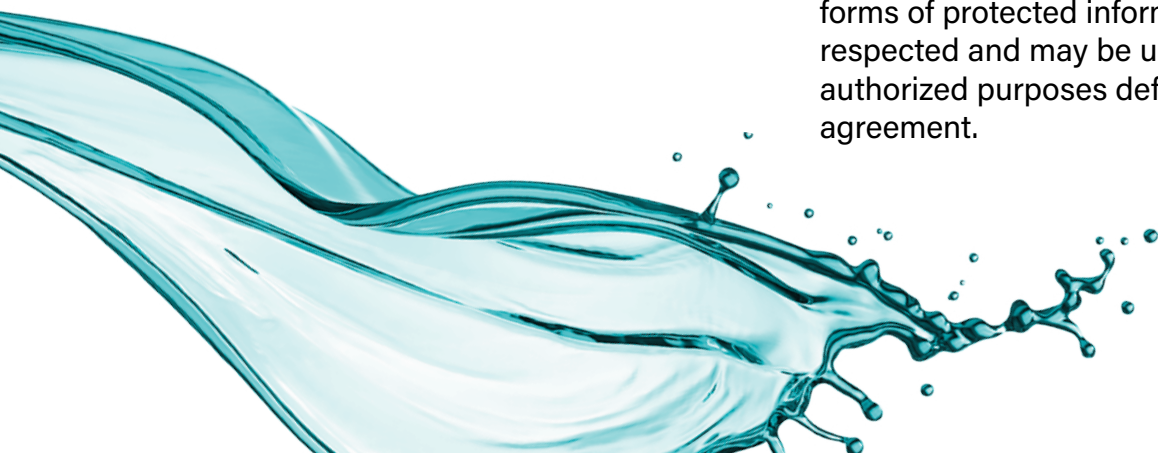
Suppliers shall avoid any activity or relationship that could lead to a real or perceived conflict of interest with Master Fluid Solutions. Any potential conflict must be disclosed proactively and at the earliest opportunity.

Data Protection

Suppliers shall collect, use, and store personal data only for legitimate purposes and in full compliance with applicable data protection laws. They must implement appropriate legal, organizational, and technical measures to ensure the confidentiality, integrity, and security of such data.

Intellectual Property

Suppliers shall protect confidential and proprietary information obtained through their business relationship with Master Fluid Solutions. Intellectual property rights, trade secrets, copyrights, trademarks, and all other forms of protected information must be strictly respected and may be used only for the explicit, authorized purposes defined in the commercial agreement.



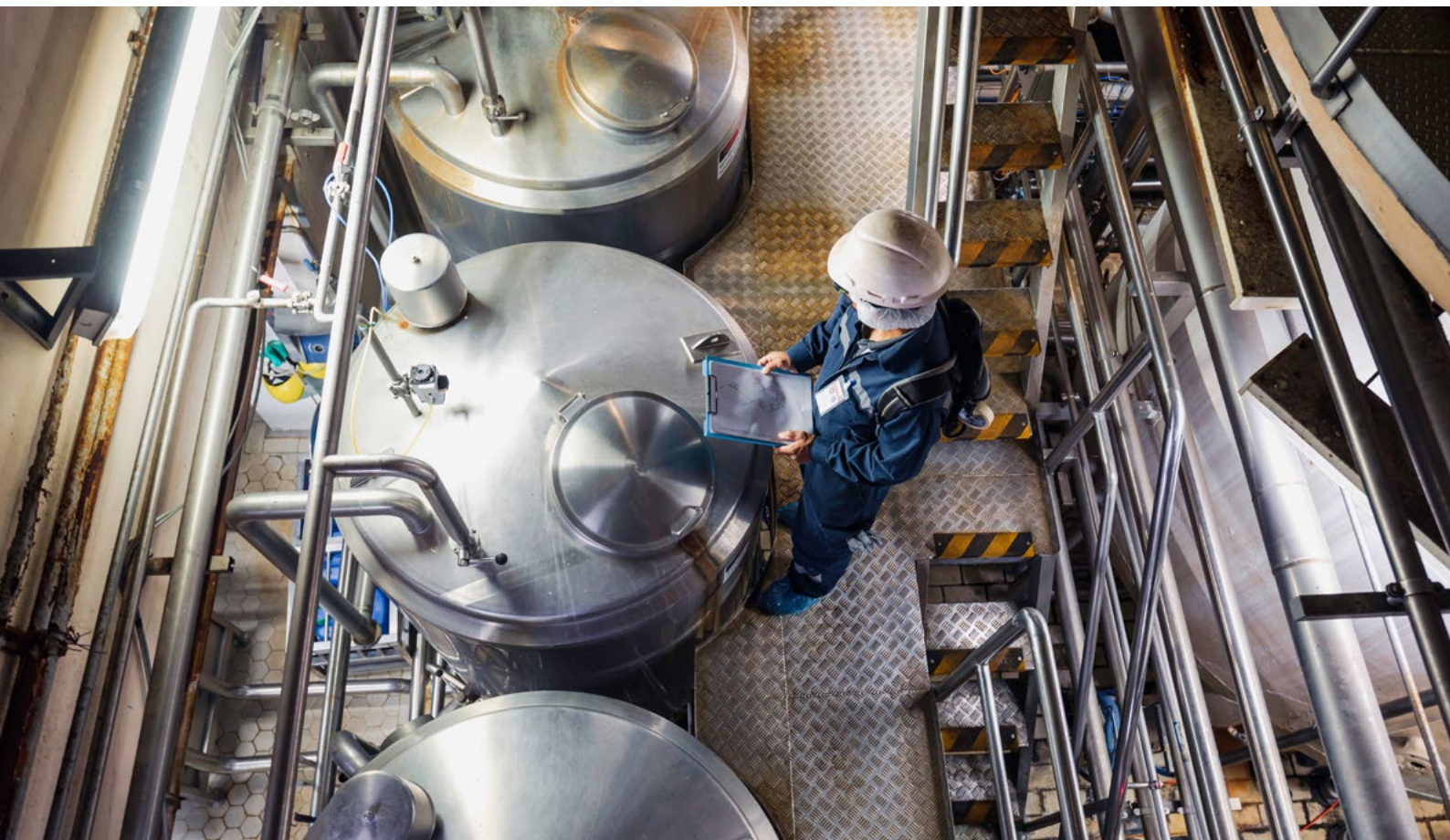
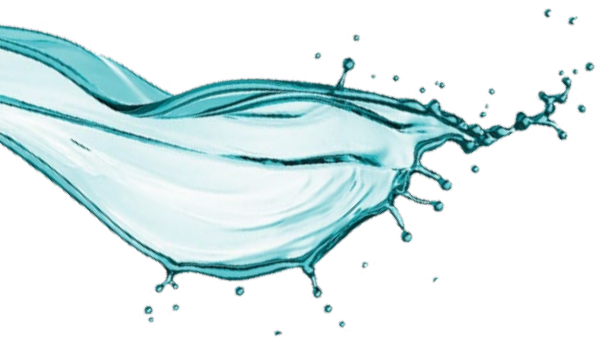
Products

Material compliance

All materials provided to Master Fluid Solutions must fully comply with relevant legal requirements concerning restricted or hazardous substances. Suppliers are responsible for ensuring that applicable substance regulations are consistently met.

Responsible sourcing and conflict Materials

Suppliers are expected to implement robust due diligence processes in strict compliance with all applicable international regulations, most notably the U.S. Dodd-Frank Act (Section 1502) and EU Regulation 2017/821 on conflict minerals. These measures ensure the ethical and lawful sourcing of raw materials, with particular focus on tin, tantalum, tungsten and gold (3TG). Any procurement of materials linked to conflict, embargoes, exploitative labor practices, environmental harm or other irresponsible practices must be strictly avoided.





This Supplier Code of Conduct defines the minimum standards of ethical and responsible behaviour expected from all suppliers of **Master Fluid Solutions**. It does not replace or override applicable laws and regulations. Where legal obligations and this Code differ, the stricter standard shall apply.

Master Fluid Solutions reserves the right to assess and verify compliance with this Code at any time, including through audits or information requests. Suppliers are expected to cooperate fully and transparently.

In cases where violations are identified, suppliers must act without delay to remedy the situation and take suitable steps to prevent recurrence. Failure to correct non-compliance

within a reasonable period, repeated breaches, or disregard of international standards may result in suspension or termination of the business relationship.

If a supplier becomes aware of a breach of any relevant law, regulation or this "**Supplier Code of Conduct**", the supplier shall contact **Master Fluid Solutions** as soon as possible.

Reports may be submitted through **Master Fluid Solutions** external complaint mechanism. Instructions for online and telephone reporting are available on the company's website.

By signing this acknowledgement, the supplier confirms its commitment to the principles outlined in the **Master Fluid Solutions Supplier Code of Conduct** and undertakes to promote awareness and compliance across all relevant parts of its organization and supply chain.

On behalf of the supplier, I hereby confirm that I am authorized to sign this declaration. I have read and understood the **Master Fluid Solutions Supplier Code of Conduct** and confirm our company's commitment to comply with its principles and requirements.

Company name: _____

Authorized Signatory Name: _____

Date: _____

Signature: _____

