

Code of Conduct*

*For the sake of simplicity and readability, the masculine form includes the feminine form.

Foreword:

As a global, family-owned business, the Magnet-Schultz Group (founded in 1912, now MSMgroup) holds a strong reputation among the public, and amongst its employees and business partners (customers and suppliers). We value integrity and maintain high standards of ethical, legal and regulation-compliant behaviour. With this Code of Conduct we acknowledge our responsibility to our business, social environment and employees. In addition we recognise the rules of conduct according to the ZVEI-VDMA Code of Conduct, which is equivalent to our own Code of Conduct.

1. Scope of Application / Objective

The MSMgroup has long had specific regulations and instructions in place, such as our Executive Rules (for managing employees, since 2003), our corporate values, social media guidelines, works agreements, etc. Since 1993, a Code of Conduct has been in place specifically for the shareholders, which places great value on ethical, economic and environmentally sustainable business behaviour, in compliance with the law and statutory regulations.

With these regulations, the MSMgroup has long maintained a good reputation and trust in the group companies and protected employees from potential risks and sanctions. This Code of Conduct applies to the entire MSMgroup and fulfils the formal requirements for certifications, audits and business partners. The Code of Conduct and the other rules mentioned do not create any rights for third parties.

The MSMgroup is confident of the quality and performance of its products as well as its long-established ethical business practices. We are committed to the rules of the market economy and fair competition. We expect the same from our business partners. We take care to comply with the principles of competition law, in particular not to enter into any kind of prohibited agreements.

2. Compliance with applicable Laws, ethical Behaviour and Social Standards

Applicable laws and regulations must be complied, even if this appears to be strategically or economically inappropriate or in the event of conflicting instructions from a manager. Every employee must act fairly, respectfully and in a trustworthy manner in all tasks and business relationships and uphold and promote the reputation of the MSMgroup.

Internationally recognised human rights, such as those set out in the United Nations Guiding Principles on Business and Human Rights or the ILO Core Labour Standards, shall be respected by our employees and business partners, in particular by private or public security forces.

Any form of unjustified discrimination, whether based on race, ethnic and social origin, nationality, age, religion, ideology, gender, sexual identity, marital status, disability, political and trade union activity or any other personal characteristic, is prohibited and will not be tolerated at the MSMgroup. The same applies to any form of harassment.

Employees' privacy, personal rights and the right to freedom of expression are protected.

The MSMgroup promotes fair working conditions and continuous health and safety at work through appropriate measures. Any form of child or forced labour is prohibited in accordance with ILO Conventions No. 138 and No. 29, as are working conditions or treatment that violate

(international) laws and customs. The amount of compensation is based at least on the applicable laws, which may vary locally.

3. Environment, Energy and Climate Protection

The MSMgroup is aware of the scarcity of natural resources and its responsibility towards future generations. For this reason, we use resources such as energy, air, water and raw materials responsibly and moderately, develop, and produce products with high resource efficiency and a long service life. Attention is paid to the reduction of waste, greenhouse gas and CO₂ emissions, effluents and pollutant emissions, and the reuse of raw materials and renewable energy is promoted.

The MSMgroup is committed to protecting land, forests and water and rejects unlawful evictions. The protection of soil quality and the reduction of harmful noise emissions are taken into account.

4. Dealing with Conflict Minerals

We take measures to avoid the use of conflict minerals in our products wherever possible in order to prevent human rights violations, corruption and the financing of armed groups or similar.

5. Protection of Assets and intellectual Property

Every employee must protect company assets from misuse and loss. Company assets may only be used for business purposes, unless personal use is expressly permitted. Each employee must also protect MSMgroup's intellectual property, such as patents, trademarks or know-how from attacks or loss. The intellectual property of others must be respected.

6. Corruption, Bribery

Corruption and bribery are rejected in all business dealings. We refrain from conducting business and achieving internal goals if this is linked to a violation of the law.

In particular, it is prohibited:

- to offer, promise or grant a personal, economic or other advantage to any domestic or foreign public official for the performance or omission of any official act
- to offer, promise or grant personal, economic or other advantages to employees or representatives of domestic or foreign companies
- to have acts of corruption / bribery carried out with the help of others, e.g. with the help of relatives, friends, dealers, consultants or intermediaries
- to support unlawful acts of other persons
- to demand or accept personal, economic or other benefits from business partners or their employees

Exceptions to this are gifts and invitations in the context of business relationships with business partners that are within the bounds of customary business hospitality, custom and courtesy, are appropriate in nature and scope and do not violate legal regulations.

Offering or accepting gifts of money is expressly prohibited.

7. Export Control

The MSMgroup complies with international and national regulations of foreign trade regulations, in particular customs and export control regulations and embargo regulations. Legally prohibited business activities with sanctioned persons, companies or organisations are prohibited.

8. Avoidance of Conflicts of Interest

The awarding of contracts to an internal or external related party (e.g. spouse, partner, relative and friend) or to a company in which a related party holds a key position, has a significant interest or acts as our negotiating partner must always be reported to the management in advance. Contract negotiations must be conducted in a neutral manner.

9. Donations and Sponsoring

Only limited donations are permitted and then only if the intentions of the recipients are recognisably "clean" and can be directly assessed by us. Our livelihood is derived from the sale of goods and services that are of "value" to our customers. We only support, to a limited and appropriate extent what is recognisably a deserving need in society.

10. Business Partner

The MSMgroup only works with reputable business partners who operate within the framework of legal regulations and do not use illegal financial resources. We expect our business partners to adhere to the principles of this Code of Conduct or to apply equivalent codes of conduct. If there is any doubt about the reliability of a potential business partner, appropriate information must be obtained prior to any collaboration. In cases of doubt, a co-operation will not take place.

11. Money Laundering

Every employee must comply with the laws against money laundering and report any suspicion of money laundering immediately.

12. Signing of Contracts etc.

In principle, contracts, agreements, etc. must be signed in accordance with the internal signature rules (generally dual control principle).

13. Data Protection and Information Security

For the MSMgroup, data protection has long been an expression of honest and fair behaviour towards employees and business partners. We ensure that the personal data of employees and all business partners is protected in accordance with legal requirements. In addition, the MSMgroup complies with the TISAX standards with regard to the availability, integrity and confidentiality of data.

Business secrets, inventions, other know-how and other company information must be treated confidentially and protected from disclosure to unauthorised persons. Employees who have access to sensitive data and information may not pass it on to third parties without authorisation or use it for purposes other than business purposes. Business documents and data carriers must be protected from unauthorised access by third parties. Personal data may only be collected, used and stored in accordance with the applicable data protection regulations.

14. Suspicion of Non-compliance with these Rules and Whistleblower System

If there is any suspicion of non-compliance with these rules, employees can contact the management, the commercial management, the HR management, the Data Protection Officer or information security officer in confidence. In addition, any employee also has the option of contacting a trusted person from the works council. These persons will then consider how the matter should be assessed and what actions should be taken.

The MSMgroup has set up a whistleblower system for internal and external reports of possible suspected cases and violations of this Code of Conduct, violations of applicable law or criminal offences. This is intended to limit the consequences of such violations and to prevent similar misconduct in the future. Reports can be made to the MSMgroup via the [MSM reporting portal](#).

15. Implementation of these Rules

The MSMgroup respects and values compliance with this Code of Conduct. All employees and business partners are obliged to follow and implement these rules. Actions that are incompatible with this Code must be corrected immediately. Violations will be subject to appropriate disciplinary measures, which may lead to termination of employment without notice and claims for damages.

Magnet-Schultz GmbH & Co.KG
In October 2024



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