

# **AUMUNDGROUP**

## **Code of Conduct for all companies and employees of the AUMUND Group**

Version: 1.3

Date: 9 October 2024

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Department: Group Audit



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## 1 FOREWORD

The AUMUND Group (AUMUND or the Group) is an international company that has to comply with a wide range of social, political and legal conditions in Germany and abroad. Even supposedly minor violations of the law by employees can have a considerable impact on the company's reputation and cause it substantial - also financial - damage. In addition, legal violations can also have serious personal consequences for the employees involved. For this reason, AUMUND insists on compliance with all applicable laws and the internal regulations issued by AUMUND in this regard.

This Code of Conduct (CoC) summarizes the values, principles and practices that guide the corporate behavior of AUMUND. It provides a binding framework of orientation and applies equally to each of us - to the management, to the executives and to each individual employee. Together we have the responsibility for the reputation of our company. The CoC and the associated other internal regulations or guidelines reflect the AUMUND's goal of ensuring company-wide compliance with all applicable legal provisions and thereby protecting the interests of AUMUND and its employees. They also serve to create a working environment characterized by integrity, respect, and fair and responsible conduct.

AUMUND places the highest value on the integrity of its companies and of each individual member of the management as well as all officers, employees and representatives.

AUMUND has been successfully serving its customers and employees since 1922. For AUMUND, sustainable business success is only possible if AUMUND's corporate values are lived.

The AUMUND Group Strategic Mission is as follows:

- Focus on **customers** to serve them with high quality solution to satisfy their technical and commercial requirements for efficient and environmental-friendly bulk material handling solutions
- Focus on **innovative products** to secure leading market position
- Focus on **diversification across industries and regions** to secure profitable growth options
- Focus on **people** with a **lean and efficient organization**

All of the above is the basis for achieving maximum satisfaction among our customers, as that alone is fundamental to the long-term success of our business and of the AUMUND Group.

The CoC contains a number of clear "DOs and DON'Ts" to which everyone must adhere at all times. The CoC also explains what to do in unclear situations where a personal assessment is required and who individuals can turn to in such a situation.

AUMUND takes the issue of compliance very seriously. Compliance helps the Group to secure its business success, to maintain its reputation and to ensure that current and future employees and managers enjoy working for the company. The AUMUND Group expects its managers in a special way to fulfil their function as role models ("Tone from the Top") for compliant behavior and to set a good example. All employees are expected to comply with the rules and also to set a good example.

This CoC applies to all companies and employees of the AUMUND Group worldwide. This includes AUMUND Holding B.V. and its subsidiaries.

**Code of Conduct for all companies and employees of the AUMUND Group**



The CoC provides an orientation framework for all AUMUND employees and defines fundamental standards of behavior that apply worldwide. Further concretizing rules are formulated in the corresponding internal company guidelines. These guidelines are unrestrictedly valid and binding for all companies and employees of AUMUND.

This CoC is updated regularly. The current version replaces all previous versions.

Venlo, October 9, 2024

AUMUND Holding B.V.

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## 2 GENERAL PRINCIPLES OF OUR ACTIONS

### 2.1 Honest behavior

AUMUND's standards go beyond mere compliance with the law and other binding regulations: AUMUND expects its employees to be committed to the company and to behave honestly, fair, sincerely and loyally in their business activities and in all situations related to these activities.

Whoever appears on behalf of AUMUND to the outside world bears responsibility as a representative of the company. Honest behavior also includes following the recognizable meaning of our internal guidelines and not trying to circumvent them with formalistic justifications. In addition, superiors must live up to their function as role models.

### 2.2 Compliance with the law and internal regulations

Compliance with all applicable legal provisions and the internal regulations of AUMUND is the indispensable basis for all actions of AUMUND and its employees. All employees of AUMUND are required to inform themselves about the legal provisions and internal regulations applicable to their area of responsibility in AUMUND and, in cases of doubt, to seek advice from their superiors and the other responsible bodies in AUMUND.

Violations of laws and other binding regulations as well as of internal rules may result in criminal, labor and civil law consequences for the acting employees of AUMUND. For AUMUND, such violations can lead to high fines, bans on awarding contracts, official sanctions, claims for damages from customers or competitors, as well as serious damage to its reputation. Such risks and damages can have a lasting impact on the profitability and viability of the affected Group companies as well as for AUMUND as a whole. Ultimately, such conduct thus endangers the jobs of all AUMUND employees. Investigations by the authorities, internal investigations or negative press coverage due to violations of applicable law or other regulations also have a lasting impact on business operations.

If the applicable laws are stricter than the regulations in this CoC or in other internal regulations, the legal regulations apply. If the applicable law is less strict, the stricter regulations in this CoC or in other internal regulations of the AUMUND Group shall nevertheless apply.

### 2.3 Reporting principles

For AUMUND, reliable reporting and communication on relevant business transactions of the company is indispensable. This also includes proper documentation of our actions both within the company and towards third parties. All employees of AUMUND are therefore obligated - as an outflow of their contractual duties and tasks - to conscientiously, completely, correctly and timely record relevant business transactions and reporting within AUMUND. This is the basis for the conclusion of effective contracts as well as target-oriented corporate management. The respective superiors ensure that documentation is carried out to an appropriate extent in their area of responsibility.

## 3 PROTECTION OF OUR EMPLOYEES

AUMUND's most important resource is its employees. AUMUND promotes a corporate culture in which everyone can achieve the best possible results, both personally and professionally. AUMUND employees and managers are treated with fairness and respect so that they can make the right decisions for themselves and the Group.

### 3.1 Employee organization and remuneration of employees

AUMUND recognizes the right of employees to form or join existing trade unions. Members of employee organizations or trade unions are neither disadvantaged nor given preferential treatment.

The applicable working time regulations are observed worldwide and fair wages are paid for work, as well as all applicable wage and compensation laws worldwide.



### 3.2 Safety at workplace

AUMUND attaches great importance to safety at the workplace for employees, business partners, visitors and the people at the locations where AUMUND operates.

It is everyone's responsibility to ensure safety and health protection. Managers and employees support each other in avoiding dangerous situations, know the emergency measures and participate in appropriate training.

Working under the influence of drugs, alcohol or other substances that impair the ability to work safely and productively is prohibited.

### 3.3 Diversity and tolerance

AUMUND respects individuals, regardless of their background, skills and opinions. Employees and managers treat each other with dignity and respect, promoting open and fair communication.

Any discrimination against an individual is against this CoC and possibly also against the law. AUMUND does not tolerate discrimination on the basis of color, gender, age, sexual orientation or identity, national origin, ethnicity, religion, marital status, physical or mental disability, veteran or other legally protected status.

AUMUND hires, employs and promotes employees based on their qualifications, demonstrated abilities and performance. AUMUND does not discriminate against anyone and expects all business partners to comply with AUMUND's standards of fair dealing and equal opportunity.

### 3.4 Zero tolerance for bullying and harassment

AUMUND has a "zero tolerance" approach to any type of abuse, bullying or harassment of employees, business partners or others. Among other things, unwanted physical or verbal conduct and derogatory or demeaning comments regarding skin color, age, gender, creed, sexual orientation, etc. are not permitted.

Any case of harassment must be reported immediately to the Managing Director or the on-site Human Resources Department.

### 3.5 Conflicts of interest

At AUMUND, business decisions are made solely in the best interests of the company. Conflicts of interest may arise when activities outside of work or involvement with other companies or personal relationships may interfere with or impair an individual's ability to make unbiased business decisions.

The avoidance of conflicts of interest also requires that employees of AUMUND refrain from even the appearance of favoritism based on personal proximity in their business dealings with competitors, consultants, customers, suppliers, service providers and other business partners of AUMUND.

Therefore, all employees and managers of AUMUND must take care that their evaluations and decisions are not unduly influenced due to close or family relationships.

To avoid actual or perceived conflicts of interest with relatives and friends, it may be inappropriate in case of personal or family relationships:

- To participate in the selection or hiring of relatives or friends as new employees.
- To select as a business partner a company owned by or employing relatives or friends.

However, a conflict of interest can be avoided even in these situations if the relationship is disclosed immediately and the situation is appropriately managed and documented.

Investments made by AUMUND employees or their close relatives must not lead to conflicts of interest. For this reason, employees may not directly or indirectly hold a material interest in companies that compete with the Group or have or seek to have business relationships with the Group. Significant shareholdings must be disclosed to the Compliance Officer (for contact details, see 7.4) without delay.



### 3.6 Secondary activities

All terms and conditions contained in the respective employment contract must be complied with in any case.

Secondary activities such as own entrepreneurial activities of employees, a sideline, a board activity as well as association memberships are permitted. However, the employee should inform the respective supervisor or the Compliance Officer of this in advance.

The unpaid participation of executives or employees in trade associations, professional associations or quasi-governmental institutions does not generally lead to a conflict of interest. Here, too, however, the direct supervisor or the Compliance Officer should be consulted in advance.

Anyone can become politically involved. However, managers and employees must make it clear that this is their personal political opinion and not the opinion of AUMUND.

## 4 PROTECTION OF THE COMPANY

### 4.1 Responsible handling of Group assets and confidential information

The material as well as intellectual property of AUMUND serves the well-being of the company. It is to be protected against misuse for own and third party purposes. AUMUND expects its employees to handle the assets of AUMUND responsibly.

Care and responsibility are also required when dealing with confidential information that employees receive in the course of their work. Confidential information includes, but is not limited to, any information about AUMUND, its companies, business partners or other stakeholders which is not publicly accessible. These data must not be misused for personal benefit or passed on to third parties without authorization.

### 4.2 Fighting fraud

Companies have to be prepared to deal with the issue of fraud. The most common fraud in this area is the misappropriation of company assets (property or material assets) and the manipulation of payments, financial and accounting data.

Any fraud to the detriment of an employee, the company or business partners is a violation of the CoC. Fraud will not be tolerated in the company. Fraud is a criminal offense and will be prosecuted in any case.

AUMUND has established appropriate control mechanisms to prevent, detect and minimize fraud:

- **Master Data:** Every company must adhere to processes by which new supplier data is created or data of existing suppliers is modified. The relevant processes must include appropriate control mechanisms, such as a clear separation of responsibilities.
- **Task sharing and signature authority:** Selected tasks are divided between two or more employees to minimize the risk of errors or fraud. In the specific case of a request for payment, employees should approach the person requesting payment directly if in doubt or seek confirmation from another manager on site.
- **Social Engineering Awareness:** Social engineering is the psychological manipulation of people, usually fraudulently, to induce certain behaviors or to obtain confidential information (see definition under 4.1). All managers are responsible at all times for ensuring the necessary awareness to protect AUMUND against such fraud or false accusations.
- **Business Records:** AUMUND's financial and operating records are always accurate and record all business transactions as they occur.

Cases of fraud or financial irregularities as well as potential fraud that are not adequately recorded by the existing control mechanisms must be reported.



### 4.3 Confidentiality and privacy

AUMUND respects the privacy of its employees, business partners and stakeholders and maintains the confidentiality of information provided by business partners and other stakeholders of the Group.

Many executives and employees have access to confidential, non-public inside information about AUMUND. The direct or indirect exploitation of insider information and the direct or indirect unauthorized disclosure of insider information are strictly prohibited. In addition, in many jurisdictions such conduct is prohibited and may result in substantial fines or imprisonment.

All managers and employees must treat such information as confidential and keep it secret in compliance with the relevant data protection regulations. The relevant processes in the individual companies must comply with data protection regulations and other applicable local laws.

Violations of data protection regulations can result in substantial fines for the company.

### 4.4 Data protection and data security

Special legal regulations exist for the protection of personal data (for example, the EU General Data Protection Regulation, GDPR). According to Art. 4 GDPR, personal data relating to natural persons means any data relating to an identifiable or identified individual, such as an identification number, a name, an online identifier or a location.

AUMUND is fully committed to compliance with these regulations. Personal data of all kinds must therefore be carefully protected against unauthorized access and misuse.

Information technology (IT) and electronic data processing (EDP) are an integral part of the everyday work of AUMUND. However, they harbor a multitude of risks. AUMUND takes these risks very seriously in its own interest as well as in the interest of its business partners and combats corresponding vulnerabilities preventively and immediately after they become known. AUMUND employees are obliged to familiarize themselves with the applicable IT/EDP guidelines and to observe the requirements contained therein.

## 5 FAIR BUSINESS PRACTISES

Fair and free competition is subject to the protection of national and international competition and antitrust laws. Violations of competition and antitrust law are prosecuted worldwide by antitrust and criminal prosecution authorities. They can lead to sanctions threatening the existence of the company in the millions, as well as to bans on the award of contracts for the companies involved and to considerable personal sanctions for employees.

AUMUND wants to convince customers and the market by the quality of its services and offer them at competitive prices. We are committed to fair competition and reject unlawful agreements or practices that restrict competition.

### 5.1 No bribery or corruption

Corruption prevents progress and innovation, distorts competition and can cause considerable damage to AUMUND and its employees. Therefore, AUMUND rejects any form of corruption and avoids even the mere appearance of it.

It is prohibited to influence decisions by granting personal advantages of any kind. This applies both to public officials and to employees of other companies and other institutions in Germany and abroad.

International law provides particularly strict rules for public officials in the fight against corruption. Public officials are all persons who (even indirectly) perform public administration duties. In addition to traditional civil servants, judges and other public employees, this also includes, for example, members of the armed forces, official inspectors, experts commissioned by public authorities, civilian employees of public authorities or other public institutions, employees of public service companies (e.g. waste disposal companies, public utilities, municipal transport companies, etc.) and of other public sector companies organized under private law or political office holders.

If you are unsure in individual cases whether you are dealing with public officials, please always contact the Compliance Officer.





AUMUND complies with international anti-corruption laws. These include, but are not limited to, the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and other regulations implementing the OECD Anti-Bribery Convention and the UN Convention Against Corruption, as well as other local anti-corruption laws and regulations.

AUMUND places the utmost importance on the integrity of its employees and its name. Bribery, corruption and unethical behavior will never be tolerated in the company or by any employee, business partner or agent. This includes, but is not limited to, promising, giving or accepting bribes, kickbacks or other benefits to or from business partner(s), competitor(s), stakeholder(s) or government official(s), except in case of gifts or gratuities permitted under 5.2 "Gifts and invitations".

### 5.2 Gifts and invitations

Each employee of AUMUND is responsible for ensuring that gifts, invitations and other benefits are only granted or accepted within his or her area of responsibility within the framework of the applicable laws and the specifications in this policy.

Gifts and other benefits are only permissible if, under the specific circumstances, they cannot give the impression of improperly influencing the respective recipient in his or her decisions. Gifts whose purchase price exceeds EUR 200 or the equivalent in local currency must be agreed **in advance** with the Compliance Officer. It should be noted that the impression of improper influence on a business partner can arise even in case of minor benefits if these are repeatedly made to a recipient.

In case of invitations to events, the inviting employee of AUMUND should also attend the event himself. In case of events to which employees of AUMUND invite or are invited, the professional occasion must always predominate (80/20 rule).

Questions of doubt must be discussed with the Compliance Officer **before** an invitation is extended or accepted.

In case of public officials, gifts, invitations or other benefits are prohibited without exception in some regions, and otherwise only permitted under very narrow conditions and within a very manageable framework. It must therefore be assumed as a rule that gifts, invitations or other benefits to public officials are not permissible, with the exception of very minor benefits such as small promotional gifts. If an employee is not sure whether an intended gift to a public official is still permissible, he or she must discuss this **in advance** with the Compliance Officer.

Gifts and invitations that could be perceived as bribery and raise questions of conflict of interest for AUMUND executives or employees may cause serious damage to the Group's reputation. Appendix 2 to this CoC contains a list of "DOs & DON'Ts" in this regard.

AUMUND executives must be informed of all meal invitations and other invitations if they appear to be for non-business purposes.

All business expenses must be properly accounted for. Each employee is required to comply with tax obligations that may arise from gratuities.

### 5.3 Sponsorship and donations

Donations from AUMUND may only be made without expectation of consideration in return. Sponsorship and donations may only be awarded within the applicable legal framework. The awarding of sponsorship and donations must be transparent: The purpose, the recipient and the recipient's receipt of the donation must be documented in a comprehensible manner.

AUMUND does not make donations to organizations that could damage the reputation of AUMUND or discriminate on the basis of religion, belief, gender, age, physical impairments or origin.

Donations to individual politicians, political parties or their associated organizations, churches or religious associations are prohibited altogether.

### 5.4 Promoting fair competition

AUMUND is a fair competitor. The company does not obtain unfair advantages through manipulation, concealment, misuse of confidential information or other unfair behavior.



Most countries and jurisdictions in which AUMUND operates have competition or antitrust laws in place to ensure a free, dynamic, fair and competitive marketplace for the benefit of consumers and competition.

AUMUND's managers and employees must therefore comply with the following rules at all times:

- Business strategy and pricing are determined independently and are never agreed upon formally or informally, directly or indirectly with competitors or other business partners
- Customers, territories and product markets always result from fair competition and are never shared between AUMUND and its competitors
- Always avoid discussions and interactions with business partners that may create the impression of unfair collusion or influence
- Avoid activities in associations or the like that could potentially lead to or be perceived as anti-competitive behavior.

AUMUND will never abuse a market position. As a company, AUMUND shall not interfere with the market mechanics of the competitive legal framework.

AUMUND has a "zero tolerance" attitude towards non-compliance with antitrust and competition laws. Non-compliance can result in serious criminal and civil penalties for AUMUND, its officers and employees, lead to significant business complications and damage AUMUND's reputation.

In this context, AUMUND takes strict care not to infringe any third-party patents and to comply with the patent laws of the countries in which the Group manufactures or distributes new products.

### 5.5 Compliance with international sanctions

Periodically, governments around the world impose export controls on goods, equipment, software, know-how, and technology. Sometimes such controls extend to a specific currency or nationals or residents of a state.

Business activities of an AUMUND company may have a negative impact on the entire Group, depending on where the goods are sold and where the buyer's headquarters are located. In addition, the importation or delivery of goods that AUMUND has sourced from abroad or externally and delivers to another country may also be subject to various laws and regulations. Violations by an AUMUND company of export control laws and regulations may have a significant impact on other AUMUND businesses or the Group as a whole. Sanctions against the Group may make AUMUND an untrustworthy business partner.

Sanctions laws and regulations prohibiting business with certain foreign governments, entities, individuals or end users must also be strictly complied with by AUMUND. The Group will not engage in any business involving sanctioned entities or individuals.

If there are any questions regarding export controls or sanctions, managers or employees should contact the person or department responsible for customs matters in the respective company.

Violations of export controls or sanctions can result in significant penalties for AUMUND and its employees, such as loss of insurance coverage, fines and imprisonment.

### 5.6 Check of business partners

All AUMUND companies must ensure that business relationships are only entered into with partners who are not involved in illegal or unethical activities.

AUMUND must comply with all anti-money laundering and anti-terrorist financing laws and regulations and act prudently in this regard; all managers and employees must make prudent decisions when dealing with business partners.

Money laundering is the smuggling of illegally generated money or illegally acquired assets into the legal financial and economic cycle. Terrorist financing occurs when funds or other resources are made available for terrorist crimes or to support terrorist organizations. AUMUND combats all forms of money laundering and terrorist financing and takes precautions to avoid becoming involved in money laundering or terrorist financing.

The procedure to be used for screening business partners is decided locally by the respective management of each company. Risk-based criteria should be used to decide when and to what extent a business partner should



be screened. Current and future business partners of AUMUND must not be subject to any prohibitions and restrictions related to countries, goods or persons.

All reviews of business partners must be documented and retained for future reference.

## 5.7 Obtaining competitive information

When obtaining information about business partners, competitors or markets, AUMUND uses only permissible and legitimate methods. AUMUND does not obtain information in an unethical manner.

# 6 OUR GLOBAL RESPONSIBILITY

## 6.1 Human rights and responsible purchasing

AUMUND is committed to internationally agreed standards such as the United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration) of the International Labor Organization (ILO).

AUMUND rejects any form of forced labor, child labor and human trafficking. Attention is paid to the observance of employee participation laws.

AUMUND takes reasonable steps to avoid doing business with companies or individuals that violate laws, disregard human rights or are involved in corruption. The Group will not knowingly work with business partners who violate human rights.

AUMUND may be held accountable for the conduct of its business partners under certain circumstances. If employees or managers have reason to believe that a business partner is involved in human rights violations, this must be reported immediately.

## 6.2 Environmental protection

AUMUND is committed to environmental sustainability and strives to reduce environmental impacts and develop environmentally friendly and resource-saving solutions.

AUMUND promotes environmental sustainability and strives to use energy-efficient technologies, minimize environmental hazards and waste, and recycle waste materials.

The AUMUND team spirit enables now and in future the development of efficient and environmental-friendly bulk material handling solutions for our customers.

AUMUND complies with all applicable environmental laws and meets the requirements of all environmental permits. Any spills or leaks of hazardous materials and any unauthorized dumping of waste must be reported immediately.

# 7 COMPLIANCE WITH THE CODE OF CONDUCT

## 7.1 Responsibility of superiors

Managers of the AUMUND Group are expected to lead by example ("Tone from the Top"). Our managers are the first point of contact for questions regarding the understanding of the rules and ensure that the employees in their area of responsibility are familiar with and comply with the CoC and the associated Group guidelines. This requires both personal discussions and organizational measures.



## 7.2 In case of doubt: ask for clarification!

Anyone who is unsure whether a particular behavior or situation is in accordance with this CoC should ask for advice and assistance. Employees should first contact their immediate supervisor or local company management.

The Compliance Officer is available to answer any compliance-related questions at any time and can provide guidance and advice regarding this CoC and other similar AUMUND Group policies.

## 7.3 Violations of the Code of Conduct

Managers are responsible for implementing this CoC in the companies at the sites. The implementation of this CoC is monitored by Group Audit as part of its regular audits in all business units. Company management must inform the Compliance Officer of all compliance-related violations and investigations and any on-site discrepancies or difficulties in the application of this CoC.

AUMUND will investigate reports of actual or suspected violations of the CoC promptly, fairly and in accordance with applicable laws. In doing so, AUMUND will at all times keep the identity of the reporter confidential. Managers and employees may not conduct investigations on their own authority without informing the Compliance Officer.

All covered persons must cooperate with internal investigations and keep their knowledge of and participation in such investigations confidential. This is particularly important in order to protect the undisturbed course of the investigation as well as the witnesses and all persons concerned and to preserve evidence.

Violations of our CoC, Group policies or the law can have serious consequences for the individuals involved and for the Group. Anyone who engages in unlawful or unethical conduct or violates our CoC or other Group policies, as well as anyone who directs, condones, approves or enables such conduct, may be subject to disciplinary action under applicable law, up to and including termination of employment.

## 7.4 Report potential compliance violations!

Employees and managers, as well as external business partners of AUMUND, are strongly encouraged to contact their respective direct supervisor, AUMUND's management or the Compliance Officer if they identify potential compliance issues or have concerns in this regard.

If you have any questions regarding compliance, please contact

**AUMUND Holding B.V.**

**Compliance Officer**

**Jens Möller**

**Wilhelminapark 40**

**NL-5911 EE Venlo**

Reports to the Compliance Officer can also be made via the specially established e-mail address:

[compliance@aumund-holding.nl](mailto:compliance@aumund-holding.nl)

Reports can also be made anonymously in all languages. The following whistleblower platform, which is administered by PWC, is available to you for this purpose:

<https://whistleblowerreporting.pwc.de/090c02720f>

All reports will be treated confidentially (see also section 7.5 "No disadvantages for reporting" below).

The Compliance Officer will process each report. As far as possible, receipt of a report will be acknowledged within 48 hours. If possible, the Compliance Officer will inform the sender within two weeks if further information is required.

The above e-mail address may only be used to report legitimate compliance concerns.



## 7.5 No disadvantages in compliance reporting

No one shall suffer any disadvantage as a result of reporting in good faith a possible violation of the law or the CoC. The identity of the reporter shall be kept secret to the extent possible under the law, company policy and the requirements of an effective investigation.

Individuals who have reported a suspected violation of the law or Group policy may not be sanctioned for doing so. In the event of such sanctions, disciplinary action will be taken.

If an employee has been involved in violations of the law, the CoC or related policies themselves and damage to the AUMUND Group can be averted through their voluntary reporting, this will be taken into account in their favor.

Anyone who recklessly or knowingly raises false suspicions or accusations must themselves expect consequences.

## 7.6 Exception

The CoC and the other AUMUND guidelines apply equally to employees and managers.

Should a company or its employees feel compelled by national or local law to violate the Group's corporate philosophy and values, local management must immediately consult with the Compliance Officer.

In rare exceptional cases, suspension of the CoC may be permissible in order to protect life and limb. The suspension must be reported to the Compliance Officer without delay. Only the Compliance Officer can approve the suspension before or after a specific event.



## APPENDIX I – BRIEF GUIDE TO THE CODE OF CONDUCT

If you are not sure whether conduct is permissible under our CoC, ask yourself the following questions:

- Do I comply with the law and the requirements of the CoC?
- Am I acting in accordance with the AUMUND values?
- Am I making a well-considered decision that serves AUMUND's business?
- Can I justify and explain my actions to employees and supervisors?

If you cannot answer a clear "yes" to any of the questions, you must reconsider your planned behavior and immediately consult this CoC or seek advice.

If you also cannot answer one of the following questions with a clear "no", you must stop your actions immediately and seek advice.

- Would I or AUMUND be embarrassed if my conduct were made public?
- Could my behavior have negative consequences for AUMUND?



## APPENDIX II - "DOS & DONTS" FOR GIFTS AND INVITATIONS

To quickly determine whether a gift or invitation is permissible under the CoC, the following information can serve as guidance.

Gifts may generally be presented or accepted as long as the following criteria are met:

- Permitted promotional gifts
- Gifts must be appropriate and justifiable, as well as of low value and not too generous. Gifts whose purchase price exceeds EUR 200 or the equivalent in local currency must be agreed **in advance** with the Compliance Officer.
- Gifts may not be requested or demanded by AUMUND or the business partner
- Gifts may not be sent to a private address, credited to a private bank account, or given in the form of cash or cash equivalents
- The giving or acceptance of gifts remains the exception
- The gift does not create an obligation on the part of the recipient. The gift is not likely to unduly influence the business decision of the recipient.
- Gifts may not be offered, promised or given in order to obtain a business advantage; and
- Gifts are not restricted or prohibited under a valid contract.

In case of public officials, gifts or other gratuities are prohibited without exception in some regions, and are otherwise permitted only under very narrow circumstances and within very manageable limits.

AUMUND executives must be informed of all tangible and intangible gifts given or received, unless they are merely promotional gifts.

In principle, invitations to meals or entertainment events may be extended or accepted as long as the following criteria are met:

- The invitation must be issued voluntarily and serve a legitimate business purpose
- Invitations must always be sent to the business address and must never be sent to the private address
- Invitations must be business-related (80/20 rule)
- The inviter must be personally present at sporting events or activities, shows or other appropriate entertainment or social activities
- The invitation must not be disproportionately expensive in each case and must be reasonable and justifiable
- The invitation must not include unjustified travel or accommodation expenses; and
- The invitation must not be extended to spouses or cohabitants - exceptions may be made, however, if the event is customarily attended in the company of spouses or cohabitants.

In case of public officials, invitations or other gratuities are prohibited without exception in some regions, and are otherwise permitted only under very narrow conditions and within a very manageable framework.