

GUIDELINES FOR SUSTAINABILITY

TABLE OF CONTENTS

1	Basic understanding	3
2	Observance of human rights	3
2.1	Free choice of employment	3
2.2	Prohibition of child labor	3
2.3	Promotion of diversity, equal opportunities	4
2.4	Freedom of association and collective bargaining	4
2.5	Wages, working hours and social benefits	4
2.6	Health and safety at work	4
2.7	Procurement of raw materials, conflict minerals	5
3	Business ethics and compliance	5
3.1	Compliance with legislation	5
3.2	Corruption	5
3.3	Fair competition	5
3.4	Prevention of money laundering	5
3.5	Protection of information and intellectual property	6
3.6	Avoidance of conflicts of interests	6
3.7	Export controls	6
4	Environment protection	6
5	Supply chain	7
6	Execution and implementation	7

EDITION 02, JUNE 10, 2022 PAGE 2 0F 7



1 BASIC UNDERSTANDING

These Sustainability Guidelines are based on a shared conception of socially responsible company management as defined by the following guiding principles.

We, the undersigned company,

Haimer GmbH, Weiherstrasse 21, 85658 Igenhausen, Germany

accept responsibility for the consequences of our business decisions and activities in respect of the legal, economic, technical, social and environmental implications as far as possible within our available scope of action. We thus contribute to the societal and economic development of the countries and regions in which we operate.

Our actions are consistent with the relevant legal regulations. We are guided by ethical values and principles, in particular integrity and honesty, as well as respect for the dignity of human beings.

These guidelines define the basic principles of our actions, and we actively demand that they are observed by our employees worldwide. They apply in all branch offices and business units within our company.

We expect the same basic understanding from our business partners, especially from our suppliers.

2 OBSERVANCE OF HUMAN RIGHTS

We respect internationally recognized human rights and encourage their observance.

In all business activities, we work to ensure that we ourselves, our suppliers, our business partners and their suppliers do not commit or participate in human rights abuses.

2.1 FREE CHOICE OF EMPLOYMENT

Forced labor, modern slavery or comparable acts that involve the deprivation of liberty are forbidden. All work must be voluntary, and it must be possible to end the employment relationship.

2.2 PROHIBITION OF CHILD LABOR

We do not employ child labor at any stage of production or processing.

Our suppliers are required to comply at least with the ILO conventions on the minimum age for admission to employment and on the prohibition of child labor. Children may not be inhibited in their development. Their safety and health may not be negatively affected.

EDITION 02, JUNE 10, 2022 PAGE 3 0F 7



2.3 PROMOTION OF DIVERSITY, EQUAL OPPORTUNITIES

We encourage equal opportunities and do not tolerate discrimination. We treat all people equally regardless of gender, age, skin color, ethnic origin, sexual identity and orientation, disability, religious or cultural affiliation, pregnancy, political orientation or membership, ideology or other personal characteristics.

2.4 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We respect the right of employees to freedom of association, freedom of assembly and to engage in collective bargaining and pay negotiations, providing this is legally permissible and possible in the relevant country in which we are operating. If this is not permissible, we look for appropriate compromises for our employees.

2.5 WAGES, WORKING HOURS AND SOCIAL BENEFITS

Remuneration and social benefits must comply with the core principles regarding minimum wages, applicable overtime regulations and statutory social benefits.

Working hours and nonworking hours must at least comply with applicable laws.

2.6 HEALTH AND SAFETY AT WORK

We ensure safety and health protection in the workplace for our employees at a minimum within the framework of the applicable national regulations and support continuous further development to improve the working environment.

Potential risks in the workplace are evaluated and reduced wherever possible. We provide our employees with appropriate personal protective equipment. They receive regular individual training on accident prevention. This training also includes the handling with chemicals, for which the corresponding safety data sheets are posted at the workplaces concerned.

The workplaces are designed in accordance with ergonomic principles. The machines in production meet at a minimum the applicable safety requirements. They are CE-compliant and regularly maintained.

In the event of accidents, first aiders are present in all areas and are trained on a regularly basis. Action plans in the event of malfunctions and accidents, e.g. alarm plans, locations of fire extinguishers and first aid kits, and marked escape routes, are available in all areas.

The production areas are provided with a fire alarm system, a sprinkler system and automatically closing fire doors. In the event of a fire, fire protection and evacuation assistants ensure that the danger areas are quickly and completely evacuated. The fire protection and evacuation assistants also receive regular training.

EDITION 02, JUNE 10, 2022 PAGE 4 0F 7



2.7 PROCUREMENT OF RAW MATERIALS. CONFLICT MINERALS

Materials, especially raw materials that could originate from conflict areas ("conflict minerals"), are solely sourced from suppliers that have disclosed their supply chains and explicitly committed to comply with EU Regulation 2017/821 "laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas".

3 BUSINESS ETHICS AND COMPLIANCE

3.1 COMPLIANCE WITH LEGISLATION

It is a matter of course for us that we will comply with current laws and other legal requirements in the countries in which we operate. In cases where local laws and regulations are less restrictive, our actions are guided by the principles of these guidelines. Where there is a direct conflict between mandatory local law and the principles contained in these guidelines, the local laws shall take precedence. Nevertheless, we endeavor to comply with the content of these guidelines.

3.2 CORRUPTION

We do not tolerate corruption, bribery or blackmail; they impede fair competitive conditions. Gifts made with the intention of influencing business decisions or which could give the appearance of doing so or to obtain some other undue advantage are neither promised, offered, granted, requested nor accepted in our business relationships. Nor do we allow these to be promised to us.

3.3 FAIR COMPETITION

We operate in compliance with national and international competition and antitrust legislation and do not participate in price agreements, sharing markets or collusion in respect of customers, markets and bids.

3.4 PREVENTION OF MONEY LAUNDERING

We comply with our legal obligations to prevent money laundering and do not participate in transactions that serve to disguise or integrate criminal or illegally acquired assets.

EDITION 02, JUNE 10, 2022 PAGE 5 0F 7



3.5 PROTECTION OF INFORMATION AND INTELLECTUAL PROPERTY

We protect confidential information and respect intellectual property.

We observe the current laws to protect business secrets and treat our business partners' confidential information accordingly. These include, in particular, commercial property rights (e. g. patents, registered designs, trademarks), but also the prohibition of misleading copies of other people's products (plagiarism).

3.6 AVOIDANCE OF CONFLICT OF INTERESTS

We avoid internal and external conflicts of interest which could illegitimately influence business relationships. Where this is not successful, we disclose these conflicts.

3.7 EXPORT CONTROLS

We undertake to comply with legal standards relevant to export controls – including but not limited to approval requirements, export bans and support bans – in the course of shipping and exporting our goods.

4 ENVIRONMENT PROTECTION

We are aware of our responsibility for the environment and for future generations.

Therefore, we act at least in accordance with applicable laws to minimize negative impacts on the environment and to continuously improve our activities for environmental and climate protection.

Priority goals include:

- Reduction of CO₂ emissions
- Increase energy efficiency
- Use of renewable energy
- Ensuring water quality
- Reduction of water consumption
- Ensuring air quality
- Promotion of resource efficiency
- Reduction of waste and its proper removal
- Responsible use of hazardous substances for people and the environment

EDITION 02, JUNE 10, 2022 PAGE 6 OF 7



5 SUPPLY CHAIN

We expect our suppliers to comply with the principles of these guidelines at least within the applicable laws and regulations or to apply comparable guidelines. Furthermore, we encourage them to implement the criteria in these guidelines in their own supply chains.

We reserve the right to systematically check the implementation of these Code of Conduct at our suppliers both systematically and on an ad hoc basis. This may take the form of questionnaires, assessments or audits.

Should this cause doubts as to whether these guidelines are being followed, the supplier is requested to take suitable measures to counter this. If required, the cooperation arrangement will be ended.

6 EXECUTION AND IMPLEMENTATION

We make suitable and reasonable efforts to continuously implement, document and apply the principles and values in these guidelines. All employees are made aware of what these guidelines contain and receive training on relevant topics as required. Violations of these guidelines are not tolerated and can have consequences under employment law.

All our employees are obligated to do so, and our business partners are expressly called upon to report possible violations of these guidelines. If desired, such reports can also be submitted anonymously or treated confidentially.

Under no circumstances will an employee or business partner who points out irregularities suf-fer any disadvantages as a result ("whistle-blower").

The contact person for complaints, in particular for business partners, is the in-house counsel of Haimer GmbH.

He can be reached at:

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signed Andreas Haimer Managing Director

Haimer GmbH

EDITION 02. JUNE 10. 2022 PAGE 7 0F 7