

Code of Conduct for Eisenmann Employees

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0 Introduction

As a leading technology company in plant engineering and a responsible, strong employer and business partner, Eisenmann is committed to ecologically and socially responsible corporate management.

Furthermore, we require our employees to respect the principles of ecological, social and ethical behavior and integrate them into the corporate culture and processes. All management personnel demonstrate this in their daily actions. They are aware of and comply with the laws, regulations and internal company rules that apply and encourage their employees to do so as well. They support regular training for their employees, pay attention to controls and are always available as an accessible contact partner.

We expect the same conduct from all our internal and external business partners.

We also strive to continually optimize our corporate practices, procedures as well as products and services for the purpose of sustainability and call on our employees and business partners to contribute to this in pursuit of a holistic approach.

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1 Corporate Responsibility

1.1 Customer Focus

With sustainable and creative solutions, we create value for our clients. Clients from all over the world enjoy and appreciate the quality of our products and services. We master the complexity of our projects through clearly defined processes and respond flexibly to our clients' wishes - from small to complete systems.

With our technologies, we set sustainable standards worldwide. The high quality standards of our products and services is ensured by the continual enhancement of our processes.

1.2 Employee Orientation

At Eisenmann, the employees are at the heart of our success. We firmly believe that committed, content employees that are well cared for are the key to a successful and sustainable future. Therefore, we are fully committed to an employee orientation that is based on the following principles of respect and appreciation, communication and openness, work-life balance, fairness and participation in the company's success.

1.3 Sustainability & Ethical Behavior

Our business practices are resource-conserving, innovative and environmentally friendly. We align our sales and return targets with the long-term economic success of our company. We attach great importance to the compliance with human rights and the protection of minorities.

When selecting our business and cooperation partners, we pay attention that this sustainability and ethical behavior are respected.

1.4 Compliance

As individuals and as a company, we always observe the rights and laws – across the globe. Our processes ensure company-wide compliance with the rights and laws and in doing so, meet two core objectives: The protection of the employees, management and the company itself from legal and disciplinary consequences due to violations of the rules while promoting our unique corporate culture.

2 Social Responsibility

2.1 Human Rights, Ban Of Child Labor And Forced Labor

We commit to the protection of international human rights and exclude any kind of child or forced labor within our company. This includes but is not limited to work carried out by children younger than 15 years, slavery, bonded labor and all forms of forced labor as well as work that is likely to harm the health, safety or morals.

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2.2 Compliance With Applicable Laws

We undertake to comply with all applicable national and international laws and to always act ethically.

2.3 Ethical Recruitment

Recruitment, employment and career development is independent of protected characteristics such as ethnic background, skin color, expression of religious beliefs, religious affiliation and nationality.

2.4 Use Of Private And Public Security Guards

Hiring or using private and public security guards shall be refrained from if, due to a lack of instruction or control, there will be a risk of torture and cruel, inhuman or degrading treatment, injury to life and limb, or impact on the freedom of assembly and association.

2.5 Minorities And Indigenous Peoples

Human rights are respected worldwide. This also applies to the rights of minorities and indigenous peoples.

2.6 Protection Against Forced Eviction And Land Grab

We expect that there will be no unlawful forced evictions in the course of our business activities. In addition, we expect that no land, forests and water bodies will be taken away unlawfully through acquisition, development or any other use.

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2.7 Conflict Materials

We commit our Suppliers to ensure that no products are supplied that contain metals the source minerals and derivatives of which originate from a conflict region, and thus directly or indirectly contribute to the funding or support of armed groups.

2.8 Options To Report Illegal Conduct

We have created options for our employees and business partners to confidentially report potential illegal conduct. Based on such reports, investigations shall be carried out and if necessary, measures shall be taken against illegal conduct.

2.9 Whistleblowing & Protection Against Retaliation

We support Whistleblowers who report breaches of the EU law and secure channels for sharing information both within Eisenmann and with the authorities. In addition, we effectively protect them from layoff, harassment or other forms of retaliation.

3 Labor Conditions

3.1 Work Hours And Wages

We undertake to provide wages and benefits in compliance with applicable laws and, above all, provide remuneration in accordance with the applicable statutory minimum wage or upward. The corresponding applicable statutory or official regulations regarding work hours shall be observed.

3.2 Freedom Of Association And Collective Bargaining

Employees have the right to join a union or other associations related to the workplace or industry as well as the right to collective bargaining.

3.3 Non-Discrimination, Equal Rights And Inclusion, Women's Rights

It is expected that our employees commit to the principle of equal treatment of people. We focus solely on qualifications and skills to ensure equal opportunities when it comes to recruitment and employment.

We condemn any distinction, exclusion or restriction based on gender. Equal opportunities for women, men and diverse people shall be ensured in all aspects of the personal and professional development.

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3.4 Occupational Health And Safety

The occupational health and safety of our employees as well as the employees of our clients and Suppliers at their workplace is our top priority. We undertake to comply with the applicable national and international Occupational Health and Safety regulations. Health risks posed to local residents caused by emissions (e.g. wastewater, exhaust air, noise) are reduced to a minimum.

4 Environmental Responsibility

4.1 Environmental Protection, Resources And Sustainability

Environmental protection, conservation of natural resources and a contribution to decarbonization are requirements for our actions.

We undertake to comply with the applicable national and international regulations with regard to sustainability, environmental protection and recycling. Furthermore, we implement a certified environmental management system according to ISO 14001 to minimize environmental impact and hazards, improve environmental protection in daily business operations and take sustainability aspects into account in our operational processes and product realization.

4.2 Decarbonization And Energy Consumption

We undertake to advance the commitment to reduce energy consumption and greenhouse gases (decarbonization) and to reduce the impact on the quality of water, air and soil to an essential minimum, while developing strategies for a resource-conserving handling of available and used resources. Processes for the manufacture of goods or services shall be operated energy-efficiently and preferably with renewable energies.

4.3 Waste Management And Recycling

We implement the regulations and requirements of national and local regulations regarding the environmentally friendly handling, storage, disposal of waste by means of appropriate waste and hazardous substance management. In doing so, we seek a long-term reduction of waste while solutions for the reuse/recycling of waste (e.g. reuse of packaging materials) is given preference.

4.4 Biodiversity, Land Utilization And Deforestation, Animal Protection

Besides environmental protection, avoidance of excessive or unlawful land utilization is the basis for the preservation of biodiversity. With respect to land utilization, we ensure in our supply chain that we or our business partners use resources responsibly when producing or acquiring products or raw materials and only obtain them from

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sources that explicitly prevent harmful soil changes and the destruction of natural habitats of species through the use of environmentally unfriendly substances and excessive land utilization.

When acquiring raw materials derived from animals, we pay attention to species-appropriate husbandry and compliance with all legal requirements for animal protection. If technically possible, we shall replace raw materials derived from animals with environmentally friendly substrates.

4.5 Handling Critical Raw Materials

We expect our Suppliers to only use raw materials, the extraction, production, transport, processing and export of which does not contribute directly or indirectly to human rights violations, occupational health and safety risks, environmental pollution or any compliance violations. This is why we take into account these aspects in our product development and realization.

Insofar as critical raw materials or process materials are used for the manufacture of goods (e.g. components), we expect our Suppliers to acquire these materials from verified sources, and to ensure for themselves and their upstream Suppliers that the EU Conflict Minerals Regulation ((EU) 2017/821) is complied with, and the compliance thereof is checked and documented accordingly through appropriate means (e.g. CMRT or EMRT) to be referred to in case of doubt.

If the use of a material cannot be avoided, it shall be ensured throughout the supply chain that the EU Conflict Minerals Regulation ((EU) 2017/821) is complied with and the compliance thereof is checked and documented accordingly through appropriate means (e.g. CMRT or EMRT).

4.6 Prohibited Substances

We undertake to comply with and implement the legal regulations applicable to the handling of prohibited or restricted substances, in particular, but not limited to the following:

- (EC) Regulation 1907/2006 (REACH), Chemicals Act (ChemG), Chemicals Prohibition Act (ChemVerbotsV)
- (EC) Regulation 1272/2008, Hazardous Substances Act (GefStoffV)
- Electrical and Electronic Equipment Directive 2011/65/EU (Directive on the restriction of hazardous substances (RoHS)), in the past 2002/95/EC and 2012/19/EU (Directive on Waste Electrical and Electronic Equipment (WEEE)), in the past 2002/96/EC, Electrical and Electronic Equipment Act (ElektroG), Ordinance on the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment (ElektroStoffV)
- Dodd Frank Act, Sect. 1502

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5 Ethical Business Practices

5.1 Fair Competition

We call on our employees to respect the principles of ecological, social and ethical behavior and integrate them into the corporate culture and processes. Eisenmann and its Suppliers undertake to conduct their business in full compliance with applicable antitrust and fair competition laws.

5.2 Protection Of Confidential Information And Privacy

We undertake to protect confidential information appropriately and to use it only to the extent permitted and, in particular, not to pass it on to unauthorized third parties. We observe applicable national and international data protection regulations. Individual contractual confidentiality obligations amend this obligation towards our business partners accordingly.

5.3 Plagiarism And Intellectual Property

The use of counterfeit materials and plagiarism is prohibited.

We respect intellectual property and therefore shall not use or publish it without authorization. This applies, in particular, to intellectual property that is protected by patents, copyrights or trademarks. We expect our business partners to do the same.

5.4 Integrity In Business Transactions

Our employees and business partners undertake to prohibit, refrain from and not to tolerate any form of corruption, extortion, breach of trust and embezzlement. In particular, neither bribes or other illegal payments may be offered or accepted - especially to public officials - nor may invitations, gifts, advantages or benefits be granted or accepted directly or indirectly outside of the legally permissible framework. Suppliers shall also refrain from offering or giving gifts or other benefits for the personal benefit of our employees or persons close to them such as their relatives and friends.

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5.5 Conflicts Of Interest

We expect that existing or potential conflicts of interest will be reported immediately if they arise, or are identified during the initiation or processing of an order. Conflicts of interest are situations in which personal interests are or could be in conflict with those of Eisenmann GmbH or its affiliated companies.

Personal interests must not influence the business activities of our employees and business partners. Business decisions shall be based exclusively on factual and objective considerations.

5.6 Financial Responsibility (Accurate Records)

We comply with applicable legal regulations and are aware of our financial responsibility towards our employees, authorities and business partners. All business transactions can be transparently tracked and accurately reflected in Accounting's financial publications.

5.7 Disclosure Of Information

Financial and non-financial information are published according to the standards of the industry and the legal framework.

5.8 Anti-Money Laundering Policy

Money laundering is the process of covering up funds from illegal activities, such as terrorism, drug trafficking, or the funneling of money from illegal activities into the legal financial and economic cycle in order to give them the appearance of legality and to cover up the real origin or identity of the owner.

Eisenmann only maintains business relationships with business partners whose business activities are in accordance with the applicable laws and regulations and whose financial resources are of legal origin.

We undertake to observe the applicable regulations protecting against money laundering.

5.9 Export Controls And Economic Sanctions

We comply with all applicable import and export control laws, sanctions and embargos as well as restrictions for the export or re-export into certain countries of destination. In addition, we comply with the prohibition of transactions involving certain countries, regions, organizations or even individual persons.

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6 Code of Conduct for Suppliers

The basis of our business relationships requires that the principles of ecological, social and ethical behavior are observed and integrated into the corporate culture and processes of the Suppliers throughout the entire supply chain.

Details regarding the Code of Conduct expected to be complied with by external partners can be found in the Supplier Code of Conduct.

7 Privacy and Confidentiality

7.1 Handling Confidential Information

We protect the confidentiality of information disclosed to us and respect the privacy of our clients, partners and employees. Confidential information shall not be disclosed without consent.

Therefore, we take all necessary steps to protect our own business and trade secrets as well as those of our business partners from access and insight by unauthorized employees, other third parties or the public - regardless of the form in which they exist.

7.2 Reliability Of Information

Reliability, truthfulness and integrity characterize Eisenmann's communication and reporting on the company's business transactions - to employees, clients, business partners, authorities and the public.

Every employee plays a part in contributing that internal and external reports, records and other documents are complete and accurate as well as up-to-date and system-compatible in compliance with the legal regulations and standards.

7.3 IT And Information Privacy Directives

Our directives regarding IT and information privacy contain binding and concrete rules for the safe handling of IT systems, information and personal data. Our systems are up-to-date, and our employees are made aware of potential risks through regular training sessions.

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8 Implementation of the Code of Conduct

8.1 Communication And Training

General management, including all managers, undertake to ensure that the principles specified in this Code of Conduct are communicated and integrated into company processes.

The content of this Directive is introduced to our employees in form of general or individual training sessions.

External business partners are made aware of the Supplier Code of Conduct when placing orders and on our website.

8.2 Inspections/Audits And Sanctions

General management, including all managers, reserve the right to carry out checks/inspections as needed, above all, to check compliance with the contractual and statutory obligations. The corporate social responsibility (CSR) and sustainability strategy are assessed externally, in the form of audits.

In case of a violation against the contractual or statutory obligations, appropriate sanctions shall be initiated.

8.3 Consequences Of Violations

Any violations against the principles and requirements specified in this Code of Conduct shall be deemed a major breach of the obligations arising from this contract.

Eisenmann reserves the right to point out violations, assert further legal remedies and to take appropriate action.

The Eisenmann Code of Conduct applies for the benefit of all companies within the Eisenmann group. Aforementioned agreements are in each case subject to the law of the location in which the respective Eisenmann company has its principal place of business.