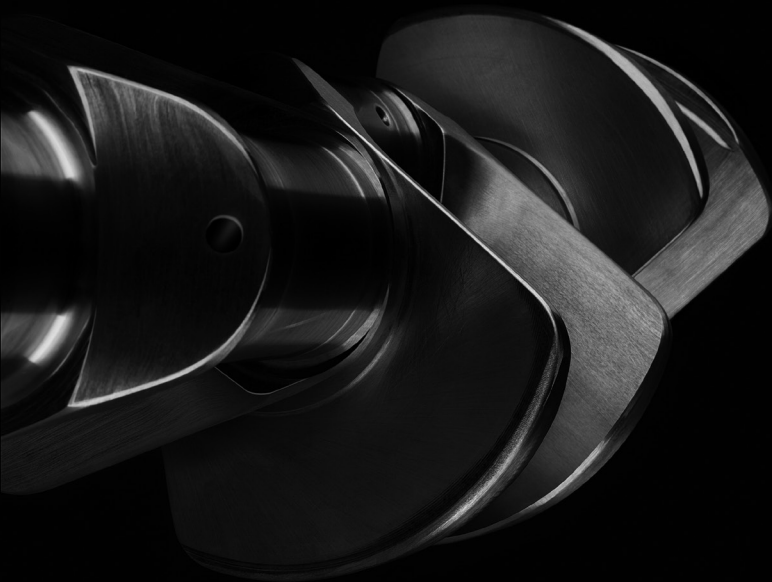


# Code of Conduct for Contractors



MASCHINENFABRIK  
ALFING KESSLER GMBH

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## 1. VORWORT DER GESCHÄFTSLEITUNG

Dear Sirs,

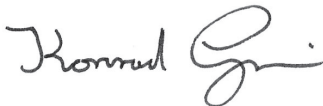
In more than 100 years of its history, Maschinenfabrik ALFING Kessler GmbH (hereinafter called „MAFA“) has developed into an internationally operating company playing an important role in the global market. We set high standards in our relationships with Suppliers including their Suppliers and Subcontractors, Contractors, Consultants, Customers and other Partners (hereinafter called Business Partners).

The Board of Management has issued this Code of Conduct in order to emphasize the continuous importance of compliant conduct in times of increasing 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 periphery.

Aalen-Wasseralfingen, 14.12.2021

Yours faithfully

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

Konrad Grimm

The Board of Management  
Maschinenfabrik ALFING Kessler GmbH

## **2. 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 undertake to cooperate closely with MAFA in order to ensure and to control, within the applicable laws, 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 of information etc.).

### **3. GENERAL CODE OF CONDUCT**

- 3.1 We take it for granted to comply with all applicable laws of the countries in which Contractors operate. Each Contractor shall be obliged to inform himself of the applicable laws necessary for his activities and to comply with these laws at any time.
- 3.2 Contractors shall respect all internationally accepted human rights and support their observance. They especially do not approve any exploitative working conditions, any kind of forced labour as well as any kind of child labour and comply with all applicable legal provisions, such as for example minimum age of employees.
- 3.3 Contractors shall boycott any kind of discrimination. They shall especially be fair and respectful with their employees and business partners. Any discrimination due to race, ethnic origin, sex, religion or ideology, due to disability, age, sexual identity, nationality or other features protected by law is strictly prohibited.
- 3.4 All applicable employment laws and collectively regulated agreements of the countries shall be respected. The employees of Contractors shall be remunerated adequately and shall be paid minimum an employee's wage based on legal or collective labour agreements.

## **4. CONDUCT IN BUSINESS**

- 4.1 Contractors are committed to fair conduct with trade partners and third parties and shall respect the applicable laws and regulations especially anti-trust, competition, economy and trade laws and regulations as well as data protection regulations (application GDPR). These regulations shall govern the conduct of Contractors towards their competitors, trade partners and third parties.
- 4.2 Every Contractor is committed to adhere to these laws and regulations. This shall include not to gain any contracts by degrading competitors or their products and not to use any unfair methods in order to do harm to competitors. Any kind of understandings, agreements or collusions with competitors concerning prices, reductions, price changes, sales conditions and profit margins shall be prohibited. The attempt to unreasonably disadvantage any competitors in the competition or to gain illegal access to their confidential information shall be prohibited.
- 4.3 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 contain specific regulations covering export and re-export of goods or technical data and 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 in order to solve and avoid reoccurrence of similar violations in the future.

4.4 MAFA expects its Contractors to cooperate with government officials and agencies based on applicable law. Therefore they shall comply with all lawful regulations of government authorities, watching at the same time their own lawful rights.

4.5 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.

## **5. CORRUPTION**

5.1 Contractors strictly refuse economic crime and any corrupt behaviour, especially manipulation and corruption of competition by bribery.

5.2 Benefits of all kinds to MAFA employees or representatives of government aiming at gaining contracts or inadmissible advantages shall not be permitted. It is especially 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).

5.3 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.

## **6. INDUSTRIAL SAFETY**

Contractors place great value upon safety and health of its employees. They undertake to be aware of and to apply all applicable legal regulations concerning safety and health protection and occupational and plant safety and to support health and safety of their employees by continuous improvement of working conditions and by numerous prevention measures. This shall include application of all applicable regulations concerning hygiene, fire protection, risk protection and electric, mechanic and architectural safety. MAFA recommends a certification according to ISO 45001.



## **7. ENVIRONMENTAL PROTECTION / ENERGY EFFICIENCY**

Contractors take seriously their responsibility for nature and environment. In a continuous process, they foster the environmental awareness of their employees and reduce ecological risks and emissions. Natural resources are used appropriately and economically and waste and all other environmental pollution shall be avoided as far as 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. MAFA recommends a certification according to ISO 14001 and ISO 50001.

## **8. PROTECTION OF INTELLECTUAL PROPERTY AND HANDLING OF COMPANY PROPERTY**

- 8.1 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 person and only to the extent that is consistent with law (Article 6 GDPR). They comply with provisions on data protection. Confidential information shall be used only to fulfill jobs assigned and may be disclosed to third parties only after MAFA's express written consent.
- 8.2 MAFA's intellectual properties, such as our trademarks, intellectual properties and related rights are an important asset and are the basis of our success. Their illegal use may cause considerable damage. Therefore Contractors shall protect such information to the best of their knowledge and belief.

## **9. 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 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 Contractor liable, shall be reserved.