

1 Preamble

People and the environment are of the utmost importance to the PFINDER Group. Because of this, the PFINDER Group works to improve health and well-being of people and the environments in which they live. The PFINDER Group expects its employees to do the same. Therefore, employees of PFINDER Group companies must comply with certain minimum standards in the areas of human rights, working conditions, and environmental specifications.

This Code of Conduct describes general behavioral guidelines, and it specifies the legal requirements. Legally compliant and responsible behavior must be regarded as a self-evident necessity. The Code of Conduct specifies the relevant legal and ethical requirements that apply to the conduct of PFINDER Group employees during the performance of their duties.

The Code of Conduct applies to all PFINDER Group companies (all group companies are jointly referred to in the following, and each company is individually referred to as “**PFINDER**”). Additional country-specific rules of conduct for the individual companies in the PFINDER Group may be specified as an Appendix to this Code of Conduct.

2 Basic values and minimum standards

The companies of the PFINDER Group and their employees are obligated to comply with the following human rights and environmental specifications (hereinafter referred to as the “**minimum standards**”) in their companies:

- | Prohibition against employing a child under the age at which compulsory education ends according to the law of the place of employment, whereby the minimum employment age of 15 must be complied with; if the law of the place of employment permits children to be employed at a lower minimum age in accordance with Convention no. 138 of the International Labour Organization (BGBl. 1976 II p. 201, 202), then this minimum age applies;
- | prohibition against the worst forms of child labor for children under 18 years of age, including, in accordance with Article 3 of convention no. 182 of the International Labour Organization (BGBl. 2001 II p. 1290, 1291) in particular the following forms of child labor: (i) all forms of slavery or similar practices, such as the sale of children and child trafficking, (ii) using, selling or offering a child for prostitution, (iii) using, selling, or offering a child for unlawful activities such as drug trafficking and (iv) work which is likely to be harmful to the health, safety or moral decency of children due to its nature or due to the circumstances under which it is performed;
- | prohibition against forced labor, including any work or services that a person is required to perform under the threat of punishment and which they have not voluntarily agreed to perform; work or services conforming to Art. 2 para. 2 of convention no. 29 of the International Labour Organization (BGBl. 1956 II p. 640, 641) or Art. 8 b and c of the International Package of 19 December 1966 regarding civil and political rights (BGBl. 1973 II p. 1533, 1534) are excepted from the definition of forced labor;
- | prohibition against all forms of slavery, similar practices, servitude or other forms of exercising power or oppression in a work environment, for instance through extreme economic or sexual exploitation or degradation;
- | prohibition against failing to fulfill occupational safety obligations under the law of the place of employment, if this results in a risk of accidents at work or work-related health hazards;
- | prohibition against failing to grant the freedom of assembly, according to which (i) employees can freely assemble to form or join trade unions, (ii) founding, joining or being a member of a trade union may not be used as justification for illegitimate discrimination or retaliatory measures, and (iii) trade unions may act freely and in accordance with the law of the place of employment; this includes the right to strike and the right to engage in collective negotiations/ (such as collective bargaining agreements);

- | prohibition against unequal treatment with respect to employment, for instance due to national or ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or worldview, if this is not justified by the requirements of the employment; unequal treatment includes, in particular, paying unequal wages for equivalent work;
- | prohibition against withholding a reasonable wage; a reasonable wage is at least the minimum wage stipulated by law, and is otherwise determined by the law of the place of employment;
- | prohibition against causing harmful soil changes, water pollution, air pollution, harmful noise emissions or excessive water consumption that (i) significantly impacts the natural resources necessary for maintaining and producing food, (ii) denies any person access to safe drinking water, (iii) makes it more difficult or impossible for persons to access sanitary facilities or (iv) harms the health of any person;
- | prohibition against illegal forced eviction and prohibition against illegal removal of land, forests and waterways upon the purchase, development or other use of land, forests and waterways that are used to secure the livelihood of any person;
- | prohibition against commissioning or using private or public security forces in order to protect the company's project if a lack of instruction or control by the company when using the security forces results in (i) a failure to observe the prohibition against torture and cruel, inhumane or degrading treatment, (ii) injuries to life or body or (iii) a violation of the freedom of assembly and freedom of association;
- | prohibition against manufacturing products using mercury according to Art. 4 para. 2 and Annex A part I of the Minamata convention of October 10th, 2013 (BGBl. 2017 II p. 610, 611), the prohibition against using mercury and mercury compounds in manufacturing processes in the sense of Art. 5 para. 2 and Annex B part I of the Minamata convention from the exit date stipulated in the convention for the corresponding products and processes; the prohibition against handling mercury waste in violation of Art. 11 para. 3 of the Minamata convention;
- | prohibition against the production and use of chemicals according to Art. 3 para. 1 a) and Annex A to the Stockholm convention of May 23rd 2001 (BGBl. 2002 II p. 803, 804, hereinafter referred to as the "POPs convention") and the prohibition against non environmentally-safe handling, collection, storage and disposal of waste materials according to the regulations that apply in the applicable legal ordinance pursuant to Art. 6 para. 1 d) clause i) and ii) of the POPs convention;
- | prohibition against exporting hazardous wastes in the sense of Art. 1 para. 1 and other wastes in the sense of Art. 1 para. 2 of the Basel convention of March 22nd, 1989 (BGBl. 1994 II p. 2703, 2704) (Basel Convention),
 - to a contractual party of the convention that has prohibited the import of such hazardous and other waste materials (Art. 4 para. 1 letter b of the Basel Convention),
 - to an importing country in the sense of Art. 2 no. 11 of the Basel Convention that has not granted its written consent to the import in question, if this importing country has not prohibited the import of these hazardous wastes (Art. 4 para. 1 letter c of the Basel Convention),
 - to a state that is not a contractual party of the Basel Convention (Art. 4, para. 5 of the Basel Convention),
 - to an importing country if such hazardous wastes or other wastes are not handled in an environmentally-friendly manner in this state or in some other location (Art. 4 para. 8 clause 1 of the Basel Convention);
- | prohibition against exporting hazardous wastes from the states listed in Annex VII of the Basel Convention to states that are not listed in Annex VII (Art. 4A of the Basel Convention, Art. 36 of regulation (EC) no. 1013/2006);
- | prohibition against importing hazardous wastes and other wastes from a country that is not a party to the Basel Convention (Art. 4 para. 5 of the Basel Convention).

In the following sections, this Code of Conduct regulates further obligations applicable to employees that go beyond these minimum standards. In particular, employees are also obligated to comply with the following general rules and principles:

- | Due respect and regard for human dignity and the upholding of human rights
- | Prohibition of any use of physical or psychological violence in the workplace
- | Prohibition of discrimination or mobbing based on a person's religion, origins, skin color, nationality, age, handicap(s), civil status, gender, sexual orientation, political views, or membership of a trade union
- | Implementation of equal opportunities
- | Compliance with the relevant requirements relating to environmental protection and the conserving of resources
- | Compliance with the relevant requirements relating to occupational health and safety (including working hours)
- | Compliance with relevant data protection requirements
- | Prohibition of the processing of conflict resources

PFINDER offers its employees training sessions on compliance with the minimum standards listed in the relevant business areas.

PFINDER is entitled to review at any time whether employees are complying with the minimum standards indicated.

If PFINDER determines that an employee is violating the minimum standards, PFINDER can require that the employee promptly end their violation, and can take disciplinary measures under labor law.

3 Legal regulations

Employees of PFINDER must comply with the law of applicable legal regulations. Furthermore, all employees are required to inform themselves regarding the legal regulations applicable to their area of responsibility within the company.

4 Fair competition

Fair competition is the cornerstone of our business strategy. Our employees must accordingly comply with the respective applicable competition rules. For example, the following are forbidden:

- | Collusive practices among competitors which lead to the prevention or the restricting of competition
- | Formal or informal agreements between customers and suppliers, such as exclusivity arrangements, specific most-favored customer clauses, exclusive supply contracts etc.
- | Non-competition clauses
- | Abuse of a dominant market position.

If there is a suspicion that agreements contravene relevant principles of anti-trust law, the management must be informed, and it may then take legal advice to ensure the legality of its decisions.

5 Export controlling and economic sanctions

All local and international trade regulations and import and export controlling laws associated with our international business transactions are complied with and updated regularly. This includes all economic sanctions.

6 Protection against counterfeiting

Marketed products are inspected for potential counterfeiting in project-specific benchmark and regular market analyses. Brand and patent protection are monitored both by external experts and by a separate department at the same time.

7 Anti-corruption and money laundering

We do not tolerate corruption or money laundering.

We choose our business partners carefully. All business partners must be treated fairly. Decision-making processes may only be influenced by factual considerations.

Employees of other companies in Germany or abroad must not be promised or granted any personal benefits in return for giving preferential treatment to our company.

No office holder in Germany or abroad may be offered or granted any personal benefit of any kind.

The offering, provision, demanding or accepting of sums of money is generally forbidden. Exceptions to this rule include occasional gifts, business entertainment, or other low-value allowances which are customary in business practice and in relation to which there is no possibility of it/them exerting any influence over a business decision or a decision by an authority.

Breaches of these provisions constitute criminal offenses which may result in prosecution in Germany even if they have been committed abroad.

8 Internal cooperation

Quality, occupational health and safety, and environmental protection

PFINDER Group companies ensure safe working conditions throughout the world. All employees are obliged to comply with all the relevant legal regulations and standards relating to environmental protection and occupational health and safety.

The reduction and avoidance of negative environmental impacts is a key priority. That is why we painstakingly analyze, plan and manage our processes with the aim of avoiding any environmental damage. We minimize the risks through the use of technical and organizational protective measures, as well as measures for specific personnel.

Through our continual and ongoing development of environmentally sound products and production procedures as well as our recommendations for the resource-efficient optimization of product applications (digital engineering), we make a positive contribution to sustainable development in our own company as well as in our customers' businesses. We reduce the carbon footprint, amounts of waste materials and environmentally harmful waste that are produced, and we consequently avoid wasting valuable resources.

Within their areas of responsibility all managers and employees are responsible for ensuring the quality of our products and services, for avoiding health risks, and for complying with the applicable occupational safety and environmental protection rules and regulations. They must therefore follow the instructions which are derived from the legal regulations and relevant standards as well as applicable customer-specific requirements, and they must take them into account in their work.

Ethical recruiting

New personnel must be recruited and selected based on ethical principles, meaning that applicants must be evaluated without discrimination or bias. The overall hiring process is designed to ensure that employees are hired in a fair, transparent and performance-based manner.

Protection of minorities and indigenous populations

The rights of minorities and indigenous populations must be upheld. Unequal treatment due to being part of a minority or indigenous population is prohibited, if this is not justified by the requirements of employment; unequal treatment includes, in particular, paying unequal wages for equivalent work.

Financial responsibility

PFINDER Group companies and their employees observe the highest standards of honesty. It is essential that internal and external reports and documents that are to be prepared or published by PFINDER Group companies or provided by PFINDER Group companies to the authorities be complete, appropriate, precise, up-to-date and easy to understand representations. In addition, precise records and reports regarding financial information are essential for making responsible business decisions. All financial records, files and accounts must accurately reflect transactions and events and must conform to generally recognized accounting guidelines and the internal controlling system of PFINDER Group companies. If employees are uncertain, they must contact the general management of the PFINDER Group company in question. Part of the obligation to behave in an honest manner is ensuring that all financial transactions of PFINDER Group companies are legal and carried out for the declared purpose as authorized by the PFINDER Group companies.

Business secrets

Business secrets must be treated as being confidential, and the same applies to confidential information which business partners or customers may have an interest in. It is prohibited to pass such information on to third parties in any form or by any means, or to make any other use of it other than for the purposes of the business. This obligation also remains in force after the termination of the employment relationship.

Conflicts of interests and private activities

We expect our employees to show loyalty to the PFINDER Group. Situations in which the private or financial interests of an employee might conflict with those of the company must be avoided.

Private activities in clubs, (political) parties or other social institutions must not in any way hinder an employee's fulfillment of his/her tasks within the company.

9 Whistleblower system: Notifications of abuses and protection against retaliation

We have established a whistleblower portal in order to pursue tips regarding violations that represent a high risk to PFINDER, our employees and our business partners in a fair and appropriate manner: <https://pfinder.dip-hinweisgeberportal.de>. There, employees can report tips on specific or potential legal violations. Business partners, customers, and other third parties can also submit concrete evidence of regulatory violations through the whistleblower portal. Whistleblowers who report potential violations based on concrete evidence are protected by the company.

10 Miscellaneous

No granting of rights under this Code of Conduct

This Code of Conduct regulates the obligations of PFINDER and its employees. However, this Code of Conduct does not grant employees any rights against the companies of the PFINDER Group.

Communication of the Code of Conduct

The management bodies of PFINDER companies are obliged to make all their employees aware of the Code of Conduct. The Code of Conduct forms part of the employment contract, and it is handed to all employees when they are appointed. The management bodies of PFINDER companies will take these rules of conduct into account when providing employee training. The respective currently applicable version of the Code of Conduct is published in PIA (the PFINDER Intranet Application). Updates are made available in PIA and are displayed on notice boards.

11 Entry into force

This guideline comes into effect on October 1, 2023, and remains valid until further notice. The management reserves the right to make additional changes.