COMPLIANCE MANAGEMENT SYSTEM

CODE OF CONDUCT FOR THE METALL-CHEMIE GROUP

METALL-CHEMIE GROUP
METALL-CHEMIE HOLDING GMBH
HERRENGRABEN 30
20459 HAMBURG
GERMANY

Scope of application and basic understanding

The requirements for lawful and responsible corporate conduct, which are a matter of course for the Metall-Chemie Group, are reflected in this Code of Conduct (hereinafter "CoC"). This CoC is valid for the entire Me-tall-Chemie Group. The signatory companies belong to the Metall-Chemie Group.

The CoC is addressed to all employees[1] of the Metall-Chemie Group, but also to its suppliers[1] , customers[1] and other business partners[1] (hereinafter collectively referred to as "**business partners**"):

- All employees are obliged to comply with the laws of the jurisdictions with which the Metall-Chemie Group comes into contact.
- In addition, the economic, social and ecological consequences of all business decisions must be taken into account and an appropriate balance of interests must be achieved.
- The Metall-Chemie Group contributes to the sustainable development of society with the greatest possible conservation of environmental resources. Business partners are treated fairly.
- In addition, the highest quality of services and products is the declared goal of all companies in the Metall-Chemie Group.
- Universal human rights are respected in accordance with the UN Declaration of Human Rights, the UN Conventions on the Rights of the Child, the International Labour Organization (ILO) and the World Health Organization (WHO).

General principles of conduct

Every employee of the Metall-Chemie Group is obliged to comply not only with the laws applicable in his area of responsibility, but also with the internal regulations. In all business matters, he must behave in a fair and credible manner and respect and promote the reputation of the company and the Metall-Chemie Group. Conflicts of interest must be avoided wherever possible, otherwise they must be discussed with the employee's superior[1]. If an employee notices infringements or other violations of this CoC, he is obliged to report this immediately to his superior or - if this is not possible - to the external compliance advisor[1] (E-mail: compliance@mittelstein.de). Every employee with management responsibility is also obliged to monitor compliance with this CoC in his or her area of responsibility in addition to setting an example.

Sustainability, environmental protection

The Metall-Chemie Group complies with the applicable regulations on environmental protection and acts in an environmentally conscious manner at all company sites. This is

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the only way to preserve natural resources for future generations and to safeguard profitability and competitiveness in the long term. Environmental damage is avoided as far as possible and unavoidable production residues or waste are disposed of in a professional and environmentally friendly manner.

Fair Competition

Regulations for the protection of free and undistorted competition must be observed under all circumstances by all companies of the Metall-Chemie Group and their business partners. Violations of antitrust and competition law, such as price agreements, territorial and customer divisions or other agreements on production quantities, terms and conditions or other unlawful conduct that restricts competition in the supply chain or vis-à-vis competitors are prohibited and will not be tolerated. A dominant market position may not be exploited. In addition, third parties may not be offered or granted advantages in connection with business activities, either in money or in any other form. This also applies to countries in which there are other customs. If there are different rules on fair trade in different countries, the rules of the country that are stricter apply.

Prohibition of bribery and corruption, handling of gifts

No member[1] of the Metall-Chemie Group is permitted to accept or offer gifts, invitations or other personal benefits in connection with business activities in order to obtain confidential information, business opportunities, services or other advantages or to influence decisions in return. Any such offers must be reported immediately to management.

Unlawful acts by other persons must not be supported. Gifts, invitations and hospitality may only be distributed or accepted if they are generally customary occasional or promotional gifts or if the gift is in keeping with the customs and courtesies of a country. The impression must not be created that something is expected in return. The same applies to invitations. In cases of doubt, consult with the supervisor.

Combating money laundering, international movement of goods

The Metall-Chemie Group only cooperates with business partners who act within the framework of legal regulations and do not use financial resources originating from illegal transactions. To this end, the Metall-Chemie Group reserves the right to subject business partners to identity and legitimation checks before entering into a business relationship and also at a later date. Any suspicious facts that could indicate money laundering must be reported immediately to the superior or otherwise to the external compliance advisor.

The companies of the Metall-Chemie Group that participate in international trade strictly observe the relevant regulations on the import and export of their products.

Equal treatment, employee protection

Working conditions that contradict human rights or other fundamental social standards are not acceptable to the Metall-Chemie Group. This applies both within the Group and in cooperation with business partners. No one may be discriminated against on the grounds of race, origin, gender, religion or belief, age, physical constitution, sexual identity, appearance or any other personal characteristics. This applies in particular to dealings with colleagues[1], co-workers[1], business partners at any time in the business or working relationship.

Every employee[1] also has the right to safety and avoidance of health hazards in the workplace, especially where there is a high potential for danger. The Metall-Chemie Group is committed to taking occupational health and safety measures to prevent accidents, injuries and health hazards in the workplace and expects the same from all business partners in the supply chain. In addition, the Metall-Chemie Group is committed to respecting individual and collective employee rights. The applicable statutory maximum working hours are observed. The Metall-Chemie Group also requires that employees within the scope of the statutory minimum wage are remunerated in accordance with the statutory minimum wage, both for itself and for its suppliers.

Product safety

In addition to occupational safety, product safety is given the utmost attention within the Metall-Chemie Group, and the underlying regulations are strictly adhered to under close supervision. This applies in particular to products that are used in connection with food or may come into contact with it.

Avoiding conflicts of interest, protecting corporate values

Employees must keep their private interests and business interests strictly separate. Personal interests must not influence the economic decisions of the Metall-Chemie Group. Each employee is responsible for this in his or her area of activity. It is not permissible to place orders with related persons or companies in which related persons work, or to engage in sideline activities for or participate in competitor companies or business partners.

All employees must use assets and objects that are part of the company's property - including correspondence and electronic data - exclusively for business purposes and protect them from loss and misuse.

Data protection, confidentiality

The protection of personal data entrusted to us by employees and business partners is an important concern for us. Personal data is therefore collected, used and stored by us exclusively within the legally permissible scope in accordance with the applicable data protection laws. We protect the security of the data by means of suitable technical and organizational measures. Company and business-related data are to be treated as

strictly confidential by employees and business partners and are only to be used within the scope of the assigned business activity. The unconditional confidentiality requirement also applies to all information received and processed in the course of activities for the Metall-Chemie Group, regardless of its form, and in particular also to the intellectual property of the respective companies of the Metall-Chemie Group or their business partners.

Consequences of compliance violations

Employees must inform their supervisor or - if this is not possible - the external compliance advisor about compliance violations or a justified suspicion of a compliance violation. An employee need not fear any disadvantages from reporting a compliance violation. If an employee violates this CoC himself, this may have consequences under labor law. In addition, claims for damages by third parties, fines or imprisonment may be the consequence. Last but not least, compliance violations can result in serious damage to the company itself, such as costly legal proceedings and fines, claims for damages by third parties, and considerable damage to the company's reputation.

If you have any questions or concerns, please contact your supervisor or confidentially contact the external compliance advisor: e-mail: compliance@mittelstein.de

The Metall-Chemie Group includes the following companies:

Märtens Transportbänder GmbH

MC Oberflächentechnik GmbH

ALSTAB Oberflächentechnik GmbH

L&P Beschichtungen GmbH

Timm Lackierungen GmbH

OZB Oberflächenzentrum Bremen GmbH

MC Chemietechnik GmbH

Metall-Chemie GmbH & Co. KG

Metall-Chemie Technologies GmbH

MC Metallhandel GmbH

Zimmer Schrott- und Metallhandels GmbH

G.S. Stolpen GmbH & Co. KG

Metall-Chemie Grundstücksgesellschaft mbH & Co. KG

Metall-Chemie China Co. Ltd

Metall-Chemie Holding GmbH

CSS Draht Schmidt GmbH

Friedmann Großkücheneinrichtung GmbH & Co. KG

Friedmann Immobilien Verwaltung GmbH & Co. KG