



Code of Conduct of FELUWA Pumpen GmbH

Preamble

FELUWA Pumpen GmbH (hereinafter referred to as FELUWA) is specialized in the development, design, manufacturing and worldwide distribution of pumps for media containing solids or those that are critical in handling. FELUWA's hermetically sealed, oscillating positive displacement pumps are used wherever abrasive, aggressive, and toxic media need to be pumped.

We are aware of our shared responsibility for a fair, free, and sustainable society. As a result of this, we, the management, come together to anchor our fundamental beliefs and values in this Code of Conduct.

Preceding the following Code of Conduct, the management of FELUWA Pumpen GmbH wants to point out that many facts are mentioned only much abbreviated and based on a large number of applicable legal provisions in the German and international legal area.

The following are just a few examples for this in the form of a non-exhaustive list:

- The Civil Code (*Bürgerliches Gesetzbuch*)
- The Criminal Code (*Strafgesetzbuch*)
- The labour laws
- The Commercial Code (*Handelsgesetzbuch*)
- Environmental legislation

German law obligates us as the officially appointed managing directors of FELUWA Pumpen GmbH, in some cases including personal liability, to implement and enforce these requirements in the company by applying a suitable organisational structure and process organisation and to ensure their sustainable effectiveness. This is verified both by official audits and by other external auditing companies at regular intervals.

1. Introduction

This Code of Conduct defines the principles and requirements of FELUWA Pumpen GmbH and its subsidiaries regarding themselves, their suppliers, and their business partners in terms of their responsibility for people and the environment. It applies to management, executives, and the entire workforce. It is mandatory for everyone.

We expect that all persons and companies associated with us, business partners, suppliers, and joint ventures will act in compliance with the human rights and environmental obligations stated here. We expect that they will take action when any violations of human rights or environmental protection occur or if they may cause these or contribute to them.

This Code of Conduct is available in German and English. This way, our international companies and business partners can acquire the necessary understanding of our mission statement. The company manual drawn up at our headquarters in Mürtenbach, the work instructions, and the training courses on safety in the workplace will be understood by all employees and they must act accordingly. Where necessary our subsidiaries will produce documents in the English language that correspond to the documents in the parent company and include any required country-specific adaptations.

From the Eifel to the world - Our pumps developed and produced in Germany ensure safe, efficient, and environmentally friendly transport worldwide. Our vision and mission provide the guiding principles for the actions of our employees. The certified quality management system emphasises our quality standards and guarantees a consistently high level of development and production. The

MULTISAFE® double hose-diaphragm pumps transport, dispense, and feed aggressive and abrasive liquids and slurries twice as safely. Customised material selection permits their use in all industrial and municipal areas.

FELUWA's principles are based on the idea of "comprehensive quality". This applies to the entire company and aims at achieving highest customer satisfaction at a reasonable cost by continuously improving products, services, and company-specific processes. Consistent focus on the essentials and the technical excellence of our products guarantees extreme durability and best operating quality while simultaneously reducing life cycle costs.

We comply with our social obligations by consistently protecting our environment, making careful use of natural resources, working to secure our skilled jobs, and maintaining an appropriate presence in public life.

We periodically review our entire range of services to ensure compliance with legal requirements, environmental aspects, regulations, and the expectations of interested parties.

2. Phrasing of purpose and scope of application

Our code of conduct sets out our minimum standards in terms of general business principles, integrity, and ethics, labour and social standards, environmental protection, and the responsible use of natural resources. Our Code of Conduct clearly states our position on diversity, equal treatment, and discrimination.

FELUWA's managers are role models for all employees where compliance with laws and regulations is concerned. They clearly demonstrate their stance on diversity, equal treatment, and discrimination. They are the point of contact and link between the individual areas of FELUWA. Questions and concerns are addressed openly by both parties at all times.

3. Our clear position

The following subjects are anchored in our code of conduct. In this context, we state as follows:

Focus on legal compliance

- We commit to strictly complying with the laws and legal regulations that affect us as applicable from time to time.
- We maintain a zero-tolerance principle regarding any crimes or administrative offences committed by our employees while acting in misunderstood corporate interest.
 - Data protection
 - Personal data in accordance with the General Data Protection Regulation (GDPR) are effectively protected and only used for legitimate purposes. They are always processed confidentially and responsibly, and everyone's privacy is respected and guaranteed at all times.
 - We protect everyone's confidential information and intellectual property.
 - Accounting and business documentation
 - We ensure that we fulfil all international requirements for transparent and proper accounting through our internal control systems, the associated documentation and compliance with the statutory retention periods.

- Export control
 - We always comply with applicable foreign trade laws and provisions. We ensure that we have processes and controls in place to ensure compliance with applicable economic sanctions and export controls.
 - As a responsible company, we always comply with all relevant tax and customs regulations anywhere in the world, complying with all declaration and reporting obligations diligently and on time.
 - FELUWA continually observes embargoes and sanction restrictions and handles accordingly.
- No money laundering
 - A risk management system has been implemented as a precautionary measure within the scope of the self-monitoring process and in order to deal with the issue in a forward-looking, preventative manner. This risk management comprises risk analysis and the resulting internal security measures.

Working conditions at the highest level as a prerequisite for successful work

- We understand equal opportunities and fairness as meaning that every person employed by FELUWA is deployed according to their skills, qualifications, performance, and experience. Everyone will receive the same opportunities to for development on personal and skill-related levels. Ensuring this equality of opportunity irrespective of skin colour, nationality, social background, disability, sexual orientation, political or religious beliefs, gender, or age, is deeply rooted at FELUWA. It is also one of the most important pillars on which we have built our actions and activities at management level. As a result of this, all employees are sensitised to the need for impeccable behaviour and respectful interaction at all times.
- Personal dignity, privacy, and personal rights of each individual must always be honoured and respected.
- We at FELUWA work hand in hand, with mutual respect, and with the necessary appreciation for each other among our employees.
- We do not permit any questions about faith, ethnic origin, sexual orientation, or gender identity in our recruitment process since we at FELUWA consider this to be an infringement of personal rights. It is also forbidden under current German law.
- No one will work against their will or be forced to work at FELUWA.
- Unacceptable treatment of employees, such as psychological or physical hardship, sexual and personal harassment, or discrimination, will not be tolerated at any time. Similarly, behaviour that is sexually coercive, threatening, abusive, or exploitative (including gestures, language, and physical contact) is never tolerated.

Any suspicion or indication of possible misconduct will be taken extremely seriously, and appropriate steps will be initiated without undue delay. Employees are afforded an opportunity to report information or specific cases anonymously at any time. Anonymity of the reporting person will be preserved under all circumstances. Furthermore, no disadvantages will arise for the reporting person. The management and executives can be held responsible for actions performed by persons employed under them.
- FELUWA offers flexible part-time working arrangements, flexible working hours, the option of taking time off in lieu for overtime worked, and mobile work wherever possible. The individual divisions will be responsible for allocating their respective working hours. We also support our employees in caring for relatives and parental leave within the legal framework. We want to

offer flexible and customised solutions for every employee and to implement these quickly and unbureaucratically.

- We guarantee the statutory national minimum wage at all times. All applicable legal provisions für cross-border staff assignments are complied with at all times, in particular regarding the minimum wage and working hours. The maximum working hours stipulated by law in the respective country are observed by all employees.

Commitment to compliance with ethical principles for fair working conditions and social standards

- Respect for human rights is a fundamental principle for all employees at FELUWA. We respect the privacy and personal rights of every single individual. The management, the department heads, as well as every individual employee, will always observe compliance within the company, also by all business partners.
- Vulnerable groups require our special attention and special protection. These groups include, among other people: Women, children, refugees, indigenous peoples, young employees, people with physical or mental disabilities, older people, LGBTQIA+, and other minority groups.
- Child labour, any form of slavery, or human trafficking will not be tolerated at FELUWA under any circumstances. We will also review any adverse effects on the human rights of others with regard to decisions that we make in our company. We expect that all business partners, suppliers, and other persons and companies associated with us show this respect.
- Staff must only be employed if their age can be proven to be at least 15 years based on official documents. FELUWA complies with the applicable Basic Law of the Federal Republic of Germany, the Federal Child Protection Act (*Bundeskinderschutzgesetz*; BMFSFJ) of the Federal Republic of Germany and the applicable Youth Protection Act (*Jugendschutzgesetz*; JuSchuG) of the Federal Republic of Germany.

Focus on employee health and safety

- We act in accordance with the applicable legal standards relating to health and safety in the workplace. We assume responsibility towards our employees in this context.
- We minimise the risks as far as possible and ensure the best possible precautionary measures against accidents and occupational illnesses.
- New employees will be trained and introduced to their positions by the managers or by a person designated as a competent employee by them. Instruction in occupational safety will be given at the start of every induction programme.
- All employees will be offered training as well as internal and external courses. This will ensure that all employees are informed about occupational safety. Training needs will be determined based on discussions with employees, department heads or the quality management officer/environmental management officer.
- Operating instructions that instruct users of equipment, work processes, or substances on correct performance of tasks will be displayed in the production areas of FELUWA. Such operating instructions are subject to continuous updates and will be managed by the occupational safety committee team.
- The health and occupational safety of each individual employee takes top priority at all times. It is subject to continuous monitoring and checks by safety officers, occupational safety specialists, radiation protection officers, laser protection officers, hazardous substances officers, load securing officers, and the company doctor.

- Filter systems are installed in all necessary areas of production specifically to reduce dust and particulate matter. This significantly reduces the impact on employees and the environment.
- Noise and occupational health and safety will be assessed within the scope of the 4 fixed regular meetings in the business year, at which the management meets with the Occupational Safety Committee (ASA), relevant officers, and responsible persons. The authorised representatives include the occupational safety specialist, the authorised person for occupational safety, the company doctor, and the persons representing the management. The regular audits and their results are discussed at these meetings. Any improvements will then be implemented speedily based on these results.

FELUWA complies with the Maternity Protection Act (*Mutterschutzgesetz*; MuSchuG) of the Federal Republic of Germany at all times as a matter of course.

Ecological responsibility for a healthy environment

- Climate change is one of the greatest challenges of our time. It demands swift action from everyone.
- Located in the state-recognised resort of Mürlenbach, with 80% forest in the middle of the Volcanic Eifel, we have set ourselves the goal of producing in the most environmentally friendly way possible. This also includes the fact that we have already converted all of our exterior and interior lighting to energy-saving LED lighting since 2020.
- A photovoltaic system was installed in 2019, with an additional expansion added in 2023 (doubling of the system size). Our own consumption rate was at 90% on average. This saves 180,000 kWh per year.
- The access road to our company premises is a 30 km/h zone. This minimises air and noise pollution for residents. Employees are made aware that they need to comply with the speed limit in fixed regular meetings.
- Our principles, environmental aspects, objectives, and measures are publicised within FELUWA by way of a communication pyramid and reinforced in training courses, audits, and discussions. Enquiries or comments from interested external parties will be answered by the quality management officer/environmental management officer or the management and channelled into the relevant processes.
- Environmental protection regarding legal norms and standards must be observed and complied with by every employee at all times. Environmental pollution must be minimised and environmental protection continuously improved.
- We have been successfully applying the environmental management system in accordance with ISO 14001:2015 since 2015.
- The product is designed to conserve resources and the materials used are selected in such a way that they can be easily recycled.
- FELUWA products are designed so that no media can enter the environment during operation when used as intended.
- Our products are characterised by being designed for a service life of at least 30 years. We continue to be able to supply spare parts of all kinds even for pumps that are more than three decades old.
- We do not use any persistent pollutants in the production process.
- We collect the water used for test operation of our pumps in collecting tanks to permit recycling of this important resource. The water in the collection tanks is checked at intervals to ensure that the new MULTISAFE® double hose-diaphragm pumps are not damaged by any contamination during the test run.

- Where procurement is concerned, we ensure that we will source as many resources as possible from the immediate vicinity in order to keep delivery routes short and thus protect the environment.
- Transport routes are chosen by our dispatch department to make our products reach our customers by the shortest and quickest route possible.
- The procurement of hazardous substances is minimised at FELUWA and monitored continuously by the environmental management officer. We keep safety data sheets for all hazardous substances in an audit-proof manner.
- We always check which hazardous substances require operating instructions to be written and posted in accordance with §14 of the Hazardous Substances Ordinance (*Gefahrstoffverordnung*) when storing chemicals. They will be handed out accordingly so that all employees are informed.
- All waste that arises during production, e.g., steel chips, is disposed of by certified disposal companies and thus added to the recycling cycle.
- Used oils can be disposed of via certified disposal companies; this is the responsibility of the pump user. Only standardised gear and hydraulic oils are used to ensure easy disposal and possible regeneration of the oils.
- Our product comprises 98% components that can be fully recycled (e.g., steel, cables, etc.).
- Discharged toner cartridges and ink cartridges are collected in a collection box provided by a recycling company, which recycles them professionally after collection.
- Introduction of a document management system has further significantly reduced the amount of toner/ink cartridges and printer paper used.
- We use a heat pump installed in 2009 to heat the entire office building.
- 11% of our site of nearly 13 hectares is built on. The remainder includes 49% forest, 35% meadow, and 5% for our biosphere pond. We provide habitats for a wide variety of amphibians, insects, fish, wild birds, and forest animals on the undeveloped part of our property. For example, a catch basin has been installed specifically to collect rainwater that is then channelled into our 3,000 m² biosphere pond. That pond, located right next to a large wooded area, is the home of a range of species of fish, amphibians, insects, and wild birds. We avoid disturbing the animals of the forest as well, allowing them to benefit from this unique landscape.

Supply chain excellence and cooperation partners

- We expect not only the highest standards but also professional behaviour and integrity from our suppliers in every part of the supply chain. Our human rights and environmental commitments always must be complied with. Adequate corrective measures are initiated without undue delay if any misconduct is identified. All suppliers are made aware of the need to pay constant attention to the health and safety of employees. Appropriate wages and working hours must be ensured. The relevant national regulations must be complied with at all times.
- The principles of non-discrimination must be observed when selecting suppliers and when dealing with suppliers as a matter of course.
- We make sure to place orders with regional suppliers in order to minimise the environmental impact of short transport routes whenever possible.
- We expect that our suppliers obtain all necessary authorisations, approvals, and registrations for FELUWA products. Furthermore, we expect that they minimise possible emissions, water consumption, and waste. Waste must be treated accordingly for recycling or disposal.

- Production must be performed sustainably in accordance with ecological principles. Energy consumption must be kept as resource-efficient as possible.
- All laws regarding import and export of goods, services, and information must be observed and complied with at all times.
- Legal regulations relating to the prevention and combating of money laundering must be complied with at all times.
- Confidential treatment of our business, financial and technical data, and business correspondence from and with FELUWA is expected of all suppliers at all times.
- If FELUWA comes to the conclusion that a supplier has failed to meet its obligations, it may terminate any and all contracts.

Joint action against corruption, bribery, and fraud

- We do not tolerate or engage in any form of corruption, bribery, or fraud, including any unlawful offers of payment or similar inducements to influence decision-making. The management is responsible for ensuring compliance with the legal provisions. Further internal precautions have also been taken to take preventive action against corruption. The conditions and tests for this are set out in individual items. The resulting tasks and measures are passed on to employees by way of delegation in the relevant areas of the company.
- Any gifts (material gifts, immaterial gifts, or vouchers) received by an employee must be reported to the line manager without undue delay and stored in a suitable, lockable room. The gifts in question (except for perishable goods) are offered to employees (e.g., through a raffle) once a year. Employees also must only attend any business meals if the following conditions are met: the meal is commercially appropriate, there is a business occasion, the value and nature of the invitation are proportionate to the position, a gross amount of EUR 100 per person is not exceeded, it does not influence business, it is not sent to a private address and the superior has been informed.
- Any attempts that have the appearance of bribery must be reported to the management without undue delay. This means that the business relationship must be reassessed, and the authorities must be informed if necessary. All attempts will be documented and filed in our document archive. This way, we will be able to take preventive action against repeat attempts.
- All employees will receive information on this subject from the management in accordance with our regulations as part of the weekly meeting once a year. The management will inform all employees of any important changes or acute cases without undue delay.

Rules regarding fair competition

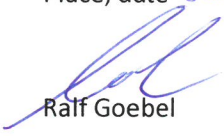
- All employees must comply with the applicable competition and antitrust laws at all times. We always ensure fair and uniform competition. In this context, we will prevent all unauthorised restrictions on competition. Equally, no agreements between competitors that would impair competition must be made.
- The corresponding risks must always be considered when communicating with competitors or cooperating with other companies and when participating in trade fairs or association meetings.

4. Adoption of the Code of Conduct

This Code of Conduct is subject to the applicable national law for FELUWA Pumpen GmbH and its subsidiaries.

The management of FELUWA Pumpen GmbH has adopted or updated this Code of Conduct as of this date. This Code of Conduct will enter into effect on this date, to complement any other applicable standards and policies regarding human rights and environmental commitments. Claims or rights of third parties cannot be derived from this Code of Conduct.

Place, date Hürtenbach, 03. August 2023



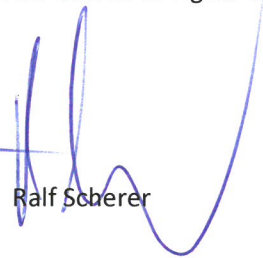
Ralf Goebel



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