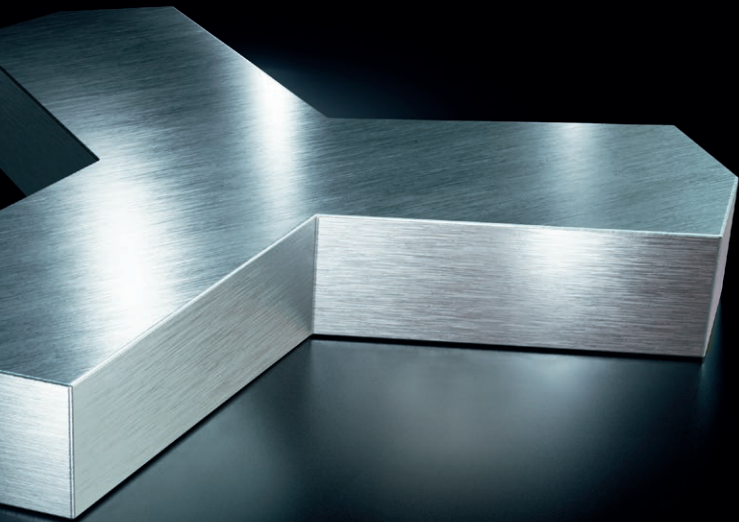




MASCHINENFABRIK  
ALFING KESSLER GMBH



# CODE OF CONDUCT

For Contractors

Dear readers,

In the course of over 100 years, Maschinenfabrik ALFING Kessler GmbH (hereinafter called 'MAFA') has developed into an internationally operating company that plays an important role in the global market. We set high standards in our relationships with suppliers, including their suppliers, subcontractors, contractors, consultants, customers and other partners (hereinafter called 'business partners').

The Board of Management has issued this Code of Conduct in order to emphasise the continuous importance of compliant conduct in times of growing international business relationships.

We expect our business partners to follow this Code of Conduct and to observe the relevant laws and regulations of the countries in their business environment.

Aalen-Wasserralfingen, 31/01/2024  
Maschinenfabrik ALFING Kessler GmbH

Yours faithfully

A handwritten signature in black ink, appearing to be 'Grimm', written in a cursive style.

Konrad Grimm  
Member of the Board of Management

# Contents

<b>1) Scope</b>	<b>p.4</b>
<b>2) General Code of Conduct</b>	<b>p.6</b>
<b>3) Conduct in Business</b>	<b>p.8</b>
<b>4) Corruption</b>	<b>p.10</b>
<b>5) Industrial Safety</b>	<b>p.11</b>
<b>6) Environmental Protection / Energy Efficiency</b>	<b>p.12</b>
<b>7) Protection of Intellectual Property and Handling of Company Property</b>	<b>p.13</b>
<b>8) Violations of this Code of Conduct</b>	<b>p.14</b>
<b>9) Complaints / whistleblower system</b>	<b>p.15</b>

## **1) Scope**

This Code of Conduct shall apply to all business partners of MAFA and its subsidiaries. Each business partner shall be responsible for reading, understanding and implementing this Code of Conduct.

Business partners commit to working closely with MAFA within the scope of the applicable laws for the purpose of ensuring and monitoring compliance with this Code of Conduct (e.g. by granting the right to carry out audits, contributing in the solving of actual or suspected cases of violation, passing on information etc.).



## **2) General Code of Conduct**

### **2.1**

Compliance with all applicable laws of the countries in which Contractors operate is considered a matter of course. Each Contractor is obligated to inform themselves of the applicable laws necessary for their activities and to comply with these laws at all times.

### **2.2**

Contractors shall respect all internationally accepted human rights and support their observance, also on the part of indirect suppliers. In particular, they shall not approve any exploitative working conditions, any kind of forced labour or any kind of child labour and shall comply with all applicable legal provisions such as those concerning the minimum age of employees.

### **2.3**

Contractors shall reject any kind of discrimination. In particular, they shall treat their employees and business partners fairly and with respect. Any discrimination due to race, ethnic origin, sex, religion or ideology, disability, age, sexual identity, nationality or other characteristics protected by law is strictly prohibited. The Contractor is obligated to ensure equal opportunities, non-discrimination and the incorporation of women into economic processes.

## **2.4**

All applicable employment laws and collectively regulated agreements of the countries shall be respected. The employees of Contractors shall be remunerated adequately and shall at minimum be paid an employee's wage based on legal or collective labour agreements. The recruitment of new employees shall take place in a fair and transparent manner that complies with international working standards.

## **2.5**

The Contractors are obligated to ensure that they do not conduct any illegal compulsory evacuations and that they shall not illegally deplete any land, forests or bodies of water by means of acquisition, building development or any other use. The rights of indigenous peoples shall be respected. The Contractors are obligated to respect and protect biodiversity. Land must always be used according to applicable environmental protection laws and with the aim of preserving soil quality while avoiding deforestation.

## **2.6**

The use and assignment of private and public security personnel is to be avoided in the event that insufficient instruction or monitoring on the part of the Contractor means this would present a risk of torture, any cruel, inhuman or degrading treatment, danger to life and limb, or any limitations concerning the freedom of association.

## **3) Conduct in Business**

### **3.1**

Contractors are committed to fair conduct with trade partners and third parties and shall respect the applicable laws and regulations, in particular antitrust, competition and economic and trade laws and regulations as well as data protection regulations (application of the GDPR). These regulations shall govern the conduct of Contractors towards their competitors, trade partners and third parties.

### **3.2**

Every Contractor is obligated to adhere to these laws and regulations. This shall include not obtaining any contracts by degrading competitors or their products and not using any unfair methods in order to do harm to competitors. Any kind of understanding, agreement or collusion with competitors concerning prices, reductions, price changes, sales conditions and profit margins shall be prohibited. The attempt to unreasonably disadvantage any competitors in competition or to gain illegal access to their confidential information shall be prohibited.

### **3.3**

Contractors shall comply in their international business with all applicable laws and regulations, especially customs, import and export control laws. These laws and regulations govern if and how business may be done with certain countries, legal entities, individuals and



end users and they contain specific regulations covering the export and re-export of goods or technical data and the payment of goods or services. MAFA expects its Contractors to be aware of and comply with these laws and to cooperate with MAFA in the event of suspected / actual violations of these laws for the purpose of resolving such violations and preventing further violations.

### **3.4**

MAFA expects its Contractors to cooperate with government officials and agencies based on applicable law. They shall therefore comply with all lawful regulations of government authorities while at the same time observing their own lawful rights.

### **3.5**

MAFA expects that its Contractors shall make decisions on the basis of objective considerations and not let themselves be impermissibly guided by personal interests. Once a Contractor is made aware of a potential conflict of interest, they are obligated to take internal measures to resolve these conflicts and to inform MAFA immediately. Private business or any other relationships between Contractors and MAFA employees that might affect the activities and decision-making of MAFA's employees shall not be allowed.

## **4) Corruption**

### **4.1**

Contractors shall reject economic crime and any corrupt behaviour, especially manipulation and corruption of competition through bribery.

### **4.2**

Benefits of all kinds to MAFA employees or representatives of government with the aim of obtaining contracts or inadmissible advantages shall not be permitted. In particular, it is prohibited to offer, grant, claim or accept any kind of bribe payments, illegal payments and hidden commissions. It is furthermore prohibited to indirectly grant such benefits (e.g. donations, sponsoring).

### **4.3**

Benefits, gifts or other personal advantages (such as an invitation for a business lunch) may be offered to MAFA employees only if they are in line with usual business practices. Any benefits, gifts or personal advantages that may affect decision-making shall not be allowed.

## **5) Industrial Safety**

Contractors place great emphasis on the safety and health of their employees. They commit to being aware of and applying all applicable legal regulations concerning safety and health protection and occupational and plant safety. Furthermore, they commit to supporting the health and safety of their employees through the continuous improvement of working conditions and through numerous prevention measures. This shall include the application of all applicable regulations concerning hygiene, fire protection, risk protection and electrical, mechanical and architectural safety. MAFA recommends certification according to ISO 45001.

## **6) Environmental Protection / Energy Efficiency**

### **6.1**

Contractors and their suppliers take their responsibility for nature and the environment seriously. In a continuous process, they foster the environmental awareness of their employees and reduce ecological risks, greenhouse gas emissions and noise emissions. Natural resources are used appropriately and economically and waste and all other environmental pollution shall be avoided as far as possible. Deployed resources are reused and recycled wherever possible. All relevant environmental laws and regulations applicable to the activities of Contractors are to be respected. Hazardous material shall be stored safely and shall be disposed of in a lawful manner. Any prohibited ingredients shall not be used. In addition, the Contractors remain obligated to supporting energy efficiency and the use of renewable energies wherever possible and economically feasible. MAFA recommends certification according to ISO 14001 and ISO 50001.

### **6.2**

The nationally applicable laws concerning animal protection and animal welfare must be complied with in full.

## **7) Protection of Intellectual Property and Handling of Company Property**

### **7.1**

Contractors shall safeguard business and trade secrets of MAFA and of third parties as well as personal data. They shall collect, process and use personal data only with the consent of the affected persons and only to the extent that is consistent with law (Article 6 GDPR). They shall comply with provisions on data protection. Confidential information shall be used only to fulfil the assigned tasks and may be disclosed to third parties only upon obtaining MAFA's express written consent.

### **7.2**

MAFA's intellectual properties, such as our trademarks, patents, intellectual properties and related rights are an important asset and are the basis of our success. The use of plagiarised or falsified material is therefore prohibited. Impermissible use of these may cause considerable damage. Contractors shall therefore protect such information to the best of their knowledge and belief.

### **7.3**

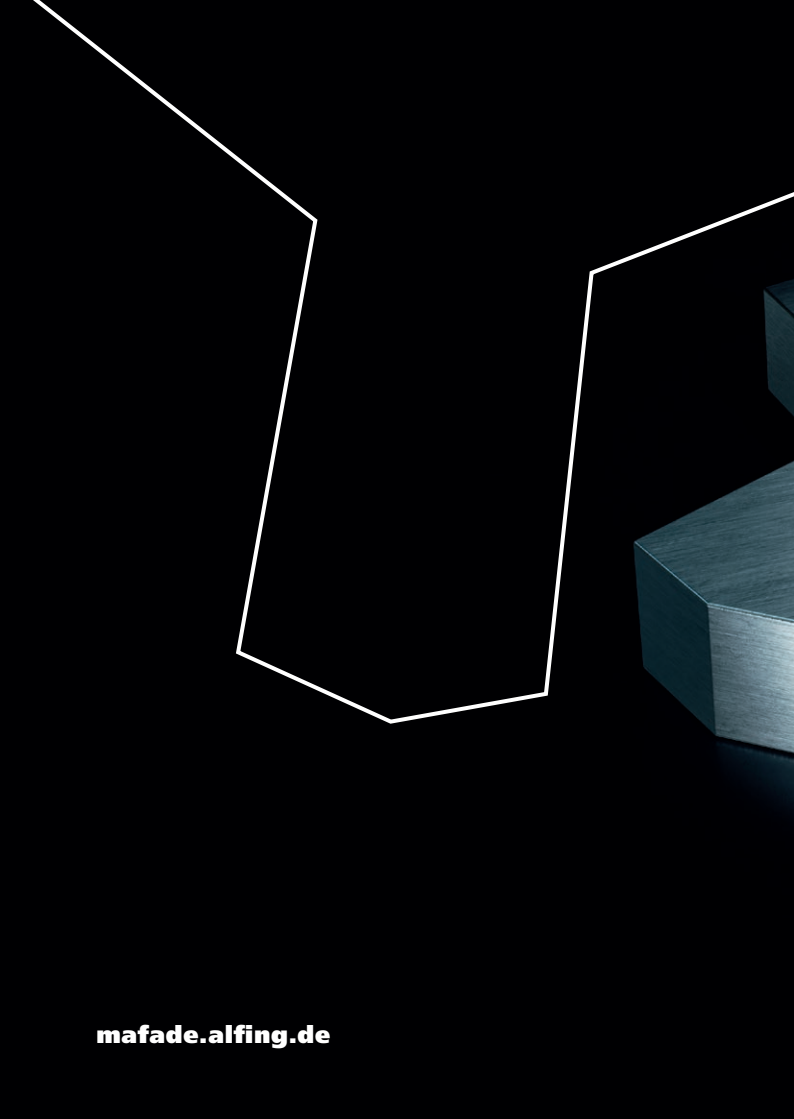
All substantial business transactions shall be documented in a prompt and comprehensible manner. Internal and external reports must be correct and complete. Documents that are relevant for internal inquiries or official investigations must not be destroyed, removed or modified. Information shall be disclosed in accordance with the valid legal regulations.

## **8) Violations of this Code of Conduct**

In the event of any violations of the regulations of this Code of Conduct, Maschinenfabrik ALFING Kessler GmbH reserves the right to terminate partly or in full the business relationship with the Contractor, without any obligation to compensate the Contractor, with or without immediate effect and based on the applicable law. All other legal rights, especially Maschinenfabrik ALFING Kessler GmbH's right to hold the Contractor liable, shall be reserved.

## **9) Complaints / whistleblower system**

In accordance with the German Whistleblower Protection Act (HinSchG), MAFA Contractors can report violations of laws, regulations and fundamental ethical principles as well as violations of the due diligence obligations of the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG) to the notification office established for that purpose. All such information shall be handled in a confidential and appropriate manner. MAFA encourages its Contractors to make use of its system for complaints and whistleblowing in the event that they suspect a violation has occurred.



**mafade.alfing.de**