Code of Conduct

Mack & Schneider's commitment to ethical business conduct forms the basis for our conduct towards employees, customers, suppliers, competitors, and other stakeholders. The following Code of Conduct outlines the principles we follow internally as well as our expectations for all entities that provide goods or services to Mack & Schneider.
We expect our Mack & Schneider employees and suppliers to adhere these standards even in regions where such standards may not be considered part of the usual business culture.

HUMAN RIGHTS

Forced Labour, Child Labour and Human Trafficking

Mack & Schneider and suppliers must comply with all applicable laws and standards prohibiting all forms of forced labour, human trafficking, and child labour, including but not limited to:

- International Bill of Human Rights
- Fundamental conventions of the International Labour Organization ("ILO"): convention numbers 29 (and its 2014 protocol), 105, 138, and 182
- ILO Declaration on Fundamental Principles and Rights at work.
- Article 32 of the UN Convention on the Rights of the Child
- UNGC Guiding Principles on Business and Human Rights

Mack & Schneider and suppliers shall not employ workers below the local legal minimum employment age in the country or region of operations. In countries or regions where there is no local legal minimum employment age, Mack & Schneider and suppliers shall not employ workers under 15 years of age. They must ensure that workers have access to their government issued identification, work related and travel documents. Workers must be allowed to resign their employment in accordance with local and national employment laws or regulations.
If a Mack & Schneider or a supplier uses a labour broker or third-party employment agency, Mack & Schneider / the supplier will ensure the broker or agency employs ethical recruitment practices, complies with applicable laws, and does not withhold identity documents.

Conditions of Employment

Mack & Schneider and suppliers must comply with applicable laws regulating work hours, wages, and benefits. They will respect the freedom of association, the right to form interest groups, and bargain collectively without fear of interference, discrimination, or retaliation as set out in ILO conventions 87 and 98. They must implement strict policies to foster an injury free work environment. They must comply

at least with the national standards for a safe and hygienic working environment. They must enable employees and other stakeholders to report concerns or potentially unlawful practices at the workplace.

Equal Opportunities

Mack & Schneider and suppliers will not discriminate on the basis of gender, colour, race, national origin, religion, sexual orientation, age, veteran status, disability or gender identity. Mack & Schneider follows the Universal Declaration of Human Rights of the United Nations, support the UN Women's Empowerment Principles, adhere to ILO conventions 100 and 111, and encourage our business partners to advance equality and inclusion. Mack & Schneider employees and suppliers must treat all workers with respect and commit to a workplace that is free of harassment.

Responsible Materials Sourcing

Mack & Schneider and suppliers must exercise due diligence on the materials in their supply chains to reasonably ensure that their products do not directly or indirectly finance or benefit armed groups or contribute to serious human rights abuses, or severe health and safety risks and negative environmental impacts.

ENVIRONMENT

Responsible Stewardship

Mack & Schneider and suppliers will aim to establish an environmental management system to ensure a healthy living environment, identify the risks and environmental impact attached to their products during the production, distribution, and transportation process as well as the entire lifecycle and look for opportunities to reduce these. They will conserve resources and protect the communities and environment that surround them. They are expected to manage chemicals to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

Continuous Improvement

Mack & Schneider and suppliers will increase efficiency throughout their operations, including a reduction in raw materials, energy, emissions discharges, noise, waste, land use, water and reliance on natural resources and hazardous substances by means of clear targets and improvement policies. They are expected to identify and eliminate the use of restricted substances in manufacturing processes and finished products.

Emergency Response

Mack & Schneider and suppliers strive to maintain policies and plans that mitigate exposure to terrorism, crime, threats, pandemics, natural disasters, and related major incidents. They must prepare reasonable and practicable emergency response plans that address the most likely anticipated emergencies and protect the safety of

their employees and local communities. Contingency plans must be in place to maintain continuity of supply.

Land, forest and water rights

We recognise the importance of land, forest and water rights for affected communities and the environment. We require our suppliers and business partners to be committed to respecting and protecting these rights in all aspects of business activities.
In particular, we reject any form of land grabbing that occurs without the free, prior and informed consent of the affected communities. Where relevant to our products and processes, we encourage sustainable practices in agriculture, forestry and water management through the supply chain to ensure the long-term protection and regeneration of these essential resources.

Soil quality

Maintaining and improving soil quality is of crucial importance to us. We take measures and encourage our suppliers and business partners to prevent soil pollution, maintain soil fertility and promote the restoration of degraded areas.

BUSINESS INTEGRITY

Ethical Behavior

Mack & Schneider and suppliers will avoid conflicts of interest and operate honestly and ethically throughout the supply chain and in accordance with applicable laws. They will value free and fair competition and comply with antitrust laws in all areas in which they operate. They will not collude with competitors, engage in price-fixing, market sharing and bid rigging, or exchange sensitive business data with competitors in an effort to restrict competition.

Anti-Corruption

Mack & Schneider employees and suppliers must uphold the highest standards of integrity in all business interactions. They will not tolerate corruption, bribery, embezzlement, extortion, or fraud in any form. These principles also apply where Mack & Schneider employees and suppliers engage third parties in connection with the activity for Mack & Schneider.

Anti-Bribery

Mack & Schneider employees and suppliers and their representatives are not allowed to offer gifts in any form, including gift certificates, food certificates or rewards certificates to Mack & Schneider employees if it could give the appearance, if not the reality, of affecting the employee's judgement. Personal advantages, as well as benefits, from Mack & Schneider employees and suppliers are also forbidden including the use of facilities or favours extended to Mack & Schneider employees' colleagues and/or their families. Mack & Schneider employees and suppliers may

only offer discounts or other benefits that are also available to the general public or similarly situated company employees. Gifts of insignificant value such as items with logo of Company's name or trademarks, and normal and appropriate hospitality, may be offered for the purpose of promoting the company's image, presenting its products and services, and promoting good relations with business partners.

Trade Compliance and Export Controls

Mack & Schneider and suppliers will respect the applicable trade laws and restrictions as imposed by the United Nations or other national or supranational bodies or governments and have implemented strict policies to ensure compliance therewith. They will comply with all applicable laws that prohibit business relationships with sanctioned countries, entities, or persons.

Forced evictions

We strictly reject any form of forced evictions that may be related to our projects or business activities. Our company is committed to finding alternative solutions in dialogue with affected communities that respect their rights and dignity. We ensure that our activities do not lead to the displacement of people and actively promote fair and equitable negotiations to avoid conflict.

Use of private or public security forces

We require our suppliers and business partners to use private or public security forces strictly in accordance with human rights standards. We expect that any security personnel engaged must avoid all forms of violence, intimidation, or abuse. Suppliers must establish effective processes to monitor compliance to ensure that the safety of the employees and assets is maintained without compromising the rights and freedoms of individuals or groups.

Protection of Intellectual Property

Mack & Schneider and its suppliers must respect intellectual property rights and protect all confidential information provided by Mack & Schneider and its respective business partners.

Counterfeit Parts

Mack & Schneider and suppliers must establish effective processes to detect counterfeit parts and materials and, if detected, quarantine the materials, and notify the Original Equipment Manufacturer, customer, and/or law enforcement as appropriate.

Privacy

Mack & Schneider and suppliers are expected to refrain from using personal data for any purpose beyond the scope of the business arrangement. They shall implement

appropriate measures to respect privacy and to protect personal data against loss and unauthorized access or use.

Information Security Practices

Mack & Schneider and suppliers must comply with all security laws of the locations where they operate. They must have clearly defined organizational information security roles, responsibilities, and accountabilities. They must publish and maintain formal written information security policies, protocols, and processes. They shall perform yearly information security awareness training for all their employees and shall regularly train others who have access to the Information Technology infrastructure or relevant information systems.
Mack & Schneider may require suppliers to perform self-assessments regarding their compliance with the standards and regulations for privacy and information security.
Mack & Schneider may audit supplier data security systems and may request supporting documentation pertaining to the Supplier's Information Security Practices, to the extent permitted by law. They shall implement technical and organizational security measures to protect against any unauthorized or unlawful processing of all Mack & Schneider data held by Mack & Schneider employees and suppliers and against accidental loss, destruction, alternation, disclosure, or damage to Mack & Schneider data. They must maintain policies and procedures to detect, monitor, document and respond to unauthorized information disclosures and encourage reporting of such incidents. They must notify Mack & Schneider of any breach of its information, or if that of a Mack & Schneider customer, partner or another supplier was disclosed. They shall maintain and annually test Business Continuity and Disaster Recovery plans.

Accurate Records

Mack & Schneider and suppliers shall accurately record, maintain, and report business documentation including, but not limited to, financial accounts, quality reports, time records, expense reports, and submissions to customers or regulatory authorities when appropriate.

Disclosure of Information

Mack & Schneider and suppliers shall disclose financial and non-financial information in accordance with applicable regulations and prevailing industry practices and, when applicable, disclose information regarding their labour force, health and safety practices, environmental practices, business activities, financial situation and performance.

Insider Trading

Mack & Schneider and suppliers must avoid the disclosure of any non-public information acquired about Mack & Schneider or another company's securities that could influence an investor's decision to buy or sell the security and should avoid

insider trading by not buying or selling such securities when in possession of this information.

Anti-Money Laundering

Mack & Schneider and suppliers must comply with all applicable anti-money laundering laws throughout the world. Mack & Schneider will only conduct business with reputable partners and suppliers who are involved with legitimate business activities and whose funds are derived from legitimate sources.

Compliance with this Supplier Code of Conduct

Mack & Schneider and suppliers shall promote compliance with this Code of Conduct among its Mack & Schneider employees, suppliers and sub- suppliers. Mack & Schneider may audit the supplier's compliance with the code, including unannounced visits and inspections, or authorize appropriately qualified third parties to do so. In case of significant breaches, Mack & Schneider reserves the right to terminate the business relationship subject to applicable laws.

Reporting Concerns

Mack & Schneider and suppliers must provide an anonymous complaint mechanism for employees and stakeholders to report grievances. They must protect whistle-blower confidentiality and prohibit retaliation. To report any violations to this code or any misconduct affecting Mack & Schneider, employees and suppliers may contact our external ombudsperson:
RA Ulf Neumann, LL.M.
Lederstraße 134, 72764 Reutlingen
Tel. +49-(0)7121-347654-0
E-Mail: info@neumann.law

Filderstadt, November 2026

Tobias, Steffen and Vanessa Bachofer
Managing Partners