

Code of Conduct

Table of contents

Code of Conduct.....	1
1 Introduction/Preamble	2
2 Principles of our corporate behavior	2
2.1 General principles.....	2
2.1.1 Scope of application.....	2
2.1.2 Integrity - Credibility - Transparency	2
2.1.3 Compliance with the law	2
2.2 Supply Chain Sustainability Act.....	2
2.3 Consumer protection	3
2.4 Conduct towards competitors, business partners and third parties	3
2.5 Corruption.....	3
2.6 Tenders	4
2.7 Donations and sponsoring	4
2.8 Public officials - political parties - elected officials - consultants - agents	4
2.9 Money laundering	4
2.10 Tax law - Customs law - Foreign trade law	4
2.11 Avoidance of conflicts of interest.....	5
3 Dealing with information	5
3.1 Trade and business secrets	5
3.2 Data protection	5
3.3 Duty to tell the truth	5
4 Principles of social and ecological responsibility	5
4.1 Social responsibility - social commitment	5
4.2 Human rights - Child labor	5
4.3 Equal opportunities - prohibition of discrimination	6
4.4 Employee rights - occupational safety - health protection	6
4.5 Environmental protection - Climate protection.....	6
5 Compliance with the Code of Conduct	6
5.1 Communication - Control - Notification of violations	6
5.2 Processes - Guidelines - Instructions	6
5.3 Consequences of violations.....	7

1 Introduction/Preamble

AS Schweißtechnik GmbH is committed to ecologically and socially responsible corporate management. We expect the same behavior from all our business partners. We also expect our employees to observe the principles of ecological, social and ethical behavior and to integrate them into the corporate culture. We also strive to continuously optimize our business activities, our products and our services in terms of sustainability and encourage our business partners to contribute to this in the sense of a holistic approach.

Our Code of Conduct is based on national laws and regulations as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on the Rights of the Child and Business Conduct, the United Nations Guiding Principles on Business and Human Rights and the International Labor Standards of the International Labor Organization. We expect our business partners to comply with all relevant laws and regulations as well as the requirements of national and international standards.

2 Principles of our corporate behavior

2.1 General principles

2.1.1 Scope of application

Our Code of Conduct sets out binding rules that must be observed by every employee of our company. The Code of Conduct is the basis and guideline for dealing with ethical and legal requirements in our daily work. The members of the Executive Board and all managers in particular are responsible for actively implementing these rules. They must act as role models in every respect. Any employee can approach their line manager or the management with questions and comments in this regard.

2.1.2 Integrity - Credibility - Transparency

We base our business actions and decisions on generally accepted ethical values, in particular integrity, credibility and respect for human dignity. We promote transparency, responsible management and control within the company in an appropriate manner.

2.1.3 Compliance with the law

Our company and all our employees comply with the laws and other legal regulations of the countries in which we operate. This also expressly applies to the provisions of national, European and international product safety, machinery, waste and chemicals legislation as well as embargo, customs and export control regulations.

2.2 Supply Chain Sustainability Act

As an SME, we are not directly affected by the Supply Chain Due Diligence Act. We are committed to complying with due diligence obligations in our supply chains in an appropriate manner with the aim of preventing or minimizing human rights or environmental risks, as well as ending violations of human rights or environmental obligations or

minimizing their impact.

The nature and scope of our business activities, which mainly relate to Germany and Europe, do not currently indicate any increased risks along the supply chain for purchased products and services. In particular, our ability to influence direct or indirect suppliers for the small quantities we purchase is only marginal. As a rule, we are only a rather insignificant part of our suppliers' sales. Due to the nature of our products and services, there is a very low probability of occurrence and low expected severity of human rights violations. Due to our lack of market strength vis-à-vis our suppliers, there is virtually no risk of contributing to causation.

The assessment of appropriateness is evaluated annually by the Executive Board and adjusted accordingly.

We take account of justified reports of an increased risk to our products and services identified by our customers by pursuing this justified submission in individual cases.

2.3 Consumer protection

Insofar as consumer interests are affected, our company complies with the regulations for the protection of consumers.

2.4 Conduct towards competitors, business partners and third parties

Competition and antitrust law

Our employees are obliged to comply with the rules of fair competition. In particular, any agreement or concerted practice with competitors on the following topics is prohibited:

- Prices and price components
- Conditions
- Customers
- Delivery areas
- Quotas and capacities
- Agreed market exits
- Voting on planned innovations
- Boycotts

Our company respects the rules of fair and open competition and does not enter into any agreements that influence competition in an impermissible manner.

2.5 Corruption

Our company is expressly opposed to any form of corruption at home and abroad and avoids even the appearance of attempting to influence business decisions through unfair business practices. No employee may exploit the company's business connections for their own benefit or that of others, or to the detriment of the company. In particular, this means that no employee may grant or accept unauthorized private benefits in business dealings, e.g. money, material assets, services, which are likely to influence a proper decision. Every employee of the company is obliged to seek advice or assistance in the event of suspicions or legal doubts regarding the existence of corruption or white-collar crime. The management offers advice and assistance.

2.6 Tenders

If a contract is awarded on the basis of a formal invitation to tender, our employees will not discuss or coordinate offers with other bidders. This applies to both public and restricted invitations to tender and regardless of whether it is a public or private procurement procedure.

Granting and accepting benefits, invitations and gifts

Invitations, such as to business meals or events that are in line with recognized business practices and are appropriate, may be extended or accepted if they do not serve the purpose of undue preferential treatment. The same applies to the acceptance or granting of gifts. If there is any doubt as to the existence of an objective reason or the customary nature of a gift, the employee must ask the management in advance. This point is regulated internally.

2.7 Donations and sponsoring

Donations and sponsoring are only made on a voluntary basis and without any expectation of consideration. Donations and sponsoring activities must not be designed to covertly promote decisions in the interests of the company. The donation must be transparent. The recipient of the donation and the specific use by the recipient must be known. It must be possible to account for the reason for the donation and the intended use at any time. Remuneration similar to donations must be avoided. Remuneration similar to donations are benefits that only appear to be granted as remuneration for a service, but whose value significantly exceeds the value of the service.

2.8 Public officials - political parties - elected officials - consultants - agents

The granting of benefits of any kind to civil servants and other public officials as well as to representatives of state institutions, including indirectly via third parties, is prohibited regardless of their value. Contributions to parties and political organizations as well as to elected officials and candidates for political office must comply with the applicable laws. The commissioning of consultants, agents and other intermediaries may not be used to circumvent the ban on bribery.

2.9 Money laundering

Our company does not tolerate money laundering. All employees are obliged to strictly comply with anti-money laundering laws. Furthermore, they must immediately report suspicious forms of payment or other transactions that indicate money laundering to the management.

2.10 Tax law - Customs law - Foreign trade law

Our company prepares tax returns and declarations truthfully. All dutiable goods are properly cleared by us. Our company consistently complies with the legal requirements for export control and customs under foreign trade and customs law and ensures their proper implementation. The company expects its suppliers to provide export control and foreign trade data in a qualified and timely manner and to implement sufficient foreign trade and customs law standards for security in the supply chain.

2.11 Avoidance of conflicts of interest

Our company expects loyalty from its employees. We take care to ensure that our employees do not find themselves in situations in which their personal or financial interests conflict with those of our company or our business partners. The employees of our company must immediately report any personal interest that may exist in connection with their work to their superiors. Our employees are prohibited from managing a company or working for a company that is in competition with our company.

3 Dealing with information

3.1 Trade and business secrets

Our employees are obliged to maintain confidentiality regarding company and business secrets and other internal matters. This applies accordingly to information about contractual partners and customers that is not publicly accessible. This confidentiality obligation continues to apply even after termination of the employment relationship.

3.2 Data protection

All of our employees must strictly comply with the data protection regulations in accordance with the EU General Data Protection Regulation and national and international data protection laws. In particular, it is prohibited to process, disclose, make accessible or otherwise use protected personal data without authorization for any purpose other than the respective lawful performance of tasks. This obligation to comply with data protection regulations continues to apply even after leaving the company.

3.3 Duty to tell the truth

Reports and other written documentation must be drawn up correctly and truthfully by our employees. This applies irrespective of whether the documents are internal or external. Relevant records and supporting documents must be based on the principles of proper accounting and must always be complete and correct.

4 Principles of social and ecological responsibility

4.1 Social responsibility - social commitment

Social responsibility is an indispensable part of our value-oriented corporate management and a key factor in our sustainable corporate success. Our company contributes to the social and economic development of the country and region in which we operate.

4.2 Human rights - Child labor

The company respects and supports internationally recognized human rights. In this context, we are also in constant dialog with our suppliers to ensure that our products do not contain raw materials from conflict regions. Prohibitions on child labor and forced labor in any form are observed without exception.

4.3 Equal opportunities - prohibition of discrimination

Our company promotes equal opportunities for our employees. Discrimination against employees and third parties is not tolerated. Our company firmly opposes unacceptable treatment of employees, in particular sexual or verbal harassment.

4.4 Employee rights - occupational safety - health protection

Employee rights are fully recognized by us to the extent permitted by national law. Our company observes the applicable national laws and labor standards with regard to appropriate remuneration and maximum working hours. This naturally also includes compliance with all provisions of the regulations on a general minimum wage in Germany. Our company ensures fair working conditions overall. The prescribed occupational safety and health protection in the workplace is guaranteed within the framework of national regulations.

4.5 Environmental protection - Climate protection

Sustainable environmental and climate protection and resource efficiency are important corporate goals for us. Both in the development of new products and services and in the sale of our products and services, we ensure that all resulting effects on the environment and climate are kept to a minimum and that our products make a positive contribution to environmental and climate protection for our customers. Every employee bears the responsibility to treat natural resources with care and to contribute to the protection of the environment and climate through their individual behavior.

5 Compliance with the Code of Conduct

5.1 Communication - Control - Notification of violations

We familiarize our employees with the content of this Code of Conduct and explain the resulting obligations. We also communicate the principles of the Code of Conduct to our business partners. We also undertake to regularly monitor compliance with the Code. Every employee of the company is required to report any actual, potential or imminent violations of laws, internal regulations and this Code of Conduct that they observe to the management without delay. Reports of a violation of this Code will be treated in strict confidence and will not have any negative consequences for the reporting employee, unless a false allegation has been deliberately made.

5.2 Processes - Guidelines - Instructions

The behavioral requirements set out in this Code of Conduct are binding for the company's employees as part of the employment contract and must therefore be complied with. The company takes all necessary steps to implement the basic values and requirements contained in this Code of Conduct through appropriate organizational measures as well as appropriate instructions, processes and guidelines in all areas of the company.



5.3 Consequences of violations

Depending on their severity, violations of the Code of Conduct and statutory provisions may have consequences under labor and liability law and may also result in criminal sanctions.

Witten, February 6, 2025

Martin Arnhold, GF