

CODE OF CONDUCT

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I. Principles, Application of and Compliance with the CoC

This CoC is designed to help us promote responsible behaviour. It guides us, the employees, managers and board members of the ABATEC Group, in our day-to-day work and business, and protects our reputation as a renowned company and our ability to generate sustainable value for our stakeholders.

Compliance, honesty, ethics, reliability, respect and trust are the foundation and universal basis for good cooperation and stable business relationships in all our locations.

With these values in mind, the ABATEC Group complies with the applicable national and international laws, regulations and guidelines and therefore expects its business partners, suppliers, customers and consultants to observe, respect and strictly adhere to these laws at all times.

Every country and every society has its own legal, social, religious and cultural norms and values. The ABATEC Group honours and respects these in full.

This CoC describes the principles and regulations according to which the ABATEC Group organises its business activities. It is applicable to all employees, managers and board members as well as to business partners, suppliers, customers and consultants of the ABATEC Group and is aimed equally at women and men.

This CoC forms the basis of the ABATEC Group's directives, guidelines and procedures. Ignorance of the CoC is no excuse for any violations.

II. Compliance Regulations in Detail

A. Human rights, respect and integrity, diversity, fair working conditions

1.

The ABATEC Group does not condone any violation of human rights. It ensures respect for human rights in the conduct of its business and does not accept any discriminatory behaviour whatsoever towards employees, business partners, suppliers, customers or consultants.

It promotes fair, trusting and respectful cooperation. A working atmosphere is created which is characterised by mutual trust and well-being for all, everyone is treated with dignity and respect, and people from a wide range of cultural backgrounds and personalities are valued. As an international company, the ABATEC Group values the diversity that is expressed in the origin, culture, language and ideas of its employees. The corporate culture is based on welcoming, respecting and valuing all colleagues. We create an environment in which everyone has the opportunity to succeed.

The personal dignity and sphere of each employee is respected. All people are respected regardless of their age, gender, race, religion, disability, sexual orientation or origin.

2.

The ABATEC Group prohibits discrimination, bullying and harassment, in particular sexual harassment in any form, for example through advances, degrading comments, jokes, obscene language, suggestive gestures or the display of related visual materials in the business or production facilities of the ABATEC Group. Such behaviour may also be classified as harassment even if it was not intended as such. In the event of such incidents, colleagues encourage each other to respond to such cases and report them to the relevant contact person at compliance@ABATEC.at.

3.

The ABATEC Group complies with all existing labour law regulations. This also includes the labour law provisions applicable in Austria and Germany (with regulations such as working hours, minimum wages, works agreements, works council, freedom of assembly etc.).

The ABATEC Group is also committed to complying with the convention of the International Labour Organisation (ILO C138) which stipulates a minimum age for the employment of children. Accordingly, the employment of children under the age of 13 is not tolerated by the ABATEC Group under any circumstances.

The entire legal text of the ILO [C138] is available at https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---norms/documents/normative-instrument/wcms_c138_en.htm.

4.

The ABATEC Group, its business partners, suppliers, customers and consultants reject any knowing use of forced or compulsory labour and all forms of modern slavery and human trafficking. Bonded labour or involuntary prison labour are not used. Employment relationships are based on voluntary actions and can be terminated by employees at their own will and subject to a reasonable notice period.

B. Sustainability

The ABATEC Group is committed to thinking long-term in its actions and creating catalogues of sustainable measures for its business partners, suppliers, customers and consultants. It contributes to a fairer and healthier society; accordingly, it is committed to promoting environmental protection, conserving natural resources and supporting international efforts to protect the climate. As a result, the ABATEC Group endeavours to act in an environmentally friendly manner in the manufacture of products and not to conclude or carry out transactions or projects that noticeably endanger the environment. Its environmental policy forms the framework for environmentally friendly behaviour within its group of companies.

C. Fair competition, ban on cartels

Fair competition is the measure of all things for an internationally active company. Thus, the ABATEC Group is committed to complying with the laws, rules and regulations on competition law, in particular cartel law, in all its markets and complies with the obligation to create a level playing field. Every business activity is conducted in a fair, ethical and transparent manner, and the company always acts fairly, respectfully and honestly towards all market players.

D. Corruption, money laundering, terrorist financing, export control, taxes (tax strategy, tax compliance, tax guidelines)

1.

The ABATEC Group fully complies with the relevant national and international anti-corruption provisions (e.g. UNCAC, U.S. Foreign Corrupt Practices Act, UK Bribery Act, OECD Guidelines for Multinational Enterprises) and thus clearly opposes all forms of corruption and bribery. It undertakes to do everything in its power to combat money laundering, corruption and terrorist financing. This includes compliance with global sanctions in accordance with instructions from the relevant legal authorities and internal directives. It also acknowledges its co-responsibility for the detection, prevention and reporting of such criminal offences. Corruption or bribery is not tolerated in any form.

The entire group of companies with all its employees, managers and board members do not accept any gifts, invitations, hospitality or other benefits or favours from business partners, suppliers, customers or consultants. The only exceptions are

those that are socially customary and appropriate and whose acceptance and value cannot reasonably be expected to influence our operational decisions or actions.

Accepting cash is never permitted.

In situations where the refusal of a gift, invitation or hospitality could be interpreted as impoliteness or an insult due to country-specific customs, the contact person responsible for compliance issues must be contacted in consultation with the staff member's direct manager.

Gifts, invitations, hospitality or other benefits or favours may not be actively demanded.

Gifts, invitations, hospitality or other benefits related to authorities, offices, courts, experts or public officials etc. must always be clarified and agreed in advance with the contact person responsible for compliance issues.

2.

The ABATEC Group only does business with reputable business partners, suppliers, customers and consultants, and only with funds that come from legal sources. Therefore, it clearly opposes all forms of money laundering and terrorist financing.

3.

The ABATEC Group strictly complies with international regulations to prevent violations of export control law (Dual Use Regulation, EAR, ITAR). In particular, it also observes embargoes relating to countries, goods or persons. As a result, its business partners, suppliers, customers and consultants are also instructed to strictly comply with international export control law.

E. Stakeholder relationships

The ABATEC Group aims to build long-lasting business relationships with the stakeholders defined in the context analysis and to provide them with good and satisfactory long-term support. For this reason, it seeks to actively protect its stakeholders from all vulnerabilities and thus honestly gain their trust.

On the one hand, the ABATEC Group achieves this through personal, timely and honest communication; on the other, it ensures that its services and products fulfil the highest requirements in terms of safety, health, environmental protection and quality and also comply with the relevant legal requirements.

The coordination, monitoring and documentation of its processes are based on certified management systems (quality management system in accordance with IATF 16949, environmental management system in accordance with ISO 14001:2015).

The ABATEC Group aims to strike a balance between sustainable performance and risk tolerance; this requires consistent behaviour and good risk management. This ensures that the expectations of its stakeholders are fulfilled, its capital and reputation protected, and its annual results improved.

F. Conflicts of interest, handling company property and business and trade secrets, data protection, ban on insider trading, political activities

1.

An individual staff member's actions are orientated exclusively towards the interests of the ABATEC Group. He or she aims to avoid any kind of conflict of interest that may have a detrimental effect on the company. The ABATEC Group avoids situations in which personal or economic interests (may) come into conflict with the company's interests by discussing such situations immediately. The ABATEC Group does not create any conflicts of interest that could cause harm to its business partners, suppliers, customers or consultants.

The ABATEC Group refuses to allow its business activities to be influenced by personal relationships or interests. Operational decisions are thus made exclusively on a sound basis, with comprehensive expertise and according to the principle of objectivity.

2.

Whenever the property of the ABATEC Group and its business partners, suppliers, customers and consultants is made available, the staff handles that property with the utmost responsibility, appropriateness and care. This includes both tangible and intangible assets, such as business-related information, trade secrets, expertise and industrial property rights.

3.

The ABATEC Group treats operational information of any kind that is or becomes accessible to it in any way, and is not already known to the public, as confidential and does not pass it on. It undertakes to protect this information and to use it completely ethically.

4.

The ABATEC Group is fully committed to compliance with data protection, which is why the personal data of natural or legal persons is only used by it in accordance with the respective national and international legal requirements.

5.

The ABATEC Group handles insider information responsibly and in accordance with legal regulations. It does not pass it on to third parties and fulfils the legal requirements with regard to trading in securities. That is why all employees, business partners, suppliers, customers and consultants are also prohibited from misusing insider information, and from insider trading itself. It goes without saying that it complies with the relevant laws, rules and regulations as well as internal guidelines.

6.

Party political activities on the premises, with funds or in the name of the ABATEC Group are generally prohibited. This means that not only may the ABATEC Group not engage in any party political activities, but third parties are also prohibited from carrying out party political activities on the premises or with the funds of the ABATEC Group.

Donations and sponsorship funds may only be granted by the ABATEC Group within the framework of the applicable legal systems.

The ABATEC Group is expressly prohibited from supporting political parties, candidates, office holders or other endorsements for religious and other ethical purposes. This does not affect communications with official representatives of a state and its territories and municipalities by persons authorised by the ABATEC Group that is necessary for the management of the company.

III. Final Provisions

The implementation of and compliance with the regulations described above is ensured through e-learning programmes for existing and new employees. Managers must fulfil their special function as a role model and bear a particular responsibility for making known, implementing and enforcing these guidelines.

The ABATEC Group undertakes to review this CoC regularly and to announce any changes. This ensures that all principles and standards of the ABATEC Group are incorporated and comply with current legislation. Fundamental developments should also be reflected in this CoC for our business partners, suppliers, customers and consultants.

2.

Violations of this CoC can lead to considerable economic disadvantages for the ABATEC Group (criminal prosecution, fines, loss of orders etc.). If it becomes aware of such violations, they will be consistently sanctioned for (termination, dismissal, criminal prosecution, civil liability etc.). This applies not only to those who violate the rules, but also to their respective superiors and all those who knew about the violations but did not report them. No excuses will be accepted for violations of the CoC, regardless of the intention behind committing them.

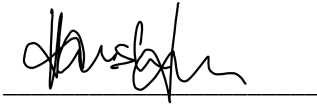
3.

Any employee can report a violation or suspected violation of this CoC. Whistleblowers shall not suffer any disadvantages as a result of providing information to the best of their knowledge and belief. Whistleblowers should first contact their immediate manager, who will provide appropriate assistance. If this is not an option, information can be sent to the contact person responsible for compliance issues (compliance@abatec.at) at any time.

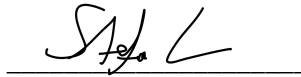
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Questions and feedback on this Code can be sent to compliance@abatec.at.

Regau, November 2023



Mr Hannes Haunschmid
CEO



Dr Stefan Lorenz
COO