

CODE OF CONDUCT

Eisenbeiss GmbH

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Code of conduct

Eisenbeiss GmbH

1. PRINCIPLES

Under the Eisenbeiss GmbH Code of Conduct all company employees must display the utmost integrity in all activities, both in business dealings with customers, suppliers and other partners and within the company with colleagues and line managers.

Faultless conduct forms the basis of our reputation and therefore also our commercial success. Eisenbeiss GmbH makes every effort to be a reliable partner and takes its corporate responsibility very seriously. Our Code of Conduct represents the principles on which all of our business relationships are based.

It should be seen as a set of guidelines for our employees. It provides guidance in a concise and clear format and supports the team so that they may carry out their work independently on behalf of the company. Compliance with the principles of the Code of Conduct forms the basis for legally, morally and ethically faultless conduct in all business situations.

1.1 Compliance with the Law and Rules and Regulations

All Eisenbeiss GmbH employees must, without exception, comply with the law and rules and regulations in their company-related activities. They must ensure compliance with applicable laws and other applicable national and international regulations as well as relevant internal company guidelines and rules.

Our company observes applicable legislation on human rights, labor law, protection of employees, protection of minors and the ban on forced and child labor, as well as competition and anti-trust law, the ban on corruption, and obligations regarding data protection.

Compliance with the law and rules and regulations also includes fiscal law and other official regulations. We ensure that all due taxes, duties and social security contributions, etc. are paid on time and comply with the principles of proper book-keeping and accounting. Furthermore, we also obtain the necessary regulatory approvals for all of our activities, e.g., for all import and export business. Eisenbeiss GmbH also expects its counterparts to comply with such laws and rules and regulations in all business relationships.

It is a company requirement that all of our employees familiarize themselves with the legislation applicable to their specific area of work by consulting the relevant documents from Quality Management. In the event of any uncertainties, the relevant line managers and/or competent professionals are available to offer advice. Our employees also receive regular internal training on legal regulations, guidelines and rules.

1.2 Respect, Diversity and Integrity

For Eisenbeiss GmbH, human rights, as laid down in the Charter of the United Nations and the European Convention on Human Rights, are fundamental values which must be taken into account and upheld in all company activities. We attach the utmost importance to human dignity, human rights including general personal rights and the right to privacy.

All employees must show mutual respect, recognition, appreciation and tolerance of each other, irrespective of gender, age, ethnic, national or social background, religion, ideology, sexual orientation, language, disability, political views and social or economic circumstances. Our company does not tolerate any form of discrimination and considers diversity amongst individual employees to be an asset. Diversity in our company is actively encouraged since the varied backgrounds of our employees increase creativity and mutual understanding, especially in terms of our international relationships.

This mutual respect also means that employees must refrain from any form of sexual harassment, such as inappropriate comments, gestures, advances or contact. Since it may be interpreted by someone else as sexual harassment, regardless of the intention in each case, employees are expected to refrain from such conduct at all times. The aforementioned principles apply both within the company and with regard to all external partners and we also expect our partners to comply with these principles in turn.

1.3 Social, Environmental and Economic Responsibility

Eisenbeiss GmbH is a socially, environmentally and economically responsible global company which is committed to sustainability and the protection of people and the environment.

Social responsibility

Eisenbeiss GmbH is a company whose activities are based on the extensive expertise of its team. Our results and success are founded on the commitment, skills and cooperation of all of our employees. The company strives to create a working environment which guarantees optimum development of individuals' potential. Our company also supports employee work/life balance with flexible working time models and flextime to accommodate a range of different circumstances, and enables employees to reconcile their family and career by

providing various additional services (e.g., our childcare offers during the summer).

Compliance with regulations on the protection of minors and the rejection of child and forced labor also form part of our indispensable basic principles. Eisenbeiss GmbH takes social responsibility very seriously, providing apprenticeships and internships as well as contracting for undergraduate and postgraduate students.

Eisenbeiss GmbH also expects its customers, suppliers and partners to show the same awareness toward social responsibility.

Environmental responsibility

Sustainability and environmental management are the essential building blocks of environmental responsibility at our company. Eisenbeiss GmbH ensures compliance with legal environmental protection standards and strives to minimize environmental impacts and to continually improve the company's environmental protection measures.

We aim to procure and use any resources required to provide our products and services in a responsible manner and to use energy, water and raw materials sparingly. Environmental responsibility also encompasses proper environmentally-friendly waste disposal, waste separation and delivery of waste to the various recycling or recovery channels.

Economic responsibility

The economical, appropriate, sustainable and frugal use of the means and resources that we obtain form the essential building blocks of our company's economic responsibility.

Business decisions at Eisenbeiss GmbH are made exclusively based on comprehensible, factual and economic arguments.

Eisenbeiss GmbH employs a results-focused approach and uses synergies wherever possible. Long-term, strategic thinking enables us to improve the company's performance potential and secure it from an economic perspective.

Eisenbeiss GmbH is committed to fair and impartial competition in compliance with legal provisions and standards. Orders are placed based on the best and lowest bidder principle, employing an appropriate performance/price ratio.

1.4 Health, Safety and Security

Eisenbeiss GmbH operates in many highly sensitive areas of life and business within modern society. We support our clients with knowledge and technology and ensure that products and

services meet current health and safety, environmental and quality guidelines.

As a matter of course we also pay careful attention within our own company to ensure that the working environment is free from danger and hazards. We ensure strict compliance with the laws and regulations on health and safety in the workplace and conduct regular checks to that end.

Our site has a medical service to safeguard the occupational health of our employees.

2. BUSINESS CONDUCT

2.1 Competition

Transparent, fair conduct in the marketplace is in everyone's interest. In order for us to maintain our own image as a reliable and responsible partner, Eisenbeiss GmbH employees are obliged to comply with rules on fair competition and firmly stand up against any illegal attempts to influence the market or restrict free competition and any breaches of competition and antitrust law.

This includes the principle that the interests of the company must be kept strictly separate from the personal interests of employees involved in all business matters. In particular, Eisenbeiss GmbH stipulates that the following guidelines must be observed in terms of conduct with regard to corporate competition:

- Unfair commercial practices, such as exerting direct or indirect pressure over customers, suppliers or other partners, are forbidden
- Exchanging information with competitors, for example about prices, conditions, capacity, costs or similar confidential data, is forbidden
- Industrial espionage is forbidden
- Distributing information which is known to be incorrect (e.g., via competitors) is forbidden

All of these guidelines also apply in full to work carried out in and on national or international associations, committees, lobby groups and similar bodies.

2.2 Corruption and the Acceptance of Benefits

Eisenbeiss GmbH employees are obliged to firmly stand up against any form of corruption, bribery and acceptance of benefits. They are strictly forbidden from directly or indirectly accepting or offering money, non-monetary benefits (e.g., invitations) or other benefits (e.g., purchasing opportunities with

special conditions) in order to influence business processes (e.g., in connection with the award and/or preparation and handling of contracts and the acquisition and execution of projects). Any activities or statements that could cast doubt over this approach are forbidden.

Eisenbeiss GmbH also expects its counterpart in each case to clearly refrain from corruption and bribery and any such related behavior.

2.3 Conflicts of Interest

As part of their work, Eisenbeiss GmbH employees may find that their economic or other personal interests conflict with the interests of the company.

In order to minimize the risk of such conflicts of interest, all company employees are obliged to report any existing or potential conflict of interest to their line manager or other relevant focal point when it arises and/or is foreseeable. Conflicts of interest may arise on account of the following circumstances, inter alia:

- Secondary employment
- Involvement of a team member in the company of a customer, supplier or partner or a rival company of Eisenbeiss GmbH
- Involvement of a relative or other person with close connections to an employee in any of the examples mentioned above
- Relative or other person with close connections to an employee who is authorized to make a decision or able to influence a decision as a representative of the opposite party in commercial transactions

Where appropriate, Eisenbeiss GmbH will find suitable measures in cooperation with the individual(s) concerned in order to avoid or rectify conflicts of interest for all those involved.

3. HANDLING OF INFORMATION

3.1 Confidentiality and Non-disclosure

As part of its certifications, Eisenbeiss GmbH must give special consideration to confidentiality and non-disclosure. All employees are obliged to conduct themselves appropriately with regard to all commercial information which they come across as part of their professional work, irrespective of the actual source of the information. In this context, information is understood to mean project, company and/or group-related

data of any kind (in particular research and development and know-how) but also concerning the company's strategies, targets and investments.

An appropriate declaration of commitment forms part of the employment contract.

Where information needs to be disclosed for business purposes, Eisenbeiss GmbH ensures that extreme care is taken to keep the group of individuals involved as small as possible.

The protection of information (data or know-how) is a top priority for Eisenbeiss GmbH, irrespective of the existence of registered industrial property rights or other intellectual property rights. This also applies in particular to know-how and intellectual property rights and hence the sphere of ownership of customers, suppliers and partners. Eisenbeiss GmbH requires its counterparts to take the same cautious approach to confidentiality and non-disclosure.

In addition to their confidentiality and non-disclosure obligations, Eisenbeiss GmbH employees are also expressly forbidden from personally benefiting from information which they obtain as part of their professional work and from using that information for the interests of third parties.

3.2 Data Security

Eisenbeiss GmbH employees are obliged to protect company-related documents of all kinds (texts, drawings, plans, images, etc.) from being accessed by unauthorized third parties, whether hardcopies (originals or copies) or electronic files. When using IT systems, suitable security measures are taken (e.g., passwords, licensed software, technology released exclusively for internal use) in order to ensure that the saved data is protected. Our company's IT maintains high security standards using state-of-the-art technology.

Should documents (hardcopies or electronic files) be taken off company premises for business purposes (e.g., for meetings), all necessary measures are taken to ensure that unauthorized individuals cannot access the documents and that the data (e.g., personal data) cannot be lost or stolen.

3.3 Data Protection

Eisenbeiss GmbH is wholeheartedly committed to complying with the Data Protection Act (DSG 2000 in its current applicable format) and to implementing the the General Data Protection Regulation (Regulation EU 2016/679, as amended). Work with and disclosure of personal data, both within the company and in cooperation with external parties, is permitted solely within the confines of the law. Personal data is only ever obtained, processed and used for clearly defined purposes and solely where necessary in relation to those purposes. Any data obtained is stored securely and transferred exclusively in accordance with the necessary precautionary measures (e.g., when it needs to be sent out).

Our data applications are transparent for all parties concerned, and their rights (right to information and right of objection, as well as the right to block or delete the data) are protected to the extent permitted by law. Our respect for individuals' privacy requires us to handle personal data conscientiously. The right to informational self-determination is protected under all circumstances, both in terms of our partners and our own team.

3.4 Communications

Eisenbeiss GmbH works closely with customers, suppliers and other partners. Trust and professionalism play an essential role in this. Swift, comprehensive and open communication is of utmost importance here. Our employees react quickly to queries and information from customers, suppliers and other partners either by providing them with an immediate response or by confirming receipt and processing it at a later date or forwarding it to the relevant person(s). Our team also keeps customers, suppliers and partners informed in long-term projects with regular status updates. They immediately report any delays, whether foreseeable or not.

3.5 IT Usage

When using IT, all of our employees strive to minimize risks by complying with the company's internal IT guidelines and security regulations. All IT devices must be appropriately stored and password-protected. Only essential data should be carried on business trips. In the event that an employee stands in for another employee, clear rules are followed and documented. In the event that company data or data belonging to a partner is lost or stolen, line managers or other responsible persons are immediately informed, who subsequently take further measures (e.g., blocking passwords, informing the partner concerned, etc.).

4. QUALITY

The quality of our work is assured by certifications that are subject to ongoing, strict monitoring by national agencies. The key element in terms of quality assurance within the company is the extensive set of rules in place for our quality management system. It covers and regulates all major work process and procedures.

Eisenbeiss GmbH employees carry great responsibility as the quality and reliability of our work has a direct impact on people, the environment and other companies.

In order to live up to these high standards, we adhere to the following quality principles:

- We strive to understand our clients' current and future requirements and to meet their needs and exceed their expectations wherever possible.

- Our senior managers create and maintain an internal environment in which our employees can apply themselves and their skills to benefit the company and ensure that the company's targets are achieved.
- The constant improvement of the company's overall performance represents one of our permanent goals.

5. ETHICS IN RESEARCH AND DEVELOPMENT

One of Eisenbeiss GmbH's core activities is research and development for maintaining the quality standards of our range of services and for tailor-made solutions for our clients and partners. We are therefore committed to the highest standards in terms of research ethics.

Honesty in all aspects of research, accountability in the conduct of research, professional courtesy and fairness in working with others, and good stewardship of research on behalf of others are the principles behind good scientific practice.

6. OUR EXPECTATIONS OF OUR PARTNERS

Eisenbeiss GmbH is committed to adhering to the various points contained in this Code of Conduct in order to ensure corporate governance in accordance with the law, giving consideration to the ethical, moral, environmental and economic obligations of modern entrepreneurship. We also expect all of our customers, suppliers and other partners to behave in the same way.

They must abide by the following and other basic principles when working with Eisenbeiss GmbH:

- Compliance with the law and rules and regulations
- Rejection of corruption
- Fair competition
- Respect for human rights
- Ban on forced and child labor
- Safeguarding of health and employment protection
- Data protection and security
- Confidentiality and non-disclosure
- Environmental protection and sustainability

7. GENERAL REMARKS

This Code of Conduct provides an overview of our guidelines for proper business conduct. However, it may not always be sufficient for specific, individual cases. Eisenbeiss GmbH employees must therefore always contact their line manager or management for support if they have any questions, problems or doubts.