

Code of Conduct

of

Haff & Schneider GmbH & Co. OHG

(as of 31.1.2023)

1. Preamble

Haff & Schneider GmbH & Co. OHG is committed to ecologically and socially responsible management. We expect all our employees and suppliers to observe the principles of ecological, social and ethical conduct and to integrate them into the corporate culture. In addition, we are committed to continuously improving our business and products in terms of sustainability, and we ask our suppliers to contribute to this as part of a comprehensive approach.

For future cooperation, the parties agree on the validity of the following rules for a common code of conduct. This agreement will be the basis for all future deliveries. The parties undertake to comply with the principles and requirements of the Code of Conduct. Our suppliers are required to oblige their subcontractors to comply with the standards and regulations set out in this document.

The Code of Conduct is based on national laws and regulations and international conventions such as the United Nations Universal Declaration of Human Rights. We expect our contractors to comply with all relevant laws, regulations and standards.

2. Core Values and Principles of Conduct

This Code of Business Conduct has been developed and issued by the Executive Committee. They represent the consistent implementation of the company values and form the basis for the responsible and ethical behaviour of all employees of Haff & Schneider GmbH & Co. OHG.

Our managers have a special role model function in this respect. The prerequisite for a company-wide implementation of the principles of conduct is that the values of Haff & Schneider GmbH & Co. OHG and that they actively counteract any behaviour that does not comply with national laws or the company's core values.

We encourage all employees, as well as our contractual partners, to seek confidential advice and assistance from their supervisors or the management of Haff & Schneider at any time regarding decisions on ethical or legal issues, or if they become aware of conduct in their work environment that they consider questionable. Complaints procedures must be accessible while maintaining confidentiality of identity and effective protection against discrimination. Suppliers are responsible for establishing an effective complaint mechanism, including at company level.

2.1. Social Responsibility

Prohibition of Child and Forced Labour

We strictly reject the use of child labour, forced labour or similar practices, and such labour shall not be used at any stage of production.

We adhere to the recommendation of the ILO Conventions on the minimum age for the employment of children, which states that the age should not be less than the end of compulsory education and in any case not less than 15 years.

All work must be voluntary and without the threat of punishment. There shall be no unacceptable treatment of workers, such as psychological distress, sexual and personal harassment and humiliation. Security personnel shall not be engaged or used if, in the course of their employment, they are subjected to inhuman or degrading treatment or injury, or if freedom of association is restricted.

Fair Pay and Working Hours

Remuneration paid to employees must comply with all applicable laws on remuneration, including, for example, laws on minimum wages or overtime. Working hours must also comply with applicable laws and industry standards.

Prohibition of Discrimination

Discrimination against employees in any form is not permitted. This includes discrimination on the basis of gender, race, caste, colour, disability, political opinion, origin, religion, age, pregnancy or sexual orientation. We do not recruit on the basis of ethical characteristics; our corporate social responsibility is to promote diversity, equality and inclusion. The dignity, privacy and personal rights of each individual are respected.

Health and Safety at Work

Both Haff & Schneider and our contractors are responsible for providing a safe and healthy working environment. By establishing and implementing appropriate health and safety systems, the necessary precautions are taken to prevent accidents and damage to health that may occur in connection with the activity. In addition, employees are regularly informed and trained on applicable health and safety standards and measures.

Management Culture and Collaboration

Relationships must be characterised by mutual respect and openness, both internally at Haff & Schneider between employees and superiors, and externally with our suppliers and customers. Supervisors have a role model function, particularly in respecting and implementing these principles of conduct.

Freedom of Association

Haff & Schneider and its suppliers respect the right to organise freely, to form and join a workers' organisation of their choice, to be represented and to bargain collectively, in accordance with applicable laws and regulations.

Preserving the Natural Environment

Harmful soil changes, water and air pollution, noise emissions and excessive water consumption must be avoided. Land, forest and water rights as well as the rights of minorities (especially indigenous peoples) must be respected and complied with.

2.2. Environmental Responsibility and Protection

We are committed to innovation and sustainability. This means continuously optimising products and technologies in terms of responsible use of resources, prevention of environmental degradation and compliance with environmental legislation and standards in development and production.

In particular, all Haff & Schneider suppliers are required to monitor the origin, supply and sourcing of any conflict raw materials such as tin, tantalum, tungsten and gold contained in the goods supplied to Haff & Schneider.

When developing products and technologies, we strive to reduce resource consumption and increase efficiency. In addition, each of us has a responsibility to reduce our environmental impact by acting in an environmentally responsible manner in our daily work.

Treatment and Discharge of Industrial Waste Water

Wastewater from operations, manufacturing processes and sanitary facilities should be typed, monitored, inspected and, if necessary, treated before discharge or disposal. In addition, measures should be taken to minimise the generation of waste water.

Air Emissions Management

General emissions from operations (air and noise emissions) and greenhouse gas emissions shall be typified, routinely monitored, reviewed and, if necessary, treated prior to release. In addition, we and our suppliers are required to find economic solutions to minimise any emissions.

Handling of Waste and hazardous Substances

Haff & Schneider and also its suppliers follow a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste. The prohibitions on the export of hazardous waste in the Basel Convention of 22 March 1989, as amended, must be observed. Chemicals or other materials that pose a risk if released into the environment must be identified and managed in a way that ensures safety during their handling, transport, storage, use, recycling or reuse and disposal.

Use of Raw Materials and Natural Resources

The use and consumption of resources during production and the generation of waste of all kinds, including water and energy, shall be reduced or eliminated. This is done either directly at the point of origin or through procedures and measures such as changing production and maintenance processes or procedures in the company, using alternative materials, saving, recycling or reusing materials.

Management of Energy Consumption and Energy Efficiency; Renewable Energies

Energy consumption shall be monitored and documented. Economic solutions should be found to improve efficiency and minimise energy consumption.

Increased use of renewable energy and own production of renewable energy should be sought and implemented.

2.3 Ethical Business Conduct

Fair Competition

Standards of fair dealing, fair advertising and fair competition must be observed. In addition, applicable antitrust laws, which prohibit in particular collusion and other activities that influence prices or conditions in dealings with competitors, shall be applied.

Confidentiality/Data Protection

We are committed to meeting the reasonable expectations of our clients, suppliers, customers, consumers and employees regarding the protection of business, confidential, secret and personal information. Both Haff & Schneider and our contractual partners must comply with data protection and information security laws and government regulations when collecting, storing, processing, transmitting and disclosing information.

Intellectual Property

Intellectual property rights shall be respected; technology and know-how transfers shall be conducted in a manner that protects intellectual property rights.

Integrity/Bribery, Unfair Advantage

The highest standards of integrity shall be applied in all business activities. None of our employees may take advantage of business relationships for their own benefit or to the detriment of others. This means in particular that none of our employees may grant or accept unauthorised private benefits outside the socially appropriate framework. Haff & Schneider has a zero-tolerance policy regarding the prohibition of all forms of bribery, corruption, extortion and embezzlement.

Compliance with Foreign Trade Laws

Haff & Schneider and all its suppliers shall take reasonable steps to ensure that transactions with third parties do not violate applicable laws relating to economic embargoes or trade regulations, import and export controls or provisions relating to the international fight against the financing of terrorism.

Avoiding Conflicts of Interest

At Haff & Schneider, business decisions are made solely in the best interests of the company. Conflicts of interest with private interests or other economic or other activities, including those of relatives or other related persons or organisations, should be avoided from the outset. If they do arise, they must be resolved in accordance with the law. This requires transparent disclosure of the conflict.

3. Awareness and Use of the Code of Conduct

We actively promote awareness and application of this Code of Conduct. Each manager is required to ensure that employees in their area are aware of the Code of Conduct and that it is followed.

We expect the same behaviour from our business partners and the same consistent implementation of the listed principles of conduct as we demand from our employees.

Nesselwang, January 2023

Richard Schneider (Managing Director)

Michael Haff (Managing Director)