

CODE OF CONDUCT



The ddm hopt+schuler Code of Conduct reflects our corporate culture and our shared values to which we are committed globally.

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PREAMBLE

This Code of Conduct summarizes the fundamental principles and values of ddm hopt+schuler GmbH & Co. KG to which we are committed as part of our global business activities. They apply to our daily dealings with employees, customers and suppliers. In addition, we are also committed to explaining our position towards the environment and society.

We believe that economic actions are subject to ethical values and standards. We therefore require all employees of our organization to adhere to and act in accordance with prescribed standards. All employees of our organization are encouraged to act responsibly and to take responsibility for themselves and others.

AREA OF APPLICATION / COMPLIANCE WITH THE LAW

This Code of Conduct applies to all national and international employees of ddm hopt+schuler GmbH & Co. KG. It covers the company's headquarters in Germany, production in Romania and international representatives.

All employees must be aware that a violation of the law may result in legal proceedings against them and the company. It is therefore important to comply with the legal regulations and internal guidelines relevant to the respective area of responsibility.

The Code of Conduct can supplement comprehensive company regulations, provided these correspond to the principles described here or are based on them. In the event of deviations, the stricter regulations must be observed. If the local legal provisions are stricter, these take precedence.

GOALS AND GUIDELINES

1. GOALS / MISSION AND GUIDELINES OF DDM HOPT+SCHULER

Through our products, we strive to ensure maximum safety and optimum comfort for users. Throughout the world, we offer our customers and partners efficient and effective solutions for the fulfillment of their tasks through our products and services. We see ourselves as creative technologists and make it our mission to develop new solutions at the interface between man and machine.

We continuously develop our expertise and resources in order to expand our competitive advantages. In doing so, we strive for sustainable growth in harmony with ecological, economic and social values. Research and development are key instruments for us to offer our customers outstanding solutions.

ddm hopt+schuler GmbH & Co. KG is an independent family business and will remain owner-managed in the future. This company structure forms the basis of our continuous development.

We have great ambitions and ensure our company's success through our employees. They act with integrity and responsibility. Our employees act fairly, honestly and in a solution-oriented manner towards all of the organization's stakeholders. They are aware that each individual is a reflection and figurehead of the organization. They play a key role in shaping the company's reputation.

Our organization has supported social activities with donations and sponsorship for many years.



RESPECT

2. FUNDAMENTAL SOCIAL RIGHTS / MUTUAL RESPECT / EQUAL OPPORTUNITIES / ANTI-DISCRIMINATION

ddm hopt+schuler is guided by the principles of the "Global Compact" of the United Nations. We respect the principles of the 1998 Declaration on fundamental principles and rights at work of the International Labor Organization in accordance with national laws and practices.

All employees of ddm hopt+schuler are given equal opportunities and are valued and employed regardless of nationality, culture, religion, ideology, skin color, gender, sexual orientation, age or disability.

The interaction of all employees should be characterized by fairness, courtesy, openness and respect as well as a common understanding of trusting cooperation.

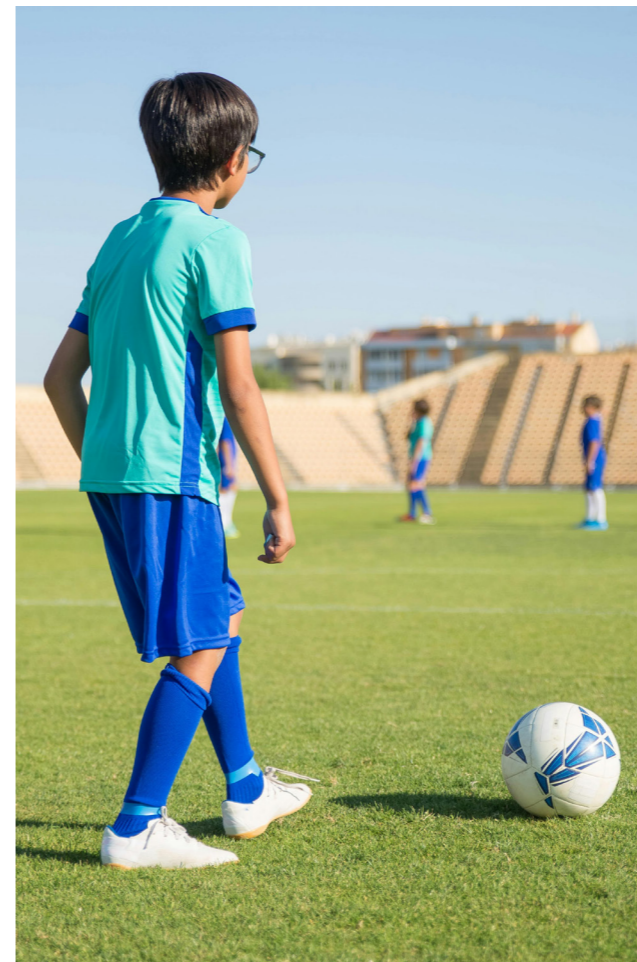
Managers at ddm hopt+schuler in particular should set an example of exemplary behavior and be aware of their responsibility towards subordinate employees. If this relationship develops abusive structures, this should be reported immediately to another manager, the HR department or the management. Third parties are also encouraged to report anomalies such as active bullying.



DONATIONS AND SPONSORING

3. DONATIONS AND SPONSORING / GIFTS / GIVEAWAYS

ddm hopt+schuler GmbH & Co. KG does not make any direct or indirect donations (money, goods or services) to political organizations, parties or individual politicians. Donations are only made by ddm hopt+schuler in accordance with the applicable laws, so that they are transparent in that the recipient and use are clearly traceable. In all other respects, the respective country-specific donation guidelines of ddm hopt+schuler GmbH & Co. KG apply.



SUSTAINABILITY

4. SUSTAINABILITY AND ENVIRONMENTAL PROTECTION

We undertake not to disregard sustainability in our business activities. We ensure that we develop and produce our products as sustainably as possible. Supply and procurement channels are also constantly checked and optimized for sustainability. Particularly in the area of procurement, we try to work with regional partners in order to avoid unnecessary emissions in supply chains. We always pay attention to the careful use of natural resources.

Our corporate activities fulfill all legal obligations with regard to environmental aspects. Mandatory details are regulated by the environmental guidelines and the quality management manual of ddm hopt+schuler GmbH & Co. KG. We are certified in accordance with ISO 9001:2015 and ISO 14001 and adhere strictly to the relevant guidelines.



WORK SAFETY

5. WORK SAFETY / OCCUPATIONAL HEALTH AND SAFETY

Our employees and the protection of their physical and mental integrity are the most important thing for us. We take the necessary measures to avoid health risks and accidents and implement national laws and regulations.

Every employee must ensure that he/she complies with the relevant rules and behavior at work. To this end, our organization offers training courses on health protection and occupational safety. Our company doctor is also available to our employees on the subject of health protection.

We are convinced that a good work-life balance is at the heart of a successful employer-employee relationship. ddm hopt+schuler helps employees to combine work, family and private life.



5.1 PROHIBITION OF CHILD LABOR

ddm hopt+schuler GmbH & Co. KG undertakes to strictly reject and prevent child labor in any form. In doing so, ddm hopt+schuler observes the regulations of the United Nations. Child labour is defined as the employment of persons below the legal minimum age (Convention 138 of the International Labor Organizations). The organization is committed to protecting the fundamental human rights of children and ensuring that children are not directly or indirectly involved in work processes that could endanger their physical, emotional or mental development.

Principles

- 1. Minimum age for employment:** It is prohibited to employ persons under the minimum age specified by law. This minimum age is based on national and international laws, guidelines and conventions.
- 2. Protection of young people:** Young people who have reached the legal minimum age for employment are employed in compliance with reasonable working hours and safe working conditions.
- 3. Suppliers and contractual partners:** ddm hopt+schuler expects suppliers and contractual partners to also commit themselves against child labor and to ensure that children's rights are respected throughout the entire supply chain.

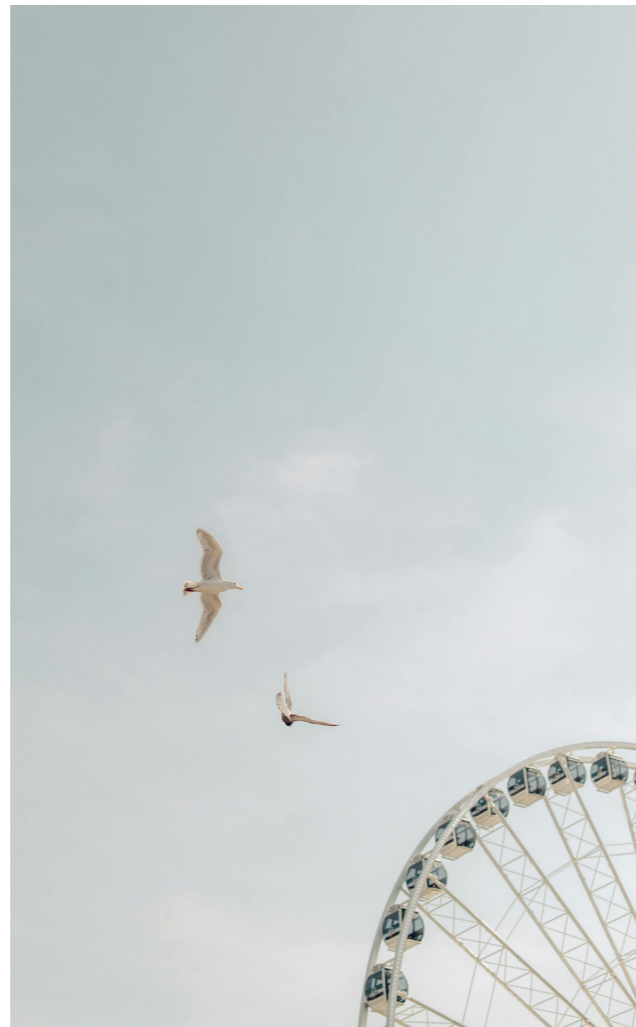
5.2 PROHIBITION OF FORCED LABOR AND HUMAN TRAFFICKING

ddm hopt+schuler is expressly committed to respecting and protecting human rights. All forms of forced labor and human trafficking are strictly rejected. Employees, suppliers and partners are encouraged to share this commitment and actively contribute to ensuring that all workers in our value chain are treated fairly.

ddm hopt+schuler respects international labor standards and is committed to ensuring that its business operations do not involve direct or indirect participation in forced labor or human trafficking. ddm hopt+schuler promotes transparency in its supply chain and is committed to ethical and responsible sourcing to ensure that products and services are produced under conditions that respect the dignity and fundamental human rights of all involved

Monitoring and sanctions

Compliance with these provisions is regularly monitored. Violations of this Child Labor Policy may result in disciplinary action, including termination of business relationships with suppliers or contractors who violate this policy.



TRAINING AND LEARNING

6. TRAINING COURSES

ddm hopt+schuler GmbH & Co. KG promotes lifelong learning.

The managers at ddm hopt+schuler make it their task to provide their employees with ongoing training and further education. They motivate their colleagues and recognize their talents and abilities.

Training and further education are considered very important to ensure that all employees can continue to meet future requirements and contribute to the constant growth and change as well as improvements and market-related changes at ddm hopt+schuler.



MARKET BEHAVIOR



7. COOPERATION WITH STAKEHOLDERS, BEHAVIOR TOWARDS COMPETITORS

As an organization, we are committed to a free market and fair competition. We strictly adhere to the relevant antitrust and competition law regulations as well as the provisions for the prevention of corruption. ddm hopt+schuler makes its decisions independently and in a self-determined manner. If there are any doubts in this regard, the compliance team in Rottweil must be contacted at an early stage. We also expect our business partners to comply with the statutory regulations and all the principles set out in this Code of Conduct.

ANTITRUST LAW

7.1 ANTITRUST LAW

ddm hopt+schuler has made a name for itself as a supplier and system manufacturer in many markets through its three business divisions. It is important for us as a company to constantly build on this reputation.

Within Germany and in an international context, ddm hopt+schuler must not only observe the general regulations of antitrust law on horizontal and vertical agreements, but also those for other companies with a strong market position.

Agreements and information regarding prices, price components and price increases as well as other terms and conditions or market-relevant secrets vis-à-vis market competitors and suppliers.

- + Such topics are secret and confidential. Accordingly, we do not request any information in this regard - we always make all decisions autonomously.

Market sharing (product-specific, proportional or regional sharing) with competitors

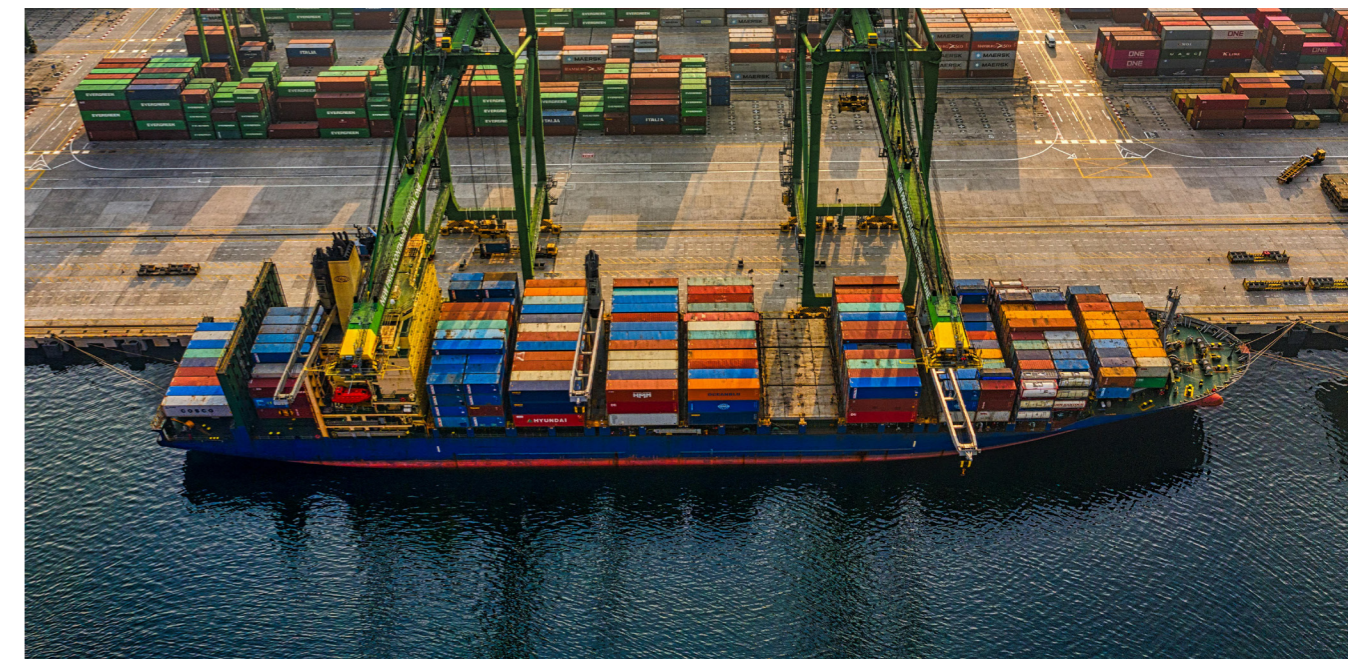
- + ddm hopt+schuler acts independently of the competition and therefore autonomously.

Participation in secret meetings with competitors or suppliers

- + Meetings must be official (specific reason and purpose must be clear and transparent). If you have any doubts or uncertainties, please contact the management or sales management of ddm hopt+schuler or do not participate if you have serious doubts.

Tolerance of behavior by others that violates anti-trust law

- + Express your concerns about admissibility, request that the further discussion be stopped and state this for the record. Leave the event and have this also recorded!





COMPETITION

7.2 COMPETITION LAW

ddm hopt+schuler is committed to fair business practices in dealing with the competition by clearly defining our own product and service advantages. This is done on the basis of our values, which promote fair and ethical dealings with one another. Defamatory statements or actions are not permitted, particularly with regard to competition.

We respect and protect the intellectual property of third parties at ddm hopt+schuler and demand the same from others. Therefore, for example, we do not use copyrighted works without appropriate authorization and do not make illegal attempts to obtain protected information.

CORRUPTION AND TERRORISM

7.3 CORRUPTION

ddm hopt+schuler competes on the basis of objective criteria such as the quality and lasting value of our own products. We also select our business partners on the basis of these solid standards. We do not tolerate any unlawful or unethical influence on individuals and reject bribery (both nationally and internationally) - both actively (as givers) and passively (as receivers). All employees of ddm hopt+schuler comply with the respective country-specific guidelines of ddm hopt+schuler GmbH & Co. KG. In the international context, we would like to refer here to the Foreign Corrupt Practices Act and the Bribery Act of 2010 and point out its worldwide scope of application.

As described in the UK Bribery Act, ddm hopt+schuler is developing "adequate procedures" to prevent corruption data.

In addition, ddm hopt+schuler is aware that the Foreign Corrupt Practices Act (FCPA) applies to its activities in the USA. The FCPA prohibition covers any payment or other benefit of value made for the purpose of procuring business for a company or person, extending a business relationship or procuring business for someone.

7.4 FINANCING TERRORISM AND COMBATING MONEY LAUNDERING

ddm hopt+schuler participates in the international exchange of goods and services. We comply with the applicable trade controls for import and export, embargo measures and sanctions against countries, organizations and persons as well as all other foreign trade regulations.

To ensure that our business is not misused for money laundering or terrorist financing, it is crucial that we only maintain business relationships with reputable stakeholders such as customers, partners and companies. They must conduct their business activities in accordance with the law. Their financial resources must have a legitimate origin.





CONFLICTS OF INTEREST

8. CONFLICTS OF INTEREST AND TRANSPARENCY

Conflicts of interest can arise when employees, their family members or friends are involved in business activities. It is important to emphasize that personal relationships must not influence work or lead to preferential treatment. Business decisions should be made in the interest of the company and personal relationships should be disregarded.

Employees must not use their position or any information to which they have access for personal gain or for the benefit of related parties or friends. This includes the preferential treatment of such persons with regard to benefits or professional development. Any conflicts of interest should be reported immediately.

ddm hopt+schuler expects all employees to fulfill their contractual obligations with full commitment during working hours. For this reason, taking up secondary employment is only permitted if this has been reported to the HR department in writing and approved. Secondary employment may be prohibited if it interferes with work performance or if there is a risk of a conflict of interest.

PROPERTY

9. COMPANY PROPERTY

9.1 PROPERTY

All employees of ddm hopt+schuler have a duty to handle the company's property and assets appropriately, sparingly and responsibly in every respect. Theft will not be tolerated and will have consequences.

9.2 DATA PROTECTION / CONFIDENTIALITY / NON-DISCLOSURE

The protection of privacy and personal data is a top priority at ddm hopt+schuler and is treated with the utmost care. Data protection and information security are an integral part of our corporate policy. We adhere strictly to the applicable data protection regulations and every single employee is obliged to comply with them. Company secrets and other confidential information must be treated confidentially and may not be passed on to third parties without prior permission. This obligation remains in force even after termination of the employment relationship.

9.3 FIDUCIARY DUTIES

Our organization is committed to upholding the highest ethical standards regarding fiduciary duties to our stakeholders. As an integral part of our commitment to integrity and responsible conduct, we recognize that certain roles within the organization entail fiduciary responsibilities.

Individuals acting in fiduciary positions, whether in the management of assets, sensitive information or other resources, are required to adhere to the following principles:

1. **Duty of loyalty:** Trustees must always act in the best interests of the organization and its stakeholders. Personal interests must not interfere with the objective and loyal discharge of fiduciary responsibilities.
2. **Duty of care:** Careful management of all entrusted resources is essential. Fiduciaries must act with due care and skill to ensure that assets and information are managed responsibly.
3. **Duty of confidentiality:** Sensitive information obtained in the course of performing fiduciary functions must be kept confidential. The protection of this information extends beyond the duration of the fiduciary relationship.
4. **Duty of accountability:** Trustees are obliged to report transparently and accountably on their actions. Communication with stakeholders about relevant information and decisions is critical to the trust and integrity of fiduciary functions.

These fiduciary duties apply equally to all members of the organization who are entrusted with fiduciary duties. The consistent implementation of these principles helps to strengthen the trust of our stakeholders and ensure that fiduciary responsibilities are carried out in accordance with the highest ethical standards.

CUSTOMS AND TAXES

10. CUSTOMS AND EXPORT, TAXES

10.1 CUSTOMS AND EXPORT CONTROL

As a globally active company, we comply with all local and international trade regulations and import and export control laws that affect our international business transactions. This includes compliance with economic sanctions and anti-terrorism regulations. Every member of our team helps to ensure that these laws, regulations and internal guidelines are complied with in this area.

10.2 TAXES

ddm hopt+schuler assumes responsibility for the proper fulfillment of its tax obligations. This includes strict compliance with applicable tax law in all countries in which we do business. This also includes the application of the arm's length principle as an international standard for transfer pricing. Every responsible member of our team helps to ensure that all laws, regulations and internal guidelines in this area are complied with.



CONSEQUENCES

11. CONSEQUENCES OF VIOLATIONS

Compliance violations can have significant consequences for both employees and the company and can be prosecuted under criminal law. For example, the following consequences may result for employees from compliance violations:

- + Third-party claims for damages
- + Fines, penalties, imprisonment
- + Costly court proceedings
- + Warning or even dismissal

The following consequences may arise for the company:

- + Third-party claims for damages
- + Fines, penalties
- + Costly court proceedings
- + Loss of image
- + Exclusion from public contracts



CONCLUSION

12. CONCLUSION AND WHISTLEBLOWER NOTICE (WHISTLEBLOWER PROTECTION ACT)

ddm hopt+schuler strives to be a company in which every single employee assumes his/her responsibility and acts/strives according to ethical and moral principles. It is not possible to identify every ethical risk in the future now. It is therefore important to note here how important it is for each individual to rely on his or her own moral compass and judgment in order to comply with the rules set out here. We expect our employees to adhere to this Code of Conduct. We encourage everyone to do the right thing. If in doubt, please contact a manager or the HR department.

If you notice something that you think is contrary to the guidelines of this Code, don't look the other way. Speak up!

With the help of a whistleblower system, corruption risks, compliance violations or (imminent) violations of human rights can also be reported anonymously both externally and internally.

In addition to employees, business partners and other third parties also have the opportunity to contact ddm hopt+schuler.

ddm hopt+schuler offers many different reporting channels for reporting compliance violations. You can contact us directly at:

hinweisgeberschutzgesetz@hopt-schuler.com

or by phone at:

+49 741 26070

If the above-mentioned persons prefer to report cases anonymously, this is also possible: paper forms are available in the company building for completion. These can be filled in and placed anonymously in the ddm hopt+schuler letterbox. They can also be sent to ddm hopt+schuler without a return address.

Do you need help understanding or implementing the Code of Conduct? Do you have any other questions or suggestions? Then talk to your manager or the HR department. We have also set up an e-mail address to which you can send your suggestions or questions:

hinweisgeberschutzgesetz@hopt-schuler.com

Escalation levels apply at ddm hopt+schuler. As a first step, contact your direct manager with your concerns. If this is not sufficient, consult the next higher manager or the HR department. Please do not be afraid to make use of this option. Only through open cooperation - even in the event of us, mistakes or misunderstandings - can these be resolved.

WHAT IS CORRECT BEHAVIOR?

You can use the following questions to check your behavior for conformity with the Code of Conduct of ddm hopt+schuler. You can ask yourself these questions at any time if you are unsure about an action or decision.

- + Is what I am doing or deciding legal?
- + Does my action or decision comply with the intent of this code?
- + Is my action or decision right?
- + Does my action or decision feel right?
- + Am I acting in the best interests of my company?
- + Is my decision free from personal interest?
- + Does it stand up to public scrutiny?
- + Does it protect my company's reputation?



We are
Creative Technologists.
Creative Minds,
Technological Masterpieces.