



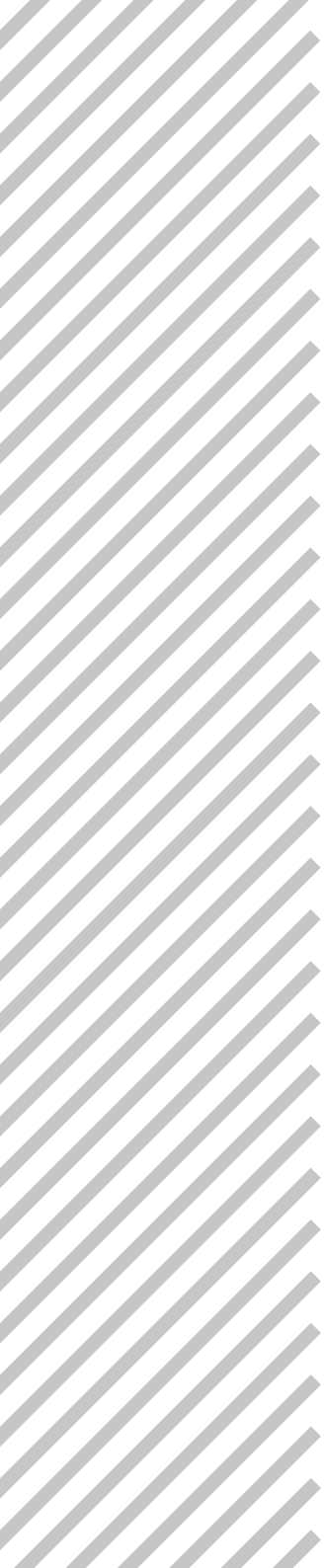
GROZ-BECKERT

Code of Conduct



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Foreword from the Management

Dear Sir or Madam,
Dear Colleagues,

Groz-Beckert never stops: We shape the future and systematically develop our company further. Our mission is to advance the world of production and to continuously create added value – that is what drives us. In our market we always aim to be at the forefront of precision, quality and innovation and set standards in the areas of environment, society and corporate governance.

Our approach is shaped by social, technological and digital change as well as the closer integration of the world. This means that our family business continues to develop in the 21st century without losing the awareness of our own history and tradition. Our values are the foundation of our success, with the goal of ensuring transparent and fair cooperation between all interested parties.

We measure the success of our company not only by economic results, but also by principles based on set values. We act responsibly and correctly, comply with the law and international agreements, and exemplify this attitude every day. The principles of our corporate governance guide every employee in the company. Groz-Beckert has shaped this attitude since the company was founded in 1852 – all over the world and each and every day.

This Code of Conduct summarizes this commitment. It provides us with guidelines in our daily, professional actions as employees, managers and colleagues and serves as a compass in our dealings with our customers, suppliers and partners.

Our Code of Conduct applies to everyone at Groz-Beckert, at all levels of the organization and everywhere in the world. We also expect our business partners to follow the principles of Groz-Beckert's Code of Conduct.

At Groz-Beckert, we all make a significant contribution to how Groz-Beckert is perceived by acting ethically and correctly. It is our duty to live up to this responsibility.

Albstadt, June 2022



Hans-Jürgen Haug
Chief Executive Officer



Eric Schöller
Member of the Executive Board



Markus Settegast
Member of the Executive Board



What we stand for: the Groz-Beckert values

The values of Groz-Beckert have grown over time, are firmly anchored in the company, and have been practically lived by all employees since 1852. Our corporate strategy is built on the principle of laying the foundation for future generations today. To achieve this, we act with foresight and reflection, continuously create added value and strive for sustainable development. Our corporate decisions must be measured against this commitment.

Groz-Beckert's values consist of five principles:

We are always reliable, fair and cooperative, quality conscious, as well as innovative.

Reliable

We are honest, reliable and credible. This creates a climate of trust and security.

Quality conscious

Our internal and external services are oriented to attaining the aims of their beneficiaries. We strive for leadership in the quality of our products and external services.

Fair and cooperative

We acknowledge the performance of our employees and promote them on the basis of a fundamental social philosophy. We shape internal and external collaboration with the goal of building and nurturing long-term relations which foster mutual benefit.

Innovative

We are able and ready to take on new challenges and changes and incorporate them into our thinking and actions.

These Groz-Beckert values are a set guideline for all employees. We categorically reject objectives and methods which would require us to override, violate or disregard our values. This Code of Conduct translates our values into concrete principles of action for daily interactions. It serves as a guideline to ensure that we as employees and managers act responsibly at all times and maintain the integrity of Groz-Beckert and our common goals.



How we act: Principles of respectful interaction at Groz-Beckert

Our foundation:

We respect legal regulations and human rights.

Compliance with all laws and legal standards is a minimum requirement for us. As a global company, we respect the legal regulations of the individual countries and the international community. Should there be conflicting requirements or standards, for example in countries where national laws, regulations or customs deviate from internationally applicable standards, we adhere to the usual, generally accepted international standards, unless local law contradicts these. We do not tolerate any form of corruption and are committed to fair business practices at all times.

We respect all UN human rights treaties and follow the UN Guiding Principles on Business and Human Rights. We reject any kind of violation of human rights at Groz-Beckert, in particular discrimination in employment and hiring, child labor and slavery, as well as threats to persons

who advocate the observance of human rights. In countries that fail to fulfill their duty to protect human rights, in whole or in part, we as a company remain obliged to protect these rights, but without taking on the tasks of the government.

Unlawful acts damage the reputation of our company. All employees are therefore required to familiarize themselves with and comply with the internal and external regulations applicable in their respective field of responsibility and the applicable laws. Employees who act illegally can not only expect to face the consequences of state prosecution, but must also answer to Groz-Beckert.







Principles of conduct at the workplace

Well-trained, qualified, satisfied employees, cooperation based on mutual appreciation, as well as motivation and performance are the basis of our long-term success. We value the individual personalities of our employees, promote diversity in the company and respect personal rights. The corporate management has also set itself the goal of actively supporting the individual development of all employees through fair and safe working conditions.

Equality and equal opportunities

Each and every one at Groz-Beckert must contribute to an atmosphere characterized by tolerance and respect. We actively support equal opportunities and the development of the personal potential of all employees. Groz-Beckert rejects any form of discrimination, harassment, physical violence or bullying.

All employees are requested to report relevant instances to their superior or the equal opportunities officer. The company expressly reserves the right to report violations of this principle under criminal law and to take action under employment law.

Management culture

Our managers are aware of their role model function. They lead on an equal footing and actively involve their employees in decisions. It is essential for managers to support employees with appreciation and recognition, to strengthen mutual feedback and dialog and to enable constructive cooperation across the various levels of the company. This creates a productive environment with sustainable economic efficiency of the company and a high level of employee satisfaction.

Compatibility of private and professional life

In discussions between corporate management, site management and employees, we create and optimize the general conditions for each country and location in order to support all employees in line with their personal situation.

Employee representatives and trade unions

Where employee representatives and trade unions exist, the management works with them based on respect and trust. We achieve sustainable, practical solutions through constructive dialog. In this process, we always aim to strike a balance between the economic, organizational and legal interests and obligations of the company and the interests of employees.

Health and well-being

Preventing hazards in the workplace and promoting preventative health care are key goals at Groz-Beckert. High technical and operational safety standards, as well as established processes help us to rule out work accidents and prevent occupational illnesses. Our company-wide management system for occupational health and safety (ARGUS) creates reliable framework conditions for safe working and is a reflection of the high value we place on individual health.

Our processes are based the principle that every employee should come to work healthy and go home again in good health every day. That is why we take technical measures, or provide suitable protective equipment where this is not possible. We work with employees to analyze the long-term impacts of the activities and have established structures that promote effective situational prevention (related to the working environment) and behavioral prevention (related to the individual) and enable continuous improvement.

Occupational health promotion at Groz-Beckert also includes all relevant processes to maintain and promote health and well-being. We offer site-specific programs aimed at effective prevention and reintegration. We advise and support employees with health complaints individually, if necessary, for example by adapting the workplace to the specific needs of the individual.



Safety

We ensure that our sites are safe for our employees, guests and neighboring residents and that no longer-term stress is caused. We also actively protect the company against negative consequences, such as time off for illness, compensation claims and the deterioration of business relationships due to misconduct or damage. To this end, we identify, evaluate and minimize all key risk factors at our sites around the world. There are also action plans in place for a wide range of relevant risk scenarios, which are used to minimize the impacts in the event of damage. In addition, we have a crisis management system in place, where responsibilities and processes are defined to enable us to react quickly and efficiently to damage and crises that may arise.

Know-how protection

New ideas and products, inventions and innovations ensure that we keep our leading position in the markets. That is why we work to preserve and protect our trade secrets. The knowledge of each individual is an important part of our know-how and therefore worthy of protection.

As we are aware of the sensitivity of our know-how, we do not pass it on to unauthorized persons and systematically protect it against unauthorized access. We take particular care in public and protect business and personal information. This applies especially, but not exclusively, to business and private communication as well as social media, on business trips, trade fairs and in other public spaces.

It is a matter of course for Groz-Beckert to protect the know-how of our business partners in the same way. For our part, we obligate external partners to secrecy if necessary and thus make mutual trust the basis of every cooperation.

Handling personal data

We take data protection very seriously as an individual right to privacy. This creates a great deal of responsibility. However, as digitalization opens up new business areas, innovative processes and communication and mobility opportunities that offer great added value for our employees and business partners, the collection or creation of data as well as its storage and use is unavoidable.

We only process and use personal data to the extent that this is explicitly permitted by laws, regulations and/or the consent of data subjects. Employees and business partners are guaranteed adequate transparency with regard to the handling of their data and options for how their data is used.

At Groz-Beckert, compliance with these specifications is ensured by a central data protection officer, supporting data protection coordinators and strict limitation to purpose-specific data processing.

Anyone who provides us with data should be able to rely on it being secure against access by unauthorized persons. Each individual employee must ensure that this is the case and receives relevant training in this field.

Social media and other digital media

When using social media platforms, internet forums, blogs and messenger services, we act with care and do not disclose confidential or protected company information. Our company-wide social media policy sets out binding requirements for this and must be complied with by all employees.

Error culture

Innovation is an important aspect for creating value, and corrections are a crucial step in any sustainable development. As a company and as individuals, we learn every day from both successful and failed attempts, helping us to improve things and find new solutions. Mistakes are therefore a natural part of our daily work. We analyze them, learn from them and eliminate avoidable mistakes. We are willing to experiment and do so based on a structured approach.

All managers and employees at Groz-Beckert are therefore required to address mistakes in a collegial, open and self-critical manner and to use them for further development in the interests of the company.





Principles of conduct when dealing with business partners

Choosing our suppliers and partners

We also expect our business partners to adhere to this Code of Conduct and to act professionally without exception. This is ensured by a careful selection process. In a multi-stage qualification process for suppliers, we ask whether they act in accordance with Groz-Beckert's sustainability goals and comply with national and international standards and laws on occupational safety, environmental protection and human rights. We also expect our suppliers not to purchase goods and materials for the manufacture of their products for Groz-Beckert in an illegal or unethical manner.

Employees who are responsible for selecting business partners must take this into account and review supplier relationships continuously. This is done based on an appropriate risk management process and is accompanied by regular training for employees.

Confidentiality

Intensive exchange and flow of information based on mutual trust are the foundations of our cooperation with business partners. As we are aware of the sensitivity of our own know-how and data, it is a matter of course for us to protect the know-how and data of our business partners to the same extent. We place high value on mutual trust.

In return, we expect the same level of confidentiality. The legal requirements set high standards for data protection for us and our business partners. We require the same standard of care from third parties in order to protect Groz-Beckert's know-how in the business relationship.

Fair competition

Reputable and fair dealings are the basis of every successful business relationship. This is another reason why fairness is one of Groz-Beckert's core corporate values. The requirement we place on ourselves to impress our customers and partners through quality and innovation is directly linked to this principle. That's why we follow this approach both inside and outside the company and are always committed to fair competition.

Violations of antitrust regulations are unacceptable for Groz-Beckert and are consistently investigated and punished. This is why every employee is trained in the regulations applicable to their area.

Bribery and corruption

Groz-Beckert distances itself from any kind of corruption. We impress our business partners with our products and services and not by granting them personal advantages. Nor do we allow ourselves to be bribed or take advantage of our position in the company.

Gifts and invitations are customary and permitted when dealing with business partners in the ordinary course of business and to an appropriate extent. The principle always applies that the mere appearance of undue influence must be avoided – regardless of whether we are a gifter or a giftee. This also applies to discounts and benefits.

Gratuities on our part are always appropriate and never aim to influence the business partner. Conversely, gifts and invitations from our business partners have

no influence on our actions. Our decisions are always based on reasonable grounds and are not guided by gratuities. Gratuities are rejected by us if it appears that they are intended to influence the situation.

Our company-wide Compliance Policy establishes a binding set of rules for gratuities and must be complied with by all employees.

Conflicts of interest

Situations are conceivable where personal interests could conflict with our professional judgment. In such cases, it is important that the superior is informed of the conflict of interest in a transparent and timely manner and that the further course of action is clarified together.

Prevention of money laundering

Money laundering refers to the procedure for introducing illegally generated money or assets acquired illegally into the legal financial and economic cycle. We comply with our legal obligations to prevent money laundering and do not participate in transactions that serve to conceal or integrate criminal or illegally acquired assets.







Social responsibility and corporate success go hand in hand at Groz-Beckert.

Environmental and resource protection

Groz-Beckert strives every day to maintain ecological conditions that are worth living in for present and future generations. To this end, we have set ourselves binding sustainability goals and committed to an active strategy to reduce greenhouse gas emissions and our consumption of resources. We therefore strive to achieve a responsible environmental and energy balance sheet as the core of sustainable business activity across the entire corporate environment.

We place particular importance on the constant further development of all technical and organizational processes in order to achieve continuous optimization. This reduces the use of materials, achieves effective energy savings and increases the share of renewable sources in our electricity and energy mix.

We also strive for continuous improvement along the entire supply and value chain – whether in the planning of internal and external processes, the selection of materials and suppliers, or the development of products

and services. In the long term, we want to transform Groz-Beckert into a circular economy, where negative environmental impact is largely ruled out through the consistent reuse of resources and materials and the sustainable exploitation of all energy potentials.

Donations and sponsorship

Social responsibility and corporate success go hand in hand at Groz-Beckert. We base our approach on regional involvement. This means that the individual sites independently support local and regional initiatives in their area. When making the selection, we ensure that the activities strengthen social development. We therefore do not fund individuals. We support initiatives that focus on a socially relevant topic such as education and science, art and culture or charitable purposes in their work.

Donations are only received by organizations that are recognized as non-profit organizations. In the case of donations, we do not pursue any economic purpose and do not expect anything in return. Sponsoring

activities, on the other hand, serve to increase the public perception of the company. They are based on contractually agreed services and trade-offs. The binding sponsoring guideline ensures compliance with our corporate principles in this area.

Volunteer work

Volunteer work is an important pillar of any functioning society. As a company, we fulfill our responsibility in this respect by supporting and promoting the volunteer work carried out by our employees. It makes no difference to us whether these are social or charitable causes.





Further support and contact persons

We ask everyone at Groz-Beckert to take responsibility in their daily interactions and to openly address any need for improvement.

It is not possible to outline all possible and conceivable situations and questions in this Code of Conduct. The principles of conduct set out here therefore also highlight the responsibility of each individual to act with care, sensibly and with integrity at all times. Employees can contact their superior at any time if they have any questions about the content or interpretation of the Code of Conduct, address their concerns openly and seek advice in difficult situations. All managers are obliged to inform their employees about the Code of Conduct and to ensure that it is understood and complied with.

All employees are requested to contact their superior or the Management directly in the event of (suspected) violations of the

regulations summarized here. You can also report the violation via the whistleblowing platform “tell us” or using the e-mail address **tell.us@groz-beckert.com**. Reports are treated as strictly confidential. All reports of violations will be investigated in detail and proven misconduct will be sanctioned appropriately. Employees need not fear any disadvantages if they inform a manager or the officers responsible for the respective area or topic (e.g. data protection officer, equal opportunities officer, information security officer, environmental officer) or the legal department of a violation or suspected case. The responsible contact persons can be found in the Compliance Policy.



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