

**Code of conduct of
Drahtwerk Oberndorfer Hütte
Peter Weil GmbH & Co.KG**

FOREWORD

Dear employees,

As an international company with customers, suppliers and business partners in many different countries, we are subject to a multitude of different legal regulations, values and political framework conditions in the national and international environment. For Drahtwerk Oberndorfer Hütte Peter Weil GmbH & Co.KG, it has always been part of our corporate culture to behave ethically correct in everyday business life - compliance with existing laws is self-evident for us. We have formalized this attitude in the present Code of Conduct.

Respecting and abiding by these sustainable business practices in the spirit of good corporate governance, serves to protect our business relationships and our reputation as a global family business. It is binding for all employees.

Geschäftsführung
Drahtwerk Oberndorfer Hütte
Peter Weil GmbH & Co.KG



Viktor Kistner

Scope

The following Code of Conduct applies to Drahtwerk Oberndorfer Hütte Peter Weil GmbH & Co.KG. It applies to all employees at all levels of the company. It is an instruction to all employees and also a clear statement that violations will not be tolerated.

We seek to apply the principles of this Code of Conduct in cooperation with our business partners - especially our customers and suppliers.

1. Dealing with employees

Equal treatment and non-discrimination

The principle of equal opportunities and respect in dealing with each other are important in our medium-sized, family-owned company. We treat all employees equally, fairly, respectfully and dignified regardless of sex, age, skin color, culture, ethnicity, sexual identity, disability, religion or belief. This is how we create a culture of mutual trust. Qualification, responsibility and willingness to perform are promoted by us.

Human and labor rights

We respect internationally recognized human rights and respect for such rights is supported by us. Forced and child labor in any form is strictly rejected by us and is strictly prohibited. The national regulations in Germany give each employee the right to organize in trade unions or employee representations. We respect this right. We recognize the right of all employees to receive appropriate compensation. Our compensation corresponds to the level of our industry and region.

Cooperation with employee representatives

A close and trustful cooperation with the employee representatives is a proven cornerstone of our entrepreneurial activities. There is a respectful, open and cooperative constructive dialogue in dealing with each other.

Work-and Health protection

The safety and health of our employees is very important to us. Occupational safety is therefore a key factor in all operational processes and is included in our considerations during the planning phase already. The work is designed to prevent accidents and health problems.

Each of our employees is an expert in safety and health protection in their work environment. We promote safety by complying with health and safety regulations and individual suggestions

for improvement. The department and team leaders are required to continuously instruct and protect their employees in the exercise of this responsibility.

We actively promote the compatibility of family and work.

In the workplace, we, under no circumstances tolerate consumption and activity under the influence of substances such as alcohol and drugs that endanger our judgment and safety at work. Non-smoking is an important concern for us.

2. Dealing with business partners and third parties

Offering and granting benefits

We are committed to fair competition and strictly reject any unlawful distortion of competition. Compliance with competition and antitrust regulations always takes precedence over economic success. The relationship with our customers is long-term. Good and strong competitors challenge us technologically. Competition is good in order to force us developing more innovative solutions. We therefore refrain from all actions that could lead to the restriction of trade and competition. We do not enter into any agreements that would serve such a purpose. We do not grant officials any benefits or advantages to promote our products. We will in no case tolerate corruption and bribery. In dealing with customers and business partners' donations, gifts and food invitations may only be accepted or given if they can be considered as adequate after careful comparison.

Sustainable environmental and climate protection

Both in the development and marketing of new products and services as well as in the operation of our production facilities, we pay attention to energy and resource efficiency as well as environmental and climate protection. We make our contribution through recycling.

Social commitment

We are an active member of society and see our social commitment on the one hand in the training of professionals for our company, and on the other hand in the promotion of students. We support social institutions at the local level. On the other hand, we do not make any financial contributions, in particular donations, to political parties or party organizations, individual mandate holders or candidates for political office.

Appearance and communication

The protection of personal rights, the right to freedom of expression and privacy is respected by us.

However, in our media age, all employees should be aware that they can be perceived in the private sphere as a representative of our company and are therefore called to reputation and reputation through their behavior in public as well as their appearance in social media and networks of the company.

3. Conflicts of Interest

Avoidance of conflicts of interest

Business decisions are made at Drahtwerk Oberndorfer Hütte Peter Weil GmbH & Co.KG in the interest of the company. We avoid conflicts of interest with private concerns or other economic or other activities, including relatives or otherwise related persons. Conflicts are immediately disclosed and resolved allowing fair competition and this code of conduct to comply with law.

Dealing with company facilities

All hardware and facilities of our family-owned company shall appropriately be used by all employees and protect from loss, theft or misuse. Intellectual property represents tremendous goodwill and competitive advantage we shall defend against unauthorized access by third parties.

We only use the material and immaterial property of the company for our corporate purpose. Travel arrangements are made in accordance with the purpose of the respective business trip. Travelling is planned take into account time and cost aspects. Each business trip is approved by the respective supervisor before departure.

4. Data Protection

We protect information and business documents in a suitable manner against access and insight of unauthorized third parties.

The protection of personal data, especially of employees, customers and suppliers, has a special significance for us. We only collect or process personal data if this is absolutely necessary or legally required to fulfill the respective work task. No personal data may be collected or processed without consent of the respective person or legal admissibility.

5. Environmental protection

Compliance with environmental laws, energy standards and the handling of hazardous substances is managed professional and according to the state of the art. We have certified our environmental management system according to ISO 14001:2015 and energy management system according to ISO 50001:2018 and strive to use resources and raw materials responsibly. We pay close attention to recycling and minimizing waste. We refrain as far as possible from using environmentally harmful raw materials, materials and production processes.

Note and contact

If you have any questions about this Code of Conduct or if you are concerned about a possible violation of this Code of Conduct, you can always contact your supervisor or our owner with the following information:

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e-mail: v.kistner@d-o-h.de

Your concerns related to this Code of Conduct will be taken seriously and will be treated confidentially.