

Our Code of Conduct

SENNEBOGEN Group of Companies (Germany)

SENNEBOGEN Maschinenfabrik GmbH
SENNEBOGEN Produktions GmbH & Co. KG
SENNEBOGEN Maschinentechnik GmbH & Co. KG
SENNEBOGEN Multi Line GmbH & Co. KG
SENNEBOGEN Vertriebs GmbH & Co. KG
SENNEBOGEN Akademie GmbH & Co. KG
SENNEBOGEN Dienstleistungs GmbH & Co. KG
SENNEBOGEN Fertigungs GmbH & Co. KG

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Foreword from the Management

As a family-owned company steeped in tradition since 1952, we are guided by the values and principles of reputable business. Trust-based collaboration with our customers and partners, a consistently high level of innovation, and a long-term outlook in everything we do have made us a renowned, world-leading manufacturer of machines in numerous markets and countries. Our aim is to carry on working in this manner for many years to come.

Adhering to ethical and legal standards is a matter of course for us and is expressed in this code of conduct. With it, we fulfill our obligation to our business partners, our employees, our shareholders, our country and our society.

This code of conduct is binding for all executives, managers, and employees of the SENNEBOGEN Group of Companies. We regard this as one of the foundations of our success and our sustainability.

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1. Principles

Our code of conduct applies to all employees of the SENNEBOGEN Group of Companies. It is consistent with the legal requirements on compliance guidelines and guides all employees in complying with laws, regulations and internal instructions. Executives, managers and the works council lead by example in complying with these guidelines.

2. Duty to be informed

Managers and employees are required to inform themselves on the laws, regulations and internal instructions applicable to their area of responsibility.

3. Confidentiality and data protection

Personal data may only be collected, used, stored, and made available to other people within the scope permitted by data protection laws.

Protecting the confidential information of our business partners is one of the key foundations of trust-based collaboration. Internal information, instructions, and documents are also handled confidentially by all relevant employees.

We always protect confidential information from unauthorized access, from being viewed by unauthorized third parties and uninvolved colleagues, and from intentional or accidental alteration. Third parties also include family members.

4. Equal treatment

We do not tolerate any discrimination, whether based on age, health, origin, race, gender, sexual orientation or religion.

5. Preventing conflicts of interest

We always separate private interests from the interests of the SENNEBOGEN Group.

If contracts are awarded to related parties or companies in which related parties work or hold shares, conflicts of interest may arise.

Moonlighting for competitors or business partners must always be approved by Human Resources.

If conflicts of interest arise in connection with contract award processes or moonlighting, the relevant supervisor or the compliance officer must be informed in writing. Establishing transparency is important.

The Management may approve exceptions if there is no possibility of the SENNEBOGEN Group being disadvantaged as a result.

6. Ban on bribery and corruption

Our Group of Companies does not tolerate any form of corruption or bribery. Employees must not be implicated in any illegal activities within their work environment, nor may they tolerate any illegal activities. This applies in particular to any violation of antitrust laws, to aiding and abetting tax evasion, or to any other tax-related offenses including tax fraud, both in the country in which the company is headquartered and in other countries where the company is active.

7. Giving gifts and invitations

Gifts or invitations to events not of a business nature must not be given or offered with the intention of obtaining unfair business advantages. This also applies even if there is concern that such intent could be implied or a conflict of interest could be assumed.

Gifts and invitations to events not of a business nature must not be in conflict with the compliance rules of the recipient or the local business standards. Employees who intend to offer gifts or invitations must therefore inform themselves of the relevant standards and rules beforehand.

Gifts and invitations to events not of a business nature with a value of up to €40 incl. VAT (per recipient per year) are permitted unless prohibited by the previously mentioned rules.

In order to preserve transparency, invitations and gifts can only be sent to the recipient's place of business. Invitations not of a business nature which go beyond a normal business meal are also to be reported to the recipient's supervisor.

In case of doubt, please consult the compliance officer.

8. Accepting gifts and invitations

Accepting gifts and other benefits is strictly prohibited if the interests of the company could be negatively affected or the professional independence of the employees could be jeopardized, whether apparently or actually.

The following rules are to be followed:

- Accepting gifts with a value of up to €10 incl. VAT is generally permitted in individual cases.
- Gifts or invitations with a value of between €10 and €40 incl. VAT may be accepted under the following conditions:
 - The gift/invitation is registered in the database.

- The sender has declared that they have paid or will pay the prescribed tax and social insurance contribution owed by the recipient from the benefit (§ 37b German Income Tax Act).
- The sum of benefits to an employee per sender per year must not exceed €40 incl. VAT. This must be ensured by the recipient.
- The following applies for accepting gifts or invitations in excess of €40 per instance as well as per sender per year:
 - The gift/invitation is registered in the database.
 - The sender has declared that they have paid or will pay the prescribed tax and social insurance contribution owed by the recipient from the benefit (§ 37b German Income Tax Act).
 - Invitations correspond to standard business practice.
 - No costs are to be covered for private individuals accompanying the recipient.
 - The gift/invitation has been approved by a member of the Management.

9. Donations

Donations, sponsorship money and other contributions without consideration, political donations and contributions to political parties are given exclusively by the Management.

The identity of the recipient and the intended use of the contributions must always be made transparent.

10. Handling company assets

Company assets such as real estate, equipment, tools, working materials, business documents, etc. are the property of the Group of Companies. We handle them responsibly and reserve them solely for company use.

When using them, we observe the relevant legal regulations as well as the internal agreements, work instructions, and guidelines.

11. Adhering to our code of conduct

If you have any questions or concerns or if you have information about infringements, please speak to your supervisor or our compliance officer.

Infringements may result in claims for damages, court cases, financial penalties, and loss of image for the Group of Companies.

Any infringement of the code of conduct may result in the following consequences for employees:

- Reprimand
- Disciplinary warning
- Dismissal
- Compensation for damages
- Court-ordered fine or imprisonment

Compliance officer contact details:

SENNEBOGEN Maschinenfabrik GmbH
Ralf Theis
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