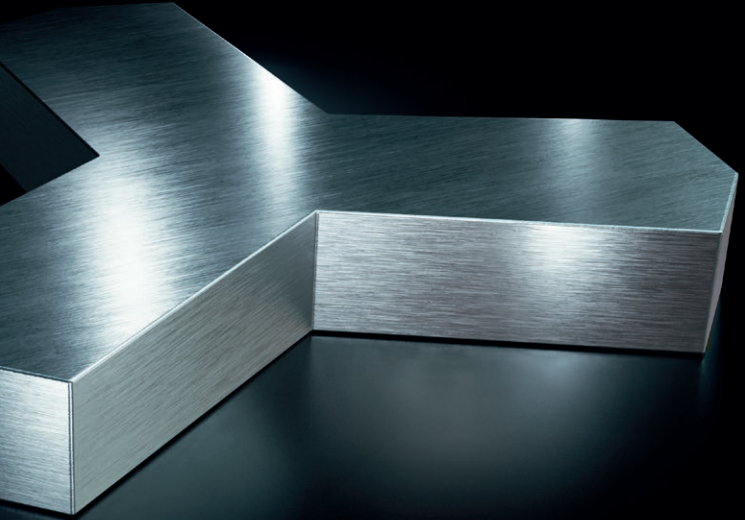




MASCHINENFABRIK
ALFING KESSLER GMBH



CODE OF CONDUCT

For Employees

**Mission Statement
by the Board of
Management**

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, contractors, consultants, customers and 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. Each employee of MAFA and its worldwide subsidiaries shall be obliged to follow these principles in order to maintain MAFA's good reputation.

Aalen-Wasseralfingen, 16/12/2022
Maschinenfabrik ALFING Kessler GmbH

Yours faithfully

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

Konrad Grimm
Member of the Board of Management

Contents

1) Scope	p.6
2) General Code of Conduct	p.7
3) Conduct in Business	p.10
4) Conduct towards Business Partners and Government Authorities	p.12
5) Corruption	p.14
6) Industrial Safety	p.15
7) Environmental Protection / Energy Efficiency	p.16
8) Protection of Information and Handling of Company Property	p.17
9) Responsibilities / Contact Persons / Additional Information	p.18

1) Scope

This Code of Conduct shall apply to all employees (hereinafter also called 'we') of Maschinenfabrik ALFING Kessler GmbH and its subsidiaries (hereinafter collectively also called 'MAFA'). Each employee shall personally be responsible for reading, understanding and implementing this Code of Conduct.

As a supplement to this Code of Conduct, MAFA has issued further regulations for its employees (such as work regulations, job instructions, process instructions to be found on the intranet) which shall also be binding. In the event of conflicts between legal and company standards and in the event of conflicts between different internal standards, the more stringent regulation shall apply.

In the event of doubts or questions concerning this Code of Conduct or in the event of violations of this Code of Conduct, contact the Compliance Officer.

Any violation of this Code of Conduct or the broader regulations may result in disciplinary and legal consequences.

2) General Code of Conduct

2.1

Compliance with all applicable laws of the countries in which MAFA operates is considered a matter of course. Every employee is obligated to inform himself/herself of the applicable laws necessary for his/her activities and to comply with these laws at all times. For reference, information on the applicable laws can be found in the respective work regulations, the Vistra database, the applicable job description, and all job instructions and process instructions on the intranet. Furthermore, principals and the Compliance Officer can be contacted any time in relation to questions and explanations.

2.2

We expect all our employees to act with responsibility and integrity in accordance with the principles of conduct laid down in this Code of Conduct.

Every employee is responsible for MAFA's reputation and shall ensure that no harm is done to MAFA by his/her behaviour. We shall act according to the best of our knowledge and belief at all times, we shall be personally responsible for our behaviour and we shall bear MAFA's reputation in mind in everything we do.

2.3

All principals shall support this Code of Conduct through their own conduct and act as role models. Principals shall avert improper behaviour within their managerial functions and shall avoid any violations of this Code of Conduct by appropriate action within their scope of responsibility.

2.4

We respect all internationally accepted human rights and support their observance. In particular, we do not approve of any kind of enforced labour or any kind of child labour and comply with all applicable legal provisions, such as those concerning the minimum age of employees.

2.5

MAFA maintains an open and communicative working environment based on the fair, tolerant and confident cooperation of all employees. All MAFA employees commit to respecting the personality and dignity of any human being and shall treat all individuals in the way they wish to be treated themselves.

2.6

MAFA rejects any kind of discrimination. In particular, we treat our co-workers 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.

2.7

All applicable national employment laws and collectively regulated agreements shall be adhered to. All MAFA employees shall at minimum be paid an employee's wage based on legal or collective labour agreements.

3) Conduct in Business

3.1

MAFA is committed to fair conduct with business partners and obeys the applicable antitrust, competition, economic and trade laws and regulations. These regulations shall govern MAFA's conduct towards competitors, contractors and third parties.

3.2

In the event of violation of these laws, both MAFA and the offending employee may face severe consequences. In case of doubt as to how far these standards concern the employee's own field of activity, the Compliance Officer shall be consulted.

3.3

Every employee 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 collusions 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 considered an offence.

3.4

In international business, MAFA shall comply with all applicable customs, import and export control laws and regulations.

Maschinenfabrik ALFING Kessler GmbH is certified as 'known consignor' and as such is entitled to ship 'safe air freight'.

MAFA is also certified as an authorised economic operator (AEO-F).

Every employee shall support MAFA within his/her range of duty to maintain this status.

4) Conduct towards Business Partners and Government Authorities

4.1

Benefits, gifts or other personal advantages (such as an invitation for a business lunch) may be granted or accepted only if they are in line with usual business practices. This shall apply during both working and leisure hours. Any benefits, gifts or personal advantages that may affect decision-making shall not be allowed.

4.2

Based on applicable law, MAFA is willing to cooperate in confidence with government officials and agencies. We shall therefore comply with all lawful regulations of government agencies while simultaneously observing MAFA's lawful rights.

4.3

Invitations to government officials or business partners shall be made exclusively on a business basis. The laws of the applicable country shall be adhered to. Complimentary gifts of minor value which are in line with generally accepted business practices and the refusal of which would be considered unfriendly may be granted and accepted.

4.4

MAFA employees shall be prohibited from claiming any benefits, gifts or personal advantages. Accepting any financial benefits or other non-cash benefits (such as vouchers) for personal advantage is not allowed. Participating in business lunches or events organised by business partners shall be allowed only if participation is voluntary, if they have a permissible purpose and if they take place within usual business cooperation.

4.5

Private business or any other relationships between employees and MAFA business partners that might affect the activities and decision-making of MAFA's employees shall not be allowed.

4.6

In the event of doubt as to the correct behaviour in individual cases, the Compliance Officer and / or the Board of Management shall be consulted.

5) Corruption

5.1

MAFA rejects economic crime and any corrupt behaviour, especially manipulation and corruption of competition through bribery.

Employees shall not be allowed to make use of MAFA's business connections to the company's detriment.

5.2

Benefits of all kinds to business partners or representatives of government with the aim of obtaining contracts or inadmissible advantages for MAFA or third parties 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).

6) Industrial Safety

6.1

Maschinenfabrik ALFING Kessler GmbH places great emphasis on the safety and health of its employees. We commit to applying all applicable regulations concerning safety and health protection. Maschinenfabrik ALFING Kessler GmbH supports the health and safety of MAFA employees through the continuous improvement of working conditions and through numerous prevention measures. Every employee promotes his/her personal safety and health by complying with the applicable regulations for safety and health protection.

6.2

Maschinenfabrik ALFING Kessler GmbH maintains a management system in accordance with the ISO 45001 standard and is certified accordingly. Within his/her range of duties, each employee shall support Maschinenfabrik ALFING Kessler GmbH in maintaining this status.

7) Environmental Protection / Energy Efficiency

7.1

MAFA takes its responsibility for nature and the environment seriously. In a continuous process, we foster the environmental awareness of our employees and reduce ecological risks. Natural resources are used appropriately and economically and waste is avoided as far as possible. MAFA participates in the development and deployment of environmentally friendly technologies. We maintain an environmental management system in accordance with the ISO 14001 standard and an energy management system according to ISO 50001 and we are certified accordingly.

7.2

All employees shall be responsible for complying with the relevant environmental laws and internal regulations, especially the process and job instructions to be found on the intranet. They shall support MAFA within the range of duties assigned to them to maintain the aforementioned certifications and to achieve the environmental and energy management targets set.

8) Protection of Information and Handling of Company Property

8.1

Protection of our business and trade secrets, of the business and trade secrets of our business partners, and of personal data is highly important to MAFA.

Personal data will only be collected with the consent of the employee and in accordance with legal provisions (Article 6 GDPR). We comply with provisions on data protection. Confidential information of our business partners shall be used only to fulfil the tasks assigned to us. Every employee shall be obliged to comply with the internal regulations covering non-disclosure and data protection.

8.2

MAFA property shall be treated carefully and appropriately and may be used for business purposes only, except if private use has been authorised in individual cases. Every employee shall protect company property from loss, theft or damage.

8.3

MAFA's intellectual properties, such as our trademarks, intellectual properties and related rights, are an important asset and are the basis of our success. Impermissible use of these may cause considerable damage. We therefore protect such information to the best of our knowledge and belief.

9) Responsibilities / Contact Persons / Additional Information

9.1

The MAFA Board of Management and the Compliance Officer shall be responsible for updating and supervising this Code of Conduct.

9.2

Responsibilities for internal and external relationships:

All questions relating to the Code of Conduct shall be directed to the authorised MAFA Compliance Officer.

9.3

The Compliance Officer shall be appointed by the Board of Management.

9.4

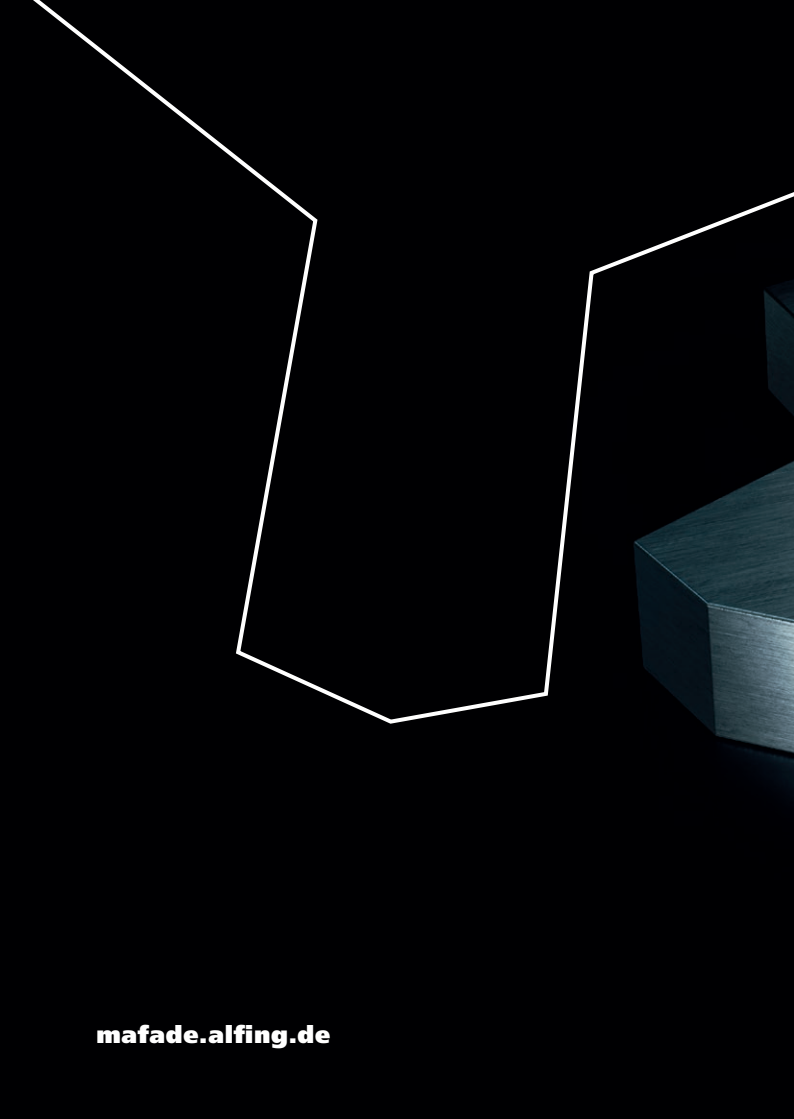
Any offences against this Code of Conduct are to be reported to the Compliance Officer. The Compliance Officer shall decide with the Board of Management how to proceed further.

9.5

Applicable documents

The Board of Management reserves the right to regulate further details in related documents.

Code of Conduct C1, Applicable Documents



mafade.alfing.de