

CODE OF CONDUCT

of the ABATEC Group

effective from September 2024

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I. General Principles and Scope

The ABATEC Group endeavors to ensure high professional and ethical standards in everything it does and all the actions it takes as a business. Adherence to the rule of law, honesty, ethical conduct, reliability, respect, and trust form the foundation and the universal basis for good collaboration and stable business relationships at every location where the ABATEC Group operates around the world. The focus is on strictly complying with the applicable laws, regulations, and guidelines.

In particular, the “OECD Guidelines for Multinational Enterprises on Responsible Business Conduct”, which are available online, apply.

The ABATEC Group seeks to build long-lasting business relationships with its stakeholders and to serve them well and satisfactorily over the long term. This is why the Group wants to actively protect its stakeholders from any kind of vulnerability and thus gain their trust in an honest way.

On the one hand, it accomplishes this objective through direct, punctual, and transparent communication. On the other hand, it guarantees that its products and services adhere to the highest standards concerning safety, health, environmental protection, and quality and comply with applicable legal requirements. Certified management systems, including the Quality Management System according to ISO 9001:2015 and IATF 16949:2016 as well as the Environmental Management System according to ISO 14001:2015, serve as the foundation for coordinating, monitoring, and documenting the processes within the ABATEC Group.

The objective is to maintain equilibrium among social factors, the economy, and the environment across the entire value chain, while continually enhancing them.

This global CoC defines the culture and values on which the ABATEC Group bases its business activities and sets comprehensive and clear rules for all employees, managers, and board members as well as its business partners, suppliers, customers, and consultants (hereinafter referred to jointly as "Business Partners"), unless reference is made to the exclusive compliance of the ABATEC Group or the Business Partners.

Business Partners are expected to introduce comparable ethical principles and uphold these standards themselves, while ensuring compliance of their affiliated companies. Affiliated companies, as defined in this CoC, include those in which the Business Partner directly or indirectly holds more than 50 % of the shares or voting rights, as well as all companies under the management or control of the Business Partner.

Furthermore, Business Partners will communicate all principles and standards defined in this CoC to their subcontractors and suppliers throughout the supply chain and encourage them to act accordingly. Business Partners will also take this into account when selecting their subcontractors.

II. Compliance Regulations in detail

A. Human rights, respect, integrity, diversity, ethical recruitment, fair working conditions, health protection, occupational safety

The ABATEC Group and its business partners:

1. do not endorse any violation of human rights, ensure respect for human rights in the conduct of their business, and do not accept discriminatory behavior toward any employees or Business Partners. The ABATEC Group and its Business Partners ensure that, in recruitment and the employment process, applicants and employees are assessed without any discrimination or prejudice and are not subject to deception or fraud. Internationally recognized human rights are respected and maintained.

2. foster cooperation based on fairness, trust, and respect. The working environment that is created is characterized by mutual trust and wellbeing in which each individual is treated with dignity and respect and people from diverse cultures and with different personal backgrounds are valued. The diversity expressed in the origins, cultures, languages, and ideas of its employees is appreciated. The corporate culture is based on welcoming, respecting and valuing all colleagues. This creates

an environment where everyone has the opportunity to succeed and freely express their opinion. The right to freedom of expression is particularly valued and respected.

3. respect the personal dignity and privacy of each employee. All people are respected, regardless of their age, gender, nationality, skin color, religion, culture, ethnic origin, worldview, any disability, sexual orientation or origin. Equal opportunities and equal treatment are respected and encouraged.

4. prohibit discrimination, bullying and harassment, in particular any form of sexual harassment, such as improper advances, derogatory comments, inappropriate jokes, demeaning expressions, suggestive gestures, or the display of explicit material in any form (e.g., written, verbal or digital). In the event such incidents occur, colleagues encourage each other to address such cases and report them anonymously and confidentially through various company channels. The provisions of the ABATEC Group's "Diversity and Anti-Discrimination Policy", which is available online, apply to Business Partners accordingly.

5. comply with all existing and applicable regulations under labor law in the respective labor markets, for example regulations on working hours, minimum wages, hygiene, works agreements, the works council or freedom of assembly. Significant importance is placed on ensuring that employees have an appropriate, decent standard of living. The salary policy aims for equal, market-standard, and fair compensation for equal performance.

Reference is made to the "Explanations on the implementation of the provisions of the core labour standards of the International Labour Organization (ILO) in Austria and within the ABATEC Group" that can be accessed online. These standards are also expected to be upheld by Business Partners. The ABATEC Group, along with its Business Partners, commits to employing only those individuals who have attained the minimum working age as mandated by the relevant national legislation.

Moreover, the ABATEC Group and its Business Partners pledge to comply with the convention of the International Labour Organization (ILO C138), which stipulates a minimum age for employing children.

In accordance with this, the employment of children under the age of 13 is not tolerated in any case. The full "legal text of the ILO (C138)" can be viewed online. Reference is also extended to the adherence to the "Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (ILO 182)", which can be viewed online.

6. strictly reject any use of forced or compulsory labor as well as any form of modern slavery or human trafficking, bonded labor, involuntary or exploitative prison labor or other forms of exploitation in their companies or at suppliers or subcontractors.

Employment relationships are voluntary and can be terminated by employees at their own will and by giving reasonable notice. No private or public security personnel are engaged in situations where there is a threat of violating the ban on torture, causing harm to individuals' lives or physical well-being, or infringing upon freedom of association and coalition.

Reference is made to the "Declaration on Modern Slavery and Human Trafficking" of the ABATEC Group, which can be viewed online. These commitments must likewise be adhered to by our Business Partners. We also highlight compliance with the "Forced Labour Convention (ILO 29)", and the "Abolition of Forced Labour Convention (ILO 105)", both of which are available for reference online.

7. ensure that the right to join associations and trade unions is preserved. Within the ABATEC Group and among its Business Partners, the right to lodge complaints without facing retaliation is guaranteed (e.g., through an implemented whistleblower system), and the rights to freedom of association and collective bargaining, as well as the right to strike, are freely exercised.

8. comply with the applicable national laws and regulations governing health protection and occupational safety and maintain appropriate occupational safety management. This includes preventive measures such as ensuring a safe workplace, providing protective clothing, preventing, and reducing excessive noise exposure, conducting training and safety briefings for employees to minimize and prevent workplace safety risks, and striving to prevent work-related accidents and occupational illnesses to the best of their ability. Reference is made to the "Occupational Health and Safety and Employee Health Policy" of the ABATEC Group, which is available online. Business Partners are expected to observe these principles accordingly.

B. Other aspects of sustainability, protection of the environment and climate, animal welfare

1. The ABATEC Group and its Business Partners commit to adopting a long-term perspective and establishing sustainable action plans in their operations. They contribute to a fairer and healthier society, affirming their dedication to promoting environmental conservation, conserving natural resources, and supporting international efforts for the decarbonization of transportation and climate protection. The ABATEC Group and its Business Partners strive to act in an environmentally friendly manner during the production of products and to prevent irreversible environmental damage.

The "Environmental Policy" accessible online, sets the framework for environmentally responsible conduct within the ABATEC Group and is expected to be adhered to accordingly by its Business Partners. The responsible stewardship of natural resources represents a strategic corporate objective. The ABATEC Group and its Business Partners do not engage in any unlawful evictions, unlawful deforestation or unlawful dispossession of land, forests and/or bodies of water. Land rights, customs and the culture of indigenous peoples must be respected. The applicable rights governing land, forests and waterways are diligently upheld and compliance within the supply chains is required.

2. The ABATEC Group and its Business Partners deliberately engage in sustainable environmental practices in order to minimize the impact of their activities and products on the environment throughout the value chain and the product life cycle. The sustainability standards for preserving the environment include in particular using sustainable materials, waste separation and reduction, harmless, environmentally friendly disposal of waste materials, chemicals and wastewater, reusing and recycling materials, monitoring and avoiding harmful airborne and noise emissions, not

diminishing water quality and preventing water pollution, avoiding excessive water consumption and using water sparingly. In addition, the ABATEC Group and its Business Partners place a strong emphasis on decarbonization. The consideration for minimizing harm to the environment and health is a core principle. A responsible treatment to living beings is an integral part of the values held by the ABATEC Group and its Business Partners. Recognized principles for animal testing, including replacement, reduction, and refinement, or the avoidance of unnecessary suffering, are adhered to.

The ABATEC Group and its Business Partners ensure responsible land use to reduce negative impacts on the environment and biodiversity, while maintaining species diversity. They diligently protect the natural ecosystem and adhere to all applicable environmental laws and regulations. Both the ABATEC Group and its Business Partners are committed to reducing CO2 emissions, air pollution, soil pollution, or any detrimental alterations to the soil, as well as deforestation to the greatest extent possible. As forward-thinking enterprises, they focus on initiatives to enhance energy efficiency, reduce energy consumption, utilize renewable energy sources, and minimize overconsumption.

C. Fair competition, prohibition of cartels

Fair competition serves as the ultimate benchmark for any company operating on an international scale. The ABATEC Group, alongside its business partners, is steadfast in its commitment to adhering to the laws, rules, and regulations governing competition, particularly antitrust laws, across all their markets. They are dedicated to establishing a level playing field as mandated by their obligation. Every business endeavor is carried out with integrity, transparency, and a commitment to fairness. The company consistently upholds ethical standards and treats all market participants with respect and honesty. The ABATEC Group and its Business Partners refrain from engaging in antitrust agreements and avoid any exploitation of market dominance. They diligently follow the pertinent guidelines outlined by the Organization for Economic Cooperation and Development (OECD) for multinational enterprises, thereby mitigating potential anti-competitive effects. These [OECD guidelines](#) include preventing the abuse of market dominance, avoiding market sharing, bid rigging, production limitations, and price manipulation.

D. Corruption, bribery, invitations, gifts

1. The ABATEC Group and its Business Partners fully adhere to the respective national and international regulations for combating corruption (e.g., UNCAC, U.S. Foreign Corrupt Practices Act, UK Bribery Act, OECD Guidelines for Multinational Enterprises) and anti-bribery provisions. They unequivocally oppose all forms of corruption and bribery and commit to doing everything within their power to combat corruption and bribery. This includes compliance with global sanctions in accordance with the relevant authorities and internal directives. They also share responsibility for detecting, preventing, and reporting such criminal cases. No form of corruption or bribery is tolerated. The ABATEC Group attaches great importance to raising awareness among its employees, which is ensured through the implementation of clear directives and policies to prevent corruption, bribery, and the unlawful acceptance

of benefits. The mandatory annual completion of a corresponding e-learning program by all employees further reinforces these measures.

2. The ABATEC Group and its Business Partners, along with all their employees, executives, and members of the organization, do not accept gifts, invitations, entertainment, or other advantages or benefits from other Business Partners. Exceptions are only made for those that fall within socially accepted and reasonable boundaries, where accepting them would not reasonably be expected to influence business decisions or actions. Invitations, gifts, other offerings, or benefits must never be misused for the purpose of exerting undue influence. Accepting cash is prohibited. Gifts, invitations, entertainment, other advantages, or benefits must not be actively solicited.

Within the ABATEC Group, in situations where the refusal of a gift, invitation, or entertainment could be interpreted as impolite or offensive due to local customs, employees are required to contact the internal compliance team responsible for such matters in coordination with their direct line manager. Gifts, invitations, entertainment, or other benefits related to authorities, offices, courts, experts, or officials, and the like, must always be clarified and coordinated with the compliance team responsible for such matters within the ABATEC Group before acceptance.

E. Money laundering, financing of terrorism, export controls

1. The ABATEC Group and its Business Partners are bound by a strict commitment to adhere to the applicable laws addressing the prevention of money laundering, the financing of terrorism, and global sanctions. They pledge to abstain from direct or indirect involvement in activities associated with money laundering and/or the financing of terrorism. Both the ABATEC Group and its Business Partners are dedicated to taking every possible measure to combat these illicit activities and share responsibility for their detection, prevention, and reporting. They unambiguously reject all forms of money laundering and the financing of terrorism.

All business transactions are conducted exclusively with reputable partners using funds derived solely from legal sources. As a result, they categorically disapprove of any involvement in money laundering or the financing of terrorism.

2. The ABATEC Group and its Business Partners strictly adhere to international regulations governing the import and export of goods, services, and information to prevent violations of export control laws (such as Dual Use Regulation, EAR, ITAR). They also carefully observe embargoes and sanction lists related to countries, assets, or individuals. They require their Business Partners to similarly comply with international export control laws. Business Partners are responsible for obtaining all the necessary permits for exporting their goods and are obligated to inform the ABATEC Group in writing if their goods and/or services are subject to any trade restrictions or export controls.

F. Taxes, Tax Strategy, Tax Compliance, International Tax Guidelines

1. The tax policy of the ABATEC Group and its Business Partners ensures that all taxes and duties are accurately declared and paid in accordance with relevant and

applicable tax laws, in the prescribed amount, and on time. They steadfastly adhere to all tax obligations, aiming to contribute to the economic and social function of the countries in which they operate through impeccable conduct.

2. The departments responsible for tax matters within the ABATEC Group and its Business Partners strive to maintain cooperative, objective, and transparent relationships with tax authorities. When necessary, external tax advisors with expertise in specialized areas are engaged to ensure compliance with legal requirements and fulfill tax obligations. Both direct taxes (such as income tax, capital gains tax, and corporation tax) and indirect taxes (VAT, mineral oil tax, etc.) are diligently paid to the relevant tax authorities in compliance with applicable laws. The tax burden is borne by the recipients of the payments.

3. The ABATEC Group and its Business Partners endorse the OECD principles regarding the avoidance of the planned reduction of tax bases and profit shifting by multinational corporations, commonly known as "BEPS" (Base Erosion and Profit Shifting). The ABATEC Group maintains its legal domicile only in countries contributing to its business activities, and it does not engage in any tax structures lacking economic substance or non-tax business purposes. Additionally, the ABATEC Group does not operate in countries classified as "tax havens."

Transfer pricing within the ABATEC Group and Business Partners (subject to compliance requirements) is determined following OECD guidelines and EU national laws and regulations. The transfer pricing concept consistently adheres to the arm's length principle. The country-by-country reporting is annually disclosed by the ultimate parent entity to the tax authorities of the country of residence (in this case, Austria) as of December 31 for the previous financial year.

G. Conflicts of interest, prohibition of insider trading, political activities, donations, sponsorship

1. The professional conduct of each employee of the ABATEC Group is governed exclusively by the legitimate interests of the ABATEC Group. Their actions are aimed at avoiding any conflicts of interest that could adversely affect the company. The ABATEC Group avoids situations where personal or financial interests may conflict with the interests of the company by promptly addressing such situations. The ABATEC Group does not create conflicts of interest that could harm its Business Partners. Employees of the ABATEC Group are prohibited from engaging in financial, business, or other activities or employments that could impair their performance or availability at the ABATEC Group or lead to an unauthorized conflict of interest. Approved secondary activities may not utilize the facilities and resources of the ABATEC Group.

Business Partners are obligated to make decisions related to their business activities with the ABATEC Group solely based on objective criteria. Any form of conflict of interest, particularly involving personal interests or economic actions, including any conflict of interest related to family members or other affiliated natural or legal persons, must be avoided.

The ABATEC Group and its Business Partners reject any attempts to influence their business activities through personal relationships or interests. Therefore, business decisions are made exclusively on a well-founded basis, with comprehensive expertise, and following the principle of objectivity.

2. The ABATEC Group and its Business Partners handle insider information responsibly and in accordance with legal regulations. They do not disclose such information to third parties and adhere to legal requirements regarding securities trading. Consequently, the misuse of insider information, as well as insider trading itself, is prohibited. The ABATEC Group and its Business Partners comply with applicable laws, rules, regulations, and internal guidelines.

3. Engaging in political activities on the premises, with resources, or in the name of the ABATEC Group is strictly prohibited. This means that the ABATEC Group is not only barred from engaging in political activities, but also third parties are prohibited from conducting political activities using the premises or resources of the ABATEC Group. The ABATEC Group is explicitly prohibited from supporting political parties, candidates, officeholders, other interest groups and religious communities. Necessary communication with official representatives of a state and its regions and municipalities by individuals authorized by the ABATEC Group for corporate governance purposes is not affected by this restriction.

Donations and sponsorship funds may only be awarded by the ABATEC Group and its Business Partners in compliance with applicable legal regulations.

H. Handling of company property, corporate assets, business and trade secrets, data protection, intellectual property

1. The staff of the ABATEC Group and its Business Partners handle the property of the ABATEC Group, its Business Partners, and their respective partners with the utmost responsibility, care, and conservation. This includes both tangible assets and intangible assets, such as business-related information, trade secrets, know-how, intellectual property, or industrial property rights. All employees of the ABATEC Group protect the assets entrusted to them by the ABATEC Group against loss, damage, misuse, and theft. Any loss, damage, misuse, or theft must be reported immediately. All equipment (company vehicles, IT equipment, mobile phones, etc.) must be used with due diligence and in strict accordance with internal guidelines. Additionally, any suspected or actual misuse of trademarks, logos, or other intellectual property must be promptly reported to the responsible departments.

2. The ABATEC Group and its Business Partners treat each other's trade secrets, as well as other confidential information and business information of any kind that is accessible or made accessible in any way, whether or not marked as confidential, confidentially and do not disclose them. They commit to protecting this information, using it ethically, and not publishing it or making it accessible to third parties in any form or for any purpose other than the agreed purpose without prior written consent. This does not apply if information must be disclosed on the orders of a court or authority or pursuant to applicable law or regulation.

3. The ABATEC Group and its Business Partners fully commit to complying with data protection. The processing of all personal data takes place in compliance with all applicable legal and contractual data protection regulations (including the European General Data Protection Regulation EU 2016/679). By implementing appropriate technical and organizational measures, the ABATEC Group and its Business Partners ensure an adequate level of information security.

I. Supply Chain Compliance

Companies are obligated by laws relating to supply chain compliance to adhere to human rights and environmental requirements and must implement defined due diligence obligations (especially fair payment terms to suppliers). The core elements of these due diligence obligations consist of risk management and the introduction of remediation and prevention measures. The ABATEC Group and its Business Partners are obliged to identify human rights and environmental risks and actively work to prevent or reduce them. In the event of a potential risk of violation or an actual violation, they will take appropriate preventive measures to prevent or minimize the risk. Business Partners will promptly inform the ABATEC Group in case of any violations.

J. Handling of conflict minerals, chemicals, pollutants

The ABATEC Group and its Business Partners are obligated to comply with all applicable legal regulations regarding conflict minerals and prohibited or declarable substances. When using conflict minerals and other critical minerals, sustainability and transparency must be ensured.

It is also ensured that prohibitions regarding mercury or certain chemicals, as per the Stockholm Convention on Persistent Organic Pollutants (POPs), are adhered to. Responsible chemical management is observed. In addition, the ban on the import and export of hazardous wastes in accordance with the Basel Convention, as well as the information obligations concerning the substances listed in Regulation (EC) No. 1907/2006 (REACH), are adhered to.

Business Partners are required to provide the ABATEC Group with annual reports regarding conflict minerals based on the Conflict Minerals Reporting Template (CMRT) of the Responsible Minerals Initiative (RMI) in its current version. They must ensure that responsible sourcing of materials is carried out within their value chain and that human rights are not violated.

III. Final Provisions

The implementation and adherence to the regulations described herein are ensured by providing each employee of the ABATEC Group with a copy of this CoC upon commencement of employment, as well as through regular in-person training and e-learning programs. Organ members and executives have a special role to act as role models and bear a particular responsibility for conveying, promoting, and enforcing these principles. The ABATEC Group commits to regularly reviewing this CoC and announcing any changes. This ensures that all principles and standards of the ABATEC Group are incorporated

and aligned with current legal requirements. Additionally, fundamental developments for our Business Partners should be reflected in this CoC.

Violations of this CoC can lead to significant economic disadvantages for the ABATEC Group (prosecution, fines, loss of contracts, etc.). If the ABATEC Group becomes aware of violations within the organization (by employees, executives, and/or organ members), these violations will be consistently sanctioned (termination, dismissal, legal prosecution, civil liability, etc.). This applies not only to those who violate the rules but also to their respective supervisors and anyone who was aware of the violations but did not report them. Apologies for violations of the CoC will not be accepted, regardless of the intent behind them.

Any violation by Business Partners of the principles and requirements stated in this CoC constitutes a material breach of the contractual relationship. In the event of non-compliance or suspicion of non-compliance with the principles and requirements of this CoC, the ABATEC Group reserves the right to request all relevant information from Business Partners and, at the sole discretion of the ABATEC Group, to not enter into future business relationships, take appropriate measures to prevent the respective misconduct, or terminate one or all contracts with the respective Business Partner without notice, if the CoC is not complied with or if measures to rectify the misconduct are not taken and implemented despite reasonable deadlines.

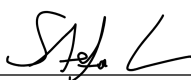
Any employee and external persons, including business partners in the supply chain, can report a violation or suspicion of a violation of this CoC. Whistleblowers will not face any disadvantages for providing information to the best of their knowledge and belief. Employees should initially approach their direct line manager, who will provide appropriate assistance.

If this avenue is not feasible or is it a report from an external person, reports can be made at any time to the compliance point of contact [\[compliance@abatec.at\]](mailto:compliance@abatec.at) responsible for compliance matters.

Questions and feedback regarding this CoC can be directed to compliance@abatec.at.

Regau, October 2024

The Executive Board of ABATEC Group



Dr. Stefan Lorenz
CEO



DI Thomas Brandmayr, MA
CFO

Appendix: Link overview

Occupational Health and Safety Policy https://www.abatec.at/wp-content/uploads/2024/12/Occupational-Health-and-Safety-Policy_2024_ABATEC_EN.pdf
Diversity and Anti-Discrimination Policy https://www.abatec.at/wp-content/uploads/2024/12/Diversity-and-Anti-Discrimination-Policy_2024_ABATEC_EN.pdf
Explanations on the implementation of the provisions of the core labour standards International Labour Organisation (ILO) https://www.abatec.at/wp-content/uploads/2024/12/Explanations-on-core-labor-standards_2024_ABATEC_EN.pdf
Declaration on Modern Slavery and Human Trafficking https://www.abatec.at/wp-content/uploads/2024/12/Declaration-on-modern-slavery-and-human-trafficking_2024_ABATEC_EN.pdf
Legal text of the ILO (C138) https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB%3A12100%3A0%3A%3ANO%3A%3AP12100_ilo_code%3AC138
OECD Guidelines for Multinational Enterprises on Responsible Business Conduct https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html
Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB%3A12100%3A0%3A%3ANO%3A%3AP12100_ilo_code%3AC182
Abolition of Forced Labour Convention https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB%3A12100%3A0%3A%3ANO%3A%3AP12100_ilo_code%3AC105
Forced Labour Convention https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB%3A12100%3A0%3A%3ANO%3A%3AP12100_ilo_code%3AC029
Environmental Policy and Targets https://www.abatec.at/wp-content/uploads/2024/12/Environmental-policy-and-targets_2024_ABATEC_EN.pdf