

OUR
CODE OF
CONDUCT

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Code of Conduct:

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A collection of behavioral guidelines that apply to the employees of the company. It contains guidelines on how employees should behave in a legally, ethically, and socially correct manner.

“CRONIMET represents
a trusting relationship
with each other.”

Jürgen Pilarsky, CEO and Shareholder



Dear Colleagues,

We're sure you always do the right thing. However, it's not always easy to make challenging decisions and act in a fair and sustainable manner. Your decisions and conduct will determine whether the values of CRONIMET are upheld, whether we as a CRONIMET group remain sustainable and whether we manage to overcome the crises and challenges facing us as ONE CRONIMET.

We want to help you do the right thing. We have therefore combined our CRONIMET values with the behaviour we require in this Code of Conduct. This paves the way to a working environment guided by honesty and fairness in our interactions with colleagues, customers, suppliers, competitors, and our respective authorities.

So, let us all implement the Code of Conduct in practice and use it to orient and guide you in your everyday life.

With good wishes and a high five,

Your Compliance Team



Do the Right Thing

The Code of Conduct is of utmost importance to us, as it embodies the core values and principles we would like to maintain as a company. Respectful, dynamic, learning, cooperative and responsible – these corporate values are the foundation of our actions, and are an integral part of the Code of Conduct. These values serve as a guide for our employees, and should help us to always make the right decisions and act in a responsible manner. In addition, this Code of Conduct promotes a culture of integrity, transparency, and responsibility in which we can work together as a team to achieve long-term success.

As the management of the CRONIMET Holding Group, we consider our Code of Conduct to be self-evident, and are committed to promoting, observing and implementing its principles. We are constantly aware that our company's success is closely linked to compliance with the Code of Conduct.

When we do the right thing and put our Code of Conduct into practice, we increase the trust of our employees, customers, suppliers, competitors, financial partners, authorities, and the public.

The Management of CRONIMET Holding GmbH



GOOD BUSINESS PRACTICE

Our commitment

We comply with all the national and international laws that are applicable to our industry. We have also implemented internal principles and rules that we observe and follow in all our business activities.

Why this is important to us

Good business practices enhance the company's image and reputation, minimise the risk of litigation and other negative consequences and increase the commitment, trust and loyalty of customers and employees. This is how we strengthen our prestige and reputation among customers, employees and other stakeholders.

1 Responsibility and social commitment

As a company, we are responsible to the community in which we are active. We support social projects and get involved for the good of society. We are attentive to the needs and interests of our stakeholders and are committed to their well-being.

2 Confidentiality and data protection

We strictly adhere to data protection and accept responsibility for the information entrusted to us. When we collect, store, process or transfer the personal data of colleagues, customers or other third parties, we treat such data with the utmost care and strict confidentiality, and comply with applicable respective laws and regulations.

3 Information and cybersecurity

As part of our Code of Conduct, we will implement all the necessary measures to protect data and technologies and other information entrusted to us in digital form from theft, damage, or misuse.

4 Fair working conditions

As an employer, we are responsible to ensure that all employees worldwide can work under fair working conditions. We are therefore committed to decent wages, reasonable working hours, and a safe and healthy working environment.

5 Quality and safety

We place a great priority on the quality and safety of our work processes. We therefore ensure that our employees have sufficient knowledge and skills to perform their work duties safely and efficiently.

6 Copyrights, corporate identity and trade secrets

As a global company, it is vital that we comply with applicable copyright and trade secret laws and safeguard our corporate identity. We respect the intellectual property of third parties, and will only use it with the express consent of the owners, or within the scope of fair and reasonable use.

Our guidelines are applicable globally and contain details of the individual regulations.



RESPECT AND TOLERANCE

Our commitment

We respect our employees, customers and suppliers regardless of their gender, skin colour, age, ethnic background, religious orientation or sexual identity, and treat them fairly and with respect. We protect the personal dignity of the individual. We consider that the appropriate national and international laws and conventions to uphold human rights and to combat child labour are self-evident. Inclusion and unity are important success factors for CRONIMET.

Why this is important to us

We're certain that respect for human rights, diversity and acceptance create a positive working environment. This increases the productivity and innovative strength of our employees and promotes trust among colleagues. As a global company, CRONIMET is a permanent part of society. It is therefore very important to work against injustice and for tolerance and acceptance in our sphere of responsibility and influence. We want to go beyond the boundaries of our responsibility to help make the world a little fairer. We therefore want to implement the CRONIMET values in our daily actions and maintain respectful relations with each other.

Furthermore, we do not accept or tolerate harassment, in particular unwanted advances or attacks of a physical or verbal nature. We fundamentally reject violence and abuse of any kind.





ENVIRONMENTAL PROTECTION

Our commitment

We are aware of our environmental responsibility in our society. As environmental protection is part of our core values, we make careful use of resources such as water and energy, and wish to contribute to creating a safe and secure future for generations to come.

Why this is important to us

Our aim is to minimise the impact of our activities on the environment, and to comply with the respective laws on environmental protection. We therefore strive to achieve maximum compatibility in our business activities and thus actively prevent the creation of hazards in the environment.

Climate change is currently one of the greatest challenges facing our global community and affects every single one of us. In addition, environmental pollution and an inefficient use of resources generate high costs for companies, for example they can create and can lead to a tarnished image or even fines, as well as rising energy and raw material prices. The success of CRONIMET also depends on a sufficient availability of resources and a pristine environment.

HONEST BUSINESS RELATIONSHIPS

Our commitment

We pursue exclusively honest business relationships, and implement all the measures available to us to prevent and eradicate any form of corruption and bribery from CRONIMET and the corporate environment. Compliance with applicable legislation enables us to avoid high risks for our employees, managing directors and the company as a whole.

Why this is important to us

Corruption and bribery, such as accepting or granting unlawful advantages, destroys the trust of our customers and suppliers, endangers our competitiveness and therefore our jobs. While we reject any form of corruption, we are also contributing to an honest and trusting working environment for our colleagues and business partners. Moreover, honest conduct promotes sustainable business relationships and consolidates our company's reputation.

We believe that conducting and maintaining transparent business relationships requires the cooperation and commitment of every individual.

Corruption and bribery destroy trust in democratic structures; they are also illegal and contrary to our values. Our guidelines describe the measures we have taken to combat corruption, and contain clear rules of conduct.





FINANCIAL TRANSPARENCY

Our commitment

As a company, we are committed to compliance with all the legal requirements regarding money laundering and to take decisive action against all forms of money laundering and the funding of terrorism. In this respect, we comply in particular with the current Money Laundering Act (GWG) in Germany and any international legal requirements.

Why this is important to us

We recognise that anti-money laundering legislation is essential to protect our business, earn the trust of our business partners and stakeholders and to create a clean, safe and secure business environment. The appropriate legislation also ensures the integrity of the financial system and our economy as a whole. We will ensure that our employees are trained to detect and report any money laundering activity. We will implement the necessary measures to ensure that our company is not used as a conduit for illegal activities including money laundering or the funding of terrorism.

Money laundering activities harm CRONIMET, our employees and society as a whole. Money laundering promotes criminal activities such as terrorism, drug trafficking, bribery, human trafficking and organised crime.

Our anti-money laundering policy contains information on our anti-money laundering measures, and sets out practical rules of conduct to prevent both money laundering and the promotion of criminal activity.

FAIR COMPETITION

Our commitment

We act fairly in our business dealings and use no unfair methods such as price-fixing, market manipulation or unfair business practices. Furthermore, we are committed to maintaining fair competition and to compliance with the applicable laws and regulations.

Why this is important to us

At CRONIMET, we believe that fair competition is the key to a healthy economy and a sustainable future. Only with fair competition is it possible to build a sustainable economy and a better society. We remain committed to promoting fairness and transparency in all our business practices and to honest transactions with respect to our competitors. Our antitrust policy explains the clear rules of conduct for compliance with antitrust law and to promote fair competition.

Price-fixing, market manipulation and other violations of antitrust law hamper innovation, lead to excessive prices coupled with declining product quality, and have serious legal consequences.



And how do we **Implement** the Code of Conduct in Practice?

Our internal rules of conduct are based on the CRONIMET values. These rules of conduct are a guide to all of us on doing the right thing.

We put our Code of Conduct into practice by ensuring that all our actions are guided by its principles, thereby creating a place where together we can look forward to creating a fairer and more sustainable life for everyone.

So, let the Code influence your behaviour, and ask yourself:

HAVE INTEGRITY

Is my conduct transparent?
Am I acting in a reliable manner?
Is my conduct credible and plausible?

BE JUDICIOUS

Do I follow new developments closely?
Am I open to new ideas?
Am I brave enough to question my own actions?

BE CONSIDERATE

Do I treat all colleagues, employees and business partners impartially?
Do I handle criticism well?
Am I committed to sustainable actions?

BE FAIR

Do I observe the principles of fair competition?
Am I making my decisions with impartiality?
Do I avoid any actions that conflict with CRONIMET's interests?

BE CONSCIENTIOUS

Am I preventing hazards to people and the environment?
Can I be trusted to handle personal data in strict confidence?
Am I performing my work duties in an autonomous and proactive manner?

REPORTING CHANNELS AND CONTACTS

Our commitment

We report breaches of any laws, guidelines, processes and the Code of Conduct. The reporting of a violation will incur no detrimental treatment or negative consequences for our employees.

Why this is important to us

We would encourage you to report any such conduct in our company to identify and eliminate any illegal or criminal activities and behaviour that could damage the company. Only through your support and reporting can misconduct and criminal acts be detected and remedied.



Contact persons in the immediate work environment:

- Colleagues who can help you change the situation
- Your direct superiors
- Compliance department
- HR, legal or, where applicable, employee representatives
- Management



The whistleblower system serves as an anonymous, secure, multilingual and confidential contact.

Sanctions in the event of non-compliance

In the event of violations of our Code of Conduct or legal regulations, the necessary organisational, disciplinary and legal measures will be taken to appropriately address the violations identified, regardless of the criminal consequences. Depending on the severity of the violation, this could also result in a termination of employment.

We live our values and conduct ourselves accordingly

This Code of Conduct is a direct expression of our values, and a set of essential guidelines for action in our transactions with customers, partners, governments, societies and general cooperation.



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