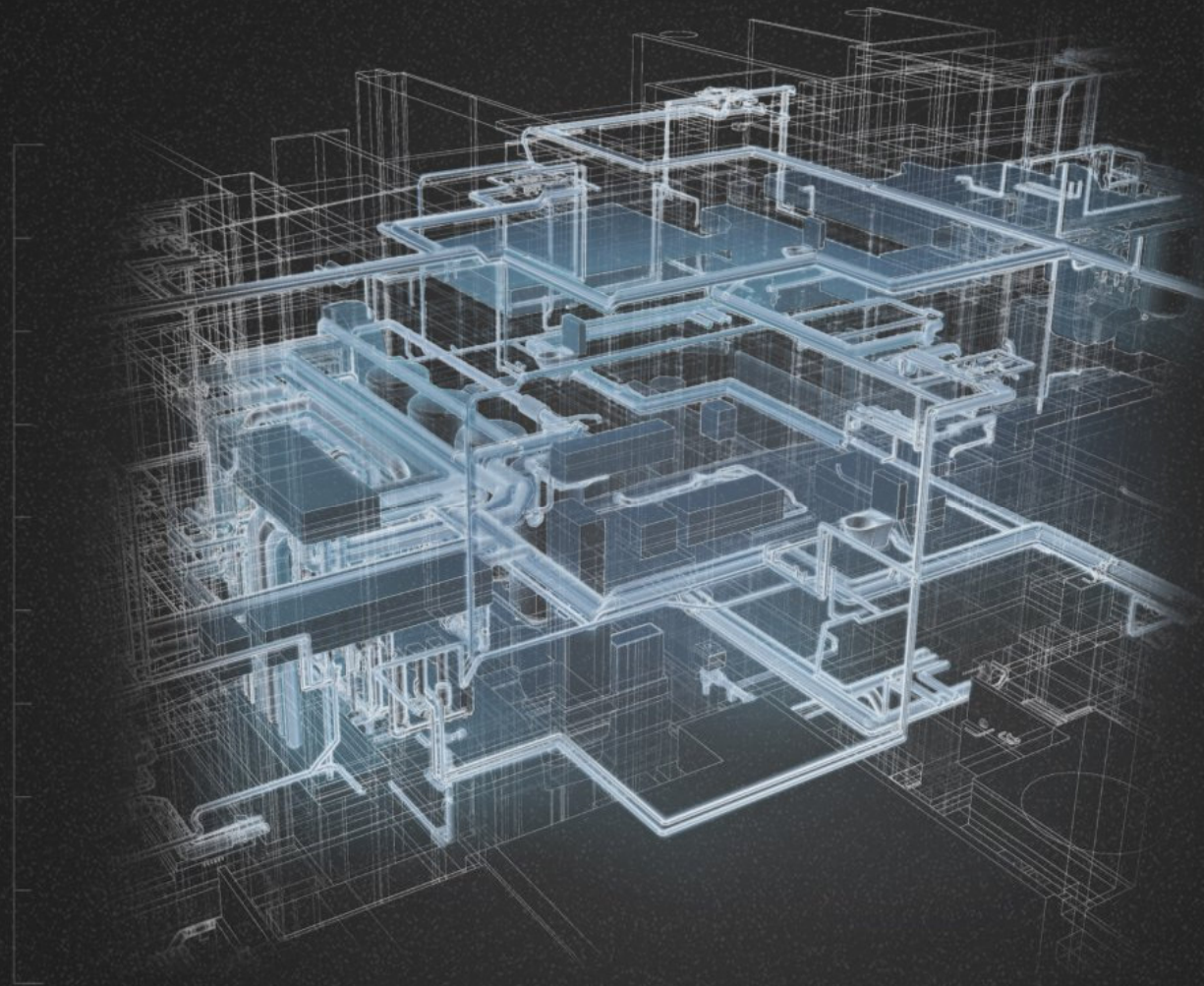


CODE OF CONDUCT



Wels – Vienna – Hartberg

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Why do we have a Code of Conduct?

No matter how much the world around us may have changed, one thing remains untouched: MOLIN's commitment to meeting the highest standards. It is not only what we do, but also how we do it that shapes MOLIN's reputation among our stakeholders and helps us remain successful in the long term.

The introduction of this Code of Conduct is therefore another consistent step to support our employees in responsibly carrying out their business activities. The Code goes beyond the mere compliance with laws and regulations and clearly sets out what our company stands for. It reinforces our commitment to acting in a moral, ethical, and legally compliant manner. We expect this conduct from each of our employees as well as from all our business partners.

I therefore ask you to read the Code of Conduct carefully. Please contribute to ensuring that MOLIN continues to meet the high expectations of trust that our stakeholders place in our group of companies. Thank you for your personal contribution to helping us fulfil our comprehensive commitment to integrity.

KR Peter Zauner

Objectives & Structure

The present Code of Conduct forms the basis for all our operational and strategic activities and decisions. It serves as a binding guideline for moral, ethical, and legally compliant behaviour. In addition to applicable laws, it also reflects the principles that guide our business conduct.

The current version of the Code of Conduct applies to all MOLIN employees and is available in German on the company website and in the intranet. New employees commit to complying with it in their employment contract and receive a personal copy of the Code of Conduct when they start their employment. We also expect our business partners to act in a lawful and ethical manner. Therefore, we take care to ensure that our business partners strictly adhere to the provisions of this Code of Conduct. We would like to point out that no third-party claims can be derived from this Code of Conduct.

Values & Conduct

Our Code of Conduct – What We Value.

Integrity in Action

There is no right way to do the wrong thing. We respect the environment in which we operate. This begins with complying with all legal requirements and internal regulations. We are committed to high standards and build trust through our behaviour.

Our communication and business relationships are based on appreciation and fairness. We approach different perceptions and opinions with genuine interest – this is a central part of our corporate culture.

Responsibility

Guiding principles for making the right decisions. All employees are responsible for complying with and implementing the Code of Conduct. Managers are expected to lead by example and to demonstrate the principles of the Code through their daily actions. They are also responsible for instructing employees in the proper application of the Code and monitoring compliance.

If questions arise regarding the interpretation of the Code of Conduct that cannot be resolved with common sense and reasonable ethical and moral judgement, designated contact persons are available to provide help and support in cases of doubt.

In the event of uncertainties or questions, each employee may contact their direct supervisor for advice and guidance. Additionally, the responsible Compliance Office can be contacted at compliance@molin.at. In disputes or questions of interpretation, the Compliance Office serves as the highest authority for the binding interpretation of the Code of Conduct.

Safety

No accidents, no health risks, no environmental damage – a mindful approach to one's own health and safety, as well as that of others, is fundamental. We are committed to preventing environmental harm and other negative impacts by actively avoiding risks and systematically identifying potential hazards.

We actively promote the assumption of responsibility and regularly implement safety measures for our employees that go beyond legal requirements.

Every employee shares responsibility for workplace safety and health protection in their area. Any potential hazards must be identified and eliminated immediately. Special responsibility lies with the relevant managers.

Each employee is expected to:

- Not perform any tasks for which they are not qualified
- Stop any work (including that of others) if it is unsafe
- Contribute to cleanliness and environmental protection
- Ensure that their ability to perform work is not impaired by alcohol, drugs, or any substances that affect awareness
- Report unsafe or unhealthy working conditions
- Report accidents, incidents, illnesses, or unsafe circumstances
- Familiarise themselves with the emergency plan for their workplace

Human Rights

Respect

We are committed to full compliance with the UN Charter, the European Human Rights Conventions, labor standards, environmental protection regulations, and anti-corruption principles. We recognize that every person is unique, valuable, and deserving of respect for their individual abilities – and we expect the same from all our business partners.

We respect and support the protection of international human rights within the scope of our possibilities and ensure that we do not contribute to human rights violations. We support freedom of assembly and the effective recognition of the right to collective bargaining. We are committed to eliminating all forms of forced labor and abolishing child labor.

Environment & Sustainability

We are aware that our activities leave a considerable ecological footprint, and therefore the careful and efficient use of resources is an essential part of our corporate philosophy. By complying with applicable regulations, continuously optimizing our processes, reducing consumption, and minimizing emissions, we aim to contribute to conscious and responsible sustainability.

For this reason, management has decided to establish an integrated environmental management system in accordance with ISO 14001, focusing on environmental protection and sustainability.

Furthermore, as a company, we take our responsibility for sustainable action in humanitarian, social, and environmental matters (CSR) seriously.



Employees

Our employees are the key to our success.

Team Spirit

We value the uniqueness that each individual brings. We achieve more when people with diverse backgrounds, skills, and ideas work together in an environment where everyone can participate and contribute their abilities without restriction.

Employees are expected to:

- Treat everyone with respect.
- Encourage active participation and listen to concerns.
- Respect cultural differences.

Fairness

We guarantee fair compensation above the legally required minimum wages and ensure an equitable structure of other remuneration components, as demonstrated by the long-term commitment of our employees.

Adherence to applicable national working time regulations and overtime rules is a matter of course for us. Ensuring required breaks and rest periods safeguards the safety and health of our employees.

Equal Opportunity

We treat all individuals fairly, respectfully, and with dignity. We do not tolerate discrimination based on age, gender, religion, national or ethnic origin, skin color, marital status, disability, culture, political opinion, sexual orientation, social background, or any similar characteristics protected by law. We also do not cooperate with companies that do not respect these principles.

Furthermore, we do not tolerate any form of insults, abuse, or harassment. This includes derogatory comments or inappropriate jokes, offensive, intimidating, or discriminatory actions, as well as any form of sexual harassment. Sexual harassment can take many forms, such as suggestive gestures or expressions, or obvious advances.

Please help us maintain a work environment free from any form of harassment.



Protection of personal data

The collection, storage, processing, and transmission of personal data are subject to strict legal requirements. We respect data protection laws and ensure through appropriate measures that the privacy and personal data of our employees and contractual partners are treated confidentially. We also ensure that the legitimate confidentiality interests of affected individuals and our business partners are not violated.

Protection of our assets

We are responsible for safeguarding MOLIN's assets. We handle company property responsibly and cost-efficiently; unjustified or unnecessary expenses must always be avoided. Company equipment must be treated carefully and used only for its intended purpose. All employees must ensure that company property is not accessible to unauthorized third parties and does not fall into their possession. Private use of company equipment is only permitted after consultation with management.

Protect our intellectual property and respect the intellectual property of others. Confidential information of any kind obtained in the course of professional duties may not be used for personal purposes or disclosed to third parties. Ensure that all company information is stored securely at all times to protect it from misuse (both internally and externally). This also applies to information received from our business partners.

Business Partners

We work with our business partners in an honest, respectful, and responsible manner.

Customers

We aim to offer our customers appropriate, efficient, reliable, and sustainable solutions within long-term business relationships—solutions that meet or exceed their requirements and expectations. Maintaining the trust our customers place in us is essential for our long-term success. We secure contracts exclusively on the basis of the quality and price of our products and services, and we provide our customers with complete and truthful information. We refrain from any form of undue influence or improper business initiation.

We protect our credibility by refusing any gifts, payments, invitations, or services that—under reasonable consideration—could influence business transactions, exceed normal business hospitality, or are prohibited by applicable law.

Suppliers

Suppliers and subcontractors are partners at eye level. Together, we work to deliver optimal solutions for our customers, and therefore we strive for long-term business relationships based on mutual respect, trust, and reliability.

Procurement processes are transparent and follow the principles of free competition. Suppliers who do not comply with our Code of Conduct are excluded from the awarding of contracts.

Competitors

We treat our competitors fairly and respectfully. MOLIN does not enter into agreements that restrict competition and does not engage in price-fixing or any other coordinated market behavior. In communication with competitors, we do not exchange confidential information that could impair competition.

Conflicts of Interest

All employees are required to avoid situations in which their personal or financial interests, or actions, conflict—or may conflict—with the interests of MOLIN. We avoid any situations that could give the impression that our objective business activities are influenced by private interests. At no time may business partners be favored for personal reasons.

Familiarize yourself with the various types of conflicts of interest:

- Secondary employment or affiliations with competitors, customers, or suppliers
- Cooperation with closely related persons
- Awarding contracts to companies in which closely related persons hold decision-making positions or have ownership interests (excluding publicly listed companies); All employees are required to disclose existing or potential conflicts of interest to their direct supervisor.

Laws and Regulations

Compliance with all legal provisions as well as internal and external regulations is an essential part of our corporate policy. Unlawful conduct not only contradicts our values but can permanently damage our reputation and standing in the public eye and may result in serious economic consequences.

Not only employees who violate the law may face individual prosecution—MOLIN itself can also be held criminally liable. Therefore, we tolerate no violations of the law. All employees are expected to comply with all applicable legal requirements wherever they operate. Employees are responsible for informing themselves about the legal regulations relevant to their area of responsibility and are personally accountable for adhering to these regulations.

Illegal Employment

All labor and social law requirements and standards must be complied with without exception—this applies to MOLIN as well as our suppliers and subcontractors. All employees are therefore required to observe and, within reason, verify compliance with labor and social law obligations by our suppliers and subcontractors. In justified cases, an assignment must not be awarded.

Competition

We are committed to a free market economy shaped by fair competition, as it ensures that the performance and quality of our products and services are recognized. We build trust through transparency and integrity; therefore, compliance with all applicable competition laws and regulations is of the highest priority.

Bribery / Acceptance of Gifts

All employees are prohibited from directly or indirectly offering or accepting advantages such as money or monetary benefits, gifts, invitations, unusual discounts, or similar benefits if such actions are intended to improperly influence business transactions—or could create the appearance of such influence.

The only exceptions are low-value gifts and hospitality consistent with normal business practices. Offering or accepting money or monetary benefits is strictly prohibited under all circumstances. Country-specific laws and practices must always be observed.

Corruption

Corruption and bribery are not only unethical and immoral; they also undermine the foundations of the rule of law and the principles of free and fair competition, thereby causing long-lasting harm to the interests of all economic participants. We do not tolerate any form of bribery or corruption and strongly condemn such behavior.

Money Laundering

All MOLIN employees are prohibited from violating anti-money-laundering regulations, and any suspicious activity must be reported to the Compliance Management. Money laundering refers in particular to the process of introducing funds or other assets derived from criminal activities into the legal financial and economic system.

Charitable Contributions and Sponsorship

As part of our social responsibility and corporate strategy, we support social, sporting, and cultural activities. Minor financial or material donations for charitable and non-profit purposes are permitted—provided prior approval has been obtained from management.

For all sponsorship activities, it must be ensured that no conflicts of interest arise. All charitable contributions and sponsorship activities must be documented and carried out transparently.



Violation

Responsibility

Compliance is mandatory for all employees. Every employee is responsible for ensuring that their own behavior—and that of all individuals reporting to them—fully complies with applicable laws, this Code of Conduct, and our corporate principles.

Reports and notifications from responsible and ethical employees are one of the most important ways to identify and address misconduct within the MOLIN Group.

Contact

All employees are required to promptly report any suspected or observed violations of legal provisions, the Code of Conduct, or internal rules and regulations to their supervisor or to Compliance Management at compliance@molin.at.

Confidentiality

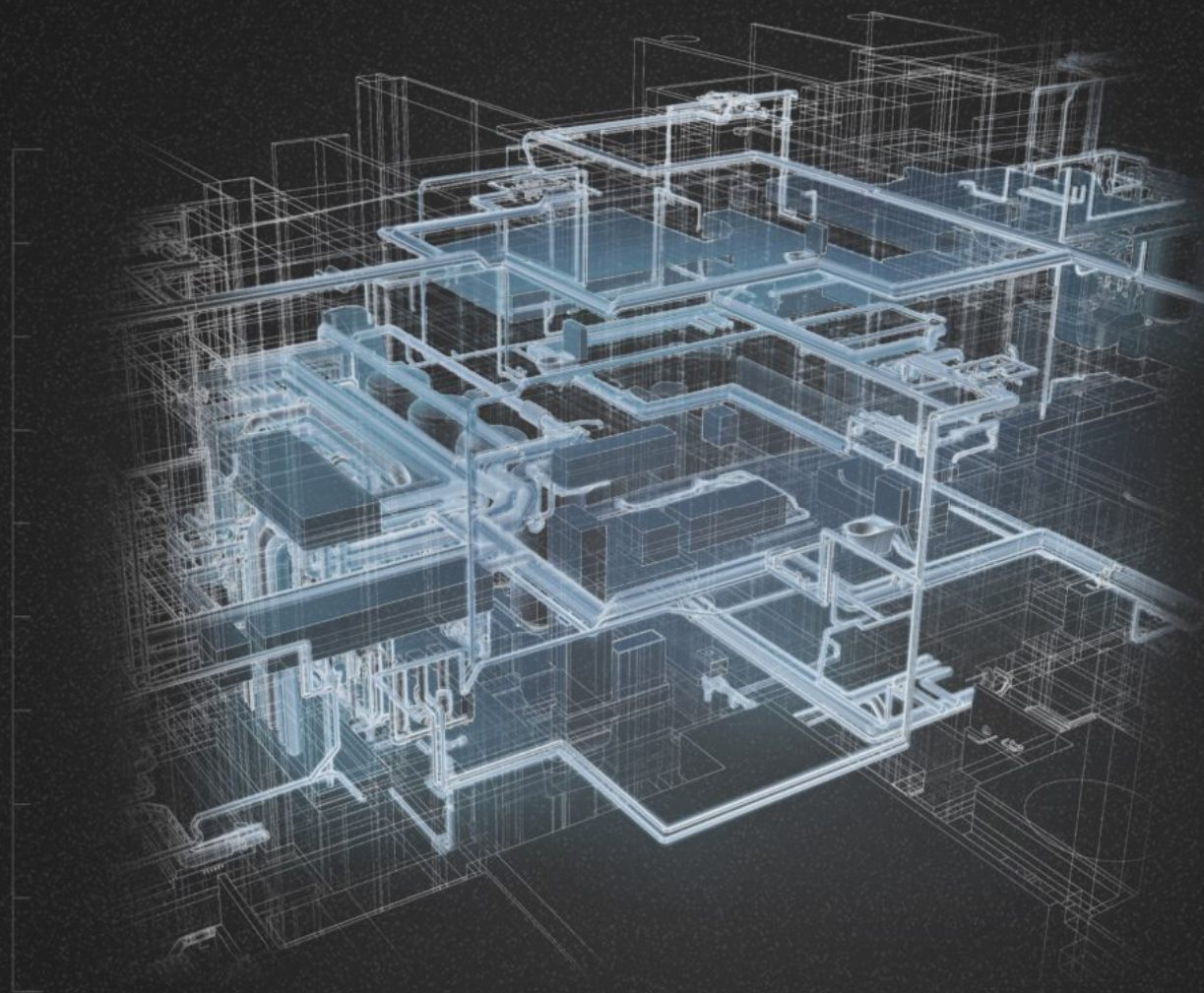
Any potential violations will be handled as confidentially as possible and investigated with great care. Employees who report proven or suspected violations of laws, the Code of Conduct, or other internal regulations will not face any negative consequences of any kind—provided the report does not concern their own misconduct.

Intentional misuse of reporting channels will not be tolerated and may result in disciplinary action.

Consequences

Violations of applicable laws and ethical principles can have far-reaching consequences for MOLIN. MOLIN tolerates no breaches of legal requirements or this Code of Conduct and will take disciplinary measures against any employee who violates them. In addition, the company reserves the right to pursue further criminal and civil legal action.

WE CREATE INNER VALUES



Imprint

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