

Code of Conduct
for
emtechnik

Principles of conduct for all employees
of EM-Technik GmbH

Maxdorf, 11.08.2020

Contents

- 1 Foreword 3
- 2 Compliance Officers 4
- 3 Conduct 4
 - 3.1 Human rights 4
 - 3.2 Discrimination 5
 - 3.2.1 Violence and harassment at work 5
 - 3.2.2 Communication 6
 - 3.2.3 Diversity 6
 - 3.3 Management responsibility 5
- 4 Industrial safety, health protection and environmental protection 7
 - 4.1 Working hours 7
 - 4.2 Work safety 8
 - 4.3 Environmental protection and use of resources 8
- 5 Cooperation with business partners and third parties 9
 - 5.1 Fair competition 9
 - 5.2 Corruption and bribery 9
 - 5.3 Donations 9
 - 5.4 Business partners 10
 - 5.5 Foreign trade and export controls 10
- 6 Avoidance of conflicts of interest 10
- 7 Responsible handling of company property 11
 - 7.1 Private use of company property 11
 - 7.2 Documentation of business transactions 11
- 8 Responsible handling of information 12
 - 8.1 Data protection 12
 - 8.2 IT guidelines 12
 - 8.3 Confidentiality agreement 12
- 9 International context 13
 - 9.1 International compliance 13
 - 9.2 Dealing with foreign suppliers 13
- 10 Reporting office 14

1 Foreword

Dear employees,

EM-Technik GmbH is an international company, which sees itself up to the challenges of global competition. It is important to us to assume both corporate and social responsibility.

Although the demands on a company are constantly changing, we always want to adhere to our core values and act accordingly. We have written the core of these shared values in this Code of Conduct. A Code of Conduct is a voluntary commitment by companies based on trust, respect, mutual reliability and integrity.

When joining EM-Technik GmbH, all employees, as well as the management, commit themselves to the permanent compliance with this agreement. Compliance is binding for every person in EM-Technik GmbH, because only in this way can a uniform standard be guaranteed. Managers in particular are required to set an example of fair and transparent conduct in order to create the basic conditions for seamless cooperation.

Through the implementation of this Code of Conduct, we would like to record in writing the already existing, generally valid standards for all our employees, suppliers and business partners.

2 Compliance Officers

A Compliance Officer is also appointed in the course of implementing the Code of Conduct. This is a neutral person who has an integral overview of the entire company and its processes. On 01.08.2020 the assistant to the management, Ms Krieg-Tomazos, was appointed as Compliance Officer.

Nevertheless, the company attaches great importance to involving employees from other departments in order to anchor compliance issues as deeply as possible in the company.

3 Conduct

The EM-Technik GmbH commits itself to comply with all valid laws and regulations. By signing this Code of Conduct, all employees and business partners also enter into this commitment.

3.1 Human rights

EM-Technik GmbH pays increased attention to the recognition of valid human rights and thereby follows the Universal Declaration of Human Rights of the United Nations as well as the guiding principles for business and human rights. Furthermore, we commit ourselves not to allow child labour, forced labour or prisoner labour within our organisation or to support it through our business activities.

3.2 Discrimination

Upon joining the company, every employee commits to our guidelines for equal treatment. These are displayed to all employees in the form of the leaflet "Information on the General Equal Treatment Act" and signed by them. EM-Technik GmbH strongly condemns any form of discriminating behaviour. If this is observed or experienced, a manager must be informed immediately and the appropriate steps taken.

EM-Technik GmbH also identifies with the following anti-discrimination guidelines of the European Union.

2000/43/EC – Equal Treatment between Persons Irrespective of Racial or Ethnic Origin

2000/78/EC – Equal Treatment in Employment and Occupation

2002/73/EC & 2004/113/EC – Equal Treatment of Men and Women

3.2.1 Violence and harassment at work

EM-Technik GmbH undertakes not to tolerate any violence, whether in the form of threats, threatening behaviour, intimidation, physical attacks or similar behaviour in the organisation.

All forms of sexual harassment, by any behaviour with sexual reference, will not be tolerated. This includes, but is not limited to, suggestive remarks, solicitation of sexual favours or other unwanted sexual contact. Any such behaviour will be punished immediately.

A detailed definition and description of the regulations regarding the prohibition and handling of sexual harassment can be found in the information sheet on "Information on the General Equal Treatment Act", which must be signed by every employee when starting work.

Also the mobbing of colleagues or employees, which can manifest itself through psychological pressure, systematic harassment, humiliation or exclusion, is not

tolerated in our organisation. This includes both mobbing directly at the workplace and continuation in social networks.

3.2.2 Communication

Throughout the company, respectful interaction is required, and communication must always be fair and on equal footing. When joining the company, each employee undertakes to refrain from condescending, degrading or insulting behaviour. Furthermore, all employees are required to contribute to a positive working atmosphere through their personal behaviour and actions.

It is extremely important to EM-Technik GmbH that problems at the workplace can be objectively addressed and solved at any time. Employees who are affected by unfair behaviour should take immediate action to end it.

3.2.3 Diversity

The organisation is convinced that its strength lies in the diversity of its employees and their talents. All employees must be committed to a diverse body of staff and promote the heterogeneity of the team.

In summary, the following applies: The rights of an employee who has experienced any form of discrimination and the company's action against it can be found in Section D of the "Information on the General Equal Treatment Act".

3.3 Management responsibility

EM-Technik GmbH is aware of the fact that management have a role model function. They must always internalise the values of the company and act according to them. By implementing fair and correct management behaviour, they set the foundation stone.

Through their open-minded and appreciative behaviour, superiors also contribute to a positive working atmosphere. Their actions must create an environment in which conflicts and problems can be addressed at any time.

Managers must act with consistent sensitivity when suspecting violations of the Code of Conduct and are obliged to clarify the facts. If the accusations or observations turn out to be justified, superiors must take decisive action against them and prevent misconduct.

4 Industrial safety, health protection and environmental protection

4.1 Working hours

EM-Technik GmbH emphasises in the context of this Code of Conduct that all standards concerning the valid Working Time Regulations are observed. The company-specific working hours can be read in the corresponding information sheet regarding flexitime regulations. The company also undertakes to comply with site-specific conditions and national and international regulations.

4.2 Work safety

The safety of all employees in the workplace has the highest priority for EM-Technik GmbH. Thus, compliance with all work safety laws is a matter of course and must be guaranteed at all times.

In addition, all employees are personally obliged to comply with the company-specific regulations on work safety. Through constant training and checks, the organisation tries to completely avoid accidents at work. If accidents occur nevertheless, they must be reported immediately.

4.3 Environmental protection and use of resources

The EM-Technik GmbH would like to make an appropriate contribution to the protection of the environment and the preservation of resources. Companies in particular can have a great deal of influence.

EM-Technik GmbH identifies itself with the current environmental protection laws and regulations, which is why we strive for constant compliance. We also support the sustainable development goals of the United Nations. The company attaches great importance to the careful and sustainable use of resources. This implies that the organisation is careful with the raw materials used in production and avoids waste.

In addition, on-site measures to protect the environment and resources are an integral part of our everyday work. In this way, EM-Technik GmbH can save fresh water by its closed water cycles. Through our own combined heat and power plant, we not only generate electricity, but can also use the waste heat to heat and cool the production halls.

5 Cooperation with business partners and third parties

5.1 Fair competition

As an international company, EM-Technik GmbH attaches great importance to fair competition. We believe that only those who act fairly can be successful.

First and foremost, the company assumes that EM-Technik GmbH as an organisation and every employee must comply with the applicable laws of competition and antitrust law.

All employees are prohibited from entering into competition agreements. These include agreements on prices, conditions, capacities, allocation of customers or markets and production programs.

5.2 Corruption and bribery

To combat corruption and bribery, EM-Technik GmbH supports the tenth principle of the "Ten Principles of the Global Compact", which calls on companies to take action against all forms of corruption.

This also means that employees do not use their official position for their personal advantage. Likewise money laundering activities are not tolerated by EM-Technik GmbH. On the contrary, we want to call for integrity and encourage responsible management and control within the company.

5.3 Donations

The basic principles of our company management prohibit any gifts from customers and/or suppliers that could influence decisions.

5.4 Business partners

EM-Technik GmbH also expects its business partners to commit themselves to the principles of conduct. In particular, we attach great importance to complying with applicable laws, fighting corruption and protecting human rights and the environment.

By introducing a separate Code of Conduct for suppliers, EM-Technik GmbH also includes this in the principles of conduct. The company reserves the right, if necessary, to conduct supplier audits for review. Compliance with the code of conduct can be a selection criterion when establishing business relationships.

5.5 Foreign trade and export controls

The company undertakes to comply with the applicable foreign trade and export control laws. It complies with current tax and customs laws and attaches great importance to supporting anti-money laundering and anti-terror laws.

6 Avoidance of conflicts of interest

In order to carry out their tasks conscientiously, it is essential that our employees do not find themselves in a conflict of interest. The company understands conflict of interest to mean that private concerns are contrary to those of the company. These are to be avoided, and it is also forbidden to conclude contracts with close relatives or to act for EM-Technik GmbH as a supplier, customer or competitor. We assume that employees always put the interests of the company first when making a business decision. As soon as an employee is in such a situation, a superior must be informed immediately.

7 Responsible handling of company property

In order to ensure the optimum use of company resources, it is important to us that all company property is treated with sufficient care. This includes work equipment such as company cell phones or laptops, as well as the machines and tools needed in production. Damage to company property, causing unnecessary costs and the misuse of company property must be avoided.

In addition, the protection of intellectual property is particularly important to the organisation. We expect our employees to be extremely careful with internal information and knowledge about our technologies. The same applies to the intellectual property of our business partners, which EM-Technik GmbH treats with respect and also protects.

7.1 Private use of company property

The use of company property in private, such as company cars or company cell phones, must be done with the utmost care. Detailed regulations for the use of the company car can be found in the "Company Car Agreement".

7.2 Documentation of business transactions

The EM-Technik GmbH company and all its employees are equally responsible for correct and detailed accounting. For this, the complete recording of all business transactions plays a special role; only honest and complete information must be provided. Both management and outsiders must be in no doubt as to the correctness and accuracy of the accounts and all financial reporting.

8 Responsible handling of information

8.1 Data protection

The protection of all data is extremely important for the EM-Technik GmbH company. For this reason, the company already wrote a data protection notice for all employees in 2018. This includes the applicable guidelines of the General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG).

The receipt and acknowledgement of this data protection notice is confirmed by all employees by signing the employment contract and the guideline "Obligation to maintain confidentiality and to observe data protection".

The data protection regulations naturally also apply to the use of IK-uP! – Application. This form of internal corporate communication is used for a faster exchange of information, which of course must remain within the company. By agreeing to the terms of use, each employee undertakes to handle the application with care.

8.2 IT guidelines

Already with the signing of the employment contract, all employees of EM-Technik GmbH commit themselves to observe the "Guidelines for the use of data processing and communication systems at EM-Technik". The IT guideline regulates the use of business e-mail and the regulations for the use of computer equipment and cell phones.

8.3 Confidentiality agreement

When joining the company, all employees commit themselves to dutiful confidentiality and to maintaining company secrets. This includes information on the organisational structure, prices and markets as well as internal figures and technologies.

EM-Technik GmbH also undertakes to treat internal information about customers and business partners confidentially.

The guidelines for confidentiality in the EM-Technik GmbH are written down in detail in the information sheet "Declaration of commitment to confidentiality". This is handed out to every employee and with the signing of the contract every employee commits to its observance.

9 International context

9.1 International compliance

As an international company we also expect our foreign subsidiaries and international business partners to comply with the Code of Conduct.

9.2 Dealing with foreign suppliers

How to deal with foreign suppliers is described in detail in the Code of Conduct for suppliers.

10 Reporting office

In addition to the implementation of the Code of Conduct and the appointment of a Compliance Officer, a Compliance Reporting Office will be established so that EM-Technik GmbH can guarantee adherence to the compliance regulations. This can be found in the form of a mailbox in the passage between production and work preparation. In this way, we not only want to create transparency, but also be active as forerunners. The establishment of a Compliance Reporting Office will be mandatory for all companies with more than 50 employees as of 2021.

The organisation attaches great importance to the anonymity of whistleblowers and the confidential treatment of all reports. We commit ourselves to consider all incoming messages with seriousness and to treat them promptly.

The EM-Technik GmbH Compliance Reporting Office is administered by the Compliance Officer, who initiates appropriate legal, preventive or disciplinary steps if necessary.

In addition to the Code of Conduct laid down above, EM-Technik GmbH is also involved in the community outside the company. Corporate citizenship and thus social commitment, for example by supporting the youth centre or the basketball department of TSG Maxdorf, is also an integral part of our shared values.

By signing the employment contract, each employee undertakes to have read the Code of Conduct and to act in accordance with its guidelines.

Many thanks for your cooperation!

Midd Meier

Management

Maxdorf, 31.08.2020



Compliance Officer