



Code of Conduct

MAX Automation SE

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Foreword

Dear Employees,

The MAX Group offers its customers innovative solutions and complex systems in the areas of efficient production and automation. The Group companies are medium-sized and have a self-sufficient structure. Integrity and corporate responsibility are what bind our Group companies together and are key components of our company culture.

Our Code of Conduct sets the standards for joint entrepreneurial action. It is intended to serve as a guideline for critical and difficult decisions. Our business success must always go hand in hand with compliance with all applicable internal and external rules. Compliance, in the sense of legal and personal integrity, is to be given priority at every level of the company.

The mutual respect and trust in the relationship between employees and the bodies of the MAX Group also extends to our dealings with our business partners. We respect human rights and always ensure a fair and healthy working environment. We do not tolerate harassment or discrimination, nor do we accept violations of the law. The protection of the environment and the climate is yet another component of our corporate responsibility.

Problems and grievances should and can always be addressed openly throughout the MAX Group without any disadvantage to the employee who discloses a critical issue. Trust goes hand in hand with responsibility. The emphasis we place on entrepreneurial freedom obliges us to handle this freedom responsibly.

All those involved in the MAX Group - the Supervisory Board, Managing Directors, the management and Management Boards of the subsidiaries, employees at all levels - are obliged, without exception, to comply with the standards and principles laid down in this Code of Conduct. We familiarize ourselves with the contents - which are already self-evident to most employees - and live this Code of Conduct and its spirit.

The Code of Conduct is an important, but not the only component of the comprehensive compliance structure to which the MAX Group is committed. It is supplemented by international standards, operational regulations, corporate guidelines of the MAX Group and companies controlled by it, and obligations arising from the employment relationship.

The Supervisory Board and Managing Directors ask that you make an important contribution to the compliance culture within the MAX Group through your very personal conduct and that you share this responsibility with us. We would like to thank you in advance for this.

Guido Mundt
Chairman of the Supervisory Board

Dr. Christian Diekmann
Managing Director

1. General Principles of Conduct

- **Value creation:** The MAX Group's goal is to achieve a strong market position in competing with other market participants and to generate added value for its customers. In doing so, we want to be perceived as a fair and reliable partner in the market and towards customers, business partners, suppliers and other market participants. Finally, we want to create a safe working environment for all employees in which integrity, respect and fair conduct are guaranteed. We make all business decisions only in compliance with and on the basis of the Group's internal decision-making powers, involvement and reporting obligations, and reliable information.
- **Dialog, trust and diversity:** The interaction between the Supervisory Board, Managing Directors, the management teams and employees is to be characterized by an open culture, constructive dialog, mutual trust and respect. The MAX Group appreciates the diversity of lifestyles, cultural and biographical backgrounds of all employees. Discrimination, especially on the basis of origin, skin color, gender, age, marital status, religion or religious freedom, physical constitution, sexual orientation and nationality, has no place at the MAX Group.
- **Law:** We always strive to comply with applicable laws and authoritative regulations in Germany and abroad in all our business decisions and actions, and to implement the respective applicable law and internal guidelines and resolutions.
- **Fairness:** We protect fair competition by complying with applicable laws on antitrust prohibitions, competition and restraints of competition. The MAX Group does not offer any unfair advantages to decision-makers and ensures that third parties have no opportunity to dishonestly influence business decisions.
- **Security:** We want to ensure appropriate and necessary protection for employees, customers and business partners in the areas of health, occupational safety, environmental protection, product quality and liability, and data protection, and to implement all legal requirements on averting hazards.
- **Responsibility:** The MAX Group respects human rights, promotes their observance in its sphere of influence and ensures that the company is not complicit in human rights abuses, slavery and child labor. The MAX Group is committed to the development of environmentally friendly technologies and strives to use natural resources only appropriately and sparingly.

2. Business Integrity

- **Competition and antitrust law:** We are committed to the principle of fair competition and comply with all applicable antitrust and competition law obligations in the markets in which we operate. We do not engage in agreements with competitors, suppliers, and distribution or trading companies that impair fair competition, such as price fixing, sharing of customers or sales territories between competitors, anti-competitive boycotts, and other unfair methods of competing. We immediately prevent violations of applicable antitrust and competition law known to us within our sphere of influence.
- **Dealing with company property and the property of business partners:** We handle all types of company assets responsibly, e.g. plant, operating and work equipment, office and IT equipment as well as intellectual property. Company property is used only for its intended business purposes and only for personal purposes that are not inappropriate or improper. Acts of fraud are prohibited in the same way as embezzlement, theft, misappropriation or tax evasion, regardless of whether this damages company assets or the assets of third parties or a state institution or the state itself.
- **Conflicts of interest:** We disclose potential or actual conflicts of interest and resolve them promptly. Employees at all levels of the company who are affected by a potential or actual conflict of interest are required to inform their supervisors or managers immediately.
- **Money laundering prevention and trade controls:** We comply with money laundering prevention obligations and carefully verify, as required and permitted, the identity of customers, service providers, consultants and other third parties with whom we have or plan to have business relationships in order to minimize the overall risk of money laundering. We comply with national and international laws so as not to violate trade regulations such as economic embargoes, import and export controls, and to meet requirements for the prevention of terrorist financing.
- **Corruption and bribery:** Zero tolerance is shown within the MAX Group to any form of bribery and corruption, whether of public officials or in dealings with business partners. The acceptance and awarding of gifts, invitations and donations must be in accordance with the internal guidelines that regulate this area with regard to appropriateness, approvals, reporting channels and documentation. The MAX Group is committed to also comply with relevant country-specific anti-bribery and anti-corruption laws, guidelines and regulations. The local management is responsible for this.

3. Safety and Quality

- **Product safety and quality:** We are aware of our responsibility as a supplier of innovative solutions and complex systems in the field of efficient production and automation for domestic and foreign markets. Compliance with all relevant national, European and international regulations on product safety, as well as self-imposed requirements, has the highest priority. This applies not only to the solutions and equipment we offer, but also to the work and production processes and supply chains. It is our goal to ensure that our products have neither defects nor hazardous properties that could impair health or damage property.

4. Protection of Data and Information

- **Information:** We respect and protect intellectual property of all kinds. The protection of the intellectual property of the MAX Group is of crucial business importance for all companies of the MAX Group and one of our most valuable assets. We protect all company information, but also information from and about our business partners or customers and treat it confidentially.
- **Data protection:** We respect informational self-determination and guarantee the protection of privacy as well as the security of data processing within the company and of all business partners and customers as well as third parties with whom we come into contact as a company. We are also aware of our responsibility in this regard when using social media.
- **Insider trading:** We treat insider information as strictly confidential. We comply with the prohibition of using insider information when trading in securities or other tradable financial instruments and of passing on insider information to unauthorized persons for such purposes at all levels of the company.

5. Communication Principles

- **Financial reporting:** The financial reporting of the MAX Group and all companies controlled by it is conducted in an orderly, correct, timely, complete and transparent manner in accordance with all applicable legal regulations and the requirements of recognized and verifiable standards. We ensure appropriate documentation of key business processes and complete and accurate recording of data and information of relevance to accounting.
- **Communication:** We make only truthful statements regarding the product solutions, services and equipment we offer. We are also aware that false statements or misleading information regarding product solutions, services or equipment we offer can harm both our business partners and customers as well as the reputation of the MAX Group and must therefore also be refrained from. When using social media in a professional context, all employees must always ensure that their statements do not run counter to the spirit of the MAX Group Code of Conduct or this Policy. We also always bear in mind and do not tolerate that content of an offensive or insulting nature posted on social media and comparable platforms can damage the reputation of the MAX Group, especially if it runs counter to the goal of a discrimination-free environment within the MAX Group.
- **Capital market:** MAX Automation SE's capital market communication is carried out in accordance with legal requirements. If information has an impact on the share price and the conditions relevant to the capital market are met, the capital market is informed on an ad hoc basis.
- **Dealing with the authorities and political and local institutions:** We act honestly and transparently when dealing with governments and authorities. We comply with applicable law and our internal guidelines when communicating with the authorities. Official inquiries of any kind are immediately passed on to the management in such a way as to ensure that they are known. We maintain an open dialogue at municipal and local level in the regions in which MAX Group companies are based and with the political and local institutions there. We are aware that business relationships with government agencies are often subject to particularly strict requirements. We do not grant gifts of money or goods to public officials, limit invitations from public officials to low-value occasions, and take our internal guidelines and consultation and approval requirements into account in advance.

6. Fairness and Respect Inside the Company

- **Health and occupational safety:** We observe all applicable health and safety requirements in the respective work environment and comply with the relevant internal and statutory regulations. We take suggestions with regard to improvements in processes, devices and equipment seriously and consider them. Circumstances that give rise to the serious fear of or constitute a health and/or safety hazard are reported to the respective responsible supervisor immediately.
- **Working conditions and social standards:** It is our goal to ensure the physical and mental health and safety of all employees at all times. We do not pay wages and salaries below the respective applicable statutory minimum wage and ensure that employees are adequately remunerated.
- **Diversity and the principle of equal treatment:** No form of psychological or physical violence, bullying, intimidation, harassment or discrimination in the workplace will be tolerated. We follow the principle of equal treatment, which means that no individual employee may be treated less favorably than other comparable employees for arbitrary reasons. In accordance with the principle, all employees are granted the same opportunities to develop and advance. In doing so, we pay attention to the training of professional as well as social and methodological skills. We reject any discrimination or harassment based on gender, race, skin color, religion, age, national/ethnic origin, disability or sexual orientation. Employees and applicants are assessed in accordance with the principle of equal treatment. Personnel decisions are based exclusively on expertise, personal suitability and work performance.
- **Reconciliation of work and family life:** We always strive to find an appropriate balance between the economic interests of the company and the current living situation and private interests of the employees.
- **Freedom of association and the right to collective bargaining:** We respect the freedom of association and thus the right of all employees to form interest groups or works councils within the legally permissible framework and to join these or trade unions. We recognize the right of employees to collective bargaining and respect the rights of trade unions. Employees and their elected representatives will not be personally or professionally disadvantaged as a result of exercising these rights.

7. Social and Ecological Responsibility

- **Responsibility for society and ecology:** We consider the social and environmental impacts of business decisions before we make them and monitor the impacts of our business decisions. We will always seek to mitigate any negative impacts of business decisions made, to the extent possible and permissible. To this end, recognized and appropriate review and control procedures are used to balance conflicts of interest and resolve ethically relevant situations.
- **Environmental and climate protection:** Dealing with climate change and the continuous improvement of the respective eco-balances represents an important reference point of the MAX Group's sustainability-oriented actions. We ensure that environmentally relevant actions within our sphere of influence are carried out at all times in compliance with the respective applicable regulations and requirements. We strive to minimize resource requirements as well as waste and potential environmental impacts in the supply chain within our sphere of influence as well. All processes and standards applied by us must at least meet or exceed the legal requirements.
- **Human rights:** Respect for human rights, including the prevention of child labor, modern slavery, and human trafficking, is an integral part of any business decision.

8. Information on the MAX Group's Compliance System

- **Commitment:** Our Code of Conduct is binding for all companies of the MAX Group. All managers and employees must comply with its requirements and principles. Nevertheless, the Code of Conduct is only one building block in the comprehensive and sustainable Compliance System of the MAX Group and its companies.
- **Further guidelines:** Specific answers to questions on individual risk areas can be found in our internal policies, which are based on our company's values and the Code of Conduct. Local management is required to establish country-specific regulations and guidelines where necessary and to ensure their implementation.
- **Dealing with misconduct:** We investigate all indications of violations of applicable laws or regulations and misconduct as defined in this Code of Conduct or binding internal policies. These violations are remedied and appropriate consequences drawn.
- **Reporting misconduct:** Employees who report actual or suspected misconduct or violations of the law in good faith will not suffer any disadvantages as a result. The rights of all persons concerned will be respected when investigating reports, and transparent procedures, appropriateness, confidentiality and fairness will be observed when deciding on sanctions and measures.

Employees can and are encouraged to contact their local work environment with any questions they may have about this Code of Conduct or to report misconduct or violations of the Code of Conduct or the Compliance Guidelines:

- To their superiors
- To their management
- To the local Compliance organization

If the person providing the information does not want to address their concerns locally or does not find adequate support there, he or she also has the option of contacting the Compliance Department of MAX Automation at any time. The email address is: compliance@maxautomation.com.

- **Electronic reporting system (Whistleblower system):** We provide an electronic reporting system for reporting significant violations of the Code of Conduct, laws or applicable internal policies. It allows a confidential dialog with the responsible Compliance Department, secured by certified encryption and anonymous if desired.