

# HOW WEACT

### Code of Conduct of the Mühlbauer Technology Group





#### Dear employees,

Do we really need a Code of Conduct? Of course, we have to abide by the law at all times, but isn't it sufficient to remember what our parents and grandparents taught us when it comes to fair and proper conduct?

It is precisely because we all have different cultural backgrounds and because this Code transcends German borders that it was important for us to set out our values and principles in writing. This allows us to refer to the Code without having to rely on unwritten rules.

A further point to note is that things are written down in the Code that we rarely deal with or where societal views have changed over time, as demonstrated by data protection or donations to lobbyists.

Together, we bear responsibility for the reputation and success of our company. Each and every one of us has a crucial role to play. By adhering to this Code, we lay the groundwork for trust-based co-operation and strengthen the companies of the Mühlbauer Technology Group for the challenges of the future.

We thank you all for your commitment!

Unger Susanne Stegen 6. tas



# OUR CODE OF CONDUCT:

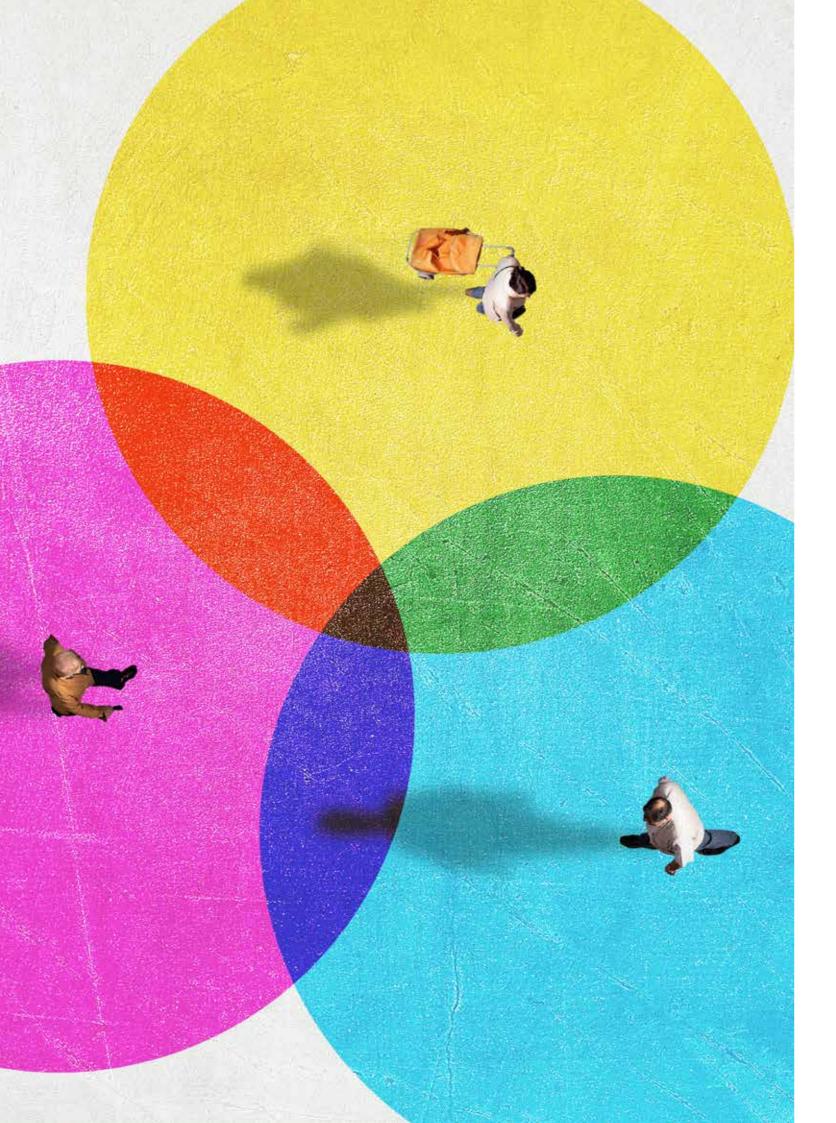
### Guidance, duty and commitment to our values

This Code of Conduct is a voluntary commitment to observe proper standards of conduct within the company. It describes the principles forming the basis of our decisions and actions.

This document applies to all employees and management. It should be used as a guide for your own actions in the workplace and outlines how we strive for fair and sustainable business practices.

These guidelines, which build upon our core values, support us in fulfilling our ethical obligations to our customers, our employees, our industry and the global community.





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# THE PRINCIPLE BEHIND OUR ACTIONS

### All of us together

Everyone within the Mühlbauer Technology Group helps to uphold our good reputation as a reliable and innovative family business and to ensure the continued prosperity of the company.

#### Fair, respectful, diverse

We act on the premise that everyone has the right to just, dignified and respectful treatment and we therefore respect the human rights, personal rights and dignity of our employees and all third parties. We are committed to diversity, inclusion and equal opportunity. Sexual harassment, discrimination, racism, bullying and abuse of power will not be tolerated under any circumstances.

### **Determined, independent, future-focused**

We consider ourselves a reliable company that faces the competition with optimism and values determination, decisiveness and ethical conduct. The independence of the family business should be ensured for the long term. One of our key strengths is being able to make our own decisions about the future.

# WE ARE RELIABLE

### **1. Compliance with legislation** and guidelines

We comply with the applicable legal and corporate provisions relating to our work. We take all information about possible violations seriously. If any are discovered, we will immediately take steps to rectify the situation and draw the appropriate conclusions from them. Furthermore, we continuously and carefully check which corporate practice should be applied in order to manage the company responsibly.

Regional codes and guidelines within the company also apply, insofar as they do not contradict the basic principles below.



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### WE PRACTISE **RESPECT**

### 2. Personal interaction and working conditions

We are committed to ensuring a safe and pleasant working environment, in which trust, teamwork, diversity and accountability, as well as fair and respectful personal interactions, are valued and practised. We support and respect the protection of international human rights in accordance with the United Nations Universal Declaration of Human Rights and ensure that we comply with it.

#### a. Personal rights and privacy

We respect and protect the personal dignity, personal rights and privacy, including the personal data, of every individual.

#### b. Health and safety

We comply with the applicable legislation and rules for occupational health and safety in the workplace and provide a healthy and safe work environment for our employees. We undertake various efforts to continuously improve the

occupational health and safety of the employees. In order to minimise the risks to our employees, we are committed to taking suitable preventative measures against accidents and occupational illnesses.

#### c. Ban on discrimination and protection against harassment

We are focused on equal opportunities and equal treatment of our employees. We offer all employees the same professional opportunities and do not tolerate discrimination or harassment of any kind. All employees must respect the privacy of their fellow employees. Sexual harassment and bullying will not be tolerated.

#### d. Collaboration

We take a solution-oriented approach, treat one another equally and empathetically and acknowledge individual performance in our collaboration. We behave in a cooperative manner and have a mutual understanding for personal crises.

Employees in management positions encourage the potential of their employees, communicate the distribution of tasks clearly, are approachable and regularly give feedback.

#### e. Expressing opinions

We encourage one another to share and communicate freely without the fear of negative consequences. Anyone expressing legitimate concerns about the business processes should not experience any adversity as a result. Attempts at intimidation and reprisals against employees who report actual or suspected misbehaviour, in good faith and with honest intentions, will not be tolerated. Deliberate false accusations are also a violation and will be subject to appropriate disciplinary action.

#### f. Ban on child labour and forced labour

We respect the ban on child labour in accordance with the "International Labour Organisation (ILO) Standards". No one should be employed against their will or forced to work. This also applies to forced labour, human trafficking and all forms of modern

slavery at our company and along the value chain.

#### g. Appearance in public

We represent the company. We promote the positive public image, the good reputation and thus the success of the company with our responsible and respectful conduct.

#### h. Pay and working hours

We respect the applicable legislation and provisions on remuneration and ensure that employees are paid appropriately. We comply with the applicable protection provisions and regulations on working hours around the world. We ensure that employees can at any time terminate their employment relationship whilst complying with the contractually agreed notice period.



### WE PUT **PEOPLE** FIRST

### 3. Work-life balance

As a family business, we aspire to implement a family and health-conscious personnel policy. This is why we offer different working arrangements and make it possible to perform part of the working hours as mobile working in the departments where this is possible to implement. The employer offers the relevant employees the opportunity to avail of a free advice service in order to reconcile their work and private life.

# WE PROTECT OUR FUNDAMENTAL PRINCIPLES

### 4. Protection of company property/secrecy

We use company property exclusively for business purposes, unless otherwise agreed in the individual case. We protect the property of the company from loss, theft or misuse. We maintain secrecy regarding all business and trade secrets both for the duration of the employment relationship and after it has ended.

We undertake to prevent any use or sharing of data that is not consistent with the purpose of the business activity and to behave in accordance with the data protection guidelines of the Mühlbauer Technology Group.

If the data protection guideline is violated or in the case of violations of data protection, in particular of personal data, we undertake to report such violations immediately to the Data Protection Officer or the body responsible for this in the company.

# WE ARE **INCORRUPTIBLE**

### 5. Ban on corruption and bribery

We reject any form of corruption, including extortion and bribery. This applies to individuals and companies as well as authorities and other institutions. We do not accept any payments, personal gifts or entertainment which may lead to the assumption that they are intended to

influence business processes or do not fall within the scope of normal business hospitality. We will immediately reject any demand for bribery money or other advantages, whether business or private.

We should not in principle give any donations to political lobbyists or parties.

# WE **RESPECT** THE PRINCIPLE OF PARTNERSHIP

### 6. Integrity towards business partners and third parties

We place great emphasis on being a reliable and law-abiding business partner. This means that we recognise and comply with our contractual obligations towards our business partners.



We take our purchase decisions based on fairness and reputability. They are based on objective criteria such as quality, price, service, reliability, availability, technical performance, contract fulfilment, resource efficiency, energy efficiency and environmental compatibility. We thus strive to cooperate exclusively with suppliers whose business activities are consistent with our principles and guidelines.

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# WE ACT FAIRLY

### 7. Fair competition

We are obligated to compete fairly and openly on the global markets. Anti-competitive practices, such as illegal price agreements, market sharing or other actions that prevent, restrict or distort competition and violate anti-trust law are thus prohibited. If official permits are required for the company or our employees, we will only operate in the relevant business area after we have obtained said permits.

# WE DELIVER **QUALITY**

### 8. Product safety and quality

Our company is synonymous with products and services of the highest quality, using our own knowledge and a high level of vertical integration at the Hamburg site. We have a duty to prevent any disadvantages or risks connected with our products as far as possible. This is why we carry out our research and development diligently and responsibly. The continuous improvement of production methods, technologies and processes is also well established. Our products comply with legal requirements and internal standards. This is ensured by regular audits and quality

controls.

# WE ACCEPT RESPONSIBILITY FOR OUR FUTURE

### 9. Environmental and climate protection

sparingly as possible when developing and manufacturing

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# WE REFLECT ON WHAT WE DO

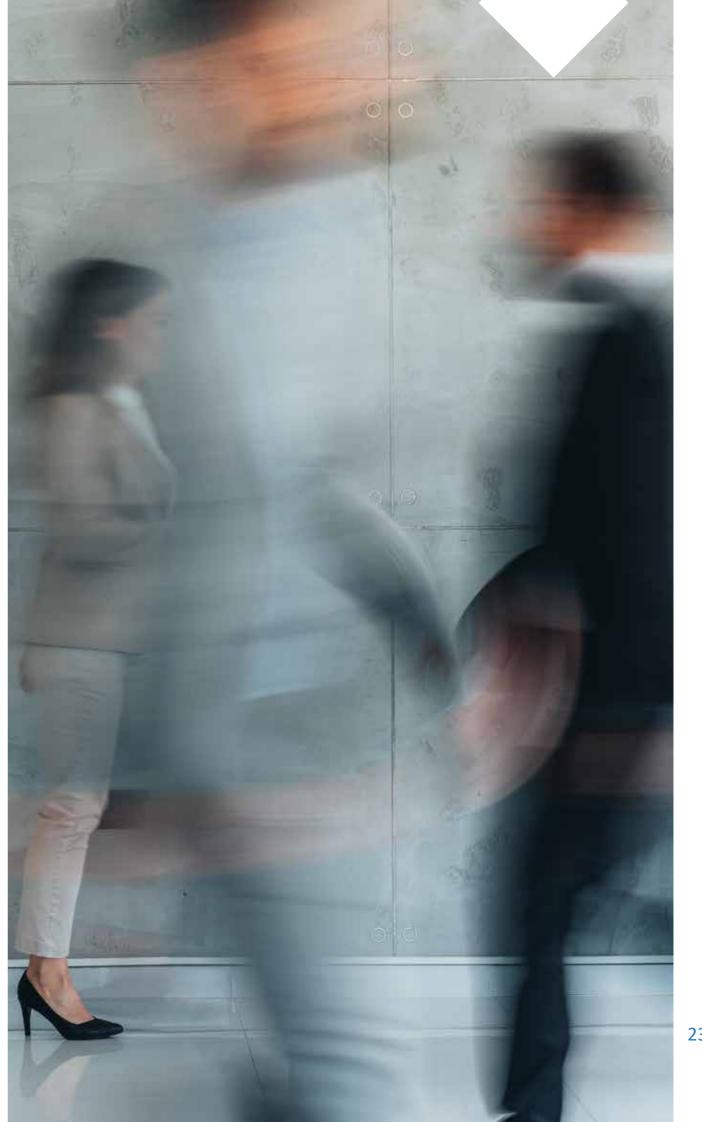
### **10.** Supporting information

As employees of the business group, we all comply with these guidelines and also exercise discernment and integrity in all situations that are possibly not explicitly covered by this Code of Conduct. The spirit and intention of the core values of the Mühlbauer Technology Group guide our actions and behaviour. However, in everyday professional life, there may be times when we find ourselves in situations where there are moral, legal or ethical questions.

In these cases, the following questions may be helpful when trying to take a decision:

- **1** Is the decision or the behaviour consistent with the company principles outlined here?
- Am I confident that my decision or my behaviour is both morally and ethically correct in relation to this Code of Conduct and my own standards?
- Would I personally stand by the decision or the behaviour in public?

If there are still doubts, we do not delay in informing your manager or management in order to discuss the next steps together.



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# WE ARE CONSISTENT

### 11. Violations of the Code of Conduct

Each manager in the Mühlbauer Technology Group is responsible for ensuring that all employees understand the Code of Conduct and comply with its provisions.

We are required to inform our managers or the relevant human resources department about violations of the rules of conduct set out herein.

Anyone who violates the Code of Conduct should expect there to be consequences under labour law, which will be determined based on the severity of the violation.

# WE HELP YOU

Should you have any questions about this Code of Conduct or compliance, please get in touch with our Head of Corporate Development, Dr Hans-Dieter Höhnk: **compliance@mtcompanies.com** 

Should you experience or become aware of discrimination, bullying or similar in your daily work, please get in touch with the Human Resources department for confidential support: **trust@mtcompanies.com** 

Should you have any questions about the protection of personal data (GDPR), please get in touch with our certified Data Protection Officer Dr Volker Wodianka (GDDcert., CIPP/E, CIPM):

privacy@mtcompanies.com

You can contact the GDPR-compliant whistleblower system in accordance with the EU Whistleblower Directive 24/7 by calling +49 40 211 078 610 or by emailing whistleblowing@privacy-legal.de.



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