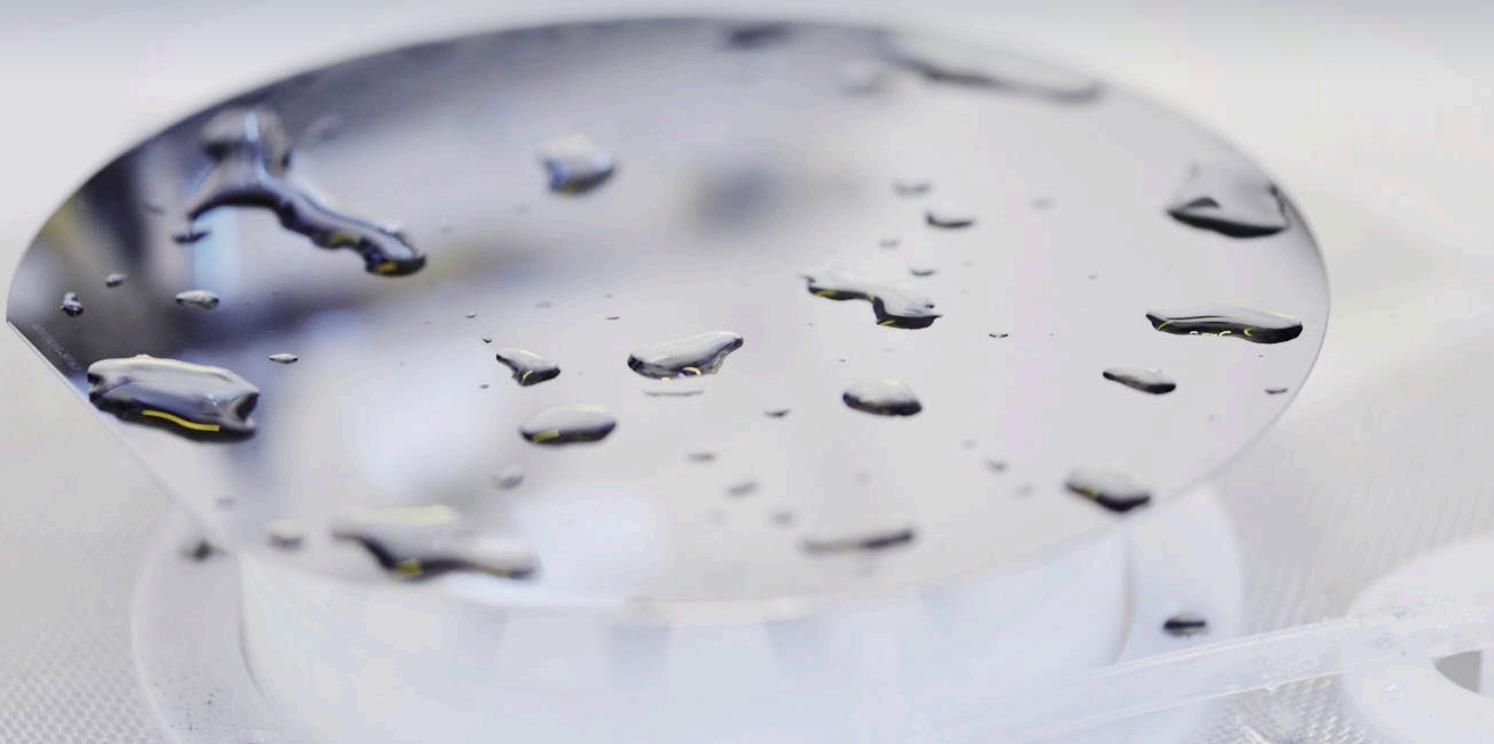




# Code of Conduct













## Business Partners

### Dialog with cooperation partners

All business information of our partners and their trade secrets are treated with sensitivity and confidentiality. Required documents are properly prepared, stored or, if necessary, destroyed at the end of the cooperation.

### Customer orientation

We conduct ourselves fairly and honestly towards our customers and business partners. We record the wishes, needs and expectations of our customers and business partners in order to ensure a target-oriented implementation in products, services or other processes. Our primary goal is to build a long-term and stable relationship with our customers and business partners based on trust.

### Fair competition

We are committed to fair competition and adhere to the applicable laws and rules. We refrain from making agreements on prices, conditions and strategies with competitors, suppliers, other companies and dealers that hinder fair competition. We do not take part in any anti-competitive boycott.

### Compliance with applicable law

We require our managers to familiarize themselves with the laws, regulations and rules relevant to their area of responsibility and to comply with them without exception. Our managers in particular bear a high level of responsibility in fulfilling the Code of Conduct. The business practices of our business partners and their suppliers must also comply with the applicable laws. This applies in particular to import, export and domestic trade in goods, technologies or services, but also to payment and capital transactions. A violation of economic embargoes as well as of trade, import and export control regulations must also be excluded by our business partners.



## Corruption measures / conflicts of interest

### Acceptance of gifts, donations

#### a) Gifts to our employees

Our employees do not demand or accept any personal advantages from customers or suppliers that influence or could influence their own behavior with regard to their work for the company. If gifts are offered by third parties, these may only be accepted if they are common practice and can be accepted as courtesy (promotional gifts with the logo of the company giving them, such as calendars or pens).

In the case of gifts whose value exceeds the usual amount (€ 35.00), the Compliance Officer or management must be informed. If this is not possible, these gifts must be rejected as a matter of principle.

#### b) Gifts by our employees

Gifts on our part may also only be offered within the usual framework for the business relationship and to a materially appropriate extent. The recipient must not be able to associate any obligation with it that would influence his business decisions.

#### c) Donations

As a matter of principle, AP&S International GmbH does not make donations to political parties, to individuals or to organizations whose objectives contradict our corporate philosophy or damage our reputation. The allocation of donations is always transparent.

### Bribery and corruption

We do not tolerate any form of corruption or bribery, regardless of whether it damages our company assets or the assets of third parties. We have control mechanisms in place to prevent bribery, theft, embezzlement, fraud, tax evasion or money laundering.

Our employees are prohibited from accepting or granting favors of any kind (cash, travel, gifts, etc.) that are linked to an undue advantage (placing of orders, project award, etc.). Our business partners are also required to avoid conflicts of interest that may involve a risk of corruption.



## Environmental / data protection

### Privacy

We treat all personal data of our customers, business partners and employees with the utmost care. This includes names, addresses, telephone numbers as well as date of birth or information about the current state of health. Our employees are obliged to take all measures to protect our IT system against internal and external data theft. This applies in particular to passwords misused in the company and unauthorized downloading of files, especially inappropriate material from the Internet.

For further information on the subject of data protection / data protection officer, we refer to our website [www.ap-s.com](http://www.ap-s.com).

### Protection of the environment

The protection of the environment and the climate are important to us. Our employees are required to treat all natural resources used in our company (e.g. energy, water, land) with care. Our employees are expected to act responsibly in the production and distribution of our products and/or services. For the protection of our employees, we comply with all laws and regulations concerning health and safety at work. To this end, our managers in particular take measures to create a healthy and hazard-free working environment for our employees.



## Human Rights

### Prohibition of Discrimination

Any form of discrimination is prohibited in principle. It does not matter whether it concerns nationality, ethnicity, age and gender, sexual orientation, marital status, pregnancy or disability, or religion or belief. Promotions and new hires are always free of discrimination.

### Protection from child labor or forced labor

We strictly reject children or forced labor without exception and expect the same from our business partners. School-age children (younger than 15 years) may not be employed even if the legal requirements of our supplier's country would allow it.

### Health and safety

We pay attention to safety. Our concern is that everyone works in a safe and healthy environment, regardless of where we are in the world.

- We have clear health and safety standards, which we require all employees to comply with.
- Our standards are continually reviewed to prevent accidents in the workplace.
- No one goes to work to be injured.
- We prohibit all forms of alcohol, drugs and abuse of other substances in the workplace.

### Fair wage

All employees receive a fair wage for their work, which is at least equal to the legal/tariff or industry standard minimum wage.

### Implementation and enforcement

AP&S International GmbH undertakes to make the necessary efforts to comply with the principles and values described in this Code of Conduct.