



Compliance regulation at Möhlenhoff

1. scope of application

This Code of Conduct applies to all employees and to the executive bodies (Supervisory Board) of MÖHLENHOFF GmbH and its subsidiaries. It is important to us that our business partners conduct their business according to similar principles.

2. behavior in compliance with the law

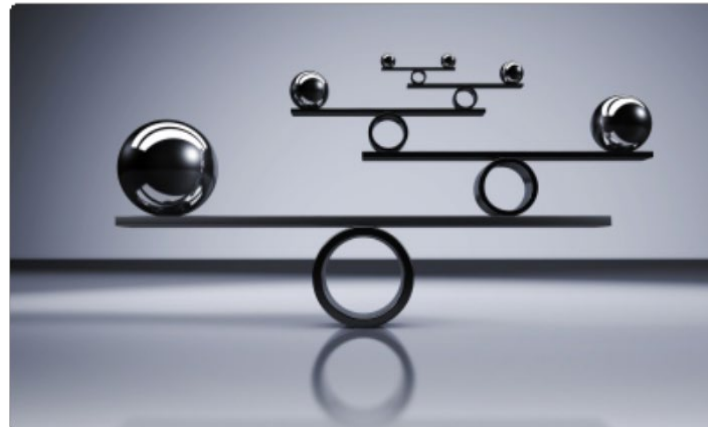
We uphold the principle of strict legality for all actions, measures, contracts and other internal processes. This also includes the payment of taxes owed, obtaining the necessary official approvals (e.g. in the area of customs and export control law) and observing the rights of third parties.

This principle is not only based on the consideration that violations can result in considerable business disadvantages due to criminal prosecution, fines or claims for damages. It is also based on the fact that violations of this principle can damage our image. We therefore strictly follow the principle of legal trade.

Every employee is personally responsible for compliance with the laws in their area of work. It is strictly forbidden to induce third parties to commit unlawful acts or to knowingly participate in such acts. Deviating actions will lead to disciplinary consequences, irrespective of the sanctions provided for by law.

Managers in particular are responsible for compliance with these regulations.

responsibility and must refer to the provisions of this Code of Conduct in their area of responsibility.



3. conflicts of interest

Conflicts of interest occur when personal or financial interests or personal ties conflict with the interests of the company. These can occur when employees award contracts or hire staff. For this reason, we avoid situations in which conflicts of interest could arise. Business activities on behalf of the company must not be influenced by personal considerations or relationships.

Examples of possible conflicts of interest:

- Conclusion of contracts with a company that is managed or owned by a close acquaintance or family member.
- Participation in a company with which MÖHLENHOFF maintains business relations as a supplier or customer, in which MÖHLENHOFF may have an interest in purchasing or which is in competition with MÖHLENHOFF.
- Membership in the supervisory body (supervisory board, advisory board, etc.) of a company or consultancy of a company with which MÖHLENHOFF maintains business relations as a supplier or customer, in which MÖHLENHOFF may have an interest in purchasing, or which is in competition with MÖHLENHOFF.

Possible conflicts of interest must be disclosed in writing to the direct superior. This person, if necessary with the involvement of the next higher management level, shall make the

and also responds in writing to the reported conflict of interest.

4. confidential information

All information about our company, our customers, suppliers and employees that is not expressly intended for the public must be treated confidentially. Information includes technologies and processes, manufacturing methods, studies and plans, research and development projects, marketing and customer information, quotations, profit margins, financial figures, etc.

Confidential information must be handled in such a way that unauthorized persons have no access to it. In particular, further internal regulations of MÖHLENHOFF regarding the handling of confidential information and the use of IT must be observed.

5. assets of the company

Our property, plant and equipment, intellectual property and information must be treated in such a way as to prevent loss, theft or damage. MÖHLENHOFF's assets are intended for business use. Private use is only permitted if it does not violate the interests of MÖHLENHOFF, this Code of Conduct or other MÖHLENHOFF guidelines and directives.

6. fair competition

The competitive system is the basis of the free market economy. It is protected and promoted by competition law. We respect the applicable antitrust laws and observe the rules of fair competition.

7. bribery and corruption

MÖHLENHOFF does not jeopardize its reputation as a company of integrity by offering or accepting bribes or the like. We do business based on the high quality and reasonable prices of our innovative products and services. We do not offer inappropriate gifts or other benefits to public officials or representatives of the private sector, nor do we promise or grant such benefits in order to induce these persons to act or refrain from acting in breach of their duties or at their discretion with the aim of obtaining a new contract, securing an existing one or otherwise gaining an unjustified advantage. Furthermore, we reject any form of bribery. This prohibition applies both in Germany and abroad and also extends to intermediaries, agents and brokers if their performance is disproportionate to the remuneration demanded.

The acceptance or offer of financial benefits, personal gifts, invitations or services by employees undermines the credibility of MÖHLENHOFF. If it is reasonably apparent that they are intended to influence a business decision and lie outside the limits of customary business and local hospitality, they must be refused or refrained from.

Any questions regarding the handling of these points should be addressed to the Finance department.

8. donations

Donations by MÖHLENHOFF to charitable, cultural or scientific institutions are made within the framework of the respective competence regulations and in accordance with local legislation.

9. mutual respect

MÖHLENHOFF does not tolerate any psychological, physical or sexual harassment of its employees, whether in direct contact, in correspondence, through gestures or physical contact. Complaints are dealt with immediately and, if necessary, punished.

MÖHLENHOFF upholds equal opportunities in the recruitment and employment of its employees. No one is discriminated against because of their gender, race, religion, nationality, political views, sexual orientation or physical disability. Conversely, MÖHLENHOFF does not tolerate any influence of political or religious groups on its employees on the company premises or during working hours.

MÖHLENHOFF respects the privacy of its employees. However, in compliance with applicable law, MÖHLENHOFF is entitled to review the use of the Internet and email traffic because any communication using MÖHLENHOFF-owned facilities is considered MÖHLENHOFF business information and may therefore be accessed, used, reviewed and disclosed by MÖHLENHOFF at any time.

The internal regulations and instructions must be observed.

MÖHLENHOFF guarantees occupational health and safety within the framework of legal regulations. Employees comply with the strict health and safety regulations as well as the obligation to report risks to life and limb, imminent damage to property or hazards to the environment.

10. drugs and tobacco consumption

The consumption of illicit drugs and the abuse of alcohol is prohibited on the company premises and during the performance of business activities for MÖHLENHOFF. The performance of business activities for MÖHLENHOFF may not take place under the influence of alcohol or other drugs. Smoking is prohibited within the business premises of MÖHLENHOFF GmbH.

11. tax compliance

A tax compliance system (TCS) represents all organizational measures that objectively ensure that all binding tax law standards are properly applied within the company (group; worldwide).

Responsibility for the introduction and implementation of the measures of the tax compliance system generally lies with the management. In the Möhlenhoff Group, this task is delegated to the Head of Finance.

The Möhlenhoff Group has identified the following as particular areas of focus:

- Value added tax (also chain transactions)
- Intercompany transfer prices

There is another point.

- Monetary benefits

The TCS is intended to ensure that all changes to application rules, particularly in **the area of VAT**, are recognized and properly implemented. To this end, instructions are to be drawn up that the relevant employees (Group-wide) adhere to. The TCS is intended to convey a critical attitude to employees who are entrusted with the processing of tax-relevant matters. If there is any doubt regarding the tax implications of measures, the person responsible must be approached and the matter must be dealt with properly

The TCS of Möhlenhoff GmbH ensures that the **transfer prices** for supply relationships with all subsidiaries or participations are reviewed at least once a year and adjusted if necessary.

In cases of doubt, clarification must be obtained from the Finance team via the audit (if necessary also via the foreign tax consultants).

12. reporting of infringements - Compliance Manager

The employees of MÖHLENHOFF are obliged to comply with all

suspected or observed violations of the law, violations of this Code of Conduct or other company principles. This can be done informally. The same applies if they are incited to such behavior by employees or third parties. The reckless incrimination of employees or third parties is not permitted.

Employees should address their complaints in writing to their line manager, the management or the Compliance Manager. They can be confident that the reported matter will be treated confidentially and investigated thoroughly and that appropriate measures will be taken if necessary.

Anyone who reports a violation does not have to fear any disadvantages. Nevertheless, infringements can also be reported anonymously. These anonymous reports must be posted in the designated letterboxes on the whiteboards in the production and office areas.

The responsible Compliance Manager is: Dirk Lippelt E-mail address: compliance@moehlenhoff.de

However, employees must be aware that anonymous reports may be more difficult to verify.

Accusations made against better knowledge will be punished.

Notifications relating to customs matters should be sent to the following e-mail address: zollFinanzen@moehlenhoff.de

13. sanctions

MÖHLENHOFF employees are obliged to ensure that not only their own conduct but also that of their subordinates complies with this Code of Conduct.

Violations will result in disciplinary measures. In serious cases, the employment relationship may be terminated.

Management Möhlenhoff GmbH
