



Code of Conduct

Aumann Group

As of 2022

This is a translation of the original German version and is provided for convenience only. Only the German version shall be binding.

Code of Conduct of the Aumann Group

As a publicly listed company, Aumann has always been committed to the values of sustainability, integrity, and social responsibility. The success of the Aumann Group is the result of our dedication, creativity, and sustainable corporate governance. Every single employee is a key component of this success. Trust, reliability, and a sense of responsibility, both among ourselves and toward our subsidiaries, business partners, and investors worldwide, are essential prerequisites for our collaboration. We convey all of this through legally compliant and sustainable corporate conduct at all times and in all places.

Our good reputation is our most important asset. It is important to maintain and expand this reputation through the right decisions. Even a single irrational decision can destroy the value of decades of work.

In this shared responsibility, we ask all colleagues to familiarize themselves with the content of our Code of Conduct. The first point of contact for understanding the requirements and rules is the immediate supervisor and the respective Compliance Officer of the Aumann Group companies. Please contact these people if you have any questions or concerns. This also applies to our business partners, from whom we also expect law-abiding behavior.

Of course, we are also available to help you at any time.

Aumann AG

The Executive Board

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Preamble

This Code of Conduct sets out binding standards for employees, managing directors, members of the Executive Board, and Supervisory Board, which define the values, principles, and practices that guide the business activities of the Aumann Group. Within the Aumann Group's Compliance Management System, our Code of Conduct serves as a framework for regulating interactions within the company and with third parties. It is further specified through guidelines and instructions.

The goal of the company's management is compliance with legal and internal company regulations and the creation of a working environment that promotes integrity, respect, and fair and sustainable behavior. A business policy that complies with the law and principles serves the long-term interests of the company as well as the protection of employees.

I. Scope

This Code of Conduct applies to all business areas of the Aumann Group.

The Aumann Group also expects its business partners to adhere to the principles enshrined in this Code of Conduct.

The Aumann Group communicates the requirements associated with the Code internally and externally.

II. Behavior in a business environment

The Aumann Group bases its actions on universally accepted ethical values and principles, particularly integrity, compliance with the law, and respect. We promote transparency, integrity, and responsible leadership and control within the company in an appropriate manner.

Law and legislation

The Aumann Group complies with the applicable laws and regulations of the countries in which it operates and expects its business partners to do the same. Compliance with regulations and prohibitions is a fundamental principle of all our business activities.

Integrity and fair competition

The Aumann Group rejects any form of corruption and bribery. The use of means to gain an unfair advantage, whether actively or passively, is not considered. Violations pose a significant risk to both the company and its employees, jeopardize sustainable economic success, and are punished accordingly severely. Conflicts of interest and the intermingling of private matters – whether of employees or close relatives – are not tolerated. Transparency is paramount.

We face global competition and comply with all **antitrust regulations**. Antitrust violations are incompatible with our commitment to technological innovation and fair competition.

The Aumann Group complies with **anti-money-laundering regulations**. We investigate unusual financial transactions within the framework of legal requirements and, where appropriate, submit them to the relevant authorities for review.

III. Behavior towards employees and each other

The daily commitment of qualified and motivated employees is the key value driver of the Aumann Group. As an innovative company, we are committed to an open, fair, and sustainable corporate culture as well as social responsibility.

Working hours and remuneration

The Aumann Group ensures **fair compensation and makes personnel decisions based on criteria such as competence, performance, and work behavior**.

Aumann Group employees are compensated at least at the level stipulated by applicable law or legislation, or higher.

The Aumann Group complies with applicable laws, rules, and regulations regarding working hours and expects its business partners to do the same.

Non-discrimination & respect

We treat each other with respect. This applies to colleagues and third parties such as customers, suppliers, and government officials. Bullying and harassment of any kind are strictly prohibited.

Abuse of position within the company and hierarchy in interpersonal relationships with other employees is unacceptable and will be punished.

Employment decisions, including hiring and promotions, compensation, training, layoffs, and terminations, are made without discrimination.

We do not make employee-related decisions based on non-work-related characteristics such as gender, age, ethnic origin, religion, sexual orientation, etc.

Health and safety at work

Ensuring the safety and health of our employees in the workplace is an **integral part of our corporate culture**.

To prevent accidents and personal injuries, the Aumann Group provides safe and healthy working conditions that, as a minimum, meet applicable legal requirements. Every employee also promotes the goal of health and safety in their environment and complies with occupational health and safety regulations.

IV. Sustainability (ESG)

Sustainability is a central aspect of the Aumann Group's corporate culture. As an innovative company, we stand for long-term thinking and entrepreneurship. Environmental protection, social responsibility, and sustainable corporate governance (ESG) form an essential part of our corporate responsibility.

Environmental protection

Sustainability and environmental protection, as well as the conservation of resources, are important corporate goals. The Aumann Group is committed to using environmentally conscious practices to minimize the impact of our actions on the environment and the climate.

The Aumann Group complies with environmental protection regulations and standards and uses natural resources responsibly. Every employee is called upon to contribute to environmental protection through their individual behavior. We expect the same from our business partners.

Social responsibility

We respect the **human rights, privacy rights, and dignity of our employees and all third parties**, and expect the same from our business partners, suppliers, and service providers.

Forced labor, child labor, all forms of modern slavery and human trafficking, as well as any form of exploitation, are prohibited at Aumann, and we ensure strict compliance with relevant laws.

Governance

We handle all types of company assets responsibly. Any form of fraud, breach of trust, theft, embezzlement, and tax evasion is prohibited.

We communicate honestly and transparently. We disclose potential or actual conflicts of interest in the workplace in a timely manner and take appropriate action.

We encourage our employees to raise concerns openly and without fear of reprisal, and we investigate them fairly and impartially.

V. Handling information and intellectual property

The protection of personal and confidential data and intellectual property is a top priority for the Aumann Group. The following applies to the handling of information across the Aumann Group, with regard to its business environment and employees:

Financial integrity

Both **internal and external reporting and communication** regarding business transactions within the company **reflect the company's values of honesty and integrity**. This applies to investors, employees, business partners, and the public.

Reports, records, and other documents are prepared in compliance with legal regulations, standards, and requirements for completeness and accuracy.

Confidentiality

All employees must take appropriate **measures to protect confidential information and business documents** from unauthorized access and misuse by third parties.

The Aumann Group expects business partners and third parties to behave in the same way with regard to sensitive Aumann Group data.

Insider information

The Aumann Group complies with all capital market regulations. This applies in particular to those regarding insider trading.

Trading in publicly traded financial instruments of the Aumann Group may not be based on insider information. Furthermore, insider information may not be shared, nor may recommendations based on it be made.

Data protection & intellectual property protection

The protection of personal data of employees, business partners, and shareholders is of particular importance to the Aumann Group, especially in times of advancing digitalization.

The Aumann Group respects the intellectual property of business partners and third parties. Likewise, all employees enhance and protect the Aumann Group's own know-how.

We respect the personal rights of all individuals and adhere to high standards when processing personal data.

The collection and processing of this data complies with legal requirements and takes into account fundamental principles such as data economy and purpose limitation.

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Aumann AG
The Executive Board

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