

Diversity and Anti-Discrimination Policy

1. Preamble

1.1. Aim and purpose of the Policy

The ABATEC Group places emphasis on ensuring that all employees are treated with fairness and utmost respect. Diversity and uniqueness of our employees play an essential role in the performance and innovative strength of the ABATEC Group. We value the diversity that is reflected in the origin, gender, nationality, age, physical and mental limitations and unique qualities, culture, religion, language, and ideas of the employees. Our corporate culture is based on welcoming, respecting and valuing all colleagues. In this environment, all employees should have the opportunity for success and well-being. This Diversity and Anti-Discrimination Policy [**"Policy"**] provides a global framework that defines how we want to live and encourage diversity within the Group and how the Group prevents, recognizes and responds to all forms of discrimination and harassment.

1.2. Scope

This Policy applies to all employees, managers and board members worldwide. It also applies to all legal entities, offices, and other workplaces of the company. For the purposes of this Policy, the term workplaces also includes work-related settings or contexts which employees visit or in which they participate as part of their work, e.g. sports events or celebrations, brand launches, photo or video shoots, work-related travel or transport activities, as well as all other places or settings in which the ABATEC Group is commercially active.

Harassment and discrimination can also occur online, including via e-mail and through other electronic communication channels or means. This Policy applies irrespective of the communication medium. Additionally, it may be supplemented by local policies that establish further prerequisites or distinct procedures for conducting investigations. It is imperative to interpret this Policy in alignment with the relevant local laws, encompassing local labour laws, anti-harassment regulations or anti-discrimination statutes. Insofar as the content of this Policy conflicts with applicable local laws or regulations, the latter shall take precedence in the respective jurisdiction.

2. Policy

2.1. Content of the Policy

All employees have the right to work in an environment that is safe, fair and respectful, fostering equal opportunities while prohibiting harassment, bullying and discrimination. Colleagues can unlock their full potential, skills, creativity, and talents in an environment that is both positive and conducive to professional growth.

ABATEC Group's Code of Conduct clearly states that the Group values and promotes the diversity of its employees. The Code of Conduct also prohibits all forms of harassment, bullying and discrimination within the workplace or in any other work-related context. This strict prohibition applies universally, regardless of the source of the harassment, bullying or discrimination and the target. A [non-exhaustive] list of examples illustrating actions that may contravene this Policy can be found in in point 2.2 below.

Any employee found to have clearly breached this Policy should anticipate appropriate corrective and/or disciplinary action to be taken aligning with local legislation. These measures may include coaching, verbal or written warnings, demotion, suspension, termination of contract or immediate dismissal.

2.2. Definitions

Discrimination

An unobjective, unjustifiable refusal to offer equal treatment or equal opportunity in relation to work and employment conditions or privileges. This includes, but not exclusively, a violation of the principle of equal treatment and equal opportunity in recruitment, dismissal, promotion, disciplinary action, training or remuneration.

Discrimination occurs, for example, when unequal treatment is based on the following characteristics:

- nationality, skin colour, ethnicity or nationality
- gender, sexual orientation
- religion
- age
- worldview, culture
- state of health or
- other aspects regulated by local legislation.

Bullying

Psychological violence defined as repeated and regular bullying, tormenting, and harming of a person, primarily on a psychological level, by groups or individuals.

Typical acts of mobbing include:

- humiliations
- spreading false statements of fact
- assignment of meaningless tasks
- other forms of abuse
- threats of violence
- social exclusion
- continued, unreasonable criticism of a person or his or her actions that amounts to tyranny or inhumane, reckless treatment.

Harassment

Behaviour that violates or intends to violate human dignity and is undesirable, inappropriate, or offensive to the affected person.

Harassment may include the following:

- snide remarks, inappropriate nicknames, slurs, inappropriate jokes, inappropriate tricks, mocking or insults;
- creating, sharing or publishing derogatory or in some other way inappropriate written content, pictures, electronic messages, videos or pieces of music;
- threatening or intimidating comments or behaviours and
- nonverbal behaviours, including intimidation, harassment, stalking or inappropriate staring that is threatening or may be perceived as threatening for another person.

Sexual harassment

Behaviour that falls within the sexual realm and undermines the dignity of a person or is intended to do so, and that is perceived by the affected person as undesirable, inappropriate, or offensive.

Sexual harassment may include the following:

- unwelcome sexual advances or requests for sexual favours, including those with an implicit expectation of benefits in return in relation to recruitment, promotion or professional advancement;
- creating, sharing or showing inappropriate written content, pictures, electronic messages, videos or pieces of music

which by their nature can be interpreted to be sexual or obscene;

- unwelcome comments on a person's personal or physical features which by their nature can be interpreted to be sexual or obscene; and
- other nonverbal behaviours of a sexual or obscene nature such as unwanted physical touch, leering or inappropriate staring.

3. Reporting violations

3.1. How should alleged violations or other concerns be reported?

It is the responsibility of every employee to contribute a secure and open working environment, where harassment, mobbing or discrimination. To ensure that this can happen, all employees can report any violations or suspected violation of this policy to their direct line manager or to the competent office for compliance issues by e-mail (compliance@abatec.at), phone, post or in a face-to-face conversation. In addition, third parties (e.g. business partners) can make an anonymously report of violations of this policy by e-mail (compliance@abatec.at).

3.2. Confidentiality and protection against discrimination

We take concerns of our employees and third parties seriously and treat all reports under this policy as confidentially as possible. As part of the process of clarifying any allegation, it may be necessary to involve third parties as well, but this will only be done as part of a discretionary decision if it is absolutely necessary. The ABATEC Group endeavours to ensure complete confidentiality when engaging third parties.

No employee of the ABATEC Group will suffer any disadvantage if, in good faith, he or she reports a violation within the meaning of this policy. In this regard, it is completely irrelevant whether the allegation of the violation is substantiated or not.

On the other hand, every employee must expect disciplinary action if they take or attempt to take retaliatory measures against a colleague who has reported or intended to report a suspected violation of this policy in good faith. Retaliatory measures include, for example, exerting pressure or threatening an employee to prevent them from reporting the suspected violation. Likewise, any employee who makes a report with malicious intent must expect disciplinary action.

3.3. Handling complaints

The Legal Department will conduct a comprehensive investigation of all reported violations of this policy in collaboration with the Human Resources Department. For each reported case, an investigation team will be formed, consisting of employees from the Legal Department and the Human Resources Department, as well as, if necessary, other internal colleagues and third parties. All members of the investigation team are subject to confidentiality and may only disclose information regarding complaints to third parties when necessary for the clarification of the matter. No individuals who are biased or otherwise unable to handle the matter fairly and impartially may be part of the investigation team. In countries where a works council exists, it will be involved in investigations in accordance with its legal mandate.

For better readability, the ABATEC Group uses the generic masculine form in its texts. Terms referring to individuals apply—unless otherwise indicated—to all genders.