

### Foreword by the Management

The Code of Conduct of Ulbrich regarding its central obligations and values as a company, both for the interaction of employees with each other and in relation to third parties, is the value framework for the responsible behaviour of Ulbrich Maschinenbau und Export-Import BetriebsgesmbH.

This is intended to help establish and maintain a common, responsible corporate culture with regard to compliance with the applicable laws, respect for human rights, mutual respect, environmental protection and equal treatment.

Violations of the Code of Conduct can be reported in confidence so that grievances can be remedied. This does not result in any disadvantages under applicable labour law.

The Ulbrich Code of Conduct is binding for all our employees. We expect our business and co-operation partners, suppliers, sales partners and all those who have a business relationship with us to adhere equally to the rules of the Ulbrich Code of Conduct.

## Legal compliance, respect for human dignity

For Ulbrich, it goes without saying that our business activities are guided by the law, regulations and minimum industrial standards.

We respect human dignity and are committed to the observance and protection of human rights in our relationships with suppliers and business partners.

We do not tolerate corruption and oblige our employees accordingly. No employee may influence decision-makers in companies, public authorities or state institutions by promising, offering or granting them benefits for which they have no legal claim.

It is also prohibited to demand, be promised or accept benefits from third parties in business dealing

To prevent money laundering, Ulbrich carries out checks on customers, service providers, consultants and other third parties with whom legal relationships are entered into.

Business relationships may only be maintained with reputable business partners whose business activities are in accordance with legal regulations and whose financial resources are of legitimate origin. Incoming payments must be allocated to the corresponding services and properly booked.

Ulbrich complies with the provisions of the Data Protection Act and has obliged its employees to protect personal data.

#### Social responsibility, sustainability

In the interests of its employees, Ulbrich ensures a safe and healthy working environment to prevent accidents related to work processes.

A safety liaison officer has been appointed to receive reports of grievances in confidence and to initiate the necessary remedial measures if required.

Ulbrich does not tolerate any form of child labour or exploitation of children and young people. No employee may be directly or indirectly forced into employment through pressure, violence and/or intimid.

Ulbrich expects dignified and respectful cooperation in compliance with the minimum labour conditions. In particular in cases where Ulbrich procures work and services from partners, we expect the partners to observe all tax and social security regulations and to pay the minimum wage in order to fulfil their obligations towards their employees.

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The statutory right of employees to establish, join or work for associations or organisations for the purpose of protecting the interests of employees is respected and recognised within the framework of the provisions of national law.

Ulbrich promotes diversity and mutual respect. All employees must ensure that no one is disadvantaged on the basis of ethnic or national origin, race, gender, religion, ideology, age, disability, sexual orientation or other characteristics protected by national law. We do not tolerate any discrimination in this respect.

Ulbrich is aware of its responsibility towards the environment and the careful use of resources. The minimum requirements for the conservation of resources, waste management, handling of chemicals and other hazardous substances, and emissions to water, air and soil must therefore be observed in all areas of the company.

Ulbrich also demands these principles from its suppliers along the supply chain.

## Innovation, fair competition, product safety

Ulbrich rejects any anti-competitive behaviour.

Illegal and/or criminally relevant practices are therefore prohibited, such as illegal collusive tendering and price fixing.

Ulbrich products stand for quality and safety. Possible risks and dangers to health from handling the products must be avoided. Ulbrich's product safety management therefore has the task of taking technical standards into account and avoiding compromises to the detriment of product safety.

# Avoidance of conflicts of interest, confidentiality, documentation, power of representation

All employees are committed to the well-being of the Ulbrich company.

They make their decisions exclusively on the basis of objective criteria and do not allow themselves to be influenced by personal interests and relationships.

Business and trade secrets of Ulbrich, of contractual partners or customers must be treated confidentially. Such information may therefore not be passed on to third parties by anyone without authorisation. This obligation continues to apply even after termination of the employment relationship.

Every employee should document his or her work in such a way that it can be traced and continued by anyone in an emergency.

#### Compliance of the business partner

Ulbrich shall be entitled to check compliance with and implementation of the principles of this Code of Conduct with the business partner or through third parties in consultation with the business partner, in the form of the submission of documents proving compliance. Ulbrich reserves the right to withdraw from the business relationship in the event of a culpable breach of the principles of this Code of Conduct.

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