

CODE OF CONDUCT OF THE HOENLE GROUP

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Dear employees and business partners,

As a leading technology company, we compete with other companies and, in doing so, must adhere to international laws and regulations. At the same time, we have a responsibility to our employees, to our customers, partners, shareholders and the society as a whole. We have therefore established a framework for acting in conformity with applicable regulations and ethical values.

The present Code of Conduct is intended to serve as an orientation guide. It applies to all employees of the Hoenle Group and is aimed at supporting them in implementing regulatory specifications and company's principles in everyday work. The Code of Conduct identifies potential areas of risks and conflicts and provides behavioral guidelines. It is supplemented by legal requirements, regulations, contractual agreements and internal instructions.

Every one of us is responsible for acting in compliance with this Code of Conduct and all managers and supervisors bear special responsibility due to their role model function. We are convinced that, by adhering to the principles set out here, we can contribute to the Hoenle Group's positive development and sustainable value enhancement.

Please make yourself familiar with the contents of this Code of Conduct and use it as a guideline in your daily work. Should you have any questions, please contact your supervisor or the contact persons referred to at the end of this Code.

Best regards
Board of Management



Dr. Franz Richter, CEO

Robert Stark, CFO

GUIDING PRINCIPLE

„As a technology company, we aim to establish ourselves in various markets as one of the top suppliers by developing customer-specific system solutions that are tailored to our customers' applications.

We strive to satisfy each of our customers with our products and services. At the same time, our aim is to meet the expectations of our employees, partners, shareholders and the public.

Our employees are the basic and most important resource for achieving our goals and ensuring the economic success of our company.“

For Hoenle, this means in concrete terms:

- Ensuring open, fair and respectful interaction with each other
- Promoting employee motivation as they are the key to functioning processes and successful business operations
- Developing our strengths and expanding our knowledge through continuous training and further qualification of our staff
- Showing the same appreciation for all employees – regardless of age, nationality, skin color, gender, religious and political beliefs, social background, disability or sexual orientation
- Fulfilling our customers' wishes on the basis of expert advice and the observance of specific application criteria
- Realizing high-quality products tailored to the customer's needs and reliable services
- Establishing long-term relationships as these build trust and help us improve
- Promoting quality awareness in all our business areas
- The continuous further development of our processes throughout the company

We set goals for improvement which are regularly reviewed in accordance with a standardized system. All employees are kept informed about the goals set and the success of the measures taken.



CREATING SUSTAINABLE VALUES





HUMAN RIGHTS

We are committed to the protection of human rights. We are committed to fulfilling our responsibilities and preventing negative impacts of our business activities on human rights. We observe the principles of the UN Global Compact Initiative and oblige our suppliers to comply with these principles in our Supplier Code of Conduct. These essentially relate to the protection of international human rights, the right to collective bargaining, the exclusion of forced labor and child labor, the exclusion of discrimination in our hiring processes and employment, compliance with the minimum wage and legal working hours, our environmental responsibility and the prevention of corruption. We do not tolerate any form of harassment or abuse, whether verbal or non-verbal. Further information on the Global Compact Initiative is available under www.unglobalcompact.org. The Hoenle Group actively requires its suppliers to confirm compliance with the Code of Conduct.

The EU Conflict Minerals Regulation entered into force on 1 January 2021. Since then, far-reaching due diligence and auditing obligations along the supply chain have become binding for EU importers of conflict minerals. This is meant to curb the financing of violence and human rights violations in conflict or high-risk areas. Hoenle also ensures that its suppliers only deliver products to the Hoenle Group that do not contain conflict minerals within the meaning of the Dodd-Frank Act.



LABOR & SOCIAL STANDARDS

Our employees are the fundamental and most important resource for the economic success of our company. We maintain an open, fair and respectful relationship with each other.

We pay appropriate remuneration that is at least equal to the statutory national minimum wage and observe the principle of „equal pay for equal work“.

We accept the right of employees to freedom of association and to collective bargaining. Members of employee organizations are neither disadvantaged nor favored. We structure our cooperation with employees and employee representatives in a constructive manner. Even in the event of disputes, our goal remains to take into account both the economic interests of the company and the interests of the employees and to develop constructive solutions.

Our managers have a special duty of care, set a good example and demonstrate responsible behavior.

HEALTH AND SAFETY

The health and safety of our employees are important to us. Therefore, we take care that all legal requirements for occupational health and safety are complied with at our sites.

We take extensive measures that contribute to improving occupational safety and avoiding occupational accidents. The basis for this is provided by risk assessments that are carried out by various departments and specialized units, and from which occupational safety measures are derived, whenever necessary. In the production area, in particular, employees are made aware of hazards at their workplaces and receive regular individual training. In addition to the strain on physical health associated with a specific job, the risk assessments also pay attention to possible adverse effects on employees' psychological condition and health.

Workplaces are designed to minimize the strain on employees. This may relate, for example, to ergonomic issues, the illumination of the workplace and the limitation of noise and emissions.





ANTITRUST LAW

Antitrust law protects free competition for the benefit of customers, companies and the society as a whole. Infringements of antitrust law can have serious consequences for companies and for the employees involved, ranging from high monetary fines and claims for damages through to imprisonment.

Agreements that violate antitrust law include, for example, agreements on sales prices with competitors or the division of segments and markets. Antitrust law also prohibits the exploitation of a dominant market position.

The Hoenle Group advocates free competition. For this reason, we do not collude on prices. Confidential information about competitors and customers is not misused to hinder competition. We handle both confidential internal and external information with care.

A close-up photograph of a person's hands in a dark suit, holding a plain brown envelope. The hands are positioned over an open book with printed text and a dark pen resting on the pages. The background is blurred, showing what appears to be a window with a view of a city.

CORRUPTION

Corruption is the misuse of entrusted power for the purpose of private or business benefits. Forms and degrees of corruption are multifaceted. The most common form of corruption is bribery in the context of business initiation or execution. Bribery is regarded as a criminal offence worldwide.

Our relationship with business partners is based on the quality of our products and services, reliability, and market-oriented prices and conditions. Clear processes and internal control mechanisms ensure adequate protection.

Hoenle does not tolerate any form of bribery. This includes the offering or granting of gifts, money or other benefits to third parties with the aim of receiving advantages in return.

In many cultures, gifts and invitations are important for developing and deepening business relationships. However, some gifts may inappropriately influence the recipient's decision-making process.

We do not give or offer overly generous gifts and we do not extend such invitations. Conversely, we do not accept inappropriate gifts or invitations.



EXPORT CONTROL

Based on the resolutions of the United Nations Security Council governing the combatting of international terrorism and safeguarding national security interests, many countries have enacted their own national laws. The aim of these regulations is to prevent the proliferation of weapons of mass destruction and the uncontrolled spread of conventional armaments and, in doing so, to also contribute to the prevention of terrorism. By means of sanctions lists, terrorists are to be deprived of the resources they need. The Embargo Regulation, the Dual Use Regulation and the Anti-Terrorism Regulation, among others, must be adhered to at EU level, in addition to the Foreign Trade and Payments Act and the War Weapons Control Act.

We comply with trade and export control regulations. As an internationally operating company, it is essential for us to know and comply with the export control and customs regulations governing international trade. Our employees in the relevant departments are trained accordingly. We strictly comply with applicable legal requirements and international sanctions and restriction lists for all materials used. We do not purchase materials or components from countries, companies or supply chains that are subject to such sanctions or restrictions. This also includes raw materials such as aluminium or steel, if their origin or trade is regulated or sanctioned. In the event of indications of possible violations, such as the unauthorized use of our products, we refrain from the respective transaction. We strictly adhere to international sanctions and restriction lists for all materials used.

FINANCIAL INTEGRITY

We maintain transparent and open communication and reporting with investors, employees, customers, suppliers, public institutions and other business partners. We are committed to complying with legal requirements for accounting and financial reporting as well as tax regulations. We prevent tax avoidance, for example due to regionally different tax rates, by using market-based transfer prices and observing the arm's length approach.

Delivery and trading transactions carry the risk of being misused for money laundering. We comply with the applicable money laundering regulations and do not conclude any transactions that give indications of money laundering. It is our declared goal to only maintain business relationships with reputable partners whose business activities are in line with the legal regulations and whose operating resources are of legitimate origin. To this end, we check the identity of our potential business partners.

Money laundering is a cross-border phenomenon and a criminal offense under both German law and the law of many other countries. Combating money laundering is considered an important tool against organized crime.



CONFLICTS OF INTEREST

A conflict of interest arises when conflicting interests of the same person come into conflict in one and the same person that originate from different positions of that person, for example when private interests are in conflict with business interests.

We therefore always make business decisions in the interest of the company and do not allow ourselves to be influenced by personal interests. Conflicts of interest could hinder the company's success if uneconomic decisions are made. This may be the case, for example, when an order is prevented or important business information is disclosed. Apart from direct economic damage, conflicts of interest may also cause reputational damage. Therefore, business decisions such as the selection of business partners, business initiatives and personnel decisions must be made exclusively on the basis of comprehensible objective criteria and transparent processes in the interest of the company.





DATA PROTECTION

Personal data is subject to special protection. Improper use of personal data can have serious consequences for the data subject.

We therefore handle personal data carefully and responsibly and respect privacy. Personal data is only used for legitimate and well-defined purposes. Everyone who handles data of employees or other persons bears a high level of responsibility. We protect confidential data from unauthorized use, modification, disclosure and loss. The purposes for which personal data are used are transparent.

For questions regarding data protection, please contact our Data Protection Officer.



PROTECTION OF PROPERTY

Every employee must handle company property responsibly and protect it against unauthorized use, damage and loss. This includes both tangible assets and intangible assets such as internal company data, intellectual property and other data protected by copyright.

We ensure that we handle assets responsibly and protect them accordingly. We identify corporate assets and implement appropriate protection measures. To this end, we regularly review the value of assets and the appropriateness of their protection.

We treat company information with the necessary caution. Sensitive company information must not fall into the hands of unauthorized third parties. This is how we create the trust that is necessary for all dealings with our customers and partners. We record, collect, store and use confidential information in an appropriately protected manner. We grant access authorizations and do not share personal passwords with third parties.

INSIDER TRANSACTIONS

Employees of listed companies are required to observe certain duties of conduct with regard to their private securities transactions. These duties of conduct are legally anchored and are governed, inter alia, by the insider regulations set out in the Market Abuse Regulation and the Securities Trading Act. The purpose of these regulations is to ensure effective investor protection.

The regulations are intended to ensure that no investor can obtain unlawful advantages due to information that is not available to all investors. By their very nature, employees of listed companies, in particular, often have access to unpublished price-sensitive information, and are therefore subject to these regulations. Compliance with these is reviewed by the Federal Financial Supervisory Authority (BaFin).

Therefore,

- we treat insider information as strictly confidential and make sure that unauthorized persons do not gain access to insider-relevant information,
- we do not buy or sell Hoenle AG shares on the basis of insider information, neither for ourselves nor for others,
- we do not induce others to engage in securities transactions on the basis of insider information or give advice on buying or selling Hoenle AG shares.





ENVIRONMENTAL PROTECTION

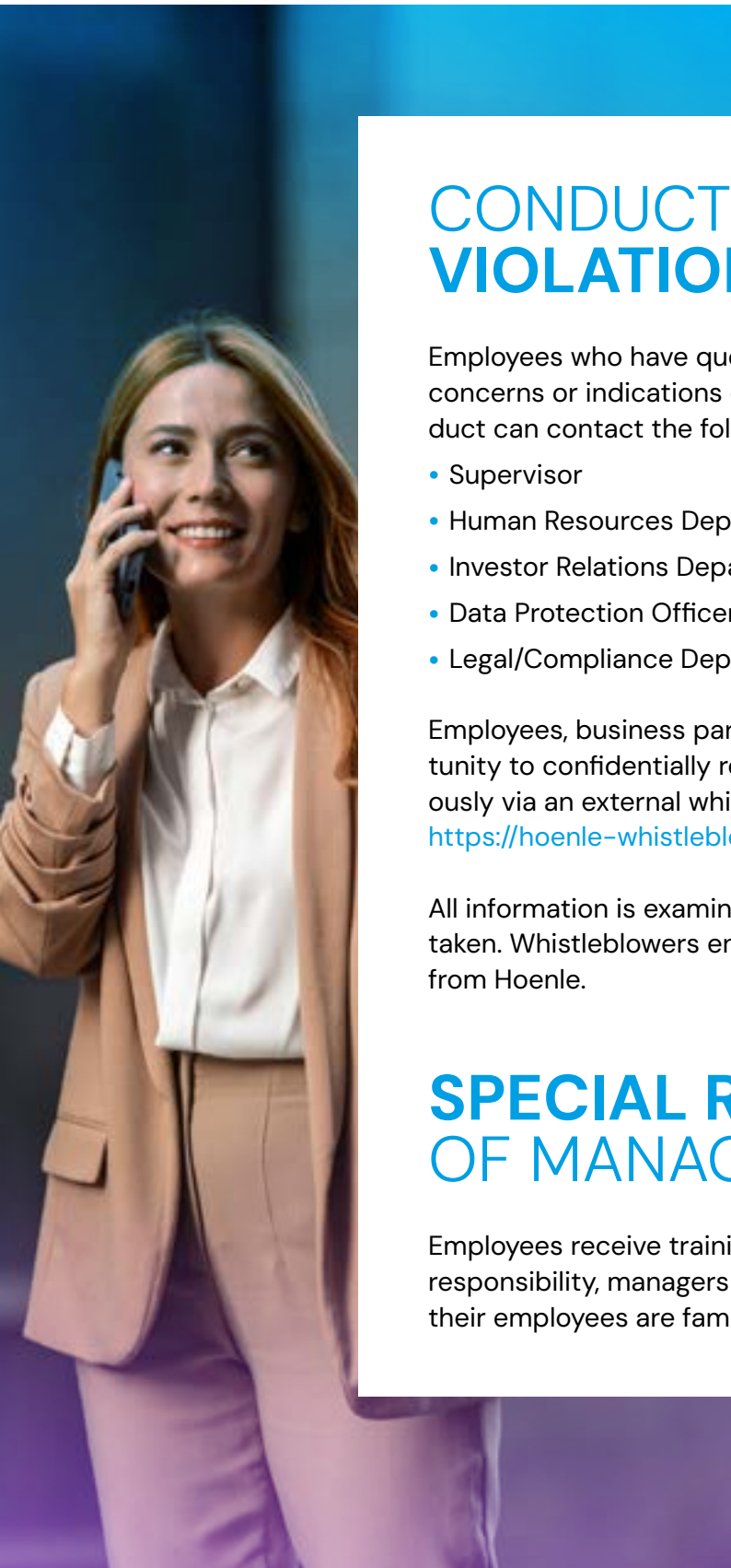
In order to protect the environment, to meet our social and legal obligations and with a view to actively contributing to the shaping of a sustainable future, the Hoenle Group has defined the following guiding principles:

Raising awareness of environmental protection and the careful use of resources are integrated into our processes and therefore play an active role not only selectively but throughout our entire value chain and everyday work.

We prefer to use reusable materials for our equipment and systems in our product development. In doing so, we want to encourage environmentally friendly disassembly and disposal of our products and reuse through recycling after a long service life.

We prefer to reduce the environmental impact from the outset and avoid the generation of waste wherever possible rather than disposing of it at a later stage. To implement this, we work closely with our partners such as customers, suppliers, logistics and disposal companies.

Just as technological change is advancing, our company is also subject to continuous change. This is why our processes and procedures are subject to continuous development. Our employees are essential for the further development and promotion of our methods aimed at active protection of the environment. We maintain an open suggestion system so that employees can contribute and actively shape our approach to environmental protection. Every employee is asked to point out errors or risks to environmental protection, and potential for savings.



CONDUCT IN THE EVENT OF VIOLATIONS

Employees who have questions concerning compliance issues or have concerns or indications of a violation of the Hoenle Group's Code of Conduct can contact the following persons or departments:

- Supervisor
- Human Resources Department
- Investor Relations Department (Insider Transactions)
- Data Protection Officer (Data Protection)
- Legal/Compliance Department

Employees, business partners and external contacts are given the opportunity to confidentially report violations of the Code of Conduct anonymously via an external whistleblower system:

<https://hoenle-whistleblowing.kinast.eu>

All information is examined and, if necessary, appropriate measures are taken. Whistleblowers enjoy special protection and will not face retaliation from Hoenle.

SPECIAL RESPONSIBILITY OF MANAGERS

Employees receive training on the Code of Conduct. Due to their special responsibility, managers have a role model function and must ensure that their employees are familiar with the Code of Conduct and follow it.

hoenle

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Note

For the sake of readability, the masculine form may be used. This abbreviated form is used solely for editorial purposes and does not imply any judgment. In the spirit of equal treatment, the corresponding terms refer to all genders (male, female, diverse).