

OUR PRINCIPLES FOR
RESPONSIBLE, ETHICALLY
SOUND AND UPSTANDING
CONDUCT IN COMPLIANCE
WITH THE LAW AND
REGULATIONS

**/ CODE OF CONDUCT
FOR OUR EMPLOYEES**



WOLL.GROUP



FOREWORD

Dear colleagues,

In 2011, Walter Woll described the little locksmith's workshop that went on to become a group of three strong companies in the following words: „**A family that has grown alongside its company; employees who work for the company, not just at it; managers that provide customers with transparent, expert and dedicated support; the interplay between engineering, craftsmanship, and management; human dignity; respect for each other and the work; and standing up for each other and the company.**“

These words convey our ethos for a successful company: close cohesion, reliability, personal responsibility, openness, transparency and fairness – plus conduct that is always in compliance with the law and ethically sound, both among each other and when interacting with wider society.

This Code of Conduct is aimed at:

- us as managers
- us as employees of the company
- and the General Meeting of Shareholders

In one document, it summarises our basic rules that we stand for and embody in the past, present and future.

It commits us to responsible, ethically sound and upstanding conduct in compliance with the law and regulations in interacting with each other, our customers, our suppliers and the public, and provides a set of guidelines for our behaviour in our day-to-day work. In order to protect each and every employee from severe consequences caused by unintentional misconduct, it is important that we read and understand the values and principles described in this Code of Conduct and integrate these into our daily work and abide by them.

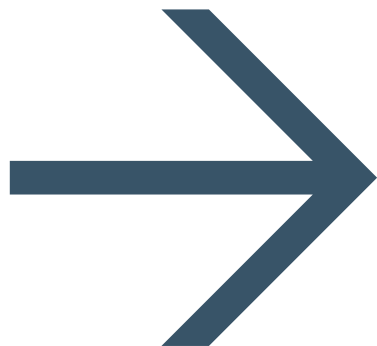
This will ensure our future just as bright and successful as our past.

Christina Woll
Management

David Seiler
Management

Atanasios Kondomitsos
Management

Claudia Woll
Chair of the Board of the
Woll Family Foundation



PREAMBLE

This Code of Conduct applies to the legally independent companies of the “Woll.Group” listed below:

WOLL Maschinenbau GmbH, Krughütter Straße 93, 66128 Saarbrücken, Germany, entered in the commercial register of Saarbrücken District Court under HRB 4907, represented by Managing Director Christina Woll and Managing Director David Seiler,

RITZ Maschinenbau GmbH, In der Breitwiese 2–4, 76684 Östringen, Germany, entered in the commercial register of Mannheim District Court under HRB 232707, represented by Managing Director David Seiler,

M-O-T Mikro- und Oberflächentechnik GmbH, Krughütter Straße 93, 66128 Saarbrücken, Germany, entered in the commercial register of Saarbrücken District Court under HRB 19744, represented by Managing Director Atanasios Kondomitsos.

The aforementioned companies operate under the umbrella brand “**Woll.Group**”. The designation “**Woll.Group**” serves the sole purpose of consistent company and brand communication. It does not constitute a legal entity of its own or a common employer, nor does it bear joint and several liability or other obligations to cover costs across the companies listed.

The employee’s employer is solely the company specified as the contractual partner in the employment contract. Rights and obligations arising from this Code of Conduct exist solely between the employee and their respective employer.

Scope of application

(1) This Code of Conduct applies to all employees of Woll Maschinenbau GmbH, RITZ Maschinenbau GmbH and M-O-T Mikro- und Oberflächentechnik GmbH.

(2) Insofar as terms such as “company”, “we” or “Woll.Group” are used, they refer exclusively to the employee’s respective employer, unless the context specifies otherwise.

(3) Shared use of the “Woll.Group” umbrella brand does not affect the legal independence of the individual companies and, in particular, does not constitute a common employer or give rise to liability or obligation to cover costs of another company.

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1 CONDUCT IN BUSINESS

1.1 COMPLIANCE WITH LAWS, REGULATIONS AND INTERNAL RULES

In all of our activities, the applicable laws and regulations, as well as all of the company's internal rules and standards, must be complied with.

Our behaviour is only in the interest of the company if we follow these norms, even if this seems strategically and economically unfavourable or counterproductive.

Our managers and employees are therefore required to familiarise themselves with the norms relevant to their area of responsibility and help to implement and uphold these binding obligations in their divisions.

1.2 SELECTION OF OUR CONTRACTUAL PARTNERS

When selecting our contractual partners, we always make our decisions based on objective and economic aspects and criteria. In doing so, we take a fair and impartial approach. We do not give preferential treat-

ment or negative responses on a non-objective basis.

At the same time, we consider basic requirements regarding integrity, human rights, employment conditions, environmental protection and responsible supply chains when selecting and evaluating our contractual partners.

When selecting and evaluating our suppliers, we ensure that resources, minerals and materials do not come from sources that support armed conflict, human rights violations or other serious breaches.

This includes responsible handling of resources and materials, in particular conflict minerals such as zinc, tantalum, tungsten and gold.

Based on our internal Code of Conduct, the company has established its own dedicated Code of Conduct for its contractual partners. From our suppliers, customers and all other contractual partners, we expect that they align themselves with the values communicated to them via the Code of Conduct in all business dealings conducted with the company and collaborate with us in accordance with this Code of Conduct.

In the case of grave and deliberate breaches of this Code of Conduct, the company will review the business or supply relationships and, if necessary, terminate them.

1.3 CORRUPTION AND BRIBERY

We do not give or accept bribes.

The company prohibits corruption and the taking or offering of any kind of bribe. This includes, for example, excessive invitations and gifts, unjustified special payments, misappropriation of donations, etc.

We do not permit anybody to offer to, confer upon or accept from our contractual partners any advantages in the form of gifts or contributions of an inappropriately high value, in excess of industry-standard limits, with a view to securing preferential treatment for our business activities as a result.

The company sets EUR 50.00 as an industry-standard value.

This also entails any agreements and arrangements that directly or indirectly involve the conferring of advantages in connection with the allocation, authorisation, delivery, processing or payment of orders.

We do not permit anybody to use their position or role in the company to secure personal advantages for themselves.

One-off contributions in the form of advertising campaigns and similar purposes, invitations to industry-standard events or dinners held for business purposes in an appropriate manner and scope, as well as

1 VERHALTEN IM GESCHÄFTLICHEN UMFELD

activities of a reasonable degree that serve the purpose of furthering the existing business relationships and are in the interests of the company are permitted.

Reporting and dealing with breaches of these limits:

If advantages or gifts in excess of the limits defined herein are requested or offered by our contractual partners, this must be refused and management must be informed of the incident immediately in order to investigate and take appropriate measures.

1.4 DONATIONS AND SPONSORSHIP

The company deems sponsorship, donations and contributions towards a charitable cause as an important element of its social engagement. Contributions of this kind must always be made in a transparent manner. This means that the recipient and the specific purpose for which these contributions will be used by the recipient must be known and traceable.

In the case of all financial contributions, we must ensure that the contribution fits appropriately with the intended public image and always works towards the company's corporate objectives.

1.5 REGULATIONS ON FOREIGN TRADE, EXPORT CON- TROLS AND CUSTOMS

As a global company, it is a matter of course that the company complies with the applicable regulations concerning foreign trade, export controls and customs. In this context, the same applies for existing payment processing regulations that are applicable in the respective countries of our contractual partners.

All employees of the company whose work is connected with the import and export of goods, technologies or services, as well as payment transactions, must diligently ensure that the applicable customs and foreign trade regulations, export control and import laws, and all provisions and guidelines are implemented and complied with as required.

The company does not engage in, arrange for or promote any actions or measures with the objective of circumventing sanctions in countries subject to embargo or for the purpose of terrorist financing.

1.6 TAX

The company is conscious of its social responsibilities with respect to fulfilling its tax and social security obligations, and acts to comply with all tax and social security regulations and pay all taxes owed.

The company facilitates legal tax practices and ensures that the tax result is in accordance with economic and legal conditions. Accordingly, the company distances itself from all activities aimed at securing unlawful tax advantages.

These principles apply equally to relationships with contractual partners.

No actions or measures are promoted or arranged for that could amount to aiding and abetting tax evasion or an illegal reduction of tax burden by contractual partners or the company.

We commit ourselves to the rules of the free and social market economy and oppose all legally prohibited activities, which are detrimental to fair competition at the national and international levels.

Our contractual partners and competitors are also bound by fair competition. We therefore expect that they comply with these laws and rules.





2 FAIR COMPETITION

We are committed to the principles of a free and social market economy and refrain from any activities prohibited by law that would undermine fair competition at both national and international level. Our contractual partners and competitors are likewise obliged to compete fairly. We therefore expect them to comply with these laws and regulations as well.

2.1 AGREEMENTS RELEVANT TO COMPETITION

In all its activities, the company ensures it complies with the requirements of competition and antitrust law. No agreements are made with competitors regarding prices, capacity or non-competition and no boycott campaigns are initiated or supported against suppliers or customers. The company does not take part in the submission of dummy bids in tenders or agreements to allocate customers, share markets or production programmes or other restrictions of competition.

2.2 PAYMENTS

Payments made by the company in exchange for deliveries and services it has received are made directly to the relevant contracting partner in the country where its registered office is located. Cash payments are excluded. Otherwise, management must be informed immediately and in advance of all payment processes and agreements that deviate from this rule.

2.3 AVOIDANCE OF AND TRANSPARENCY REGARDING CONFLICTS OF INTEREST

In day-to-day work, all of us make decisions on a regular basis. If in doing so it becomes apparent that the company's interests contradict one's own personal interests, this can result in decisions being made that are no longer in the company's interests, which can do long-term damage to both the company and its employees.

Anyone who encounters a conflict of interest of this kind is therefore obliged to inform their line managers or the management and disclose the conflict for the sake of clarification, thereby protecting against poor decision-making.



3 CONDUCT TOWARDS COLLEAGUES

3.1 EQUAL TREATMENT AND NON-DISCRIMINATION

Interaction with colleagues is always characterised by mutual respect, openness, tolerance and appreciation.

In all HR-related decisions, we do not tolerate any form of discrimination or unequal treatment on the basis of gender, ethnic origin, skin colour, nationality or national origin, religion or worldview, age, marital status, citizenship, disability, health condition, physique, appearance, sexual orientation and gender identity or legitimate political views and activities. Unlawful and discriminatory conduct will not be tolerated under any circumstances and will be met with immediate disciplinary action.

At the company, this fundamental principle applies both to the appointment of new employees and to existing employment relationships, as well as contractors and agency workers who work with us.

Only performance, experience and ability, as well as commitment to the company, are relevant factors for personal progression at the company. When making choices and decisions regarding continuing professional development, care is taken that these are fair and equitable.

3.2 HUMAN RIGHTS

We respect the dignity and personal rights of our colleagues and contractual partners. We oppose forced labour and child labour, as well as any form of exploitation or discrimination.

3.3 FAIR AND SAFE WORKING CONDITIONS

A core value of our family-owned company and an enduring component of its ethos is to ensure fair and safe working conditions. We comply with the legal requirements regarding fair employment conditions, including in respect of pay, working hours and the protection of the individual's private life.

3.4 THE TASK OF OUR MANAGERS AND MANAGEMENT CULTURE

The company's managers see themselves as role models and take their duty of care over the employees entrusted to them seriously. They embody the company's values with conviction, exemplify the familial and corporate culture in their daily work and impart all of this to the employees under their management.

This involves taking consistent action against all behaviour that contravenes the company's values and this Code of Conduct.



4 OCCUPATIONAL, ENVIRONMENTAL AND PRODUCT SAFETY

4.1 OCCUPATIONAL HEALTH AND SAFETY

The company endeavours – by means of state-of-the-art equipment and technological protection mechanisms, as well as a health centre and other health-promoting activities – to provide the basis for physical and mental well-being at the company and to ensure a safe and healthy workplace.

In return, we expect all employees to actively contribute to occupational health and safety within their area of responsibility and to comply with all applicable legal and internal health and safety requirements in order to protect themselves and others.

All of us bear responsibility for putting safety first in our activities, taking preventive action, reporting hazardous situations and making suggestions for improvements.

Our occupational health and safety management system, which is certified in accordance with ISO 45001, also helps to achieve this with the processes and procedures that it contains.

4.2 ENVIRONMENTAL PROTECTION

In manufacturing our products, we take constant care to implement the required processes in an environmentally friendly manner and avoid negative environmental impacts to the full extent possible. This also applies to the machines that we build for our customers.

In doing so, we take into account the impact of our activities on the climate, climate change and biodiversity, alongside sparing use of resources. We endeavour to reduce emissions, use energy and resources efficiently, and avoid or minimise negative impacts on the environment, nature and biodiversity as far as possible.

Through constant retrofitting and replacement measures, we are making efforts to optimise the equipment used by us and to minimise the resulting effects on the environment and climate.

For the purpose of independent assessment and refinement of our sustainability system, we use the EcoVadis assessment once per year. The findings gained inform our measures for the continuous improvement of our environmental and sustainability performance.

4.3 PRODUCT SAFETY AND QUALITY

The success of our business is based on long-term retention and the maintenance of positive relationships with our customers. This makes it all the more important to supply our customers with consistently reliable and safe machines, assemblies and individual components.

The basis for this is our quality management system in accordance with ISO 9001. This system helps us to take the requirements of customers, the law and regulations systematically into consideration, as well as internal quality standards, and to improve our processes continually.

When developing, manufacturing and assembling our products, we ensure that these do not have any defects or dangerous attributes that could endanger or damage the health or property of the customer.

As part of this, quality and product safety are not the sole task of individual departments, but the collective responsibility of all employees. Deviations, risks or areas for improvement must be identified in good time, discussed openly and processed in the interests of effective troubleshooting and continuous improvement.



5 DATA AND INFORMATION

PROTECTION OF INFORMATION AND DATA

Our expertise, built through our collective knowledge and experience, is one of our greatest strengths and forms the foundation of our company's long-term success. For this reason, we work together to ensure that all company data, company property, trade secrets and all the information entrusted to us by clients, customers, suppliers and other third parties is handled properly, protected adequately and not shared or disclosed without authorisation.

Any and all commercial information belonging to the company, its customers or suppliers that is not public knowledge is deemed to be confidential information.

Furthermore, we handle personal data with particular care and in accordance with applicable data protection requirements, in particular the General Data Protection Regulation (GDPR). Personal data is only processed to the required extent, in connection with a specified purpose and in a manner that maintains confidentiality.

Shortcomings in the area of information security or data protection can lead to significant problems, damage and legal consequences for the company. For this reason, there are clear instructions for conduct and courses of action that we must always comply with in our commercial work for critical processes and actions that will or might jeopardise information security, data protection or the confidentiality of the company's information or that of its contractual partners.

To further reinforce information security, an information security management system has been deployed in accordance with the requirements of ISO/IEC 27001. Its objective is the systematic identification and evaluation of information security risks, and the management of these by means of appropriate technical and organisational measures.

6 WE'RE LISTENING

REPORTING AND DISCLOSURES

All employees are encouraged to report any irregularities, risks, misconduct or breaches of legal requirements, internal instructions or, in particular, of the principles and guidelines laid out in this Code of Conduct. The objective is to protect the company, identify risks at an early stage and prevent conduct detrimental to the company.

The usual communication channels via line management and via the company's dedicated, internal reporting office in accordance with the Whistleblower Protection Act (Hinweisgeberschutzgesetz, HinSchG) are available. Disclosures can be submitted via the reporting channels put in place for this purpose.

The company ensures that disclosures received are handled in confidence and are reviewed with care. Whistleblowers acting to the best of their knowledge and in accordance with their conscience have no reason to fear detrimental treatment or other negative repercussions. The same principle applies even if a report is found to have been unjustified after the fact.

7 WE'RE WORKING ON IT

TRAINING AND AWARENESS

The best way to raise awareness of how quickly laws or regulations can be violated and the long-term reputational damage and liability that might result is to have trained and mindful staff. For this reason, compliance training courses based on this Code of Conduct are implemented and offered to provide the required training.



Our employees can direct any questions about this Code of Conduct or points of uncertainty regarding what constitutes compliant conduct to their respective manager or the competent point of contact for compliance matters.

COMMITMENT
TO COMPLY

In the course of my work at the company,

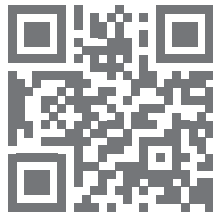
I undertake to uphold and comply with the values conveyed in the Code of Conduct.

Surname

First name

Location, date

Signature



#PROBLEMSOLVERD
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