

Code of Conduct (CoC)

■ Preamble

This document contains a set of rules of Herbert Arnold GmbH, Glastechnischer Maschinenbau, hereinafter referred to as ARNOLD, for conduct of all employees of the company internally to each other and externally towards business partners, interest groups and the public. This set of rules is based on the ARNOLD corporate policy and the mission of a responsible and sustainable corporate management as a voluntary commitment and is continuously adapted to local and global requirements.

All ARNOLD employees, without exception, are bound to comply with the established principles, whereby there is no difference in the evaluation of legal requirements and ethical standards.

At the same time, this Code of Conduct is intended to guide employees in their daily work processes when uncertainties occur or conflictual decisions become necessary.

The aim is that all ARNOLD employees work in an environment that is characterised by respect, integrity and fair behaviour to each other and to third parties and in where both legal regulations and also ethical principles, such as those listed below, are fully observed.

■ Compliance with legal regulations

For all commercial decisions and actions that ARNOLD makes and undertakes on a national and international level, the basic principle is the observance of and compliance with the applicable laws and other relevant regulations at domestic and international level.

All ARNOLD employees are obliged to inform themselves about the regulations applicable to their area of responsibility from the relevant project documents or the company's own database on guidelines, regulations and laws and to comply with them.

If local regulations, rules or standards deviate from the Code of Conduct at foreign places of work, either the Code of Conduct or the local standards must be complied with, whichever is the highest standard.

In the case of doubt, the managers responsible for the process in question must be involved in a supportive manner.

■ Respect of fundamental rights

In both, internal and external cooperation with people of different ethnic origin, culture, religion, ideology, various ages and regardless of disability, skin colour, sexual identity and gender, ARNOLD does not tolerate any discrimination on the basis of these characteristics, harassment of whatever kind, or other personal attacks on individuals.

ARNOLD employees always respect the personal dignity, personal rights, freedom of opinion and the privacy of each individual they work with and deal openly, honestly and fairly with colleagues and business partners.

ARNOLD's economic decisions are made exclusively on the basis of objective considerations and never due to extraneous reasons such as discrimination or compulsion.

ARNOLD declares solidarity with the principles of the United Nations Global Compact (UNGC) and the declarations of the International Labour Organization (ILO) on fundamental principles and labour rights. This particularly applies to the outlawing of child and forced labour, compliance with fixed maximum working hours and fair and adequate pay, as well as the protection of nationally granted labour rights.

■ Environment, work safety and health

ARNOLD considers a high level of commitment in sustainable management, taking into account the interactions of economic, ecological and social aspects. In addition to environmental protection, the aim is to improve the company's environmental performance on the basis of government requirements through the forward-looking and systematic integration of environmental aspects into corporate decisions. In this respect, every employee is requested to make his or her contribution by an environmentally friendly behaviour within the scope of his or her activities.

The health and safety of employees at their workplace is a high priority for ARNOLD.

Therefore, the technical planning of workplaces, facilities and processes is carried out strictly in accordance with the current rules of occupational health and safety. ARNOLD also places equally high demands on the products manufactured by the company, which must comply with national and international safety and health standards. Safety training based on product-specific instructions and hazard documentation is carried out regularly for employees and customers in order to achieve the best possible precautions against incorrect behaviour, accidents at work and harmful influences.

The aim is to create and maintain a safe and healthy working environment in compliance with the relevant legal requirements and the responsible participation of all employees.

■ Business Integrity and Fair Competition

Any business transaction by improper means such as corruption, bribery or embezzlement is clearly contrary to the company's own values and is resolutely fought against by ARNOLD. ARNOLD conducts its business in accordance with fair and strong competition within the scope of all applicable antitrust laws and does not participate in illegal incentives for business relationships. ARNOLD employees are not permitted to accept personal benefits or gifts from business partners with a value of more than 35€. The employee must openly communicate any such incidents to the responsible supervisor, who shall inform the management. If there is any uncertainty as to whether a gift may be accepted, the case must also be discussed with the responsible supervisor and, if necessary, with the management. By proceeding that transparently, the creation of an indirect obligation for a possible reward shall be effectively prevented and the possible impairment of an objective business decision shall be avoided.

As a national and international trading partner, ARNOLD undertakes to comply with all multinational applicable foreign trade regulations. The employees proceed within the scope of the applicable export and import restrictions, official approval provisions and applicable customs and tax regulations.

This also includes the international regulations for the prevention of money laundering and the handling of conflict materials (3TG).

In order to ensure fair competition in the national and international markets where ARNOLD is active, the company expects its employees to comply with the prohibition of price or condition agreements with competitors. Also prohibited is the coordination of behaviour in the markets as well as agreements with competitors for the purpose of market-sharing or customer allocation.

■ Conflicts of Interest

ARNOLD expects its employees to avoid situations in which their individual or financial interests may conflict with those of the company. Therefore, the company prohibits any business involvement with competitors, suppliers or customers or to enter into business relationships with the aforementioned parties from the private sphere of the employees. Additional activities for the above-mentioned groups are only permitted with the explicit consent of the management. Any preferential treatment of certain business partners for private interests is excluded.

If possible conflicts of interest arise due to the particular circumstances, the case must be discussed directly and transparently with the responsible superior.

■ Confidentiality and Data Protection

For internal confidential or confidential information of the company, which is not intended for the public, all employees of ARNOLD are bound to secrecy and the protection of privacy and intellectual property. The same applies to confidential information or information to be protected that employees receive from third parties via external business contacts. According to the legal and contractual requirement, all sensitive data shall be protected against access or disclosure to uninvolved parties. ARNOLD employees must therefore carefully consider in external communication whether they are authorised to pass on the relevant data. In cases of doubt, the company's own data protection policy or the company's data protection officer must be consulted. The obligation to maintain the confidentiality of the business-related data shall continue even after the termination of the employment relationship with ARNOLD.

ARNOLD respects the personal rights of its employees and collects, processes and uses personal data only in accordance with the applicable data protection regulations (e.g. DSGVO).

■ Communication and Handling of Internal Knowledge

A good and well-regulated flow of information throughout the entire company structure is essential for the optimal performance of business processes. For this reason, ARNOLD considers an open and effective communication between employees as well as with business partners, the media, the public and all government agencies to be absolutely essential. This includes correct and truthful reporting and documentation, which the employees are obliged to provide to government authorities or other interested parties in accordance with the applicable rules of the company or the disclosure obligations. Within the scope of the internal exchange of information ARNOLD promotes the open exchange of opinions, criticism and ideas for improvement and supports its employees in their professional and personal development.

Relevant knowledge and information required to carry out the company's own processes and to achieve conformity of the products and services is collected in the company's own databases, archived in a structured manner and made available to all employees, according to their assigned access rights. In addition to the information generated internally by the company Code of Conduct (CoC) and evidence, external documents and media elements are also entered into the knowledge databases. All documents are prepared in accordance with company guidelines, not unfairly altered or destroyed and stored appropriately, preferably in electronic form. In order to grant a prompt and smooth operation of the operational exchange of information, the databases are updated on a daily basis. The handling of company knowledge is subject to the basic rule for all employees that relevant knowledge may not be unduly withheld, distorted or be passed on only selectively. Moreover, the company's knowledge belongs to the protective corporate property and is thus subject to the duty of confidentiality.

■ Handling with company property

ARNOLD expects its employees to treat the company's property responsibly and with care.

Each employee is obliged to protect the property of ARNOLD against loss, damage, misuse, theft, embezzlement or destruction. Employees are not authorised to use company equipment for personal purposes unless their personal use is expressly permitted by contractual agreements or by the responsible supervisor.

In addition, ARNOLD employees must ensure the efficient use of the company's assets. Business decisions are generally to be made on the basis of commercially reasonable risk- and benefit analyses. In case of doubt or increased risk, the advice of the supervisor or, if necessary, of the management should be obtained prior to making any legally binding declarations.

If a staff member becomes aware that an activity contrary to the foregoing is being or has been planned or carried out, he or she must immediately inform his or her supervisor, as such occurrences can have a direct impact on the profitability of ARNOLD.

■ Implementation and enforcement

As the rules specified in this Code of Conduct constitute the basis of the corporate culture, ARNOLD undertakes all relevant and reasonable efforts to continuously implement the principles and values mentioned in this Code of Conduct. Consequently, each employee is personally responsible to adhere to these principles, which is also reviewed by the company as a matter of daily practice.

Because violations of behavioural requirements, legal regulations and internal guidelines and rules can have serious consequences not only for the individual employee personally but also for the company, ARNOLD will not tolerate conscious misconducts in any way. Non-compliance with the Code of Conduct will be consequently sanctioned by ARNOLD without consideration of the rank and position of the acting and affected person. Due to the violation of the contractual obligations, the employee will be subject to disciplinary measures.

If an employee becomes aware of or suspects a breach of the Code of Conduct, he or she is requested to raise this immediately with his or her superior in order to limit possible damage to personnel and the company. The supervisor or the management will treat this report as strictly confidential on the basis of the legal provisions in order to avoid reprisals or harassment on the part of the persons concerned. Should these negative consequences occur despite everything, the management will take decisive action against them.

Managers have a key role in the implementation of the Code of Conduct, as they exemplify integrity through their behaviour, and advise and assist in ensuring that their subordinates understand the requirements of the Code and that they conduct in a commercially and ethically correct and fair manner.