

CODE OF CONDUCT

The ml&s Code of Conduct sets out how we can do the right thing each and every day, and in so doing, act with integrity. This means that everyone who works at ml&s has to comply with the applicable laws and common rules. These rules are set out in the Code of Conduct, in a way that is transparent and that everyone can understand.

They apply just as much to shareholders, managing directors, employees, suppliers, customers and all those who work on our behalf. This is the case regardless of the location they are at or country they are in.



With integrity. Respectful. Diverse.

Dealing with our customers

Our customers are the focus of our activities. We generate attractive added value for them and allow for innovations to industrialised. We support our customers in every way we can to achieve common goals faster, better and more effectively. We treat our customers, partner companies, shareholders and employees in a way that is trustworthy, fair and proper. We meet each and every obligation we enter.

Dealing with each other

We behave respectfully in our daily interactions with each other and are committed to creating an environment that is suitable and fair for everyone. We do not tolerate any form of degrading, intimidating or hostile behaviour. We reinforce and support the individuality of every employee. We make our decisions on recruitment, promotions, assessment, remuneration and terminations exclusively based on talent, performance and success.

Dealing with diversity

As a company that operates around the world, we value the various skills, ideas and talents of all our employees, as well as the fact they come from different cultures, and use this as a source of inspiration for further development and growth of the company. We believe that diversity and an inclusive working environment are essential for fostering innovative energy and maintaining our competitiveness. We stand for equal opportunities and equal treatment and do not tolerate any discrimination or harassment based on age, physical impairment, background, skin colour, gender, political stance, religion or sexual orientation.

With integrity. Fair. Collaborative.

Integrity in business practices

We achieve our successes through our own innovative energy. We are convinced that our appealing services and innovative electronic solutions are competitive and that we can hold our own on the market against any competitors. In doing this, we focus on integrity and fairness and expect the same from our business partners. We undertake to comply with all laws and regulations of the countries in which we operate. We do not tolerate any form of bribery or corruption. Employees who do not observe these rules risk making themselves liable to prosecution for corruption offences. Even promising or demanding unfair advantages may result in prosecution.

Compliance with legal requirements

The Management shall ensure compliance at an organisational level with all legal regulations within its area of responsibility. Employees are responsible for their own actions. In case of doubt, they must coordinate with their superiors or the legal department to avoid damage or liability.

Financial and fiscal integrity

We ensure that our financial reporting is accurate, appropriate and complete. We retain and store relevant files and documents in electronic or printed form in accordance with legislation, as well as the prescribed policies and procedures. Furthermore, as a company and employer, ml&s undertakes to comply with all applicable tax laws and regulations in the countries in which we operate. The same applies to compliance with international treaties and tax directives (of the OECD).

Compliance with trade and customs regulations

We comply with applicable national and international trade sanctions, customs regulations and indirect taxation legislation, even though VAT, customs and excise tax laws may sometimes be very complex and frequently change. We ensure compliance with all applicable regulations through effective import/export controls and internal monitoring systems.

With integrity. Fair. Collaborative.

Prevention of market abuse

In relation to financial market transactions, we comply with all the applicable requirements of the financial supervisory authorities. We do not enter into illegal market agreements, any form of market manipulation, insider trading or other unfair business practices.

Prevention of money laundering

ml&s takes all appropriate and feasible measures to prevent any form of money laundering and the financing of criminal activities.

Conflicts of interest

If employees of ml&s undertake industrial, financial or business activities other than in the course of their employment, these must not conflict with their professional duties or the interests of the company.

Specifically, the following requirements shall apply:

- No undertaking any secondary employment that affects the duration of the contractual employment duties or the competitive interests of ml&s.
- The manager and the person responsible for compliance must be notified in advance if any contracts are to be awarded to relatives, life partners or other close associates of the employee. This also applies to transactions with companies in which relatives have direct or indirect holdings.
- Direct reporting lines between children, parents, spouses or life partners are to be avoided.
- No assuming roles with corporate responsibility with customers, business partners or competitors.

Gifts, tickets and invitations

We give and accept gifts, tickets and invitations in a transparent manner and exclusively for legitimate business purposes. We have summarised the individual provisions in an internal guideline, which can be requested from those responsible for compliance.

With integrity. Fair. Collaborative.

Improper use of business assets and prevention of fraud

The assets and company facilities, business documents and work equipment of ml&s may not be improperly used for private purposes or left to third parties. To prevent fraudulent activities, we apply the four-eyes principle, along with other measures. The management promotes a culture of open feedback and transparency to make it easier to detect such activities.

Risk management

We assume full responsibility for all risks we take within the scope of the ml&s risk strategy. When managers transfer responsibility for effective risk control to employees, they shall remain accountable. This shall also apply to the appropriate supervision of teams or third-party providers and their conduct.

Data protection and personal data

Confidential information and documents about customers or employees of ml&s must be protected from being viewed by third parties, as well as by employees who they do not concern, in a suitable manner. Personal data may only be collected, processed or used if this is necessary and there is a corresponding legal basis or consent on the part of the data subject. The use of data must be transparent for the data subject. Their rights of access and rectification as well as their rights to object, blocking and erasure, where applicable, are to be protected. In relation to technical protection against unauthorised access to data and information, an appropriate standard that meets the state of the art must be met. In this regard, ml&s has issued a more extensive guideline on information security and data protection, which is expressly referred to. We cooperate with all competent public authorities and supervisory authorities.

With integrity. Fair. Collaborative.

Intellectual property and confidentiality

Information about ml& and our expertise, as well as innovative and new ideas, are key building blocks of our competitiveness and profitability. We therefore protect intellectual property from access by unauthorised third parties. Conversely, ml&s undertakes to use the intellectual property of third parties, including patents, copyrights and trademarks, only after securing the corresponding rights of use.

Confidential information about past, present or future business transactions or internal matters shall not be disclosed directly or indirectly to third parties without authorisation. If information is unpublished, we shall treat it confidentially. Employees shall bear responsibility for any decisions they make to disclose information, as well as for the consequences that may arise from this. The loss or theft of company information must be reported immediately.

Labour standards and respect for human rights

As an employer, we offer our employees a pleasant and professional working environment as well as fair remuneration. Employment is subject to free choice, and the employment relationship is governed by the national laws and practices of the country in question. Our employees are strictly forbidden from working under the influence of alcohol or drugs. The same shall apply to the impairment of performance due to the prescribed or improper use of medication.

ml&s respects the fundamental rights of every human being and trusts its employees to play an important role in protecting these rights and social standards. We meet the standards of the International Labour Organization (ILO) on child labour and forced labour, which is something we do not tolerate under any circumstances.

Health and occupational safety

In all actions of the company, ml&s puts the protection of human life first. We are committed to health promotion and maintaining this as well as the best possible occupational health and safety. This allows us to create safe and healthy workplaces. We take technical, organisational and behaviour-based measures to prevent our employees and contractual partners from falling victim to accidents, injuries or occupational diseases.

With integrity. Fair. Collaborative.

Security

We take appropriate security measures to protect our facilities and administrative buildings. All employees shall avoid security risks, pay attention and report unauthorised access and other security incidents immediately.

Company resources and their protection

The tangible and intangible resources of ml&s are to be used in a responsible and efficient manner and only for legitimate business purposes. All employees are responsible for following the appropriate procedures to protect IT systems in compliance with internal policies and procedures.

Process liability

ml&s is a manufacturing and logistics service provider. We manufacture our customers' products and work continuously to design manufacturing, logistics and other service processes in such a way that they do not pose any risks to people or the environment. On the contrary, we shape changes in the market and technology. By mastering new technologies, we secure growth, reduce environmental impact and offer our employees secure and attractive jobs. We regard compliance with statutory and other regulatory requirements as a minimum requirement. We are well prepared for emergencies: An established program enables fast and efficient response in every department of our company if necessary.

Environmental protection

Sustainability is our responsibility. To minimize the impact of our business activities on the environment, we have anchored environmental protection in our corporate goals: climate neutrality by 2025, conservation of natural resources through optimal process alignment, and energy savings through permanent process optimization. Management and employees strive to use less material and energy in their work and to reduce and recycle waste. In addition to economic considerations, ecological and social criteria are also considered when selecting supplier companies, advertising materials and other external services. We know that this is only a first step, which will have to be followed by many more. However, it is the path we want to walk together.

External relationships.

Relationship with society

We are a good neighbour at all our locations, in all our regions and in every country. As a result, we act not only in the interests of the company, but in the interests of society too. This includes an open and transparent dialogue with the communities in which we operate and with other representatives of civil society who have a legitimate interest in our activities.

Relationships with public administration

In the case of invitations and gifts to state employees, the regulations they are subject to regarding gifts and invitations must be observed in all instances. The granting of benefits to state employees may result in prosecution for the acceptance of benefits or the granting of benefits in and of itself since this relates to an official position. It is not necessary for the exercise of the office to have been influenced in an unfair way. Any person entrusted with the performance of public duties may be a state official, rather than just public officials and employees of the civil service.

Monitoring.

Guidance for decision-making

- Even the best policies and procedures cannot cover all complex situations and ethical dilemmas. Our employees are therefore guided by the following principles in their day-to-day work when deciding whether specific actions are appropriate:
- We are guided by good judgement and follow our corporate values in all our actions.
- We align all our actions with legal and regulatory requirements as well as internal rules and regulations.
- We design workflows safely and eliminate hazards to people and/or the environment.
- We protect the reputation of ml&s, with all the actions we take being in the best interests of the company.
- No assuming roles with corporate responsibility with customers, business partners or competitors.

Responsibilities and infringements

ml&s promotes a culture of transparency. Concerns can be addressed while maintaining confidentiality. No one should fear adverse consequences because of this. If an infringement of our Code or of laws or regulations becomes known, employees are requested to report it immediately. Reporting usually takes place within the local organisation. If notification on-site is not appropriate or effective, please contact the compliance officers as set out in the following section „Suspicious Activity Reports“. Infringements of the Code shall be taken seriously and may lead to disciplinary action.

Suspicious activity reports

Suspected compliance infringements must be reported immediately where they occurred. As a general rule, managers and superiors shall be the right contact persons for this. If it is possible to raise concerns and reservations on-site but not to address them, or in the case of serious misconduct such as fraud, corruption, infringement of competition law or other criminal acts that require objective and structured prosecution, we ask you to report the problems to the following e-mail address: <https://mlands.trusty.report>

Monitoring.

Investigation process

A lawyer is responsible for the independent and impartial investigation of all reported issues. He also decides, where applicable, on whether to bring in internal or external investigators. All problems and concerns shall be investigated in a timely manner. The anonymity of the reporting person shall be maintained if requested. Adverse action of any form against persons who report an infringement in good faith or participate in an investigation, even if the suspicion is not substantiated, will not be tolerated.

In addition, the placing of undue influence or pressure on the persons involved in the investigation will not be tolerated in any form. The principles for the prevention of adverse measures are subject to the ml&s Guideline for Reporting Conduct that infringes the Code of Conduct.

Greifswald, September 2023

Bernd Odoj

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Managing directors