



Code of Conduct

for employees of the EMCO Group





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Equality Notice

For the sake of convenience, where necessary only the masculine form is used for personal names and personal nouns in this document. The corresponding terms apply to all genders in accordance with the principle of gender equality.

Welcome

Dear Colleagues,

For me, one thing is certain: by doing the right thing, we will achieve the best results. We want to be a reliable partner and create real value for our customers. At the same time, we bear responsibility toward our colleagues, our business partners, as well as toward society and the environment. This responsibility is reflected in the decisions we make every day.

In our day-to-day work, our Code of Conduct serves as a binding standard that guides us—especially in challenging situations—and makes clear what we stand for. We align our behavior with it, particularly when decisions are difficult. This reliability in our dealings with our customers, partners, and one another strengthens the EMCO Group's reputation. Trust is the foundation of our success. Maintaining and further building upon it is a responsibility we all share.

Sustainable growth is achieved by meeting our customers' expectations while acting with clarity, responsibility, and integrity. Quality and a deep understanding of their requirements are crucial to this. It is equally important that we adhere to rules and treat one another with respect. I am convinced that we will ensure the continued success of our company if we consistently combine economic success with responsible conduct and live by our principles together.

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CEO EMCO Group



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EMCO Bau

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Klaus Mensing
Vice President
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Frank Indenkämpen
Managing Director
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Our Responsibility Regarding Compliance

The term compliance simply means “abiding by the rules” and is a euphemism for conforming with legislation and guidelines, as well as with companies’ voluntary codes of conduct.

Responsibility, trust, fairness

Our company’s success critically depends on all of us – i.e. the directors, senior managers and every single employee – behaving honestly, ethically and with integrity. This also means that our internal and external reporting and communications are truthful, comprehensive and timely. Our common goal is to take responsibility for our company and protect the reputation of our brands.

We take a proactive and forward-looking approach to our planning. This allows us to create sustainable values through innovation and quality for ourselves and our customers.

Our Code of Conduct is based on the **Universal Declaration of Human Rights** and the principles of internationally recognised standards for responsible corporate governance. These include the **UN Global Compact**, the **core labour standards of the International Labour Organization (ILO)** and the **Organisation for Economic Co-Operation and Development (OECD)**. We are committed to respecting these and collaborating exclusively with suppliers that act according to these principles and, within this framework, comply with the relevant national legal requirements.



Universal human rights: <https://www.ohchr.org/>
UN Global Compact: <https://www.globalcompact.de>
ILO core labour standards: <https://www.ilo.org>
OECD: <https://www.oecd.org/>

EMCO Group Corporate Values

We shape our future with a unique entrepreneurial spirit based on our heritage as a family business. We act and behave like one big family to create a motivational and inclusive working environment. We are guided by our corporate values. These are important in determining both our actions and our decisions.



#1 Integrity, partnership

Doing the right thing based on our own personal convictions.

Integrity is the foundation on which we build. This means that our words and actions are in keeping with our ethical standards. Every single one of us is responsible for our company, as business partners and as members of society. We regard ourselves as active partners in the development of our sites and invest in cultural and social projects.

#2 Transparency

Transparency is more than just the right to information.

We attach a great deal of importance to honest communication on equal terms, both within our teams and with our business partners. This is because openly communicating our expectations is the only way to efficiently achieve our common goals.

→ Act clearly and communicate transparently!

#3 Excellence

We continuously strive for improvement.

The diversity and quality of our products are our unique strengths. We take a proactive and forward-looking approach to our planning and focus on identifying our customers' needs at an early stage to create added value and provide them with innovative system solutions. We therefore create sustainable values for ourselves and our customers and secure the long-term future of our company by means of innovation and quality.

#4 Employee focus

Our employees are our most valuable asset.

Our employees are our most valuable asset and make a significant contribution to our company's success. We develop and support our staff from day one so that they can meet the challenges of a constantly changing working environment.

At the same time, we invest in our employees' health and attach a great deal of importance to responding to the need for flexibility and work-life balance while treating everyone equally – regardless of their origin, religion, sexual orientation, age, gender, disability or background.

#5 Sustainability

Healthy, sustainable growth and the careful use of resources are important to us.

We take responsibility for our commercial activity. We achieve this in constant dialogue with our stakeholders, working with them to develop sustainable solutions. We use our management systems to ensure that the highest environmental standards are met and continually developed.

Our Responsibility as Members of Society



Human rights

We treat everyone with dignity and respect.

We respect human dignity and uphold recognised human rights. In all our business activities, we constantly endeavour neither to cause nor contribute to human rights violations. We expect our business partners to do the same.

We value our employees. We reject any form of illegal sanctions, abuse, harassment, intimidation or any other derogatory treatment of our employees.



Universal human rights: <https://www.ohchr.org/>

Equal opportunities, equal treatment and non-discrimination

We are committed to equal opportunities and reject any form of discrimination and/or unfair unequal treatment at work. No one should be discriminated against or disadvantaged due to their origin, skin colour, nationality, origin, gender, faith or ideology, political views, age, physical condition, sexual orientation, appearance or other personal characteristics.

HR decisions are based on qualifications, experience and other work-related criteria. We also apply the principle of equal pay for male and female colleagues. This corresponds to at least the national and local statutory standards and/or the level of the national industries/sectors and regions.

Lobbying

We endeavour not to influence political decisions in the name of the company.

We conduct lobbying centrally, openly and transparently. We follow the statutory lobbying guidelines and categorically avoid unfair influence on policies and legislation.

Public image and communication

We respect the right to freedom of expression.

We respect the right and freedom of expression to protect personal rights and privacy. Every employee should understand that they may also be regarded as part and representative of the EMCO Group outside of work and is therefore required to protect the company's image and reputation through their public behaviour and image, especially towards the media.

Social media is an integral part of the business world. When using social media, the same rules essentially apply as for traditional media. When expressing personal opinions, we make sure that the respective EMCO Group function and/or activity is not associated with our private statement. For the correct behaviour on social networks, please refer to the company's Social Media Guidelines.

If we are unsure, we always contact our manager or a member of the Compliance Department. It may also be useful to take a look at the relevant guideline.



See Intranet: Guidelines/Social Network Policy

Donations, sponsorship and charities

We only make donations and award sponsorship as part of a transparent approval process.

We regard ourselves as active members of society and are therefore committed to a number of causes. We make donations and award sponsorship and support various social projects.

To avoid conflicts of interest and ensure consistent conduct within the company, donations and sponsorships are only permitted within the framework of the respective legal system and in accordance with the current internal regulations and EMCO Group companies.

Long-term environmental and climate protection

We consider the social and ecological impact of our actions.

We acknowledge our environmental responsibility by complying with the applicable statutory requirements and recognised environmental and climate protection standards while endeavouring to continually improve the impact of our commercial activities on the environment and climate.

Each of our employees contributes to this by assuming responsibility for using natural resources effectively and protecting the climate and environment through their individual behaviour.



See Intranet: Guidelines/
Sustainability report

Our Responsibility as Business Partners

Compliance with the law and legislation

We undertake to comply with all the legal regulations that apply to us.

We believe that compliance with laws and regulations is a fundamental basic principle of commercially responsible conduct. We observe the applicable statutory obligations and bans, even if this involves short-term economic disadvantages or difficulties for the company or individuals. If national legislation includes restrictive regulations that deviate from those that apply to the EMCO Group and within Germany, the national law applies.

Avoiding conflicts of interests

We act in the interests of our company.

We all understand that our personal relationships and interests should not affect or influence our business activities and decisions. We therefore ensure that we avoid situations in which personal and professional interests could collide or even give the impression that this is the case.

We do not make any investments or join any organisations that may cast doubt on our fairness, integrity or objectivity.

→ Potential conflicts of interest must be reported to your line manager immediately.



Gifts, benefits and invitations

We do not accept or offer gifts or other benefits that may be regarded as illegally influencing a business relationship or decision.

If small gifts or invitations are offered as a result of a successful business relationship, common sense should always prevail. It is important to ensure that gifts are not associated with inappropriate expectations or rewards. The same rules apply to both receiving and giving gifts. Cash and cash equivalents (e.g. vouchers) are never permitted.

We only give or accept gifts, invitations and other benefits, such as attending business dinners and events paid for by third parties, if they meet our Compliance Guidelines and do not question the reputation of the EMCO Group.



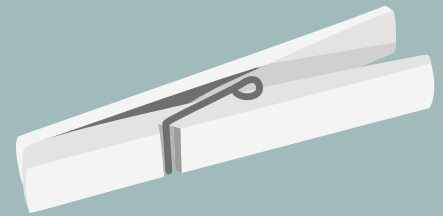
See Intranet: Guidelines/Compliance Policy

Preventing money laundering

We do everything we can to prevent our company from being misused as a means of money laundering.

We only work with reputable business partners who comply with the application legislation and obtain resources from legitimate sources. We thoroughly verify the identity of potential customers, business partners and other third parties. In addition, we take comprehensive measures to ensure transparency in our business relationships.

To avoid criminal liability and protect our reputation, we screen all our business partners before concluding contracts or entering into transactions.



Fair competition

Our business activities promote free and fair competition.

We always comply with all the applicable competition and antitrust laws and regulations. We understand that any violation of antitrust legislation may result in hefty fines and even prison sentences for the company, as well the managers and individuals involved. We must all be alert to situations that could jeopardise free and fair competition.



See Intranet: Guidelines/Procurement Policy

Our Responsibility in the Workplace

Responsibility in the workplace

We are responsible for our employees.

We comply with the statutory and contractually agreed occupational safety requirements and observe international labour and safety standards.

To maintain our employees' health and safety, we provide a safe and healthy working environment. Each of our employees abides by the occupational health and safety regulations and encourages safety in their workplace.

Cooperation with employee representatives

Achieving success together.

To ensure commercial success, safeguard jobs and ensure the well-being of EMCO staff, the EMCO Group traditionally maintains constructive dialogue with its employee representatives and trade unions.

Confidential company information/insider information

We undertake to protect trade and business secrets.

We take great care to ensure that any trade secrets and other confidential information that our business partners and customers entrust to us are adequately protected against unauthorised access, use and disclosure, at the very least in accordance with the relevant statutory provisions for protecting trade secrets.

We respect the intellectual property of our business partners, customers and other third parties and ensure that adequate precautions are taken to protect intellectual property rights when transferring knowledge and technologies.

Protecting company property

We only use company property for business purposes.

The careful and respectful use of company property is firmly embedded in our values. This also includes the responsible handling of intangible assets such as our intellectual property, copyright materials, finance documents and brand image.

Our facilities, production lines, processes and materials are valuable assets. We are all responsible for treating these with care and protecting them against damage, improper use and misuse. Company-owned computers and other devices are intended to perform day-to-day tasks. The use of mobile phones, company vehicles or corporate networks for personal purposes is only permitted with the company's explicit consent. The same rules may not apply in every country. We should always enquire about deviations and seek advice if in doubt. We undertake to always comply with the applicable guidelines for protecting the company's property.

Data protection and information security

We treat all personal data in total confidence.

We respect everyone's personal rights and maintain high standards when processing personal data. We process personal data with care, in a way that the data subject can understand and in accordance with the applicable statutory requirements, particularly the EU General Data Protection Regulation.

We regard the protection of personal data as an essential prerequisite for ethical business activities. This is based on more than just corporate responsibility or legal obligation – the protection of personal data forms part of our licence to operate in the digital world and ensures that our customers and business partners can trust us.



See Intranet: Guidelines/IT Security Policy

Information Regarding Non-compliance

This Code of Conduct combines applicable statutory and operational regulations.

The obligation to comply with the principles described here arises either directly from legislation, internal regulations, our corporate philosophy or as a secondary obligation from our contract of employment.

We take any violation of our Code of Conduct seriously and reserve the right to initiate measures to resolve any reported violations appropriately and confidentially. If required, we take suitable remedial or preventive countermeasures.

Self-test to Help with Decision-making

Which questions help assess situations and make decisions?

- Is my conduct in my company's interest or driven by my personal interest?
- Am I confident that my decision complies with the statutory and internal regulations?
- Will I still consider my decisions to be correct if my company has to represent them in public?
- Would my conduct damage my company's image?
- Is it possible to disclose my conduct to someone in a position of trust?
- Do I stand by my actions and would I accept my own decision as an affected party?



Contacts and Reporting

To seek advice or report misconduct, or if they have any questions and/or doubts, employees and managers can talk to their line manager in the first instance or contact the relevant Compliance Officer.

If they prefer to remain anonymous, there is the option to report these via the external whistle-blower system or using our Compliance mailboxes. In addition, employees can reach out to external reporting agencies established at the Federal Office of Justice, the BaFin, and the Federal Cartel Office.

The electronic whistle-blower system is managed by Compliance Team staff.

Compliance Email

The EMCO Group Compliance Team can be contacted directly via the following email address: compliance@emco.de.

Compliance Office

Güler Has, Compliance Manager

Tel.: +49 591/9140-289

Mobil: +49 151/15902119

Mail: g.has@emco.de

The Compliance Office is located in Werk I on the left next to the Post Room and is staffed in the mornings. However, afternoon appointments are also possible by arrangement.

Compliance mailboxes

Employees can also report any compliance violations or tip-offs anonymously using the mailboxes provided. The compliance mailboxes are located in Werk I and II next to the digital EMCObards:

Werk I

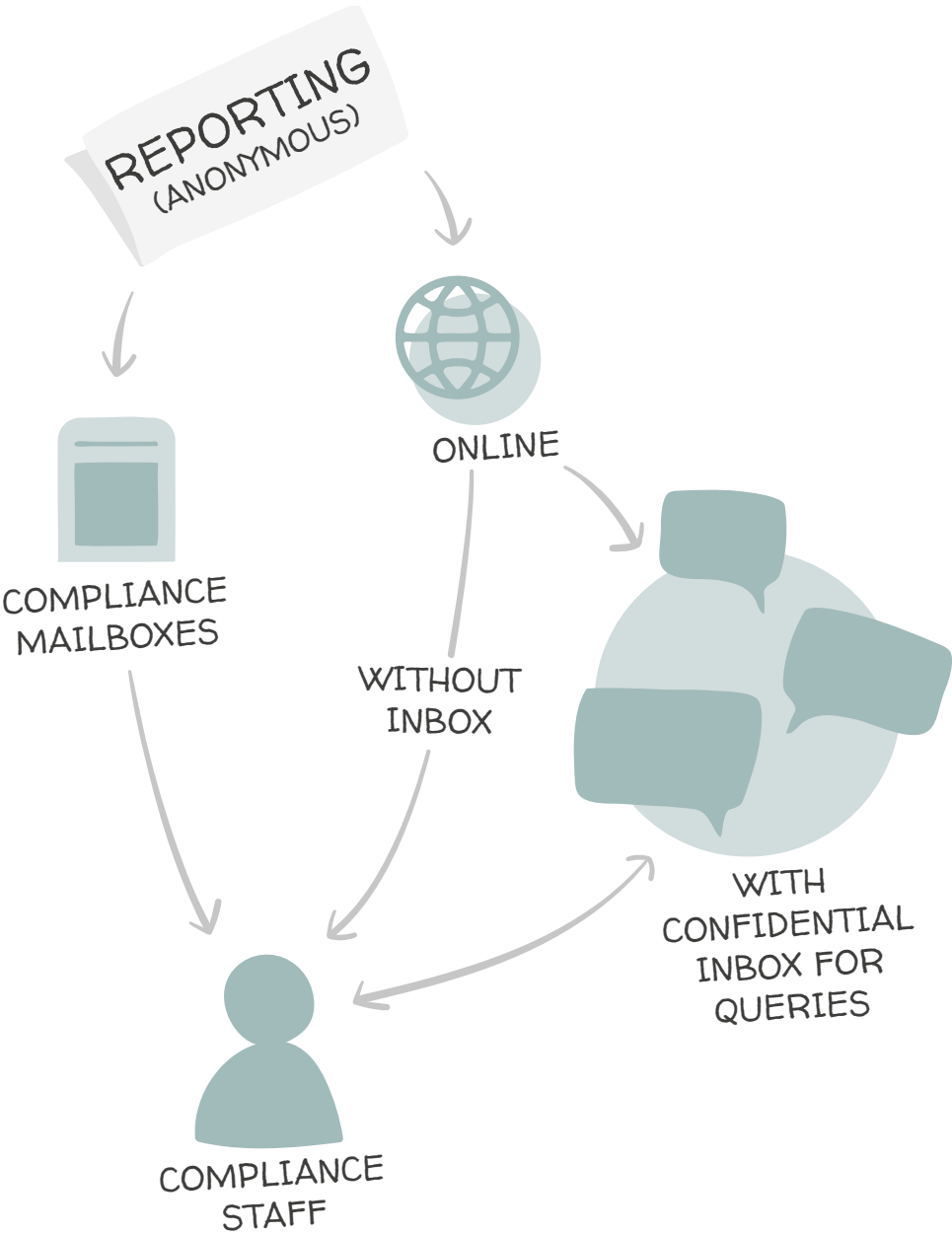
EMCOboard
Meeting Point

Werk II

EMCOboard
Hall B

Online – whistle-blower system (anonymous)

The anonymous whistle-blower system is accessed by inputting this web address <https://emcogroup.whistleblownetwork.net> directly into your browser.



<http://emcogroup.whistleblownetwork.net>



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Architecture

Worklife

