

Code of Conduct of Dockweiler AG

Ethical and legal rules
for the employees of Dockweiler AG

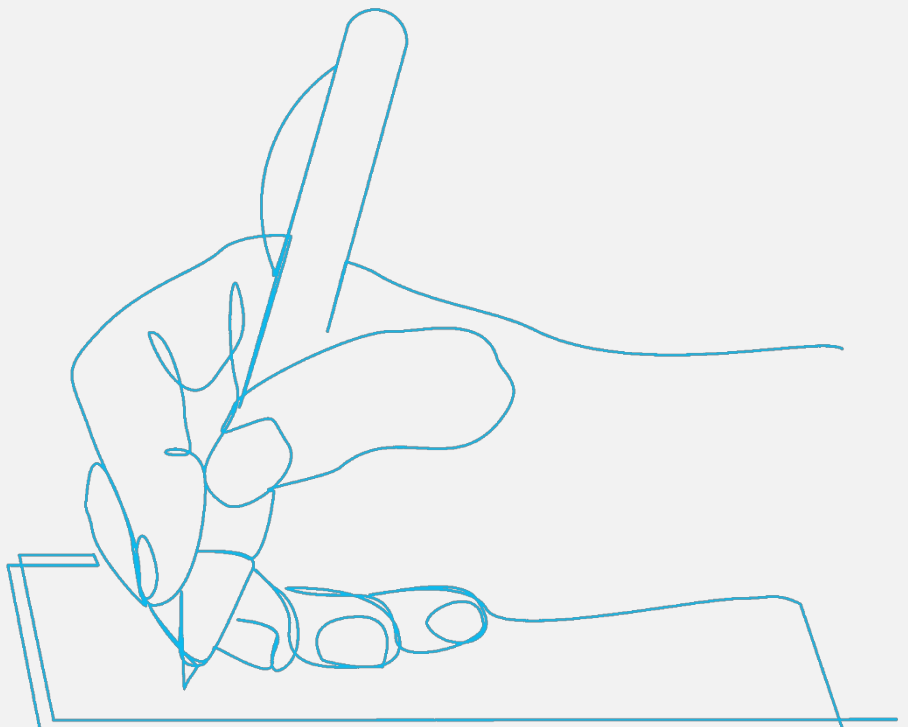


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1 Foreword

We, the employees and managers as well as the Management Board of Dockweiler AG, hereinafter referred to as "employees", strive to manufacture and market high-quality products that meet the qualitative requirements of our customers. It is a matter of course for us to conduct all global activities in accordance with professional business practices. Values such as respect, commitment, quality and sustainability are basic requirements for us in our dealings with one another. This also applies to our dealings with customers, suppliers and other business partners.

Our Code of Conduct serves to implement the values and business practices in such a way that our behavior in accordance with these principles contributes to Dockweiler's continued excellent reputation and economic success.

All employees are responsible for behaving in accordance with the principles set out in the Code of Conduct and for helping to ensure that these principles are practiced in day-to-day dealings within the company.

The following rules of conduct form the foundation of our Code of Conduct:

- Respect **for human rights**
- fair, honest and **ethically correct behavior**
- Compliance with the relevant **legal requirements, standards and regulations**
- Responsibility towards the **environment**

Accordingly, Dockweiler AG is also committed to the United Nations Global Compact, the OECD (Organization for Economic Co-operation and Development) Guidelines for Multinational Enterprises and the Code of Conduct of the Electronic Industry Citizenship Coalition (EICC).

As the principles of the Code of Conduct listed below cannot, of course, be all-encompassing, the responsibility for impeccable conduct also lies in the good judgment and personal integrity of all employees - we rely on this.

We would like to call on all employees to actively support the implementation of the Code of Conduct, as it will only "come to life" if it is consistently applied by each individual in everyday life. This is the only way we can act responsibly - for the company, for ourselves, for society and for the environment. If you have any questions or suggestions regarding the Code, for example specific situations and examples that should be included, please get in touch with the Compliance contact person. We look forward to your ideas and contributions.

In September 2024

The Management Board of Dockweiler AG

Who does the Code apply to?

All employees of Dockweiler AG, as well as other employees who have the status of employees (i.e. apprentices, dual students, temporary workers and other employees who are considered employees under applicable labor and/or tax laws) and contractually bound representatives (collectively, "Employees"), must follow the requirements of this Code. We strive to work with business partners and others who share our values and standards and expect them to conduct themselves in accordance with the provisions of the Code.

How does the Code fit in with the law?

Dockweiler AG is committed to complying with applicable laws and regulations wherever it operates. In the event of a conflict between local laws and the requirements of this Code, Dockweiler AG and its employees will comply with applicable laws and attempt to find appropriate ways to address the requirements contained in the Code.

In the event of a possible conflict, please get in touch with your Compliance contact person.

What are the consequences of violations of the Code and misconduct?

Dockweiler AG will take appropriate disciplinary action for violations of the Code or other misconduct, which in the most serious cases may include termination and possible legal action. Because Dockweiler AG operates in many countries, each of which has its own unique business, legal and regulatory environment, the Code does not attempt to establish a uniform set of sanctions for non-compliance with its requirements. Dockweiler AG has clearly defined internal policies for employee relations, including disciplinary action for misconduct as described in the Code.

Dockweiler Whistleblowing Policy

Dockweiler AG provides its employees with a way to respond confidentially to concerns about ethics, compliance or other requirements of the Code. We at Dockweiler are encouraged to report any suspicion of inappropriate, unethical or illegal behavior by another Dockweiler employee.

To raise a concern, you should be aware of our Whistleblowing Policy, which has been published and communicated on our local intranet. The whistleblowing process allows us to raise any concerns either locally or directly to the Group. The Group's dedicated whistleblowing hotline (in English, Thai and Chinese) is overseen by an external law firm that is independent of management.

Each of us should feel comfortable raising concerns without fear of repercussions. Dockweiler AG will not tolerate retaliation against anyone who reports in good faith about actual or suspected misconduct. Reporting in "good faith" means that we have provided all information available to us and believe it to be true.

Reprisals may lead to disciplinary action against the person responsible for the reprisals, up to and including dismissal. If a Dockweiler employee believes that he or she has suffered retaliation, he or she should report it immediately to the Human Resources department or the Compliance contact person.

A written code such as this document can only serve as a general standard of conduct. It cannot be a substitute for personal integrity and good judgment and cannot provide the appropriate response to every type of situation.

If there are any questions about the interpretation of the Code that may affect a particular situation, please speak - before you do anything! - first speak to your line manager or a representative of the HR department or the Compliance contact (e-mail: compliance@dockweiler.com).

2 General remarks

2.1 Important note in advance

Please note the following information:

- If there is any doubt as to whether a course of action is legally sound, ask first and then act - never the other way around! Get in touch with your compliance contact, your line manager or the Management Board. The important thing is to ask before you act.
- For all cases in which you become aware of processes that contradict this Code, please use the whistleblower contact options ([Whistleblower hotline](#), see p. 7). All submissions are treated with absolute confidentiality. They cannot and must not be traced back to you. Dockweiler AG takes its legal obligations under the Whistleblower Protection Act very seriously. The relevant details can be found in this document under "Whistleblowing".

2.2 Measures to ensure compliance

The Dockweiler AG Code of Conduct contains the standards for conducting business in a legal and ethical manner as determined or adopted by Dockweiler AG, hereinafter referred to as "Dockweiler". All employees agree to conduct themselves in accordance with this Code, other company policies, applicable laws, rules and regulations wherever they are in the world. Furthermore, all members of the Management Board declare that they are committed to these and other existing internal company and statutory regulations and provisions to the best of their knowledge and belief and in accordance with their responsibilities.

All employees are given a copy of this Code of Conduct when they join the company. Members of the Management Board receive a copy after their appointment to the Management Board. Amendments and additions are updated and published as required.

Dockweiler reserves the right to take appropriate measures in the event of non-compliance and non-compliance

with the Code. [Examples of violations and non-compliance with the Code are](#)

- General violations of the Code or other company guidelines
- Inciting third parties to violate the Code or other company policies
- Failure to promptly report known or suspected violations of the Code or other company policies
- Measures to conceal or cover up known or suspected violations of the Code or other company policies
- knowingly spreading false facts or suspicions
- Measures to the detriment of third parties who report or suspect violations of the Code

- Violations of the respective legislation or actions that result in civil or criminal consequences for employees or for Dockweiler (claims for damages or fines or fines or imprisonment).

2.3 Confidentiality

All reports regarding violations and non-compliance with the content described in the Code will be treated confidentially in accordance with legal requirements. To the extent permitted by applicable law outside the EU and to the extent practicable, the information will also be treated confidentially. Please note, however, that in certain exceptional cases it may be necessary to disclose confidential information to the extent permitted by law.

3 Confidential information

Dockweiler is committed to ensuring the confidentiality of information about its business conduct and to complying with disclosure obligations in a timely, complete and accurate manner. Accordingly, all employees who handle or become aware of confidential information are required to comply with the following rules and regulations:

- Confidential information is data that is not publicly accessible and could have a detrimental effect on Dockweiler and its business partners if published.
- Confidential information includes all information about Dockweiler and our business partners, as well as information provided to us by third parties.
- All employees are obliged to treat confidential information accordingly, unless disclosure is authorized or required by law.

[In addition, the following information is considered "sensitive":](#)

- Information on the financial status of the company or the results of business transactions, including profits
- Financial forecasts, in particular profit expectations
- Information on mergers, acquisitions and sales, tenders or the acquisition or sale of important assets or important legal proceedings
- Information about official investigations, criminal proceedings or charges, as well as indirect consequences, including the threat of termination of contracts with authorities or other significant official steps

It should be noted that endorsements and stamps can often draw attention to confidential or sensitive information in documents and handwritten notes, but are not a reliable indication that such information is actually to be classified as sensitive or confidential. The absence of notes and stamps does not mean that information is not worthy of protection!

In general, the disclosure of non-public information is the responsibility of the Management Board. Accordingly, all employees are obliged to ensure the confidentiality of such information within and outside the company at all times.

4 Relationships with customers, suppliers and competitors

Dockweiler's success is based on good relationships with customers and suppliers. To achieve this goal, it is important to create an atmosphere of trust and to market our products according to strict performance criteria. Dockweiler therefore adheres to the following standards and guidelines.

4.1 Fair trade

All employees must endeavor to deal with customers, suppliers and competitors in a fair and trustworthy manner. Unfair behavior through manipulation, embezzlement, misuse or misrepresentation of confidential or sensitive information or other unfair practices to the detriment of third parties must be avoided. Manipulation also includes bribery or material or financial influence to obtain business deals.

4.2 Marketing - denigration of competitors

All marketing activities must comply with the laws and regulations governing unfair competition and deceptive marketing practices, as well as with internal company marketing and advertising guidelines. The content of our marketing measures must be truthful and not misleading. Claims about performance and quality must be verified in advance.

In principle, the quality and characteristics of our own products and services are paramount. All employees must therefore refrain from making unfounded disparaging comments about competitors or their products and services. Information about a competitor (written or verbal) must be fair and factual. When communicating about a competitor, its products or services, the following rules must be observed:

- Avoid talking about negative characteristics or business practices of competitors.
- The main focus should be on Dockweiler's performance, know-how and the advantages of its products and services for the customer, rather than on the shortcomings of the competitor.
- Avoid references to non-product related problems or weaknesses of the competitor (e.g. financial difficulties, pending litigation or regulatory investigations).
- Information on technical details, quality, benefits or value of competing products or services should be omitted unless supported by manufacturer's claims or other current product information. In some countries, however, claims about competing products may also have to include positive aspects.

- Similarly, unsubstantiated claims about products and performance characteristics developed by Dockweiler should be omitted.

4.3 Protection of free competition

We strive to outperform ourselves by acting honestly and ethically and never gaining an unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or other unfair business practices.

Dockweiler will at all times act in compliance with all applicable antitrust laws in all markets in which we operate.

Antitrust laws serve to ensure fair and transparent competition on the market by strictly prohibiting certain agreements and the exchange of sensitive information with competitors. These illegal agreements include price fixing, bid rigging, territory or customer sharing, boycotting customers or suppliers and tying agreements. Employees are required to observe the following rules in particular.

What you need to do:

- Knowledge, understanding and compliance with applicable laws and Dockweiler guidelines
- Agreements with competitors: No price agreements or market sharing with competitors. Please pay particular attention to the examples in Work Instruction AA 5.2-01 "Guideline on Antitrust Compliance of Dockweiler AG" on the exchange of information, which may already constitute coordination with competitors
- Confidential information at meetings or events: In general, but especially at meetings or social events and at association meetings with competitors or potential competitors, avoid discussing information that is not publicly available, including:
 - Prices, pricing policy, contractual terms or conditions
 - Costs, inventories, marketing and service plans, market surveys and studies
 - Capacities, territorial agreements and proprietary information
- Protection of trade secrets: Do not use trade secrets, confidential or proprietary information from previous employers or other companies
- Compliance with guidelines and procedures for compliance with information barriers ("Chinese walls")
- Compliance with the principles of fairness and competition, neutrality, confidentiality and transparency in the procurement of goods or services
- Notification of the compliance contact person in case of doubts or questions

Dockweiler AG is committed to strict compliance with all applicable antitrust laws. We do not support any activities that could create the appearance of an anti-competitive agreement. Detailed guidelines and information on antitrust compliance are available in our Dockweiler AG Antitrust Compliance Policy AA 5.2-01. These guidelines provide comprehensive guidance on compliance with the law and must be carefully read and understood by all employees involved in business activities.

Failure to comply with antitrust laws is a serious violation that may result in disciplinary action, including the possibility of termination, as well as criminal prosecution and the risk of significant civil penalties. Each employee has a responsibility to comply with applicable antitrust laws and to ensure that our business practices are in compliance with these laws. This commitment to legal compliance and ethical behavior is critical to maintaining the trust of our customers, partners and society in the integrity of our company.

4.4 Prevention of bribery and corruption

Dockweiler has a long-standing commitment to conducting all of its business with honesty and integrity while adhering to the highest ethical standards. Bribery and corruption can take many forms. It can be defined as offering, promising, giving, soliciting or accepting an illegal bribe or inducement that results in personal gain or advantage to the recipient (or a person or entity associated with the recipient) in violation of applicable law and that is intended to improperly influence a decision by the recipient. Any form of bribery and corruption will not be tolerated and may result in disciplinary action. Certain situations require special attention: for example, political contributions are subject to national laws, which vary from country to country. Even if they are legal in one country, they can be a source of corruption. In addition, practices that may be acceptable in the commercial business environment may be unacceptable and even illegal if they relate to government employees or others. More and more regulations, national and extraterritorial laws are in place to prevent bribery and corruption. Risks include legal, reputational, financial and commercial risks and can seriously jeopardize a company's business and lead to criminal prosecution of employees and Dockweiler itself.

Business gifts of a higher value to employees of the company that are suitable for influencing the selection of providers and suppliers in an impermissible manner may not be accepted.

All decisions regarding the acceptance of gifts and invitations from providers and suppliers must be made in accordance with local circumstances, with prudence and a sense of proportion. As a general rule, business gifts can be accepted if they are of low value and do not involve cash, jewelry, valuables or securities. Minor gifts (max. €5) such as (low-value) pens, drinks and promotional items may always be accepted. Other factors to consider when accepting business gifts:

- Is a gift or an invitation appropriate for the business relationship in question?
- Is the frequency with which a Dockweiler employee accepts invitations disproportionate?
- Was the acceptance approved in advance by the supervisor?

Gifts from providers and suppliers

At Dockweiler, gifts from vendors and suppliers of the company must always be given for a good cause. Asking suppliers, customers and competitors of the company for gifts, invitations and favors is prohibited.

If you are not sure whether a gift is subject to approval under these guidelines, please contact your line manager.

Gifts and invitations to customers

Attempts to influence customers' purchasing decisions through personal gifts, invitations or personal favors are inadmissible, unacceptable and, in certain cases, illegal and **therefore** prohibited.

In cases where local tradition requires gifts to be presented on certain occasions, gifts of a lower value may be presented. These include the usual promotional gifts, tickets for sporting events, invitations to meals and other tokens of appreciation of a corresponding value (€80/person). Gifts and invitations over and above this amount require the special approval of the relevant line manager. Any costs incurred must be documented and approved.

Bribery and corruption are prevented by:

- Knowledge and adoption of (possibly local) codes of conduct and guidelines to combat bribery and corruption - if you have any questions, please get in touch
- Application of local prior authorization procedures before offering or accepting a gift or invitation
- No offer of a gift that compromises or could compromise the impartiality of the person receiving it, or gives the appearance of compromising it
- No financial or material contributions to political parties or organizations or to individual politicians (to the extent permitted by law) on behalf of Dockweiler without prior approval by the Board of Directors
- Never use the funds and other assets of Dockweiler for personal, in particular political, activities
- Obtain prior written approval and properly record any public benefit contributions or sponsorship on behalf of Dockweiler or with financial resources
- Not make any payment or gratuity (a "facilitation payment") to any government official or employee to expedite a routine administrative action

- Never be in a situation that could be perceived by a bona fide third party as an improper attempt to influence a company. If in doubt, think about how it would look on the front page of the tabloid press - is it then clear that it is not an attempt at bribery, or do doubts remain?

5 Prevention of money laundering, terrorist financing and violations of international sanctions

In the business activities of companies such as Dockweiler, money laundering, terrorist financing and international sanctions are significant risks from a legal and reputational perspective. Possible warnings include customers who are on a sanctions list or cannot be identified, who wish to make cash payments or carry out transactions with foreign shell companies or offshore companies.

Dockweiler has adopted specific policies to prevent violations of laws and international sanctions in connection with our products and services. Dockweiler's Anti-Money Laundering and Sanctions Compliance Policy sets out minimum requirements for the prevention and detection of money laundering, terrorist financing and violations of international sanctions. These requirements are designed to ensure that Dockweiler knows its business partners well and that transactions are monitored for suspicious activity.

We recognize and prevent money laundering, terrorist financing and avoid violations of international sanctions by:

- Understanding and complying with the applicable regulations and guidelines
- Compliance with requirements regarding the identification and verification of customers and their transactions
- Contacting the compliance contact person before proceeding with business transactions where there are warning signs of suspicious customers or activities

6 Responsibility towards employees

The relationship between Dockweiler and all employees is characterized at every level by mutual respect, mutual trust and the pursuit of common goals. Appropriate interaction with one another, as described below, is the basis of all good business conduct.

6.1 Health and Safety

Dockweiler continuously strives to provide safe and secure workplaces in accordance with labor protection regulations and laws. All employees are therefore required to comply with all relevant laws, regulations and provisions. Employees whose workplace is subject to special occupational health and safety regulations are trained accordingly.

Dockweiler does not participate in or profit from child or forced labor. Dockweiler sees

is bound by or complies with the respective country-specific legislation.

6.2 Against discrimination and harassment in the workplace

In accordance with the relevant statutory provisions and regulations, equal treatment must be guaranteed in recruitment, promotion and other operational processes. Discrimination on the basis of origin, skin color, age, gender, sexual orientation, religion or disability is not permitted.

All forms of harassment in the workplace are also not tolerated. This includes verbal abuse, intimidation, physical violence or other defamatory, hostile or disparaging behavior towards any employee.

Employees who have been victims of such harassment or discrimination are requested to report this to the HR department, the Equal Treatment Officer or the Works Council. You will be protected and the incidents will be investigated!

6.3 Privacy

Dockweiler respects the privacy and personal rights of all employees and recognizes that most employee information maintained in company files relating to personal background, family relationships, income, responsibilities and health is confidential by nature. Employees who have access to such information are required to comply with applicable laws, regulations and policies governing the confidentiality and disclosure of such data and information. If employees have access to such data, they are not authorized to pass it on to third parties outside the company unless they are legally obliged to do so or this is demonstrably necessary. In principle, the data protection regulations apply.

6.4 Intoxicants and stimulants

At Dockweiler, the use, possession and distribution of drugs and the use of alcohol during working hours and on the company premises are strictly prohibited. Employees are therefore not permitted to report to work under the influence of alcohol or other intoxicants or stimulants.

Smoking (including vaping or using e-cigarettes) is only permitted in the designated areas on the company premises. Smoking is prohibited on the rest of the company premises.

7 Responsibility towards the environment

We are committed to holistic environmental protection and the responsible use of resources. Dockweiler's goal is to make a contribution to climate neutrality. To this end, Dockweiler is striving to become climate-neutral itself. Dockweiler is committed to fully complying with the requirements of German and European environmental laws and directives. This applies, among other things, to the handling of hazardous substances, the promotion of nature conservation, energy efficiency in machinery and equipment, the conservation of resources, waste disposal and the recycling of packaging.

We use a risk-based and sustainable business perspective to identify environmental factors and find ways to reduce or minimize the impact of our business activities on the environment. We take positive, preventive action as soon as we realize that our operational activities could harm the environment.

- **Compliance with environmental laws and regulations:** We are committed to strictly complying with all applicable environmental laws and regulations in the countries in which we operate.
- **Efficient use of natural resources:** Our business activities are geared towards the efficient use of natural resources, whereby we give preference to renewable raw materials and support the development of environmentally friendly packaging.
- **Product safety and pollutant-free materials:** All products and packaging supplied by us are demonstrably free of pollutants and hazardous substances. The use of chemicals banned in the EU is prohibited.
- **Environmentally friendly disposal of waste and containers:** We guarantee the environmentally friendly disposal of waste and containers.
- **Environmental permits and reporting:** We obtain all necessary environmental permits, approvals and registrations, keep them up to date and comply with all existing notification and reporting obligations.
- **Conserving resources and preventing pollution:** Our aim is to avoid waste and reduce water and energy wastage through targeted process changes and the use of alternative materials.
- **Handling hazardous substances:** We identify and handle chemicals or materials that pose a risk to the environment safely in terms of handling, transportation, storage, use, recycling, reuse and disposal.

8 Conflicts of interest and business activities

8.1 Conflicts of interest

A conflict of interest exists if the private or personal interests of an employee collide in any way with those of the company or even appear to do so. All employees are expected to avoid conflicts of interest or even the appearance of conflicts of interest. Conflicts of interest include, but are not limited to

- Doing business for companies in which your own interests are pursued (example: commissioning your own cleaning company or your spouse's workshop is prohibited)
- Requesting personal favors from the company's business partners.
- Consultative or active activities for competitors, suppliers or customers of the company.
- Other circumstances likely to call into question personal loyalty to Dockweiler.

Personal relationships

Employees may have related parties (such as friends or relatives) whose personal interests are connected to Dockweiler's activities, for example because they are suppliers or service providers. In such cases, employees must inform their supervisor of the relationship and may not themselves participate in any decisions regarding it. Similarly, employees should not be involved in the decision to hire close friends or relatives.

External commitments

Any expression of political opinions and personal involvement by Dockweiler employees must remain private and must be distinguished from activities on behalf of the company. Employees are expressly prohibited from using Dockweiler as a company or its resources for political activism, rallies or demonstrations. In particular, by mentioning the Dockweiler name, using images with the Dockweiler logo, letterhead, company funds or other resources without the express prior approval of the Board of Directors.

Financial or business interests outside Dockweiler

Dockweiler employees must ensure that they are not in a conflict of interest if they plan to invest in a competitor, supplier, partner or customer, as personal investments can lead to conflicts of interest or increase the perception of a conflict. This also applies to listed companies where the investment is higher than 3% of the company. Such conflicts may also arise if an employee's family member has a shareholding or an executive or advisory role in a company that has or seeks to have a business relationship with Dockweiler. In such a case, please discuss the specific measures with the compliance contact person in confidence.

Secondary activities

Employees are prohibited from engaging in secondary employment or applying for secondary employment during working hours without informing their supervisor and the HR department. As a matter of principle, it is not permitted to use facilities, telephones, materials, equipment or information that are the property of the company for such purposes.

Actual or potential conflicts of interest must be reported to the line manager immediately.

What you need to do

Avoid actual or apparent conflicts of interest by:

- Honest and timely disclosure of current or potential conflicts to superiors and the compliance contact person before acting and making decisions
- Withdrawal from decision-making processes if you find yourself in a conflict of interest, e.g. in personal relationships
- Strict separation between the expression of political views or personal commitment and the Dockweiler company

- Before making personal investments in companies that have or could have a business relationship with Dockweiler, inform your line manager and the compliance contact person of the planned investment. This applies to your own investments and those of family members.
- Before taking up an external business activity or accepting a mandate with an external company, obtain the approval of your line manager and the Compliance contact person. In the case of membership and in particular the assumption of activities for political organizations and institutions, care must be taken to ensure that the values of Dockweiler are upheld and that no connection can be established with activities at Dockweiler.

8.2 Business activities

All employees are obliged to represent the legitimate interests of the company and to take advantage of all opportunities to increase its benefits. It is prohibited:

- Business activities that are carried out using the company's property and information or due to their position, for personal purposes or to assist third parties in doing so
- Use the Company's name, property or information or their position for personal gain or advantage
- To compete with the company.

9 Protection of company property

All employees have a duty to protect company property against theft, loss or misuse and to treat it with the utmost responsibility. This includes intangible property such as customer lists, product processes, technical drawings and specifications, as well as various written or digitally stored information and tangible assets such as money, equipment, facilities and materials. To protect against industrial espionage, we expect constant vigilance with regard to trade secrets, business data and secret know-how. Company resources must not be used for purposes other than those for which they were intended and must also be used sparingly for reasons of environmental protection.

9.1 Dealing with company assets

Company property or assets may only be used for legitimate business purposes. Removal of company property is prohibited unless expressly authorized by the owner.

Products and services are the property of the company. The shares that employees of the company contribute to their development and introduction during their period of employment are also the property of the company and remain so even after they leave the company.

9.2 Intellectual property

Intellectual property includes patents, brand names, trade and product names and other intellectual property such as work processes, documents, know-how, industry secrets, formulas, improvements, production processes, computer programs and information and lists of contracts with suppliers and customers. Employees are prohibited from passing on information to third parties - inside and outside the company - that could jeopardize their own technologies and industry secrets. In addition, precautionary measures should be taken to prevent the inadvertent disclosure of such information. Employees of the company are obliged to maintain confidentiality about such information even after they have left the company.

In addition, the rights of others regarding intellectual property and confidential information are equally respected. Accordingly, it is a violation of company policy for employees to appropriate computer software, audio or video recordings, publications or other protected intellectual property by copying, electronic means or other methods. Unless this is done with the permission of the patent or copyright holder.

10 Responsibility towards the public

10.1 Dealing with civil servants - anti-corruption legislation

All employees are required to comply with laws, regulations and ordinances governing dealings with government officials. These include anti-corruption laws that prohibit the direct or indirect transfer of anything of value to public officials or politicians in order to gain business advantages. When dealing with legislators, supervisory authorities and political parties, party members or candidates, all employees are prohibited from directly or indirectly influencing business transactions through their behavior or hindering or influencing these persons and their employees in any way in the performance of their duties. As a general rule, cash payments or the giving of gifts or valuables to public officials are strictly prohibited. This applies equally at home and abroad. See in detail in the previous chapters and the associated directive.

10.2 Media contact - Public statements

To ensure that disclosures of company information such as financials, company contracts and other information important to investors, regulators and the public are made accurately and in accordance with laws and regulations, and that Dockweiler can fully comply with its publicity obligations, such disclosures may only be made by designated parties. In general, therefore, all employees are not permitted to discuss company matters with third parties, such as media representatives or comparable persons, without special authorization.

The Management Board and the company's marketing department are responsible for ensuring that reports about the company are made correctly, on time, truthfully and in accordance with the law.

responsible. In general, inquiries from all media (newspapers, publishers, radio, e-mails and social media, etc.) are forwarded to the marketing department and answered promptly in consultation with the Management Board.

10.3 Export and import restrictions

In many countries, special regulations apply to international transactions to restrict exports, re-exports and imports as well as the transfer of technical data. This includes goods, technologies, information, data or software or electronic transfers. Here too, all employees are obliged to comply with the relevant laws, regulations and ordinances. Before carrying out international transactions, you must ensure that all relevant laws, regulations and ordinances are observed. This also applies to our internal export controls.

Dockweiler AG fully complies with all applicable export control regulations, embargo regulations and customs regulations, both with regard to the export of products and technology and their import. Compliance with these regulations is not only a legal obligation, but also an expression of our ethical responsibility to ensure fair trade and integrity.

We continuously monitor the validity of sanctions and embargoes and carry out regular, automated comparisons of our customers with the current sanctions and terror lists. Dockweiler AG is committed to strict compliance with all applicable sanctions and embargoes. Business with countries, persons or companies on these lists is consistently rejected.

For further details and practical guidance on how to comply with these regulations, please refer to **our** Export Control Work Instruction AA 8.2-16. This work instruction provides valuable information and helpful advice to ensure that our business conduct always meets the highest legal and ethical standards. We encourage all employees to read this guide and use it for guidance to ensure the integrity and legality of our international business practices.

11 Data protection

All employees are required to familiarize themselves with Dockweiler AG's policy on the protection and use of electronic data: i.e., the status of information stored, processed or otherwise contained, distributed or accessed in Dockweiler AG's electronic communications systems (including Internet access). Access to and use of any part of this system is provided to authorized personnel for the sole purpose of operating Dockweiler AG's business. While Dockweiler AG respects and protects the privacy of the persons covered, they must be aware that Dockweiler AG may determine and monitor the use of the system in accordance with data security requirements, company policy and applicable law. In addition, some aspects of Dockweiler AG's electronic communications system and some information on the Internet may be copyrighted or otherwise protected. It should not be used without the permission of the rights holder or the publisher.

No such information may be copied, uploaded, downloaded or distributed.

Dockweiler AG maintains a corporate presence on the worldwide web. Internet access, including access to certain social networks, is available to employees through the use of Dockweiler AG's electronic communication system exclusively to support the company's business activities.

Likewise, the use of all electronic means of communication, e-mail and messenger services provided, in particular on mobile devices, is only permitted for business purposes. Business matters must be conducted exclusively on the devices, servers and services provided for business purposes.

Exceptions, for example in the case of duplicate cards, require the approval of the line manager, which can also be granted on a blanket basis.

9 Conclusion

All employees receive this Code of Conduct and agree to respect and implement these standards. Should there be any deviations from the Code of Conduct, the line manager must be informed first and, if necessary, the HR department, the compliance contact, the works council or the Management Board. In the event of safety-related issues, the internal occupational safety specialist should be contacted.

The creation, amendment, implementation and compliance with the Code of Conduct is the responsibility of the Executive Board of Dockweiler AG.

Dockweiler AG

On the highway 30

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