



Code of Conduct of the Graepel Group - our self-commitment

- Friedrich Graepel Aktiengesellschaft | D
- Graepel Löningen GmbH & Co. KG | D
- Graepel Seehausen GmbH & Co. KG | D
- Graepel North America Inc. | Omaha, Nebr. | USA
- Graepel Oberflächentechnik GmbH & Co. KG | D
- Graepel Perforations India Pvt. Ltd. | IN



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(For reasons of better readability, the simultaneous use of male, female and diverse (m/f/d) is dispensed within this Code of Conduct. We regard the generic masculine as a neutral grammatical expression which - unless otherwise specified - expressly includes all genders.)

Principles and goals

Graepel has been a responsible and successful company since it was founded in 1889, focusing on offering its customers, employees, investors, dealers, suppliers, as well as the cities and communities in which Graepel operates. Graepel is always oriented towards the basic social and ethical values and offers service that persists.

Following the principle of sustainability, the Graepel Group is aware of its responsibility for the economic, social and ecological impact of its actions. This also means that the rules that apply in the company are observed and adhered to by all staff members, at all locations, at all times.

The focus of this Code of Conduct is to anchor the principles of conduct with regard to our responsibility towards society, business partners, and staff into the mindset of our staff members. Thus to reduce risks from any questionable actions.

This Code of Conduct is supplemented by internal guidelines and regulations as well as contractual agreements. In addition, all staff are required to abide by all domestic and international regulations.

A single violation or non-compliance to the Code of Conduct can significantly impact the entire Group, - not only for our company, but also for the staff members, business

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partners and stakeholders. Compliance with the Code of Conduct is mandatory for everyone in the company, including employees, managers, and board members.

Violations of the Code of Conduct will not be tolerated. Anyone who violates the Code of Conduct must expect consequences, which - depending on the severity of the violation - can range from civil law claims for damages to criminal penalties.

To ensure that this does not happen, it is the responsibility of each of us to familiarize ourselves with the contents of the Code of Conduct, to incorporate it in our own practice and to take it into account when making decisions.

Our responsibility as a member of society, as a business partner and as an employer

It is important to the Graepel Group to consistently implement the statutory framework, internal guidelines and corporate values and to communicate them clearly.

The Graepel Group observes the principles of the UN Global Compact Initiative, which essentially relates to the protection of international human rights, the abolition of forced and child labor, the elimination of discrimination and responsibility for the environment. In all business decisions, we are obligated to observe the legal system within which we act and to comply with the existing laws.

Human rights

We reject any use of child, forced and compulsory labor as well as any form of modern slavery and human trafficking. This not only applies to the cooperation within our company, but also to the conduct of our business partners.

Equal opportunity and equal treatment

At the Graepel Group, no discrimination based on ethnic or national affiliation, gender, religion, worldview, age, disability, sexual orientation, skin color, political attitude, social origin or other legally protected characteristics of persons who work with or for us, is tolerated. Our staff members are selected, hired and promoted on the basis of their qualifications and skills.

Employee representation and freedom of assembly

We recognize the fundamental right of all employees to form trade unions and employee representatives and to assemble.

We are committed to remain open with the staff representatives, to conducting a constructive and cooperative dialogue and to strive for a fair balance of interests.

Remuneration and Working Hours

The Graepel Group pays its employees competitive salaries.

The working hours correspond at least to the respective national legal requirements or the minimum standards of the respective national economic sectors.



Occupational safety and health

The Graepel Group takes its responsibility for the safety and health of its staff members very seriously. We guarantee occupational safety and health within the framework of the applicable national regulations and on the basis of the company's occupational safety and health policy. We create a working environment in which accident prevention is promoted and the risk of damage to health is minimized.

Product conformity and safety

We adhere to the legal and official regulations as well as internal standards that apply to our products. The Graepel Group observes all applicable product safety regulations and requirements, in particular the legal requirements relating to the safety, labeling and packaging of products as well as the use of hazardous substances and materials. Our products correspond to the current state of the art and have been developed in accordance with legal requirements.

Environment

As an industrial company, we are responsible for the environmental compatibility and sustainability of our products and sites.

We rely on environmentally friendly, progressive and efficient technologies.

Already with development and production phase, we try to minimize our use of natural resources, a continuous reduction of the environmental impact and compliance with environmental protection laws and regulations. In addition, we constantly re-evaluate the environmental impact of the manufacturing process and optimize it if necessary.

Donations

To avoid conflicts of interest and to ensure uniform conduct within the company, donations and sponsorship measures are only permitted within the framework of the respective legal system.

We grant monetary and material donations for the following areas: Science and research, education, charitable causes, sport, culture, churches and ecclesiastical institutions. In addition, donations are only granted to organizations that are recognized as non-profit or that are authorized to accept donations through special regulations.

Marketing

The Graepel Group communicates clearly and openly with all stakeholders. Each staff member is responsible for following the internal communication regulations in order to ensure a uniform and consistent image for the Group.

Each of our employees respects the achievements of their stakeholders and respects their professional and personal reputation. We pay attention to a uniform and clear image. Before we approve and carry out planned communication and marketing measures, we coordinate them with the relevant specialist department.



Conflicts of Interest and Political Advocacy

We avoid conflicts between private and business interests. We make our decisions exclusively on the basis of objective criteria and do not allow ourselves to be influenced by personal interests and relationships.

Graepel remains neutral in dealing with political parties and interest groups. Unfair influence on politics and legislation is not allowed.

Corruption, Bribery

We do not tolerate corruption. We grant benefits to business partners, customers or other external third parties only within the legally permissible framework and specified requirements.

Gifts and Entertainment

We ensure that business gifts, meals or entertainment events are appropriate and we never offer or accept them when they could improperly influence a business decision or affect our independence or judgement. We also expect our suppliers and cooperation partners to serve us with consistent exemplary performance. In addition, we refer to the current and country-specific tax laws and exemption limits.

Fight against money laundering and terrorism

We carefully verify the identity of customers, business partners and other third parties with whom we want to do business. It is our goal to only maintain business relationships with reputable partners whose business activities are in accordance with the statutory provisions and whose resources are of legitimate origin.

We immediately assign incoming payments to the corresponding goods or services and book them. We ensure transparent and open cash flows.

Law-abiding and guidelines

Graepel expects its employees to know and adhere to legal regulations and operational requirements.

We strictly adhere to the statutory framework for proper bookkeeping and financial reporting. Transparency and accuracy are our top priority. We publish our annual financial statements on time, which are prepared in accordance with national and international accounting regulations.

Export and Import Laws

We are aware of our social responsibility in fulfilling tax and customs obligations and are expressly committed to complying with national and international legal provisions. We ensure compliance with all regulations for the import and export of goods and services.



Fair competition and responsible procurement

We conduct business exclusively according to the performance principle and on the basis of the market economy as well as free and unhindered competition. We like to measure

ourselves against our competitors and always adhere to legal regulations and ethical principles. We do not enter into any anti-competitive agreements with competitors, suppliers or customers. We carefully select suppliers and service providers based on objective criteria.

When purchasing products and services, we involve the responsible purchasing departments in accordance with the relevant procurement principles.

Handling of data, confidential data and IT security

Information regarding persons and internal business secrets and assets require special protection. The data integrity is ensured by the Graepel Group.

We protect personal data of staff members, former employees, customers, suppliers and other data subjects. We collect, record, process, use and store personal data only in accordance with the statutory requirements.

We pay attention to IT and EDP security and adhere to the applicable regulations.

We are aware of the value of in-house know-how and protect it. In order to guarantee a high level of data and information protection at Graepel, knowledge of confidential processes, data, and projects may only be used by Graepel and its business partners in a direct business

context and are subject to confidentiality. We recognize the intellectual property of competitors, business partners, and third parties.

Handling of corporate assets

The tangible and intangible assets of the Graepel Group serve to support our employees in achieving the company's business goals and may only be used within the framework of the company regulations.

We respect the company's tangible and intangible assets and do not use them for purposes outside the company.

Chief Compliance Officer of the Graepel Group: Felix Graepel

Contact persons at the companies:

FGAG /Graepel Lönigen GmbH & Co. KG:	Hedi Ostermann, Ansgar Moormann
Graepel Seehausen GmbH & Co. KG:	Rüdiger Beutler, Eldor von Lentzke
Graepel North America Inc.:	Joe Cole, Dirk Schulte
Graepel Oberflächentechnik GmbH & Co. KG:	Alexander Boxhorn, Jan Hiltermann
Graepel Perforations India Pvt. Ltd.:	Pankaj Gautam, Faiyaj Momin