

CODE OF CONDUCT

MACCON GmbH & Co. KG



MACCON GmbH & Co. KG
Sitz der Gesellschaft / Registered in: München, HRA No. 114483
Geschäftsführerin / Directorship: MACCON Verwaltungs GmbH
Dr. Edward Hopper, Thomas Müller, Eric Marchal

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Code of Conduct

With the development of a Code of Conduct MACCON GmbH & Co. KG fulfills its social responsibility. We expect each of our employees to feel personally responsible for complying with this corporate code and to support their colleagues in adhering to it. The principles described below represent minimum standards. They do not restrict any further country-specific formulations in accordance with the respective cultural conditions. In line with the United Nations Global Compact, we are committed to supporting the fundamental values of **Human Rights, Labor Standards, Prevention of Corruption** and **Environmental Responsibility** and to complying with them within our sphere of influence. The management bears responsibility for the implementation of these principles. We also expect our business partners and suppliers to act in accordance with equivalent principles. The German language version of the code of conduct shall prevail in all respects and in the event of any inconsistency with the translated English version

Human Rights

MACCON GmbH & Co. KG supports the contents of the "Universal Declaration of Human Rights" of the UN General Assembly and is committed to respect and protect them as far as we can influence them. Decisive for the protection of the interests of each individual employee (m/f/d), we recognize the core labor standards of the ILO ("International Labour Organization" of the United Nations) as a maxim for orientation and action.

The following areas are included, among others: Prohibition of forced or compulsory labor; Prohibition of child labor; Freedom of association and right to collective bargaining within the limits of the law; Equality of remuneration of male, female and other workers for work of equal value; Prohibition of discrimination in respect of employment and occupation.

Equal Opportunity, Discrimination and Harassment

Any form of discrimination or harassment based on gender, race, color, religion, age, national origin, disability or sexual orientation, will not be tolerated. MACCON GmbH & Co. KG values equal opportunity in all aspects without exception. As a company, we are obligated to ensure that our employees are provided with a work environment that is free from physical, psychological, and verbal harassment or any other form of abusive behavior.

Labor Standards

Remuneration and working hours

We recognize the entitlement of our employees to appropriate remuneration. MACCON complies with the applicable regulations on working hours.

Health protection and occupational safety

We take responsibility for providing our employees with a safe and healthy working environment that meets or exceeds the relevant standards for workplace safety and health. By taking appropriate measures, we aim to prevent workplace-related injuries and occupational illnesses. Our company physician and an occupational safety specialist are available for this purpose.

Employee development

We regard the development of our employees as an essential investment in the future of our company and job security. In addition to the development of professional skills, we also pay attention to the development of social and methodological skills. Employee appraisals and periodic feedback meetings are firmly established in our company.

Preservation of identity and protection against retaliation

We firmly believe that only an open corporate culture can achieve sustainable success. In case of doubt about the fulfillment of the above-mentioned obligations and in order to avoid improper activities, we encourage our employees to contact the management. MACCON GmbH & Co. KG assures to

protect all employees who submit a report from any adverse action within the company.

Privacy

It is in the economic interest of MACCON GmbH & Co. KG that company-internal data and information, confidential information of our business partners and company-specific knowledge are protected and that the valid data protection laws including the EU data protection regulation are observed. Likewise, MACCON GmbH & Co. KG to handle confidential and personal data responsibly and to protect it from misuse. The employees are obliged to comply with the data protection regulations and to contribute to the protection of confidential data against unauthorized access.

Corruption Prevention and Conflicts of interest

Bribery and Money Laundering

MACCON GmbH & Co. KG will at no time carry out or tolerate corruption, extortion, embezzlement or bribery in any form and expects the same from all business partners and third parties. MACCON GmbH & Co. KG also expects its business partners to comply with all applicable laws to prevent money laundering and not to participate in any money laundering activities.

Conflicts of interest, handling of gifts and invitations

Our company is obligated to implement policies aimed at avoiding any conflicts of interest or situations that may lead to potential conflicts of interest. Additionally, we undertake not to accept or make any gifts that could lead to a conflict of interest. Gifts and gratuities that grant or hold out the prospect of unwarranted benefits may not be accepted or offered by any employee at any time.

Environmental Responsibility & other laws

Environment

The responsible treatment of the environment is part of the self-image of MACCON GmbH & Co. KG.

MACCON GmbH & Co. KG commits itself to comply with existing national and international environmental

laws and regulations as well as official regulations. Beyond the requirements of existing environmental laws and regulations, we are constantly working to reduce the negative environmental impact of our products and business activities. When it comes to consumables and purchases, we rely on regional products wherever possible under similar conditions and without increased expense, in order to maintain value creation and prosperity here. The continuous improvement of our environmental performance and resource efficiency is the result of responsible handling and careful use of energy, water and other resources. High-quality products, technologically sophisticated solutions and close personal ties between our company and business partners contribute to the satisfaction of all involved.

REACH, RoHS and conflict materials

MACCON GmbH & Co. KG pays special attention to the compliance with laws, regulations, directives and standards of its products. Therefore, it is important for MACCON GmbH & Co. KG that the suppliers know the applicable legal requirements regarding conflict minerals as well as REACH, RoHS, and ensure their compliance. However, in order to be able to provide the complete information regarding compliance, we are dependent on our suppliers.

Foreign trade and export control

National and international laws apply to the trade of goods, products and services. MACCON GmbH & Co. KG complies with any applicable foreign trade and customs regulations when selling or purchasing goods, products or services across borders. All imports and exports are to be cleared properly and transparently.

Sanctions and Supply Chain Integrity

In alignment with sanctions imposed by the United Nations (UN), the European Union (EU), and similar organizations, MACCON commits to adhering to these restrictions and requirements to the best of its knowledge and ability. When selecting business partners, MACCON strives to choose those who operate in accordance with equivalent principles. However, it should be noted that due to the complexity and structure of the supplier and subcontractor chain, maintaining complete oversight of our supply chain at a 100% level and providing a corresponding statement is regrettably not feasible in

all instances. Nevertheless, our dedication to transparency and compliance remains unwavering.

Competition and anti-trust law

Anti-competitive agreements with our business partners and agreements that violate antitrust law will not be tolerated.

Diligence Obligations in Supply Chains

Currently, our company is not legally obligated to comply with the Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz - LkSG). However, we recognize the value and importance of responsible supply chain management. We voluntarily commit to monitoring our supply chain, taking into account our capacities, and ensuring that our partners and suppliers adhere to the fundamental principles of human rights, labor standards, environmental protection, and ethics. Through transparent communication, regular assessments, and the promotion of responsible business practices, we aim to ensure that our supply chain meets the highest standards of sustainability, social responsibility, and environmental consciousness.

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Aschauerstr. 21
81549 Munich
Germany

www.maccon.com

