



CODE OF CONDUCT

TRADITION CREDIBILITY JUSTICE OPENNESS TRUST
DILIGENCE COMPETENCE COHESION FAIRNESS
RESPONSIBILITY INTEGRITY INNOVATION TRUTH
COURAGE ATTITUDE TRANSPARENCY PREVENTION
CONVICTION PROTECTION DISCRETION ADVISOR
COMPLIANCE DOCUMENTATION QUALITY
LEADERSHIP EQUAL OPPORTUNITY LOYALTY
SOLIDARITY TOLERANCE SINCERITY REPUTATION
VALUES ETHICAL PARTNERSHIP ROLE MODEL
FAMILY INTEGRITY COMMITMENT TOGETHERNESS
CULTURE RESPECT HONESTY CONSIDERATION

Foreword by the Management Board

Dear colleagues,

we have stood for the classic values of a responsible family business since 1928. Innovation and competence make us a reliable partner for the industry. Our focused work forms the basis for the company's success.

We understand that our staff, customers, suppliers and the general public place great trust in us. So we are committed to responsible and sustainable company management and to conduct ourselves in a proper manner, both legally and ethically.

What this means in specific terms, we have compiled in our Code of Conduct. The Code of Conduct represents our commitment to meet requirements and expectations while offering a guiding role.

Against this backdrop, we take the courage to seize responsibility and forge ahead.

Your Management Board

Our maxims

1. We are a **down-to-earth** family business from the East Westphalia region of Germany. You can **rely** on us.
2. Competence and **innovation** are the engines of our success – with **tradition** dating back to 1928.
3. The **quality** of our products is paramount for our high-performing **staff**.
4. Together, we **create added value** for our business partners.
5. Applicable **law**, agreements with third parties and internal directives are **non-negotiable for us**.
6. We take **responsibility** for observing **human rights** in our supply chain.
7. We deal with **resources** sparingly and protect the **environment**.
8. We always use company resources in a **purposeful** way for the benefit of the company.
9. We foster an **open** and trusting **culture** in which all staff can seek advice and voice their concerns.
10. We respect the rules of **competition** which we approach with sporting ambition.

Our values

I. Integrity

We act true to our values. For us, honest and fair conduct is a matter of course. This involves complying with legal regulations, agreements with third parties and internal directives.

II. Respect

We are tolerant. We treat each other as equals. No form of discrimination, harassment, coercion or verbal assault is tolerated, neither is intimidating or offensive behaviour. We apply the same standards to our business partners.

III. Responsibility

You can rely on us. Especially our managerial staff need to stand out as role models. We expect them to ensure that the relevant rules are observed in their field of responsibility. Violations of the law, which could be prevented by obligatory information and supervision, must not be allowed to happen.

IV. Openness

We foster an open culture and togetherness in which all staff can seek advice and voice their concerns. Transparency in dealing with mistakes and respect for other opinions promote dialogue among us. Together we are strong.

VI. Trust

Based on trusting collaboration, we encourage self-reliant work and promote individual talent among our staff. Good cooperation is reflected in the mutual, open exchange of information, as well as in supporting and appreciating each other across the company hierarchy.

VII. Respect for human rights

We are committed to respecting internationally recognized human rights. We strictly reject forced and child labour in any form. We recognize the right of all members of staff to form trade unions and employee organisations on a democratic basis within the framework of domestic regulations. Pay and other benefits, as well as maximum working hours and minimum rest periods, at least meet the legal standards or the level prevailing in the national economic sectors and regions.

VIII. Supply chain diligence

AGOFORM recognises that its business activities and global supply and value chains have potential adverse impacts on human rights. That's why we focus on due diligence processes with regard to human rights in our supply chains and have introduced a special code of conduct for suppliers.

Our duties

We acknowledge our responsibility with regard to our activities as a company and align our business actions and decisions towards the applicable ethical values in Germany. We promote transparency, responsible management and accountability in the company to ensure we act in accordance with our principles and the applicable law.

I. Competition

As a commercial enterprise, we follow the rules of fair and free competition. All members of staff and external service providers must therefore comply with national and international anti-trust and competition laws. Any contact with other companies with the aim or effect of preventing, restricting or distorting competition is strictly prohibited. Members of staff contacted by competitors, business partners or third parties for such a purpose must inform the Management Board without delay.

If a contract is awarded on the basis of a formal tender, AGOFORM will neither consult nor coordinate its bid with other bidders. This applies to both public and restricted tenders irrespective of whether a public or private procurement procedure.

II. Prevention of corruption

We don't tolerate corruption. We would rather sacrifice business and achievement of our goals than violate laws. We always make business decisions in the interest of AGOFORM and do not attempt to unethically influence the decisions of our business partners.

However, it is permissible, and may also be part of a courteous and respectful business relationship, to exchange gifts and extend invitations. Only if there is an attempt to exert an unethical influence on the decision-making behaviour of the recipient may this constitute criminal conduct.

As a general rule, gifts or other gratuities may be accepted or accorded if they do not exceed a socially accessible extent. Invitations to customary business hospitality that remain within reasonable limits may generally also be accepted or extended. Every invitation, however, has to be disclosed to the Management Board.

III. Authorities and public officials

Specific rules apply for interacting with governments and authorities and their representatives. Public officials not only include civil servants, but all persons appointed to undertake public administration duties.

Even offering advantages in exchange for performing official duties is a criminal offence. AGOFORM employees and external service providers are generally not permitted to offer, promise or grant public officials any advantages. Conversely, no advantages may be demanded or accepted from public officials. Exceptions are only possible within very narrow limits and must therefore be agreed in advance with the Management Board.

IV. Conflicts of interest

We work together for AGOFORM. So we expect loyalty from all our staff and for them to separate their professional and private lives. Personal relationships with a business partner must not result in preferential treatment. Professional positions must not be misused for personal advantage.

Transparent management is essential here: Having a conflict of interest is not necessarily a problem. Informing a supervisor of a conflict of interest is a necessary step in the right direction. Members of staff are obliged to notify the Management Board of working for or holding shares in a competitor company or business partner. The same applies to the work or shareholdings of close relatives.

V. Prevention of money laundering

AGOFORM complies with its legal obligations to prevent money laundering. We expect our staff to notice unusual monetary transactions. If in doubt, every member of staff is required to report to the Management Board any unusual financial transactions, in particular involving cash, that may raise the suspicion of money laundering.

VI. Export control

AGOFORM trades worldwide. We comply with all laws of relevance to international business transactions. We review the implementation of relevant sanctions and are vigilant in doing business with sanctioned countries. All goods are subject to correct customs processing.

Our company

I. Business matters

1. Assets

Each member of staff is responsible for protecting company facilities and using them in a resource-conserving manner. It is prohibited to remove document or other company assets without a legitimate business reason. Assets must be used responsibly and not for personal gain. The same goes for working time.

2. Donations and sponsoring

Donations are only to be made on a voluntary basis and without expecting anything in return. The donation must be transparent. The recipient of the donation and its specific use by the recipient must be known. It must always be possible to account for the reason for the donation and its intended use. Donations and sponsorships must not be aimed at covertly promoting decisions in the interests of the company.

3. Activity in the public domain

We respect the right to freedom of expression as well as the protection of personality rights and privacy. The reputation of the company is very important to us at the same time. Every member of staff must be aware that they may be perceived as part of AGOFORM or its representative, even outside the company. So everyone is called upon to uphold the company's status and reputation through their exemplary behaviour and activity in the public domain and thus promote its positive image.

4. Documentation

Our accounts, records and reports are only as accurate as the data on which they are based. Inaccuracies in our financial information may result in regulatory proceedings and undermine the confidence of our business partners and the public. For this reason, each record must be complete, truthful, timely and intelligible in line with the applicable law. This requires that information be documented or filed such that it is possible for any authorized member of staff to find the relevant information within a reasonable time. Documentation required to be retained by law or internal requirements must not be modified, destroyed or disposed of.

5. Releases and payments

Significant decisions and actions having financial implications must be released in accordance with the existing rules.

AGOFORM only accepts payments from traceable sources. Payments from AGOFORM to business partners presuppose a performance received in return. They are generally paid cashless into a business account of the contractual partner in question after receiving a proper invoice and traceable evidence of performance. The purpose of the transaction, designation of the payer and recipient, as

well as the source and target accounts for remittances have to be documented. The true nature of a transaction must not be falsified.

II. Information and data

1. Duty of confidentiality

Sensitive information must be kept confidential. Confidentiality must also be maintained with regard to sensitive information from our business partners, unless disclosure of such information is authorized or prescribed by law. The duty of confidentiality continues to apply after termination of the employment relationship or business relationship.

2. Data protection

In addition to the general secrecy provisions, data secrecy must be observed in accordance with the General Data Protection Regulation (GDPR). In particular, it is prohibited to process, disclose, make accessible or otherwise use protected personal data without authorization for a purpose not intended for lawful fulfilment of the task. This commitment to data secrecy continues after a person has left the company.

3. Data security

The confidentiality of our data is highly valued. The relevant concepts and plans allow AGOFORM to maintain a high level of security to avoid failure and disruption of its operations in the best possible way.

Despite continually updated organizational and technical measures to protect against physical and digital attacks on company information, all measures to prevent and detect vulnerabilities can never completely eliminate the risk of an IT security incident. Especially in this area, it is important that all members of staff participate in the training measures offered and that we are aware of the risks posed by cyber-crime and our associated responsibility in our daily activities.

4. The public domain

Our values remain the same – regardless of the medium. So respectful interaction between AGOFORM, colleagues and business partners must be observed, especially in social media, internet forums or blogs. The Management Board communicates regularly within the public domain.

III. Sustainability

1. Health

The safety and health of our staff are highly valued. Occupational safety and health protection are therefore integral components of all operational processes. All members of staff are required to comply with requirements. Every manager is obliged to instruct and support their staff in fulfilment of this responsibility.

2. Equal treatment

A culture of equal opportunity, mutual trust and respect is of great importance to us. This applies not only to hiring staff, but also, for example, to promoting staff or providing training and education. We treat staff equally, regardless of gender, age, skin colour, culture, ethnic origin, sexual identity, disability or religious affiliation.

3. Prevention of mobbing and harassment

We do not tolerate mobbing as systematic and repeated hostility, bullying and exclusion of a person with the aim or consequence of making the person mobbed feel insecure, belittled or excluded from the work environment. Proven cases of mobbing are pursued under labour law. The company is resolutely opposed to all forms of unacceptable treatment of staff, in particular sexual or verbal harassment.

4. Environmental and climate protection

Protecting the environment and conserving natural resources are essential, and we want to play our part to this end. We therefore reduce our impact on the environment by treating resources responsibly and reducing waste generation and emissions.

Each member of staff is responsible for contributing to the protection of the environment and climate through their individual behaviour. This also includes saving energy in their own areas.

Our implementation

The Code of Conduct applies to all members of the AGOFORM staff. Previous regulations not in conflict with the Code of Conduct remain in force. In case of deviations, the stricter regulation takes precedence.

The most important measures we can take are expressed in brief and are easy to understand: ask questions, address concerns and report irregularities. This Code of Conduct is a guide to help all members of staff to stay on track.

If you ever get stuck, but still have to make a decision, ask yourself how you can make the decision to most closely align with the AGOFORM values and in the best possible interest of the company. How would you feel if you had to justify your decision to someone you confide in or had to read it in tomorrow's newspaper?

The Management Board and managerial staff have a special role model function and their actions in particular are measured against the Code of Conduct. The heads of department are usually the first point of contact for questions of understanding and ensure that all members of staff know, understand and implement the Code.

We expect our staff to report violations of the Code of Conduct. This can also be done anonymously. Every report is treated in confidence. Every whistle-blower acting in good faith will be protected. Retaliatory measures against whistle-blowers are prohibited and are not tolerated.

AGOFORM encourages all members of staff and business partners to address their issues and concerns openly and directly. In case of any questions or suggestions regarding the Code of Conduct, they can contact the Management Board or their supervisor directly or use the whistle-blower portal:

<https://www.agoform.de/en/whistleblower>

Finally, no one needs to learn this Code of Conduct by heart. Instead, it is important to familiarize yourself with the principles and continue relying on your common sense.