

Code of Conduct

Preamble

We are committed to conducting our business in a responsible, lawful and sustainable manner. This Code of Conduct sets out the principles that guide the Sauer Group in its dealings with employees, customers, suppliers, business partners and public authorities.

This Code applies to all employees of the Sauer Group at all locations and across all business areas.

Furthermore, we expect our suppliers and business partners to comply with these principles or equivalent standards.

Our actions are guided by internationally recognized standards, in particular the principles of the United Nations Global Compact, the ILO Core Labour Standards, and applicable human rights and environmental standards.

1. Compliance with Laws and Responsible Conduct

We comply with all applicable laws, regulations and official requirements in the countries in which we operate. Our actions are guided by integrity, fairness, respect and responsible conduct.

2. Conduct Towards Business Partners and Conflicts of Interest

We maintain fair and trustworthy relationships with customers, suppliers, public authorities and other business partners. Consumer protection regulations and contractual obligations are respected and fulfilled.

Employees and managers shall always act in the best interests of the company and avoid situations in which personal, financial or other private interests may influence, or appear to influence, the objective and independent performance of their duties.

Potential or actual conflicts of interest must be disclosed without delay and addressed transparently with the responsible manager or the Whistleblowing Officer.

3. Confidentiality, Data Protection and Responsible Information Management

We ensure the responsible and secure handling of all business, personal and technical information. Confidential information, trade secrets, production data and process-related information are protected and disclosed only to authorized persons. Existing statutory or contractual confidentiality obligations remain in effect after the termination of employment.

Personal data is treated confidentially and in accordance with applicable data protection laws. The privacy of individuals is respected.

Internal and external reports, records and documentation must be complete, accurate, understandable and traceable.

We implement appropriate technical and organizational measures to protect against unauthorized access, data loss and IT security incidents. Security incidents are documented and reported where legally required.

Code of Conduct

Our Data Protection Manual provides detailed requirements regarding the handling of personal data and information security.

4. Fair Competition, Gifts and Anti-Corruption

We are committed to fair competition and comply with antitrust and competition laws. Illegal agreements, price fixing or abuse of market power will not be tolerated.

We prohibit corruption, bribery, acceptance of bribes and fraud. No form of improper advantage or undue influence is tolerated. Employees must ensure that no personal dependencies or obligations arise in relation to customers, suppliers or other business partners.

In particular, gifts, invitations or other benefits must neither be offered nor accepted if they could reasonably be perceived as influencing business decisions.

Where gifts or invitations are customary and consistent with normal business courtesy, it must be ensured that no inappropriate obligations arise and that all applicable legal requirements are complied with.

The following limits apply to employees of the Sauer Group:

- ▶ Gifts up to a value of €35 per individual case are permissible if they are customary and appropriate.
- ▶ A maximum value of €100 per business partner per calendar year applies.
- ▶ Gifts or invitations exceeding these limits require prior approval from the responsible supervisor.

Violations of these principles may result in disciplinary measures under employment law.

5. Anti-Money Laundering

We prohibit all forms of money laundering and participation in illegal financial transactions.

Before entering into business relationships, we verify the identity and integrity of our business partners. This includes sanctions screening to comply with legal and foreign trade requirements. We remain alert to indications of money laundering or other unlawful activities in connection with payments to or from business partners.

Business activities and transactions are properly documented.

Code of Conduct

6. Human Rights and Working Conditions

We respect and support internationally recognized human rights. Child labor, forced labor, modern slavery and any form of exploitation are not tolerated.

We provide fair and safe working conditions for all employees. Compensation is paid in accordance with applicable legal requirements and in an appropriate manner. Employees receive clear and comprehensible payroll documentation.

Applicable working time regulations are observed. Overtime is performed only within the framework of legal requirements.

We respect the rights to freedom of association, freedom of assembly, and collective bargaining, insofar as these rights are legally permissible and applicable.

7. Equal Treatment, Freedom of Expression and Respectful Conduct

We do not tolerate discrimination or unequal treatment based on ethnic or national origin, ancestry, skin color, gender, age, religion or belief, physical or mental disability, membership in an employee organization, or any other personal characteristic.

Harassment, intimidation and physical, psychological or sexual violence are not tolerated.

The right to freedom of expression and opinion is respected within the framework of applicable laws.

We foster a respectful, fair and appreciative working environment.

8. Occupational Health and Safety

The safety and health of our employees are of the highest priority. Legal and internal occupational health and safety requirements must be observed.

Risks are minimized through appropriate measures, and safe working conditions are maintained.

Qualified specialists and responsible functions are involved in supporting occupational health and safety activities.

Code of Conduct

9. Environmental Protection and Resource Conservation

We support the objectives of sustainable environmental protection and act responsibly toward the environment and society.

We use environmentally responsible production methods and promote the efficient use of energy, raw materials and natural resources. Environmental impacts are minimized wherever possible.

We strive for the continuous improvement of our environmental performance and promote measures to reduce environmental impacts and conserve resources.

10. Responsibility in the Supply Chain

We expect our suppliers and business partners to comply with applicable laws and appropriate standards relating to human rights, labor conditions, environmental protection and anti-corruption.

We also expect these principles to be considered and promoted throughout their respective supply chains.

11. Reporting Misconduct

The company has established an internal reporting channel and appointed a Whistleblowing Officer.

Employees and other stakeholders are encouraged to raise concerns or report observed or suspected violations of laws, internal policies, this Code of Conduct, or other ethical concerns through the designated reporting channels without delay. This helps protect the integrity and reputation of our company.

Reports and notifications are treated confidentially and reviewed carefully. Where legally permissible and feasible, reports may also be submitted anonymously.

No retaliation or disadvantage will be tolerated against individuals who report concerns in good faith.

Knowingly false or malicious reports are not tolerated and may result in legal or disciplinary consequences.

Reports may be submitted to the direct supervisor, the Whistleblowing Officer, or via the designated compliance email address.

Where contact information is available, the reporting person will receive an acknowledgment of receipt within seven days and feedback on actions taken or planned within three months, insofar as legally permissible and feasible.

Dedicated Reporting Channels

External Reporting Office: [Meldestelle des Bundes beim Bundesamt für Justiz](#) (Federal Reporting Office at the German Federal Office of Justice)

Sauer Compliance Team Email: compliance@sauer-polymertechnik.de

Code of Conduct

12. Implementation, Responsibility and Compliance with the Code of Conduct

This Code of Conduct is reviewed at least annually and whenever required by specific circumstances and is updated as necessary.

Responsibility for maintaining, reviewing and further developing this Code of Conduct lies with Management. Human Resources and the Whistleblowing Officer support the operational implementation of the measures and regularly report to Management on implementation status, relevant incidents and developments.

Appropriate measures and, where necessary, measurable objectives are defined, reviewed regularly and adjusted as needed to support the implementation of this Code of Conduct.

For questions regarding this Code of Conduct, employees may contact Management, Human Resources or the Whistleblowing Officer. Questions regarding data protection and information security may be directed to the IT Department or the Data Protection Officer.

All employees receive a copy of this Code of Conduct together with their employment contract and are trained on relevant topics according to their role and responsibilities. This includes basic training for all employees as well as advanced training for employees with customer or supplier contact and for employees with specific compliance, leadership, approval or procurement responsibilities.

Participation in the relevant training courses and receipt of the Code of Conduct are documented. Refresher training is conducted at appropriate intervals and whenever required, for example following significant changes, identified violations or specific risk situations.

This Code of Conduct and the available reporting channels are accessible to employees and other stakeholders via the company website.

Violations of this Code of Conduct will be investigated and addressed consistently. Non-compliance with these principles may result in disciplinary action. In cases of serious legal violations or criminal conduct, the competent authorities may be informed. Our integrity and reputation as a company depend significantly on the lawful and responsible conduct of every individual.