

## 1. Scope of application

The Compliance Directive applies to all companies of the pro-beam Group and is binding for their employees (hereinafter referred to as “employees”).

## 2. Basic concepts

Our fundamental beliefs about what constitutes right and wrong behavior, especially in a professional setting, unite and guide us pro-beam employees. We assume responsibility, individually and collectively, for actively living these beliefs, and each employee is required and obliged to act accordingly.

- We respect law and order.
- We are guided by generally applicable values and principles such as integrity, righteousness and respect for human dignity.
- We include economic, ecological, technological and social consequences and impacts of our entrepreneurial actions in our decisions.
- We take the training content required by pro-beam seriously and comply with the specifications from the training courses.

## 3. Data protection

- Personal data and private sphere

We use the personal data of our employees and contractual partners exclusively for the purposes for which they are made available to us and treat all data confidentially. We process personal data only within the applicable legal requirements for data protection.

- Confidential business information

We also adequately protect non-personal data within the business relationship. We comply with the legal regulations on the subject of data protection.

We do not publish or share confidential information about our business partners without explicit consent. We also enter into individual applicable non-disclosure agreements at the request of our business partners and customers.

## 4. Working conditions/standards

Our work environment must be safe and professional, and everyone must have an equal opportunity to contribute and share in the success. Discrimination, harassment and unsafe working conditions shall not be tolerated.

Against this background:

- we respect the personal rights and private sphere of the other person,
- we promote equal treatment and equal opportunities for employees, regardless of their gender, religious beliefs, ethnic origin, race, age or sexual orientation,
- we protect others from sexual and personal harassment and discrimination,

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- we sanction any kind of sexual and personal harassment and discrimination,
  - we ensure the highest possible occupational safety to prevent accidents and injuries,
  - we comply with labor standards such as those regarding permissible working hours,
  - we ensure appropriate remuneration and comply with the statutory minimum wage at all times,
  - we maintain a close working relationship based on trust with employee representatives. the basis of mutual trust and cooperative interaction is an open and constructive dialog characterized by mutual respect,
  - we respect employee rights with regard to freedom of association and assembly,
  - we do not employ any workers who are not at least 15 years of age, and
  - we firmly reject any use of forms of modern slavery (e.g. forced labor, child labor, etc.) in our companies as well as within the supply chains.

## 5. Corruption and bribery

Corruption and bribery are not only prohibited by law, they create dependencies, undermine trust and in the end cause massive harm to all parties involved.

Against this background:

- we do not bribe or allow others to bribe on our behalf,
- we do not make useful monetary contributions, even if this would be permissible under local law,
- we do not accept gifts & invitations that affect our objectivity and
- we do not offer gifts & invitations to influence the objectivity of others.

## 6. Financial responsibility and disclosure of information

We document all significant business transactions in a timely and traceable manner. Our financial records are kept in accordance with generally accepted accounting principles and within the applicable legal framework.

We comply with the retention requirements for tax and commercial law purposes. Corresponding documents are structured and filed in a comprehensible manner (in paper or electronic form). Submissions and reports, are completed completely, factually and correctly.

If documents are needed for research or investigation, they will not be altered, removed or destroyed.

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## 7. Competition

Fair and healthy competition is the basis of our economic order, growth and thus our prosperity. We are committed to confronting it and not hindering it.

Against this background:

- we vet our new customers and suppliers and only do business with partners who adhere to our standards,
- we comply with the antitrust law as well as the tax and commercial law regulations,
- we do not exclude competitors and do not try to hinder competition.

The prices of the services provided by the companies of the pro-beam group are determined independently. We consider collusion with competitors and other parties to be inadmissible.

## 8. Conflicts of interest

Conflicts of interest arise when personal, social or financial activities overlap with an employee's job duties. Against this background, we disclose potential conflicts of interest when personal activities overlap with professional duties; for example, we apply the dual control principle to all business activities with external third parties.

## 9. Intellectual property and plagiarism

Our proprietary know-how is protected by all employees. Likewise, we consistently reject the theft of intellectual property from others in all areas.

Against this background, we attach great importance to the use of original parts. The use of plagiarism is prohibited. Violations of this requirement by our suppliers must be reported immediately to the purchasing management.

Fraudulent activity is an act that leads to a financial or actual benefit under false pretenses. This can result in financial or other disadvantages for different interest groups. We reject any fraudulent behaviour and the benefits derived from it, under penalty of consequences under labour law. Violations must be reported immediately to the supervisor or to the works council.

## 10. Export controls and economic sanctions

We participate in international trade. In doing so, we comply with the applicable legal framework in terms of import and export controls, trade restrictions, customs law and economic sanctions, etc.

## 11. Prevention of money laundering

We comply with our legal obligations to prevent money laundering and do not engage in money laundering activities. Every employee is requested to have any unusual financial transactions, in particular involving cash, that may give rise to suspicion of money laundering, checked by the Compliance Officer in case of doubt.

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## 12. Whistleblowing and protection against retaliation

One of our basic principles of trustful cooperation is the protection of employees, business partners or other third parties in the event of a report of non-compliance. The identity of the reporting employee must always be protected. However, reports must always be truthful.

We oppose any action to retaliate, directly or indirectly, against any person in connection with a report, actual or suspected non-compliance, or investigation.

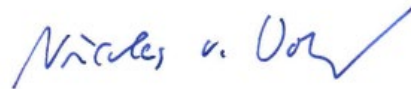
## 13. Contact Persons

In all cases and for questions in connection with compliance matters, employees can confidently contact their managers or the respective incumbent works councils.

Gilching, 16.02.2024

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*Place, date*



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Nicolas von Wolff