

CODE OF CONDUCT FOR ETHICAL BUSINESS PRACTICES

Preamble

All employees and members of the management team at Technische Federn GmbH Otto Joos are bound by the provisions of this Code of Conduct.

It outlines the values, principles, and actions that guide the company's business activities. The goal of the company's management is to uphold ethical standards and create a work environment that fosters integrity, respect, and fair conduct.

A strict, law-abiding business policy serves the long-term interests of the company.

This Code of Conduct has been defined and adopted by the management of Technische Federn GmbH Otto Joos and applies to all areas of the company.

Compliance with Laws and Regulations at Home and Abroad

In all business decisions and actions, Technische Federn GmbH Otto Joos is committed to complying with applicable laws and regulations, both domestically and internationally. Integrity and transparency foster fair competition, including in our relationships with customers and suppliers.

Management Commitment

Technische Federn GmbH Otto Joos is committed to acting responsibly in economic, social, and environmental matters.

The company strives to conduct its business competently and ethically while ensuring fair competition in all markets where it operates.

This includes strict adherence to antitrust, competition, and trade restriction laws.

Employees must avoid gaining unfair advantages over customers, suppliers, or competitors.

Conflict of Interest

Technische Federn GmbH Otto Joos is committed to acting in an economically, socially, and environmentally conscious manner.

Technische Federn GmbH Otto Joos therefore strives to:

- conduct its business competently and ethically
- protect fair competition in all markets in which it operates by complying with applicable laws on antitrust, competition, and restrictions of competition.

Unfair advantages over customers, suppliers, or competitors must be avoided.

Prohibition of Corruption and Bribery

Technische Federn GmbH Otto Joos has a zero-tolerance policy towards corruption and bribery. Employees must not offer, receive, or accept any benefits from business partners that could compromise or appear to compromise objective and fair business decisions. Unethical or improper transactions will not be tolerated.

Fair Working Conditions

All employees of Technische Federn GmbH Otto Joos must contribute to maintaining a safe and healthy work environment. Compliance with safety regulations and best practices is mandatory.

As a socially responsible employer, Technische Federn GmbH Otto Joos values its employees and shares its business success with them. The company's HR policies aim to provide every employee with opportunities for professional and personal development, encouraging open dialogue, constructive criticism, and the exchange of ideas.

Human Dignity and Working Conditions

Technische Federn GmbH Otto Joos upholds the principles of equality, diversity, and respect in the workplace. Employees are expected to conduct themselves accordingly and respect the rights and cultural differences of others in business interactions.

The company also expects its business partners to uphold these principles, which include:

- ✓ Equal opportunities and non-discrimination
- ✓ Fair, performance-based compensation
- ✓ Compliance with applicable working time regulations
- ✓ Rejection of forced labor and child labor
- ✓ Work-life balance support
- ✓ Zero tolerance for modern slavery
- ✓ Freedom of association and collective bargaining rights
- ✓ Commitment to women's rights and gender equality
- ✓ Promotion of diversity, equity, and inclusion
- ✓ Respect for the rights of minorities and indigenous peoples
- ✓ Protection of intellectual property and avoidance of plagiarism
- ✓ Ethical and transparent recruitment practices

Handling of Internal Knowledge

All employees of Technische Federn GmbH Otto Joos are required to facilitate efficient and transparent information exchange within the company.

- Information must be shared accurately and completely with relevant departments unless overriding confidentiality obligations apply.
- Unlawful withholding, falsification, or selective disclosure of relevant knowledge is strictly prohibited.
- Dishonest reporting within the company or to external organizations is not tolerated.
- Financial statements, reports, and business records must accurately reflect business transactions and comply with legal requirements, accounting principles, and internal financial policies.

Handling of Company Assets

Employees are responsible for the proper and careful use of company property. All company assets must be protected against loss, damage, misuse, theft, embezzlement, or destruction.

If an employee becomes aware of any misuse of company assets, they must immediately report it to their supervisor.

Confidentiality and Data Protection

Much of the business information handled by Technische Federn GmbH Otto Joos is confidential or legally protected, requiring strict confidentiality.

Employees must not disclose confidential information unless:

- Explicitly authorized by the company, or
- Legally required to do so

This confidentiality obligation applies particularly to intellectual property, including:

- Trade secrets
- Patents, trademarks, and copyrights
- Business and marketing plans
- Designs, business reports, and financial data

All personal data of employees, customers, business partners, and suppliers must be handled with the utmost care and in strict compliance with data protection laws.

Implementation and Compliance Monitoring

The principles outlined in this Code of Conduct are a core part of the corporate culture at Technische Federn GmbH Otto Joos. Strict adherence to these principles is mandatory for all employees.

If an employee has concerns or becomes aware of a possible breach of this Code, they should immediately report it to their supervisor. Reports may be submitted confidentially or anonymously.

If the concern is not resolved, employees may escalate it to:

- The Legal Department via the official reporting system, or
- The Human Resources Department.

Technische Federn GmbH Otto Joos strictly prohibits retaliation against employees who report concerns in good faith.

Responsibility and Consequences

All employees and members of the management team at Technische Federn GmbH Otto Joos are bound by this Code of Conduct. Violations will result in appropriate consequences, which, in serious cases, may include termination of employment.

Final Thoughts

By following this Code of Conduct, we uphold our commitment to ethical business practices, foster trust among employees and business partners, and ensure the long-term success of Technische Federn GmbH Otto Joos.

R. Veit
(Management)