

0 PRELIMINARY NOTE

The companies

- Binder Technologie GmbH,
- Binder Parametric Metal GmbH,
- Metallwarenfabrik Reichertshofen Karl Binder GmbH,

all located at Münchener Strasse 45, 85123 Karlskron-Brautlach, Germany, have drawn up a Code of Conduct that contains the compliance principles of our companies and the guidelines for conduct in everyday working life. This content is not exhaustive and is supplemented by guidelines and specific work instructions as required.

This Code of Conduct is based on national and international standards. These include the United Nations Universal Declaration of Human Rights, the fundamental principles of the International Labor Organization (ILO), the UN Convention against Corruption, the Guiding Principles on Business and Human Rights, the 17 Sustainable Development Goals and the German Sustainability Code, as well as all of Binder's internal rules and regulations. This Code of Conduct applies equally to all of Binder's divisions.

The Code of Conduct applies to both our companies and our suppliers. Therefore, the wording “we” has been chosen below.

1 COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

As a general principle, we consistently observe the applicable national and international laws and regulations as well as the internal guidelines and rules, including this Code of Conduct. If there is any uncertainty about the scope of application or the meaning of certain regulations, the respective line manager or, if necessary, an external legal advisor must be consulted. Documents and records such as financial reports, invoices, test results, quality documents, etc. must be presented as proof of compliance with all applicable regulations.

We handle the resources provided by the companies responsibly, cost-consciously and carefully. This applies in particular to the financial resources entrusted to us. Financial flows are recorded in a complete and traceable manner. The establishment or maintenance of so-called “black funds” is prohibited.

No action may be taken that damages the reputation of BINDER or BINDER's customers. Similarly, all risks and potential harm associated with the use of the products must be identified and eliminated. At the BINDER companies, we firmly believe that human rights and working conditions are of paramount importance. Therefore, in addition to this Code of Conduct, we have adopted a “Declaration of Principles on Human Rights and Working Conditions” which includes the following points on respect:

2 HUMAN RIGHTS

We uphold and promote compliance with internationally recognized human rights so that we are not complicit in causing or violating human rights. Fundamental human rights must be respected in the conduct of all business activities and all employees (our own, those of our suppliers and those of our customers) must be treated with dignity and respect.

2.1 Ban on child labor

We adhere to the ILO Convention on the minimum age for admission to employment of children and

a) do not permit work by children who have not yet reached the minimum working age specified by the ILO. In countries that fall under the exception for developing countries in ILO Convention 138, the minimum age may be reduced to 14 years, and b) do not employ workers for risky work who are not at least 18 years old according to ILO Convention 182.

2.2 Prohibition of slavery, human trafficking, forced and compulsory labor

We ensure that neither forced nor compulsory labor, nor any form of slavery, human trafficking or debt bondage is used or contributed to. The work of workers must be voluntary and they must be able to terminate the employment relationship. The employer must not withdraw an employee's official identity card, passport or work permit as a condition of employment. Mistreatment or retaliation of a sexual, physical, psychological or any other kind must not take place.

2.3 Fair working conditions

We pay our workers equal pay for equal work, regardless of their gender or other differences listed above. We pay our workers a fair wage and social and fringe benefits that at least comply with national and local laws. We are committed to prescribing and complying with local working time regulations and standards. Employment contracts are in written form and understandable to the employee, including information on wages, benefits and working hours.

2.4 Compliance with labor standards

We are committed to complying with the core labor standards of the International Labor Organization (ILO), taking into account the laws and regulations applicable to local suppliers. Among other things, this includes maximum daily working hours, break times, maximum working days in a row and annual leave.

2.5 Freedom of association and collective bargaining

We are committed to upholding the freedom of association and the right to collective bargaining. We recognize the right of workers to form and join trade unions and to participate in collective bargaining. This must not be interpreted to the detriment of workers, e.g. in the form of retaliation or discrimination.

2.6 Unequal treatment and rights

A working atmosphere characterized by fairness promotes motivation and efficiency. Relationships between managers and employees at all levels and in all areas of the company are guided by fairness, mutual respect, openness and a shared understanding of trusting cooperation. Every employee is strongly encouraged to actively contribute to an atmosphere of respectful cooperation in which any kind of personal harassment is prohibited. This includes, in particular, workplace harassment, unwanted sexual advances, unwanted physical contact, indecent offers, humiliation of any kind as well as insulting, offensive or derogatory jokes, remarks and actions. Violence in any form, assault in the workplace, including threats and intimidation and bullying are prohibited. Violations - especially of these principles - will result in appropriate measures and sanctions.

Any form of discrimination has no place in our corporate culture. We do not discriminate against or favor anyone on the basis of gender, race, religion, age, disability, sexual orientation, origin or other legally protected characteristics and do not tolerate any form of discrimination in this regard. The yardstick for assessing employees is exclusively their professional skills, their performance and their ethical behavior. We actively promote an appropriate environment to counteract discrimination.

At Binder, we respect the rights of local populations and communities, minorities, indigenous peoples, indigenous people and other vulnerable groups. We strive to protect these people and to avoid or prevent any negative impact on them.

Business partners shall ensure that the commissioning or deployment of private or public security forces, e.g. due to a lack of instruction or control by the company, does not lead to human rights violations such as torture and cruel, inhuman or degrading treatment, or otherwise cause injury to life and limb. Business partners shall refrain from directly or indirectly contributing to the support of public or private security forces that exercise unlawful control over extraction sites, transportation routes and upstream actors in the supply chain.

2.7 Occupational health and safety

As a minimum, we comply with the respective national laws and standards for a safe and hygienic working environment. This applies to employees as well as to contractual partners on site. We ensure an appropriate framework for this by carrying out risk analyses and taking measures and regulations to guarantee health and safety in the workplace. Processes, systems and operating resources are managed in accordance with the applicable legal and internal health and safety regulations as well as fire and environmental protection. The “Safety First” principle applies. As a preventive measure, our systems are regularly inspected and maintained, accidents are thoroughly investigated and emergency instructions are drawn up and communicated. Employees are thoroughly instructed, trained and supervised. The working environment must be safe and the safety of employees must not be jeopardized by the use of alcohol, banned substances, legal and illegal drugs. In addition, we are actively working on the introduction of an occupational health and safety management system (e.g. ISO 45001) or similar. The consumption of drugs (including alcohol) is prohibited on the company premises.

3 CLIMATE AND ENVIRONMENTAL PROTECTION

We observe climate and environmental protection with regard to the applicable laws and international standards, limit the impact of our own economic activities on biodiversity to a minimum, operate an appropriate environmental and climate management system, follow the precautionary principle when dealing with environmental problems and promote the development and dissemination of environmentally friendly technologies. The regulations required for implementation are laid down in an ISO 14001-certified environmental management system. Consumption such as the quantity of materials used, waste and emissions are documented and tracked in the form of key figures.

3.1 Sustainable resource management

We use resources such as energy, water, land and raw materials in an efficient and sustainable manner. Packaging is reduced to the bare essentials and where possible switched to reusable packaging.

3.2 Greenhouse gas emissions, energy efficiency and renewable energies

We pursue active and sustainable climate protection, for example by increasing energy efficiency or promoting the use of renewable energies. In order to achieve CO₂ reduction targets, we enable transparency through CO₂ emissions and reductions. As part of this, we try to reduce the amount of waste we produce. We ensure that the acquisition, development or other use of land does not lead to local evictions and that the acquisition and use of land, forest and water does not lead to the unlawful deprivation of people's livelihoods. Land use and deforestation are minimized to protect animals and biodiversity.

4 RESPONSIBLE CHEMICAL MANAGEMENT, PROCUREMENT AND DISPOSAL

We avoid harmful soil changes, water changes and consumption as well as air and noise pollution that destroy the environment in such a way that it significantly impedes the natural basis for the preservation and production of food, makes it difficult or impossible for people to access clean drinking water and sanitary facilities or damages people's health.

We comply with all applicable laws and regulations regarding bans on the manufacture and use of chemicals and materials, e.g. RoHS and REACH, and provide evidence of this on request.

We are committed to,

- Minamata Convention on Mercury to be observed,
- observe the ban on the production and use of substances within the scope of the Stockholm Convention on Persistent Organic Pollutants (POPs) and the ban on the environmentally unsound handling of waste containing POPs,
- observe the ban on the import and export of hazardous waste in accordance with the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal.

We comply with applicable laws and regulations regarding the sourcing of critical materials and conflict minerals, especially when they are incorporated into purchased products. These materials include tin, tungsten, tantalum and gold, rare earths and other minerals or metals such as bauxite, cobalt, titanium and lithium. We support efforts to prevent the sourcing of materials that lead to human rights violations and exercise due diligence on our suppliers to minimize the impact. If the source cannot be determined, appropriate certifications should be obtained or this material source should be phased out. The use of conflict minerals should be monitored and reported to us (if applicable).

5 INTEGRITY IN BUSINESS RELATIONSHIPS

By integrity, we mean the consistency of our external actions with our inner values, based on righteousness and fairness. Integrity represents a kind of inner moral compass and - for example in the case of regulatory gaps - provides guidance for decisions and courses of action that correspond to our values and are consistent with a generally accepted understanding of integrity. We always ensure that we act with integrity in our day-to-day work. We also expect our employees to comply with all applicable laws, rules and regulations in the countries in which they operate or are based, including with regard to ethical corporate governance, and to take appropriate measures to ensure compliance with these laws, rules and regulations. Tax laws, trade regulations and all export control regulations must be complied with. Fraudulent behavior, deception, false claims with the aim of gaining an advantage for oneself or third parties are prohibited, as is any form of corruption, bribery or extortion.

5.1 Free competition and antitrust law

We are in business competition with numerous other companies within and outside our industry. We are committed to fair and unrestricted competition in compliance with the provisions of antitrust and competition law. All employees are obliged to comply with antitrust and competition law. This includes the prohibition of agreements that violate antitrust law and the prohibition of abuse of a dominant market position.

In particular, employees refrain from making agreements or arrangements with competitors both within and outside our industry regarding the prices of products and services. This applies to both purchase and sales prices. Furthermore, such agreements or arrangements on production and sales volumes of a product and on the allocation of markets and customers are not permitted. Employees must be aware that the exchange of competitively sensitive information also violates applicable law. As a general rule, price fixing, exclusive supply or exclusive purchasing obligations, abusive discounts and imposed links between different products or services when purchasing or procuring (“bundling”) are not permitted with suppliers and dealers. When participating in a tender, there is no agreement with other participants in this tender.

5.2 Prohibition of corruption and bribery

Our employees comply with all applicable anti-corruption laws and regulations. In particular, it is ensured that employees, subcontractors or representatives do not offer, promise or grant any benefits to BINDER employees, customers or suppliers with the aim of obtaining an order or other preferential treatment in business dealings. This also includes bribes and kickbacks, gifts of money, kick-back payments or other incentives, favors, advantages or benefits of value to obtain unfair business advantages. These principles also apply if our suppliers cooperate with other third parties in connection with their activities for BINDER. This also includes the prohibition of improper payments to official bodies such as government representatives, political parties or candidates for public positions with the aim of gaining a competitive advantage or other benefits. Other types of gifts or business courtesies must not violate applicable law or the recipient's standards and must be in line with normal market practice. BINDER and its suppliers shall take sufficient precautions to prevent and detect corruption in all business agreements such as contracts, etc.

5.3 Business secrets

We ensure that confidential information of BINDER's customers and of BINDER itself is kept secret in accordance with applicable laws and contracts and that intellectual property is protected. Furthermore, any plagiarism or counterfeit materials/products found will not be put into circulation, but will be reported to the relevant authorities. This also applies after termination of the business relationship. Information that has been transmitted as part of the business relationship and is not publicly accessible may not be used for insider trading. Furthermore, we comply with all applicable data protection laws and only use third-party software (including open source software and firmware) within the scope of the rights granted and in compliance with the relevant license conditions. We operate a cyber security program that mitigates threats to the information system, products and services and the supply chain, taking into account all contractual and legal requirements. We comply with all applicable data protection laws and use third-party software (including open source software and firmware) only within the scope of the rights granted and in compliance with the relevant license conditions.

Insider information is any precise information that is not publicly known and which, if it were made public, would be likely to cause economic harm to BINDER or its customers. Employees may not use insider information for personal gain or pass it on to third parties without authorization.

Violations - especially of these principles - will result in appropriate measures and sanctions, including criminal prosecution by the competent state authorities.

5.4 Prevention of money laundering and terrorist financing

Money laundering is the smuggling of money or other assets acquired through previous criminal acts into the legal economic cycle. Money laundering is often used to finance terrorism. We comply with the legal provisions on the prevention of money laundering and terrorist financing and do not participate directly or indirectly in money laundering activities or terrorist financing. Employees refrain from transactions that facilitate or support such infiltration, for example in the form of the receipt, exchange or transfer of illegally acquired funds or assets. We comply with national and international laws and regulations for the prevention of money laundering and terrorist financing. In this context, they observe the applicable legal requirements relating to “conflict commodities” and comply with them accordingly.

5.5 Conflicts of interest

Employees are aware that mixing professional and private matters can be problematic. Business decisions or personnel decisions must not be made on the basis of private interests or relationships. Employees therefore make their decisions on the basis of objective considerations and do not allow themselves to be improperly guided by personal interests. Possible conflicts of interest must be disclosed immediately to the responsible line manager and resolved appropriately.

5.6 Prevention of fraud

Fraud is a deliberately misleading act (or omission) that is intended to create an advantageous situation for you, another person or the company, or to avoid an obligation or responsibility. It differs from a mistake because it is a deliberate act. We prohibit all fraudulent acts.

The term “fraud” includes:

- Dishonest or fraudulent acts
- Misuse or misappropriation of funds
- Alteration of documents and records
- Misappropriation of the assets of the company, employees, customers, partners or suppliers
- Dishonest practices or breach of trust intentionally carried out for profit or to gain an unfair or improper advantage
- Falsification of information, intentional omission, misrepresentation of facts, and intentional misuse of qualified resources or certifications / qualifications / authorizations.

We are committed to the prevention and detection of fraud and investigate any suspicion of fraudulent activity. Fraud is a criminal offense and is not tolerated in our company.

5.7 Potential Consequences of Fraudulent Activity

The revised procedure now includes a dedicated section outlining the **potential consequences** of fraudulent activity, such as:

- Immediate suspension of involved personnel pending investigation.
- Notification of relevant internal departments (Quality, HR, Legal).
- Reporting to the customer and applicable regulatory bodies.
- Possible termination of employment and legal action.
- Impact on company certifications (e.g., Nadcap, ISO) and customer trust.

This section is designed to reinforce a **zero-tolerance policy** and ensure all employees understand the seriousness of falsifying records or misrepresenting welding data.

5.8 Actions Upon Discovery of Fraudulent Activity

The procedure now defines a **clear escalation and response protocol**, including:

1. Initial Reporting

- Any suspicion or evidence of fraud must be reported immediately via the anonymous ethics hotline.

2. Containment Measures

- Affected parts are quarantined.
- All related documentation is reviewed for inconsistencies.

3. Investigation Process

- A cross-functional team conducts a root cause analysis.
- Interviews and document audits are performed.

4. Corrective and Disciplinary Actions

- Based on findings, disciplinary measures are taken.
- Customers are informed of the scope and resolution.
- Preventive actions are implemented to avoid recurrence.

5. Documentation and Closure

- All actions are recorded.
- A final report is submitted to management and, if applicable, to the customer.

6 WHISTLEBLOWER SYSTEM

In the event of suspected violations of this Code of Conduct of our companies, a neutral contact point at BINDER is available to BINDER employees, customers and suppliers of BINDER and other affected parties. The information that reaches our Whistle Blowing System is treated confidentially and the information or complaint is forwarded confidentially to the relevant office at BINDER so that further measures can be taken. This protects the whistleblower from retaliation. However, deliberate false reports will be followed up by disciplinary action.

Contact details:

hinweisgeber@bindernet.de

hinweisgeber@bindertechnologie.de

7 SELF-CHECK FOR EMPLOYEES ON THE SUBJECT OF INTEGRITY

If you are unsure whether a certain action could be critical from a compliance perspective, a brief self-check can provide assistance. In such a situation, every employee should ask themselves the following questions:

- „Do I have a good feeling about this or am I worried?“
- „What if it were in the newspaper tomorrow?“
- „What would my family and friends say?“

Although the answers to these questions cannot replace professional legal advice, they can provide an initial assessment of the situation. In case of uncertainty, employees should contact their line manager or a neutral person in the company using the whistleblower e-mail address.

8 COMPLIANCE WITH THE CODE OF CONDUCT BY BINDER SUPPLIERS

The Code of Conduct for BINDER suppliers is a binding component of all contracts between BINDER and its suppliers. BINDER's suppliers therefore undertake, regardless of their business location, to comply with and promote all the principles and requirements of the Code of Conduct described above and to train their employees regularly and appropriately in this regard. BINDER expects suppliers to pass on the contents of this Code of Conduct to their subcontractors and sub-subcontractors and to ensure that their subcontractors and sub-subcontractors also comply with these principles and requirements.

BINDER reserves the right to inspect suppliers' compliance with this Code of Conduct in an appropriate manner. To this end, BINDER shall coordinate with the supplier on the scope, period and location accordingly. A breach of this Code of Conduct shall constitute an impairment of the business relationship between BINDER and the supplier. Without prejudice to further rights, BINDER reserves the right in this case to demand clarification of the facts and initiation of countermeasures. If the supplier demonstrably fails to initiate suitable improvement measures within a reasonable period of time or if the breach is so serious that a continuation of the business relationship becomes unreasonable for BINDER, BINDER reserves the right, without prejudice to further rights, to terminate the contractual relationship concerned without notice or to withdraw from the contract concerned.

9 SUSTAINABILITY

9.1 Renewable energies, energy efficiency and decarbonization

In order to use energy efficiently, we intend to monitor and reduce energy consumption and the relevant Scope 1 (direct CO₂ emissions) and Scope 2 (indirect CO₂ emissions) as CO₂ equivalents and to promote the economical procurement, use and further development of energy-efficient technologies.

We are also expanding the integration of renewable energies in order to further optimize decarbonization.

9.2 Water management (water consumption and management)

Our water management includes the following principles:

- Promote the use and further development of water-saving technologies and water reuse technologies;
- identify, monitor and control wastewater and, where applicable, treat it in accordance with regulations prior to discharge or disposal;
- water management should include the documentation, identification and monitoring of water sources (origin), water use and water discharge and discharge

9.3 Air quality/air pollution control

To ensure that air quality is maintained, we regularly monitor emissions into the ambient air, e.g. of organic chemicals, aerosols, corrosive substances, particles (fine dust, etc.), ozone-depleting chemicals and combustion by-products from production-related processes. Measures are taken to reduce these emissions to a minimum. The minimum target here is compliance with the respective national legal requirements (e.g. Technical Instructions -TA-Air).

9.4 Chemicals management

Our chemicals management includes the following principles, taking into account the REACH and RoHS regulations:

- Effectively identify chemicals and other substances that may pose a risk if released into the environment. The use of these identified chemicals and other substances must be reduced to a minimum. The use of substitute substances (with a lower hazard potential) must be examined;
- that ensure hazardous substance management so that hazardous substances can be safely handled, transported, stored, reprocessed or reused and disposed of using appropriate procedures

9.5 Conflict minerals

Conflict minerals include tantalum, tin, gold, tungsten and cobalt, which are mined from the Democratic Republic of the Congo and neighboring areas, among others.

he supplier is obliged to,

- immediately notify Binder of any use and any discovered use as well as indications of a possible use of conflict minerals in minerals in parts, components, materials or products delivered to Binder without delay. The reporting shall be made using the currently valid CMRT template (Conflict Minerals Reporting Template; www.responsiblemineralsinitiative.org).

9.6 Sustainable resource management

Our sustainable resource management includes the following principles:

- to minimize, optimize or (where possible) avoid the use of natural resources such as water, fossil fuels, minerals and products from virgin forests. This should include

procedures and techniques such as changing production processes, maintenance procedures and building management procedures, material substitution, reuse and recycling;

- Prevent pollution and environmental damage (at all stages of production and/or service provision)

9.7 Waste management

Our waste management includes the following principles:

- to implement and operate an efficient process that effectively ensures the identification, sorting, reduction, disposal or transportation/transfer and recycling of solid waste (in accordance with relevant requirements and legislation);
- to consider the possibilities and opportunities for waste prevention and reuse/recycling for products supplied or services provided. Ideally, a life cycle approach should be applied (development, production, use, end of use and/or recycling);
- The supplier is also requested to develop measures that incorporate the sustainable use of water into operational planning processes (water management). Among other things, this should also include consideration of the operational effects of possible water shortages/water scarcity

9.8 Soil quality management and biodiversity

Our soil quality management includes the following principles:

- We pay attention to land use that does not lead to a permanent loss of biodiversity;
- we protect natural ecosystems and do not contribute to the alteration, deforestation or degradation of natural forests
- For new buildings, we ensure a good balance between green spaces and building areas;
- In water protection areas, we take particular care not to damage the soil quality or to drill deep boreholes;
- no raw materials from agriculture and forestry are used in our production or in our company processes;
- we do not participate in land grabbing and respect the rights of indigenous peoples and local communities

9.9 Noise emission

To ensure that noise emissions (from our production-related processes) are minimized, noise sources are analyzed and typified where necessary in order to determine and initiate suitable corrective measures. In this way, we try to minimize noise pollution for people and animals to a tolerable level in order to ensure an appropriate level of health and environmental protection. The minimum goal here is also to comply with the respective national legal requirements (e.g. Technical Regulations on Noise and Vibration Occupational Safety and Health Ordinance -TRLV- Noise).

9.10 Animal welfare and protection

It is of great importance to us that our business activities also take into account the welfare of animals. In principle, animal testing should be avoided and preference should be given to alternative animal-free methods, unless animal testing is required by law. In all cases, national and international regulations on animal welfare and animal testing, such as the German Animal Welfare Act, must be complied with. Our products are created without cruelty to animals.