

General Business Principles

Code of Conduct

Sundwiger Messingwerk GmbH

Version 2.0



Introduction

We participate in fair competition and have undertaken to be successful on the market through our employees, our innovative strength, the quality of our products and the reliability and regularity of our manufacturing and supply chain and to thus assume responsibility for the environment and society.

Hence, we respect applicable law everywhere and expects the same of its employees and business associates. Unlawful conduct may cause considerable economic loss. Even the semblance of a violation of the law may impair the company's market position. The consequences of one's own actions are to be measured in terms of how these affect the reputation of the company and the integrity of its employees and Directors.

A further pillar of the company's success is its corporate culture of dedication and motivation carried by the conscientious and ethical actions of every employee. A corporate culture of dedication, motivation and conscientiousness also includes a personal commitment to maintain integrity in business dealings.

Every action must, therefore, be based on a clear understanding of the statutory and legal provisions, the company's internal guidelines and the common values.

The rules of conduct describe the framework within our goals are to be implemented in the course of the day-to-day work. It is not only the results that matter in this respect, but also how these goals are achieved. The rules of conduct thus facilitate compliance with statutory provisions and internal rules. However, they cannot represent a complete collection of the duties arising under all legal systems where our company operates. Nevertheless, these rules of conduct shall – just as these business principles – be heeded and complied with by all employees. The employees' supervisors as well as the Compliance Coordinator shall be available to answer any questions.

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1 Proper Business Practices

We place an emphasis on integrity and fairness in all business activities. All business records must be in keeping with the laws and the company's own guidelines. All assets must be recorded in the books of account.

1.1 Bribery/prohibition of corruption

We prohibit all types of bribery. No employee shall offer, give or accept bribes himself. It is a crime to commit bribery, whether in business transactions or in relation to public officials, and/or to grant undue advantages. In particular, all employees are prohibited from directly or indirectly offering, promising, granting or accepting inappropriate tangible or other advantages for the purpose of winning a contract and obtaining unlawful favours.

1.2 Collaboration with public authorities

The regulatory duties in relation to the competent public authorities shall be complied with.

1.3 Acceptance or granting of advantages

No employee shall demand, accept, offer or grant personal advantages in connection with his professional activity. No employee shall accept or take receipt of gifts from business associates or other third parties where this constitutes undue influence on business decisions or could be perceived as such.

1.4 Competition/prohibition of cartels

All employees must comply with the respective applicable provisions of the law on cartels and competition. In particular, employees shall not propose or enter into any type of collusion:

- with a competitor regarding trading in goods or services with third parties;
- with customers regarding the price at which the customer resells our products or services to third parties or the terms of delivery in respect of such reselling.

1.5 Business relations

Relations between companies or employees and their business associates – e.g. with suppliers and customers or with government agencies and their employees etc. – must be marked by transparency, particularly in purchasing and sales. This shall also apply to relations with former employees and, in particular, relatives of employees who directly or indirectly supply the companies with goods or services. Due diligence checks on defined business associates shall be conducted on the basis of our business principles. Employees involved in contractual negotiations with public authorities must know the tendering process guidelines valid for the country concerned and shall not breach these. We shall compete for contracts by fair and legal means and conduct contract negotiations in compliance with all legal provisions.

1.6 Observance of export and import control laws

Employees involved in the importing or exporting of goods, services or technical information must know and comply with the relevant provisions. Furthermore, they must ensure that the import/export documentation is complete. Where the exporting of products and technical data is regulated in the country concerned, the employees must obtain corresponding licences and other governmental authorisations prior to exporting.

1.7 Tax law/customs law/foreign trade law

We shall truthfully create tax declarations and tax returns. We shall properly clear through customs all goods that are subject to customs duty. We shall consistently comply with the statutory export control and customs requirements with regard to foreign trade law and customs law and ensure that these are properly implemented. For this purpose, our employees shall carry out the following measures in particular:

Checking sanctions lists in accordance with Regulation (EC) 2580/2001, Regulation (EC) 881/2002 and Regulation (EU) 753/2011 in respect of suppliers, customers, employees and other business contacts:

- checking exports for which an authorisation may be required (in particular: dual-use products), in collaboration with the German Federal Office for Economic Affairs and Export Control (Bundesamt für Wirtschaft und Ausfuhrkontrolle (BAFA)), and obtaining corresponding negative certificates;
- checking and monitoring compliance with embargoes, particularly with the prohibitions of delivery and supply resulting from the country-related embargo measures set out at www.bafa.de.
- measures for ensuring the security of the supply chain, in particular in accordance with or in line with the provisions relating to authorised economic operators (AEOs) under the Union Customs Code (Regulation (EU) No. 952/2013), the Implementing Regulation (EU) 2015/2447 and the Delegated Regulation (EU) 2015/2446...

We expect our suppliers to provide the export control and foreign trade data in a qualified and timely manner and to implement adequate supply chain security standards in the context of global customs security programmes. In the context of the export control and foreign trade data, we request that our suppliers provide in particular the following binding information:

- the statistical commodity code according to the current commodity classification for foreign trade statistics and the customs tariff number according to the HS (Harmonised System),
- the country of origin (preferential origin and non-preferential origin).

1.8 Prevention of money-laundering

The channelling of assets derived from criminal acts into legal financial and economic circulation whilst concealing their true origin, as well as all other money-laundering activities at home or abroad are prohibited.

We shall adhere to the legal provisions relating to the prevention of money-laundering.

1.9 Insiderhandel

It is impermissible to use for trading in shares or other securities, or to pass on to third parties, confidential information that would, if it were to become known, be likely to considerably affect the stock exchange price or market price of the shares or securities of a company ("Insider Information").

1.10 Avoidance of conflicts of interests

All employees must avoid any situation that may give rise to a conflict between their personal interests and the interests of our company. A conflict of interests may arise where an employee undertakes acts or pursues interests that could hamper the objective and effective performance of his duties and the exercise of his responsibility in relation to our company.

1.11 Correct handling of invitations, gifts and other advantages

The acceptance or granting of gifts or other advantages is permissible only with the prior approval of the supervisor concerned or the Compliance Coordinator and only on condition that the gifts or advantages do not violate laws or guidelines, are kept within the bounds of what is appropriate and are not aimed at unfairly influencing decisions. The assessment of whether gifts or invitations are appropriate shall be determined on the basis of customary business practice; country-specific peculiarities shall also be taken into account in this respect where applicable. Any semblance of improbity or improbity shall be avoided.

1.12 Business secrets and protection of intellectual property

Every employee shall be obliged to treat confidentially business information concerning our business associates that is not publicly known and to protect such information against unintentional disclosure.

A significant asset of our company is its intellectual property.

This includes patents, business secrets, trademark rights and copyrights. It is company policy to establish all rights in economically significant intellectual property, to use these rights responsibly and to preserve, protect and defend these rights. We shall respect the intellectual property of other natural persons and legal entities and use the corresponding information, computer programmes or procedures exclusively in accordance with the respective licence agreements and/or within the scope of the statutory provisions.

1.13 Data protection

Personal data shall be collected, processed and used only insofar as this is permitted by law, serves lawful purposes and is necessary for the performance of a task. All employees must handle personal data in conformity with the applicable laws and protect the data.

We use security measures of a technical and organisational nature to protect personal data against manipulation, loss and destruction and against access by unauthorised third parties. In this respect, these security precautions shall be continually improved in keeping with the state of development.

We have appointed a data protection officer to whom every employee can turn with questions and comments.

1.14 Product safety

As a company operating in the field of metal processing, our focus is on the manufacture and delivery of safe and high-quality products. We expect our employees to support the quality of the products. In particular, this involves all employees reporting to their supervisor without delay any complaints they become aware of regarding products.

1.15 Supply chain responsibility

Even if we are not directly subject to the provisions of the Supply Chain Act (Lieferkettengesetz), we pledge to uphold the values and goals of the Supply Chain Act. We shall respect human rights and support the protection of life and health and the protection of the environment and nature. We shall respect the freedom to form trade unions and employee representative bodies.

We endorse the prohibition of slavery, forced labour and human trafficking, the prohibition of child labour and the protection of children, the prohibition of torture and the prohibition of discrimination and discriminatory treatment.

We advocate the duty to uphold worker safety regulations and comply with the respective local applicable minimum wage laws.

Consequently, we shall, within the bounds of its possibilities, support our contractual partners by providing these, to the best of its knowledge, with the information they need for performing their supply chain responsibility and/or fulfilling their statutory duties arising from the Supply Chain Act.

2 Employees

2.1 Conduct in the company

The requirement of tolerance, respect, professionalism and fairness shall apply in interactions with one another and with third parties. This shall also apply to interactions with and on so-called social media.

Employees must separate their private interests from those of the company at all times.

The consumption of drugs, alcoholic drinks and intoxicating substances before or during the working time is prohibited.

Our conduct in relation to our employees (including future potential employees) shall be characterised by respect and fairness. We shall respect the personality of our employees and reject all forms of harassment, discrimination and discriminatory treatment.

Nobody shall be discriminated against or favoured or harassed or marginalised on the basis of nationality, ethnic or social origin, skin colour, age or appearance, gender, disability, gender identity or sexual identity, religion or ideology, membership of trade unions or parties or a pregnancy.

2.2 Protection against harassment and discrimination

All employees, customers and suppliers have the right to be treated fairly, respectfully, with dignity, politely and without discrimination. We feel bound by this principle and wish to ensure that this right is upheld in our company.

We shall heed the principles of equal opportunity at the workplace. Personnel decisions (e.g. in respect of recruitment, selection, training, promotion and remuneration) shall be based on qualifications, experience and other work-related criteria. We shall not discriminate on the basis of gender, race, ethnic origin, religion, ideology, disability, age or sexual orientation.

It is our duty to safeguard the right of our employees to work in an environment where they are not sexually harassed or impermissibly discriminated against. Any form of sexual harassment or other impermissible discrimination on the basis of gender, race, ethnic origin, religion, ideology, disability, age or sexual orientation shall not be tolerated and must not occur.

Sexual harassment is any undesired conduct of a sexual nature, including undesired sexual acts or requests for such acts, physical contact of a sexual nature or comments of a sexual nature and any undesired showing or visible display of pornographic images with the purpose or effect of violating the dignity of the person concerned, particularly if an environment marked by intimidation, animosity, humiliation, debasement or insults is created. Sexual harassment is unlawful.

Examples of unlawful sexual harassment are:

1. requesting sexual acts or offering sexual acts in order to obtain advantages at the workplace;
2. cornering, patting, pinching or touching or other undesired physical contact of a sexual nature;
3. public speculations or repeated enquiries about a person's sex life;
4. jokes, comments or innuendoes of a sexual nature concerning a person or men and women in general; or
5. visible display of pornographic images at the workplace.

Examples of other impermissible discrimination prohibited on the basis of gender, age, race, ethnic origin, religion, ideology, disability or sexual orientation are:

1. violation of an employee's dignity through insulting or degrading comments or conduct (e.g. based on foreign origin);
2. threats or insinuations implying that the continuation of an employment relationship depends upon acquiescence to certain behaviour;
3. forcing an employee to perform degrading or humiliating acts, e.g. harassment based on sexual orientation.

If employees are harassed or otherwise impermissibly discriminated against, they should report this to the personnel department.

2.3 Health and occupational safety

We shall comply with the statutory provisions for ensuring health and safety at the workplace and has taken the measures necessary in this respect in order to avoid work accidents and protect the health of the employees.

The statutory provisions relating to worker safety, health and safety at the workplace as well as building safety shall be adhered to with the aim of minimising the risk of accidents and occupational illnesses.

Every employee shall bear joint responsibility for occupational safety; provisions concerning occupational safety, health and the environment shall be strictly applied. With regard to the handling of hazardous substances, works directives and safety data sheets created in accordance with the statutory provisions shall be heeded.

2.4 Confidential information

We confide a great deal of information to our employees on a daily basis in the course of the performance of their work and duties, information that is marked confidential or is identifiable as such ("Confidential Information"). This information shall be protected and kept secret. The same duty to maintain secrecy shall apply to information communicated to the company by business associates under a non-disclosure obligation.

To protect Confidential Information, it is essential to heed the following in particular:

- You must not pass on Confidential Information to other persons within or outside of the company (including colleagues or relatives) during the employment relationship or thereafter unless this is necessary for carrying out your work for the company.
- Confidential Information shall not be discussed (in person or on a mobile telephone) in public places (entrance areas, corridors, public means of transport, toilets etc.) where a conversation can be listened in on.
- Documents containing Confidential Information shall be stored in such a way that there is no possibility of unauthorised persons accessing them.
- Particularly with regard to visitors, care must be taken that these receive no access to the company's records. For this reason, visitors shall invariably not be permitted to be in our business or office premises without being accompanied.

3 Social Environment Public

3.1 Working time

The working time should conform to the statutory provisions or the provisions customary in the industry, whichever are stricter. Entlohnung

3.2 Pay

Wages and salaries, including remuneration for overtime and special benefits, must conform to the level prescribed by the applicable laws and provisions.

3.3 Freedom of association

We shall safeguard the right of its employees to freedom of association and collective bargaining.

3.4 Prohibition of child labour

Child labour in any form is opposed. No person of school age or under the age of 15 shall be employed unless a higher age limit is set by law.

3.5 Prohibition of forced labour and human trafficking

Forced labour, slavery and human trafficking of any kind are prohibited. This includes forced prison labour, serfdom and the like.

4 Environmental and Health Protection, Sustainability

We pledge to protect the environment and human health. This includes the health and safety of its employees and all persons working in the company.

We attach great importance to sustainability and shall take sustainability into account in our business deliberations.

We shall explain in a clear and comprehensible manner how our products are to be used and what risks could be associated with their use.

5 Reporting and Documentation

5.1 Financial reporting and documentation duties

All business transactions shall be documented appropriately and truthfully. It shall be ensured that all information relevant to accounting and required under tax law is recorded fully and correctly. Statutory and official regulations concerning retention shall be heeded

5.2 Handling of media and government agencies

Enquiries from the press or the like shall be answered only by employees expressly and specifically authorised to do so.

6 Compliance with the Business Principles

Supervisors and managerial staff have a special role model function and shall ensure that their employees are familiar with the content of these business principles. The managerial staff shall, within their sphere, implement preventative measures in order to guard against breaches. All employees at every hierarchical level as well as the company's organs shall themselves be responsible for compliance with these business principles. Breaches of these business principles shall not be tolerated and may lead to disciplinary measures under labour law, which may even include dismissal and, depending upon the nature of the breach, liability proceedings under civil law and criminal prosecution.

We warrant that no employee who reports irregularities or suspicions will suffer harm or any other discrimination as a result thereof.

7 Breach of the Guidelines/Complaints, Questions

7.1 Questions

The Compliance Coordinator shall be responsible for reviewing our business processes with regard to compliance with these principles, identifying compliance-related problem areas and investigating breaches detected.

Indications of cases of suspicion or breaches of Sundwiger Messingwerk GmbH's General Business Principles or against the law or legislation shall be reported to the Compliance Coordinator.

7.2 Reports

Any person inside or outside Sundwiger Messingwerk GmbH may lodge a personal complaint or point out to this Board circumstances indicating a breach of these guidelines. Such reports may be made in person, by internal mail, by telephone or by email to the email address specially set up for this: meldestelle@sundwiger-mw.com. The reports shall be treated with strict confidentiality and have no adverse consequences for the person making the report unless a false claim has been deliberately made. It is also possible to make anonymous reports via internal mail. After a thorough investigation, appropriate measures will be taken where appropriate. All documents will be kept confidential.

Hemer, dem 01.03.2024



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Executive Director



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