

CODE OF CONDUCT

Version: 2.0

Date: 2025/11/10

Effective from: 2025/11/11

Preamble

The ALMAMET Code of Conduct takes precedence over all other guidelines and directives. However, it is not the only regulation in the company which is issued by the management.

Of course, compliance with all of these regulations does not exempt you from the obligation to be aware of and comply with applicable local laws. For ease of reading, the term "employee" as used in this Code of Conduct refers to both male and female employees.

This Code of Conduct is aimed at all employees of ALMAMET. Persons in a part-time position or with a fixed-term employment contract are also considered employees. Each employee receives a printed copy of the Code of Conduct and is obliged to sign a confirmation of receipt and submit it to the relevant HR department.

If they have any legal doubts about their own conduct or if they become aware of legally dubious activities in the working environment, employees are expected to seek advice and assistance from their managers, the relevant specialist departments and employee interest groups. All concerns will be taken seriously and the reporting person will not be subject to any disciplinary action or sanctions, even if the alleged misconduct is not confirmed. However, deliberately false or malicious accusations made with the aim of defaming others will not be tolerated. Reports may also be submitted anonymously. Confidentiality will be guaranteed if requested by the whistleblower.

Each ALMAMET employee bears responsibility for quality, safety, health and environmental protection and ongoing improvement thereof. To this end, we regularly implement improvement measures. Through training and education, we raise our employees' awareness and enable them to successfully implement our principles of conduct.

At the same time, we encourage them to submit complaints (confidentially or anonymously) and to report irregularities, including in the event of a conflict of interest, and to actively cooperate in remedying them. We protect all those who report criminal offences (whistleblowing) in this connection. Competence, commitment and responsible action on the part of our employees are essential to the success of ALMAMET.

Violations can be reported within the established compliance structures to the follow address: compliance@almamet.com.

Responsibility towards people and the environment, as well as fairness and tolerance, are key characteristics of our corporate culture. The management and executives of ALMAMET have a special responsibility with regard to compliance with this Code of Conduct.

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1. Fair Dealings with Employees and Business Partners

The business partners (customers, sales partners and suppliers) and employees of ALMAMET are the focus of our activities. Relationships with our business partners and employees should be characterized by mutual trust and sustainability. We are expected to act with honesty, courtesy, respect and fairness.

Fair conduct also means fair working conditions. This includes free choice of employment, i.e. the prohibition of forced or slave labor and human trafficking, the prohibition of child labor, compliance with legally or contractually prescribed or agreed remuneration, freedom of association and the right to humane treatment in the workplace.

Furthermore, no one may be harassed or discriminated against because of their race, skin color, nationality, origin, gender, sexual identity, faith or ideology, political views, age, physical characteristics or appearance.

These principles can only be implemented if they are exemplified by managers with respect to employees and adhered to by the employees themselves.

2. Pay, Social Benefits and Working Hours

The remuneration paid to employees and working hours are in line with legal requirements, in particular minimum wage regulations. Information on working hours, social benefits and notice periods for termination is included in the employment contracts and is in line with statutory / collectively agreed provisions. ALMAMET undertakes to ensure that working hours and break times comply with applicable national laws or industry standards.

3. Combating Corruption

We comply with the Global Compact anti-corruption and bribery laws. We want to succeed in competition due to the price, performance and quality of our services.

Corruption is prohibited at ALMAMET. Corruption consists of demanding, accepting, offering or granting personal advantages in return for preferential treatment in the initiation, awarding or implementation of a contract. Criminal liability applies both to the person who grants (or offers the prospect of) an advantage and to the person who demands (or receives) it. Such advantages include, for example, benefits such as monetary payments (e.g. donations), non-cash benefits (e.g. vouchers, unauthorized discounts) and the like.

A distinction must be drawn between corrupt conduct and the granting or acceptance of invitations or gifts. Invitations and gifts may be permissible if they are "customary social benefits" and are not made with the aim of unlawful preferential treatment in connection with the awarding of contracts, for example. However, the appearance of improper influence can quickly arise in this context too – thus general restraint must be exercised with regard to

invitations and gifts. Particular restraint should be exercised with gifts and invitations in the case of civil servants or public officials, especially from foreign countries.

4. Fair Competition

Regulations to protect fair competition are an indispensable part of a free market economy. Almost all countries have passed laws in that regard. They concern, in particular:

- the prohibition of agreements and the exchange of information between competitors on prices, territorial allocations, production volumes or other parameters relevant to competition,
- prohibited price maintenance by distribution partners, and
- the prohibition of abusing a dominant market position.

Such prohibited agreements include informal discussions, informal gentlemen's agreements or even merely coordinated action if a measure restricting competition is to be agreed or implemented as a result. Even the appearance of coordinated action must be avoided.

Violations of the legal requirements may lead to considerable damage for the company, such as fines or loss of reputation, and may result in a personal fine for the employee concerned.

5. Occupational Health and Safety

Safety in the workplace is paramount for ALMAMET. Our goal is a totally accident-free workplace. Each employee is required to identify accident risks in their personal workplace and either eliminate them themselves or report them to their line manager. Every manager is responsible for the protection of their employees and must instruct, train and supervise them accordingly.

All employees, contractors and suppliers are obliged to comply with the occupational safety regulations at our facilities.

We attach great importance to the health of each and every employee. We are committed to promoting the health of our employees and encourage them to lead a healthy lifestyle. We strive to employ people with disabilities and thus integrate them into the work process.

ALMAMET is committed to ensuring that employees can find a balance between work and leisure. We observe the statutory maximum working hours. Holiday leave is intended for relaxation. The respective line managers must ensure that employees actually take the holiday leave to which they are entitled wherever possible.

The consumption of narcotics or other substances that have an intoxicating effect or impair mental faculties is strictly prohibited in the workplace. Employees must start their working day free from the influence of such narcotics and substances. Smoking in the workplace is only permitted in designated areas.

6. Protection of Business Secrets and IT-Security

Our know-how is of particular importance for the long-term success of our company. For that reason, our intellectual property must be protected against disclosure to and unauthorized access by third parties. Intellectual property includes, for example, production methods, but also business secrets such as details about customers, suppliers and software.

IT security supports the protection of intellectual property against access by unauthorized third parties, data theft, the outflow of our know-how or the effects of malware through a wide range of IT security measures such as passwords, anti-virus software or access concepts.

Furthermore, employees may not participate in public discussions (e.g. lectures, Internet forums, etc.) or post company-related information in public (e.g. on the Internet) without ALMAMET GmbH's permission. The loss of trade secrets may have a negative impact on the future success of the company and therefore also on its employees.

7. Avoidance of Conflicts of Interest and Private Activities

In day-to-day business, situations may arise in which private and personal interests or relationships conflict with ALMAMET GmbH's interests. Conflicts may arise, for example, from an employee's own entrepreneurial (secondary) activities, and possibly also from that of family members. In order to avoid conflicts of interest, the responsible HR department must be informed of any additional (entrepreneurial) activities, mandates and the like and its approval must be obtained.

ALMAMET supports socio-political or social commitments of its employees. However, any activities in associations, parties or other social, political or societal institutions, whether as an elected representative or in an honorary position, must be compatible with the fulfilment of obligations under an employment contract. Undisclosed conflicts of interest and unauthorized secondary employment may result in damage to the company and lead to consequences under employment law for the employee in question.

8. Handling Company Property

Each employee must handle company equipment, in particular machines and tools as well as information and communication systems, with due care and for their intended purpose. The workplace and all facilities that serve the workforce or company operations must be kept in order at all times and any damage must be reported to the manager.

Company property may not be used for private purposes or removed from the company's premises without the express consent of the responsible body within the company. Violations

of this provision may lead to consequences under criminal or labor law for the employee in question.

9. International Trade Restrictions and Export Controls

Governments and international bodies occasionally impose trade restrictions or boycotts on certain products against countries or individuals. We conduct our business activities exclusively in accordance with international regulations and do not export any goods or technologies subject to trade restrictions.

All products processed by ALMAMET are usually designed for peaceful use. In exceptional cases, individual products could also be used for the manufacture of goods for military purposes (so-called dual-use goods). The relevant export control regulations must be observed for such products. In case of doubt, the control authorities in the individual countries or the management should be contacted.

10. Protection of Personal Data

The easier and more extensive electronic data processing becomes, the more important it is to protect the personal data of our customers, business partners and employees (e.g. name, address, date of birth, tax number, medical information). Such personal data may only be passed on and processed within the limits defined by applicable laws. Violations of data protection regulations are punishable by heavy fines.

11. Financial Integrity and combating Money Laundering

All business transactions must be properly reflected in the company's accounting records, balance sheets and tax returns. This requires that all relevant facts and circumstances be recorded correctly and completely and documented and archived in a reproducible manner. Any violation of this requirement entails the risk of being investigated for balance sheet manipulation, document fraud, fraud allegations, tax offences or money laundering allegations.

Money laundering means that the origin of illegally obtained money (e.g. from terrorism, drug trafficking, bribery or other criminal offences) is concealed by smuggling it into legal economic circulation, thereby creating the appearance of legality. It is the declared aim of ALMAMET not to be misused for money laundering or other illegal purposes or to contribute to such misuse.

12. Child Labor and Forced Labor

We take responsibility for our own products and, in particular, for the people who produce them. We strictly reject all forms of non-free labor (e.g. child labor or forced labor, modern slavery), inhumane working conditions and discrimination. ALMAMET ties cooperation with its partners

to the recognition of its Code of Conduct or requires compliance with at least comparable standards (e.g. ILO conventions).

ALMAMET does not employ children. Persons under the age of 18 must in any event have completed their schooling and are not deployed on night shifts or for work with hazardous substances.

13. Sustainability, Environmental Protection and effective use of Energy

Optimum environmental protection must be guaranteed in all phases of ALMAMETs production. We attach particular importance to the use and further development of energy and water-saving technologies, characterized by the use of strategies for the reduction of emissions, reuse and recycling. We employ environmentally-friendly processes from the design and construction of our systems and onwards.

Our company is committed to protecting the natural environment and declares that resource conserving and energy-efficient production is a production factor that must be taken into account. The following voluntary commitments to environmental protection and efficient energy use apply:

- a. Careful treatment of the environment, careful and economical use of all resources, including energy, and regulated recycling and disposal are obligatory in the course of our day-to-day business. As a result, we avoid or minimize the impact on people, the environment and nature and continuously improve our performance in terms of energy efficiency.
- b. We take into account the requirements for an unspoiled environment in the production process, packaging and shipping, as well as in the improvement of processes and when introducing new systems or services.
- c. Our guiding principle is to use resources as efficiently as possible while maintaining sustainable profitability.

At ALMAMET, we pursue the goal of halving our CO₂ emissions in business operations by 2028. We aim to achieve climate neutrality by 2040.

With our operational waste management, we make an active contribution to environmental protection and the conservation of resources. Although our company does not generate any hazardous waste, an environmentally-friendly waste system is very important to us. We therefore systematically collect, sort and dispose of waste in an environmentally-friendly manner.

We also endeavor to minimize the packaging material used for our products or avoid using it altogether, taking transport safety into account. In addition, we strive for an integrated product

policy, i.e. we try to reduce the environmental impact of our products across the entire product life cycle, from the extraction of raw materials to waste disposal and recycling.

All products manufactured for ALMAMET along the supply chain must meet the environmental protection standards of their market segment. This includes the entire product life cycle and all materials used.

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