

Preamble

Our actions towards our employees, customers, suppliers, shareholders and the public are characterized by high ethical and legal principles.

Every single employee in the Carl Stahl Group contributes to the reputation of the company vis-à-vis internal and external business partners through his or her actions, personal appearance and behavior.

Reliability, honesty and fairness in daily activities and in the strategic orientation of the company are basic prerequisites in dealing with each other, our business partners and the public.

Sustainable growth and success is only possible through fair dealings with all our business partners and with each other. For this reason we do not tolerate unfair or even illegal means to achieve our goals.

The following compliance guidelines therefore contain **binding rules for every employee of the Carl Stahl Group.**

We are obliged to act in accordance with these guidelines. We refrain from anything that is in conflict with these rules.

Carl Stahl Group

Wolfgang Schwenger (Managing Director)

Andreas Urbez (Managing Director)

This document was created electronically and requires no signature.

I. Basic behaviour

1. Law-abiding behaviour

We act in accordance with the legal systems and regulations of the respective business environment in which we operate. For the employees of the Carl Stahl Group, compliance with the law is the top priority.

Violations of the law must be avoided under all circumstances.

Every employee must also comply with all applicable internal regulations of the Carl Stahl Group in addition to the laws. In the event of a violation of his obligations under labor law, every employee must expect disciplinary consequences of the Carl Stahl Group, apart from possible criminal sanctions.

2. Respect, honesty and integrity

We are reliable partners both in internal cooperation and with external business partners and persons.

We keep our promises and only give promises that we can keep. We act honestly, are open and stand by our responsibility.

We respect the privacy, personal rights and personal dignity of each individual. We value working with women, men and various people of different origins, nationality, culture, religion and skin color. We do not tolerate any exclusion or discrimination based on sexual orientation or other reasons. We do not tolerate sexual or other personal insults or harassment.

II. Basic rules of cooperation of the Carl Stahl Group

1. Leadership, responsibility and supervision

Superiors must earn the recognition of their employees through their exemplary personal behavior and performance. They must act openly and honestly and demonstrate social competence. In their dealings with employees, they set achievable goals, demonstrate trust and rely on as much freedom and personal responsibility as possible.

The management principles issued by the Carl Stahl Group (Annex 1) must be observed by every employee in a management position. The superiors comply with their supervisory duties and organize work in such a way that all requirements can be met. They ensure that the compliance guidelines are observed in the respective area and legal requirements and regulations must be observed.

2. Financial Responsibility

Proper bookkeeping and financial reporting is a matter of course in all companies of the Carl Stahl Group.

Only the prompt recording of all business transactions in compliance with tax and commercial law can ensure that the company's situation is correctly presented at all times and that all obligations can be met.

All processes are organised in such a way that all bookings can be recorded correctly and on time.



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for the Carl Stahl Group and its affiliated companies

3. Employment contract

Remuneration and working hours

All work performed at the Carl Stahl Group is regulated by an employment contract and is of course voluntary. Every employee can leave the Carl Stahl Group at any time in compliance with the statutory and/or contractually agreed notice period. The minimum wage and its guidelines are applied. The salary is paid monthly.

Before starting work, every employee receives detailed and comprehensible information on the contents of the employment contract and the composition of the remuneration. Every month, every employee receives a detailed and detailed pay slip.

Overtime is paid on the basis of the valid legal regulations and on agreements, saved or remunerated. The working hours comply with the legal regulations (e.g. labor law, federal vacation law) and are described in the employment contract. Overtime is voluntary in accordance with the respective company agreements.

4. Occupational safety

Due to our responsibility towards employees, colleagues and external partners, we ensure the highest possible occupational safety and ergonomics of workplaces. These principles are observed in the technical planning of workplaces and equipment as well as in processes and personal behavior in everyday work.

The working environment and workplaces must meet the requirements of a health-oriented design and the necessary safety regulations.

However, each employee is also responsible for occupational safety in his or her area. All regulations concerning safety at work must be strictly applied and complied with.

If employees draw attention to deficiencies regarding work safety or the ergonomics of the workplace, the respective occupational safety specialist must immediately follow up on these instructions and take remedial action.

5. Child labor and youth protection

The Carl Stahl Group generally rejects child labor as well as any exploitation of children and young people and obliges its suppliers to make corresponding declarations and comply with these declarations.

All regulations for the protection of young employees are observed. No work is done at night or under dangerous conditions for young people under 18 years of age. The employment of juvenile employees is only possible within the framework of the legal regulations and must be planned with special care.

6. Human rights, working conditions and modern slavery

Respect and protection of personal rights and the dignity of each individual person are basic values of our actions. It is a matter of course for us to observe the rules and laws for the protection of human dignity. We support the observance of internationally recognized human rights.

We comply with laws and create fair working conditions that are humane and dignified.

We reject modern slavery.

We expect our business partners to think and act in the same way.

7. Ethical recruiting

Equal treatment, respect and protection in the recruiting process are fundamental values of the Carl Stahl Group. Therefore, it is a matter of course that there is no unequal treatment of applicants. Job descriptions do not contain missing or incorrect information and no social media is used to collect private information. Furthermore, we also refrain from asking for irrelevant information.

8. Rights of minorities and indigenous peoples

The rights of minorities and indigenous peoples will be protected and respected at all times. If they are affected by our business activities, we act in accordance with internationally applicable principles. Respect for these rights is always out of the question and must be observed at all times.

9. Women's rights

The Carl Stahl Group promotes equal opportunities and does not tolerate discrimination. All people are treated equally, regardless of their gender. There will be no preferential treatment when filling a new position and no quotas will be met. Remuneration for the position is based solely on the job to be performed and not on gender. Appointments are made solely on the basis of professional suitability.

10. Social benefits

The Carl Stahl Group has an extensive catalog of social benefits in the respective companies, to which every employee working there is also entitled. This consists of a wide range of services and is constantly being developed further.



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11. Dealing with company property

All employees of the Carl Stahl Group handle the equipment and resources entrusted to them carefully and gently. Unless otherwise regulated by the company or individual contracts, the facilities and equipment in offices and workshops (e.g. telephone, copier, PC including software, machines, tools) may only be used for business purposes. The viewing, downloading or passing on of information that incites glorification of violence, racial hatred or other criminal offences is prohibited. The same applies of course to sexual content.

If not regulated separately, the use of private equipment for business purposes is generally not allowed (e.g. recording with a cell phone or with a private camera/video equipment, use of a private notebook).

Exceptions to this must be regulated separately.

III. Dealing with business partners and third parties

1. Fight against corruption

a) General information

We do not tolerate corruption.

Corruption undermines citizens' trust in the integrity and functionality of the economy and individual companies and also causes great economic and business damage.

We understand corruption to mean any misuse of an official function or personal power to gain an advantage for oneself or a third party.

Any cases of corruption that occur are consistently pursued and punished. We take preventive measures to counter corruption in a sustainable and consistent manner.

We are aware of the risk of corruption in all areas of work.

Decisions, such as the awarding of contracts, the conclusion of contracts, which involve particularly high material values, require the special attention of all those involved. In the event of any suspicion of corruption, i.e. if there are indications of corrupt behavior, the employee must immediately inform his or her superior. The superior will not be informed if there is a suspicion against him or her. In this case the next higher hierarchical superior must be informed.

b) Demanding and accepting benefits

No employee may use his or her position or decision-making authority to demand, accept, obtain or be promised advantages.

The acceptance of gifts and other benefits is therefore strictly prohibited. If gifts or benefits cannot be refused with regard to the business relationship, they must be reported to the superior. The management decides on the use of such gifts.

Gifts which are given in large quantities to customers or partners (e.g. lanyards, pens, calendars, notepads) with a low value can be accepted and remain in the department or company.

Invitations to appropriate business meals may be accepted.

c) Advantages - offering and granting

We do not tolerate the granting of advantages. Therefore, no employee may offer or grant unjustified advantages to business partners in connection with business activities, either in cash or in the form of other benefits. Indirect benefits are also not permitted.

Employees who conclude contracts with consultants, agents, brokers, agents or comparable third parties must ensure that these also do not offer or grant any unjustified advantages benefits to business partners or their employees can be granted at a customer event, to the extent then agreed. Outside the measures described there, these are strictly prohibited. Giveaways can be given to customers, business partners and guests on special occasions as small gifts or samples. Care must be taken to ensure that the positive company image is in the foreground. Invitations to business meals may be issued in the usual business context.

2. Free competition

The Carl Stahl Group is fully committed to competition by fair means. Cartel law is strictly observed. Even the mere appearance of behavior restricting competition must be avoided. Every employee is absolutely obliged to comply with the rules of fair competition. In the event of misconduct by others, the management must be informed. All agreements between companies that restrict competition are prohibited. Even a mere exchange of information between companies may be prohibited.



3. Avoidance of conflicts of interest:

We make business decisions freely and independently and exclude conflicts of interest as follows:

- If there is a personal or family interest in connection with official duties, the superior must be informed immediately.
- Suppliers or service providers may not be favored or disadvantaged in the competition for contracts for personal or other irrelevant reasons.
- If suppliers or service providers are also active in the personal environment of the key employee, the decision for this supplier or service provider must be approved by the employee's superior. Conflicts of interest must be avoided as a matter of principle, or even better, excluded.
- Any secondary employment of an employee requires the express prior written consent of the personnel department of the Carl Stahl Group or the respective personnel department.
- Sideline employment for a company that also has business relations with the Carl Stahl Group is not permitted.
- If the danger of a conflict of interest is recognizable in decisions, the employee concerned must inform his or her superior of this without being asked.

4. counterfeit parts

While there is no single process or standard that can absolutely ensure that we as a company do not receive counterfeit or unapproved parts, there are frameworks and best practices that are effective and identify weaknesses.

We do everything we can to ensure that we have absolutely reliable contractors and testing procedures that prevent counterfeit parts from entering the value stream.

5. export controls and economic sanctions

We, as Carl Stahl Group, observe regulations for the import and export of goods and services.

We are aware that customs law and other regulations must be observed in cross-border business transactions. The cross-border movement of goods also includes the taking of goods on business trips or the temporary transfer of goods abroad.

Transactions with companies or persons who are on sanctions lists are strictly prohibited. For this reason, it must be checked before every offer is made whether companies or countries are on embargo lists.

IV. Sustainability in all actions

1. Environmental protection and conservation of resources

We give high priority to issues such as environmental protection and the conservation of resources. These topics are corporate goals of high priority. The persons responsible for environment / safety in the company, ensure compliance with the law and set high standards. The exemplary behavior and performance of each individual employee is important. Everyone works on these topics at his or her place.

2. Social responsibility

We see ourselves as a responsible, important employer in our companies and at our locations and take on the associated social and regional responsibility. We do this through open communication with people and through active commitment to the respective region. We are an integral

part of public life in our regions and a constructive partner for society and its people. We expect our customers, suppliers and employees to act sustainably and to treat people, animals and the environment with respect.

3. Quality management / Integrated management systems

The Carl Stahl Group attaches great importance to its quality management system and the quality of its products and services. As a manufacturer and distributor of safety-relevant work equipment and objects, we are subject to a special duty of care and are committed to these standards. These obligations are laid down in our documented information (process and work instructions) and are binding for all our employees.

In addition, we maintain various other management systems which have the purpose of continuously improving processes, quality and work safety.

V. Data protection and protection of intellectual property

1. Business secrets / information protection

We handle the data and information entrusted to us with care and discretion. We know that the know-how and business secrets of the Carl Stahl Group as well as the companies cooperating with the Carl Stahl Group are valuable and must be protected. We therefore observe our internal regulations for the protection of confidential information and business secrets and disclose internal information to third parties only to the necessary and permissible extent.

We maintain secrecy about internal affairs of our company and our partners that have not been made public.

We do not disclose any information, such as details about the organization of the company, business, manufacturing, research and development processes and figures from internal reporting, which we have experienced in our cooperation with customers, suppliers, service providers or other business partners, but which are not absolutely necessary for the specific task.

The obligation to maintain secrecy continues to apply even after termination of the employment relationship. The basis of any trusting and effective cooperation is trust. This applies equally to the relationship with shareholders, employees and customers, business partners as well as to the public and all government agencies. Therefore, all records and reports that are made internally or disclosed externally must be accurate and truthful. According to the principles of proper accounting data acquisition and other records must always be complete, correct, timely and system-compatible.

2. Intellectual property

To promote innovation, it is particularly important to ensure that intellectual property is protected. Entrepreneurs and private individuals would not be so involved in research and development if they could not benefit fully from their inventions. Carl Stahl Group respects the own intellectual property and that of others. The intellectual property of the Carl Stahl Group and its business partners is a valuable asset that must be protected at all costs. Anyone who misuses it for his own benefit must expect the corresponding consequences.



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3. Data protection and data security

We observe the European Data Protection Basic Regulation and the Federal Data Protection Act and ensure that the applicable principles for processing personal data are observed at all times.

The protection of personal data and compliance with the data protection regulations applicable to the Carl Stahl Group is indispensable for us. We take all necessary measures to protect the personal data collected or processed by us. Personal data may only be collected, processed or used, as far as this is necessary for defined, clear and legitimate purposes. The Carl Stahl Group has appointed an external company data protection officer whose contact data can be found on the Carl Stahl website under "Data protection".

VI. Reporting of infringements and protection of whistleblowers

1. Contact person for infringements

Every employee of the Carl Stahl Group can point out circumstances to his or her disciplinary superior, the Head of Human Resources, the Head of Quality Management that indicate a violation of the compliance guideline or point out violations with regard to quality management. Concerns or complaints regarding discriminatory behavior can be addressed by each employee directly to the company complaints office cs.compliance@carlstahl.com for general equal treatment in the human resources department. Each process is thoroughly examined. Where appropriate, appropriate measures are taken. All information and documents are treated confidentially.

2. protection of whistleblowers

Misconduct by individual employees must be quickly detected and reported. It is therefore essential that the whistleblower is protected.

The separate e-mail address, which is only accessible to selected persons in the management and personnel department, guarantees that all information remains absolutely confidential. This guarantees that the whistleblower is protected and need not fear reprisal.