

CORPORATE POLICY.

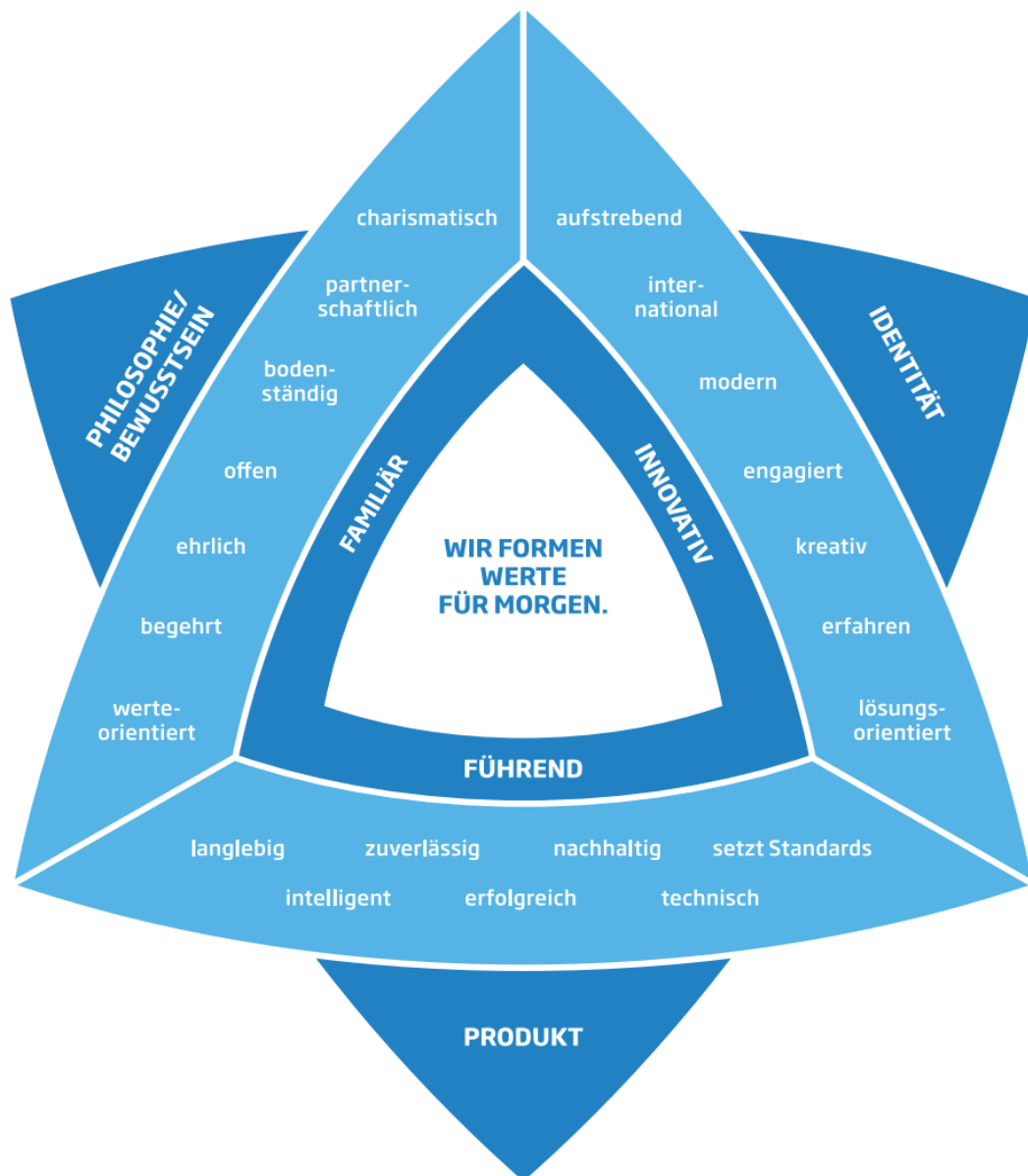
Klimmer Group.

- Ernst Klimmer GmbH, Stanz- und Umformtechnik
Ostpreußenstraße 8, 89331 Burgau
- BSB Metallverformung GmbH + Co. Stanzwerk
Siemensstraße 8, 89331 Burgau
- BWB Behälter-Werk Burgau GmbH + Co.KG
Siemensstraße 8, 89331 Burgau
- HMT-Häseler Metall Technik GmbH
Industriestraße 5, 78112 St. Georgen

Family-oriented, innovative and leading.

Since our foundation in 1969, we have been successful in forming and welding technology. We are masters in the development of the most complex tools and the most modern production processes. With passion, precision and constant innovation, we will continue to develop perfect solutions for our customers.

The following circle of values shows the corporate values of the Klimmer Group. The values depicted in the circle apply in all areas. The values of family-oriented, innovative and leading are of particular importance and take precedence over the others.



Our vision: We want to become the world's leading provider of high-tech solutions in the fields of stamping and forming technology, welding technology and technical cleanliness. Working together as a strong team is the basis for our efficient further development in a global market. Leading and innovative, yet familiar and down-to-earth – **the mission** of the Klimmer Group is part of a corporate philosophy that transcends product and market cycles, technological innovations and management methods.

We want to be a reliable partner for our customers in the long term. To ensure this, we strive for long-term and stable growth. We achieve this through innovation, customer focus, versatility and sustainable action.

This corporate policy and our compliance guidelines are intended to serve as our ethical and legal compass. They contain the basic rules governing our conduct within the Klimmer Group companies and towards our business partners and the public.

With the help of our integrated management system (IMS), we are continuously improving. We continuously improve our environmental performance, avoid environmental pollution and optimise the energy efficiency of our facilities. When procuring and designing facilities, products and services, we ensure that they contribute to improving our energy-related performance. We are committed to the European Union's climate targets. We want to do our part to reduce greenhouse gas emissions as much as possible.

We achieve all this through a high level of competence, awareness and personal responsibility among our employees and managers, which we actively strengthen on an ongoing basis. They shape the issues of quality, energy, the environment and sustainability through their personal behaviour. All products, processes and procedures are assessed in terms of 'quality', 'environment', 'energy consumption' and 'occupational safety' in the planning environment and at the workplace.

We identify quality, energy and environmental aspects within the company and derive appropriate targets from them. This enables us to ensure continuous improvement in the areas of quality, environment and energy-related performance. The company management provides the necessary resources to achieve these targets. When procuring products, services and equipment, we always strive to improve energy efficiency.

We are also committed to informing our suppliers, service providers and temporary workers at our site about our quality, energy and environmental policy and involving them in our quality, energy and environmental management.

The relevant elements of DIN EN ISO 14001 and DIN EN ISO 50001 apply to all areas, products and services of our companies. In addition, IATF 16949 applies to HMT and Ernst Klimmer GmbH, and ISO 22163 (IRIS) applies to BSB and BWB.

Quality policy.

Our own high quality standards and the expectations of our customers, authorities and society regarding our products and services are an essential part of our corporate principles. With the help of our integrated management system (IMS), we continuously improve our quality performance. We identify the quality aspects in the companies and derive corresponding goals from them. Error prevention (zero-error strategy) and the safety aspects of our products are also a focus for us.

The relevant elements of IATF 16949 apply to all areas, products and services of HMT and Ernst Klimmer GmbH; ISO 22163 (IRIS) applies to BSB and BWB.

Occupational safety and health.

Our overriding goal is to prevent health risks and maintain the long-term health of our employees. Only satisfied and healthy employees can reach their full potential and thus contribute to the success of the company. The companies of the Klimmer Group are committed to creating safe and healthy working conditions. With the help of our integrated management system, we pursue a preventive approach in our occupational health and safety policy and assess the potential hazards of workplaces and processes at an early stage. We carry out risk analyses and eliminate any faults that are identified.

Our employees are involved in the further development of our processes. We comply with national standards and laws and emphasise the obligation of managers to act responsibly.

Safety risks and near misses must be reported to management and are dealt with during regular meetings in the technical and administrative departments. We record information about accidents at work and risks in our monthly accident documentation. We inform new employees about safety-related aspects in an initial briefing.

All our employees bear personal responsibility for health and safety at work by carrying out their work in a safety-conscious manner and [using the personal protective equipment provided](#). Safety risks and near misses must be reported to management and are dealt with during regular meetings in the technical and administrative departments. We record information about accidents at work and risks in our monthly accident documentation. We inform new employees about safety-related aspects of their workplace in an initial briefing. After that, mandatory safety briefings are held regularly.

The occupational safety and health policy area is divided into occupational safety, occupational medicine, workplace health promotion, integration management, ergonomics and social counselling. We therefore not only offer our employees occupational health consultations and preventive services, but also advise and support managers and employees who are experiencing change, conflict or crisis in their professional or private lives.

Our managers and supervisors serve as role models. They exemplify occupational safety and health protection and ensure compliance with our guidelines.

We are also committed to involving our suppliers, service providers and temporary workers at our sites in our occupational safety and health policy.

Contractors.

Suppliers must adequately manage the health and safety of their employees as part of our companies' extended supply chain. Suppliers must coordinate their procurement processes in order to identify hazards and assess and control risks. Further details are described in our SUPPLIER CODE OF CONDUCT.

Security personnel.

We undertake not to engage or use private or public security forces if there is a risk that the prohibition of torture and cruel, inhuman or degrading treatment will be disregarded, physical integrity or life will be harmed, or freedom of association and coalition will be impaired.

Fire safety.

Employees are obliged to comply with the company's fire safety regulations.

Employees are regularly informed and trained on the relevant fire safety regulations. Fire safety assistants are familiarised with firefighting procedures in an emergency through instruction and drills. Particular attention should be paid to the process description 'Emergency plan for fire and natural hazards.' The company's fire safety regulations and fire safety organisation are continuously being developed.

Environment.

The companies of the Klimmer Group are committed to actively protecting animals and the environment. Compliance with all legally binding obligations is a matter of course for us. We are committed to the climate targets of the European Union and support the 2015 Paris Climate Agreement. We improve resource efficiency and reduce our waste and greenhouse gas emissions as much as possible.

We also expect our suppliers and service providers to demonstrate this ecological responsibility. Suppliers are required to implement and demonstrate a certified management system (e.g. DIN EN ISO 14001; DIN EN ISO 50001) in order to comply with the requirements and regulations listed in the SUPPLIER CODE OF CONDUCT.

Treatment and discharge of industrial wastewater.

Wastewater from operational processes, manufacturing processes and sanitary facilities is monitored, checked and, if necessary, treated before discharge or disposal. In addition, measures are introduced to reduce the generation of wastewater.

Handling of emissions.

General emissions from operational processes (air and noise emissions) are monitored, checked and, if necessary, treated before they are released. Greenhouse gas emissions are recorded and reduced in accordance with EU and German climate protection legislation.

Handling waste and hazardous substances.

The Klimmer Group follows a systematic approach to identifying, handling, reducing and responsibly disposing of or recycling waste. Chemicals or other materials that pose a hazard when released into the environment are identified and handled in such a way as to ensure safety and protect the environment during handling, transport, storage, use, recycling or reuse, and disposal. Mercury, mercury compounds and mercury waste are treated in accordance with the prohibitions of the Minamata Convention on Mercury of 10 October 2013 (Federal Law Gazette 2017 II, pp. 610, 611) (Minamata Convention) in its currently valid version. The ban on the production and use of persistent organic pollutants, as well as the ban on the environmentally unsound handling, collection, storage and disposal of waste in accordance with the provisions of the Stockholm Convention of 23 May 2001 on Persistent Organic Pollutants (Federal Law Gazette 2002 II, p. 803, 804) (POPs Convention) in its currently valid version shall be observed. The prohibitions on the import and export of hazardous and other waste in the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of 22 March 1989 (Federal Law Gazette 1994 II, pp. 2703, 2704) (Basel Convention), as amended, shall be observed.

The prohibitions on the import and export of hazardous and other waste in the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of 22 March 1989 (Federal Law Gazette 1994 II, p. 2703, 2704) (Basel Convention), as amended, shall be observed.

Sustainability.

For the companies of the Klimmer Group, sustainability is an important factor for long-term success. We therefore also expect our partners at home and abroad to act sustainably.

Natural resources.

We protect natural resources and prevent harmful soil changes, water and air pollution, harmful noise emissions and excessive water consumption. We want to reduce our contribution to global deforestation and promote the rights of people and indigenous peoples.

Consumption of raw materials and natural resources.

The use and consumption of resources (raw materials, water, energy) during production, as well as the generation of waste of any kind, are continuously reduced or, where possible, avoided within the framework of our management systems. This is done either directly at the point of origin or through procedures and measures such as changing production and maintenance processes or company procedures, using alternative materials, saving resources, recycling or reusing materials.

Dealing with energy consumption/efficiency.

Our energy consumption is monitored and documented. Cost-effective solutions are continuously developed to improve the energy efficiency of our processes and minimise overall energy consumption.

Dealing with conflict minerals.

For the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt, the company is establishing processes in accordance with the guidelines of the Organisation for Economic Cooperation and Development (OECD) for fulfilling its duty of care to promote responsible supply chains for minerals from conflict and high-risk areas, and expects the same from its suppliers. Smelters and refineries without appropriate, audited due diligence processes should be avoided.

Renewable energies.

We promote the use of renewable energies and are continuously expanding our own generation of renewable energies (e.g. photovoltaics) in our companies.

Social responsibility.

The companies of the Klimmer Group stand for responsible, lawful and ethically sound conduct. We place high demands on both our employees and our business partners. We expect all national and international laws, standards and official instructions to be observed.

Exclusion of forced labour.

No forced labour, slave labour or similar forms of labour may be used. All work must be voluntary and employees must be able to terminate their work or employment relationship at any time. Furthermore, there must be no unacceptable treatment of workers, such as psychological hardship, sexual harassment or personal harassment.

Prohibition of child labour.

Child labour must not be used at any stage of production. Suppliers are required to comply with the recommendation in the ILO conventions on the minimum age for employment of children. According to this, the age must not be lower than the age at which compulsory schooling ends, and in any case not below 15 years. If children are found working, the supplier must document the measures to be taken to remedy the situation and enable the children to attend school. The rights of young workers must be protected and special protective regulations must be observed.

Fair remuneration.

Remuneration for regular working hours and overtime must be in line with the national statutory minimum wage or the minimum standards customary in the industry, whichever is higher. Employees must be granted all benefits required by law. Wage deductions as punitive measures are not permitted. The supplier must ensure that employees receive detailed and regular written information about the composition of their remuneration.

Fair working hours.

Working hours must comply with applicable laws or industry standards. Overtime is only permitted if it is performed on a voluntary basis.

Freedom of association and freedom of collective bargaining.

The right of employees to freely form or join trade unions must be respected. The establishment of, joining and membership in a trade union must not be used as grounds for unjustified discrimination or retaliation. The right of trade unions to operate freely and in accordance with the law of the place of employment must also be respected; this includes the right to strike and the right to collective bargaining.

Prohibition of discrimination.

Discrimination or unequal treatment of employees in any form is prohibited unless justified by the requirements of the job. This applies, for example, to discrimination based on national and ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or belief. Unequal treatment includes, in particular, unequal pay for work of equal value. The personal dignity, privacy and personal rights of each individual are respected.

Equal opportunities (m/f/d).

The companies of the Klimmer Group stand for equal opportunities in employment and are committed to paying equal pay for equal work.

Financial responsibility.

Suppliers should conduct their business in a transparent manner and accurately reflect it in the company's financial reports and records. Suppliers should confirm that an appropriate control system for financial reporting is in place.

Ethical business conduct.

The companies of the Klimmer Group stand for responsible, lawful and ethically sound conduct. We place high demands on both our employees and our business partners. We expect all national and international laws, standards and official instructions to be observed.

Fair competition.

The standards of fair business practices, fair advertising and fair competition must be observed. In addition, applicable antitrust laws must be applied, which prohibit agreements and other activities that influence prices or conditions when dealing with competitors.

Confidentiality/data protection.

We are committed to meeting the reasonable expectations of our clients, suppliers, customers, consumers and employees with regard to the protection of private information. When collecting, storing, processing, transmitting and disclosing personal information, we must comply with data protection and information security laws and regulations.

Intellectual property.

Intellectual property rights must be respected. Technology and know-how must be transferred in such a way that intellectual property rights and customer information are protected.

Integrity/bribery, accepting advantages.

All business activities must be based on the highest standards of integrity. We pursue a zero-tolerance policy towards all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing standards must be applied to ensure compliance with anti-corruption laws.

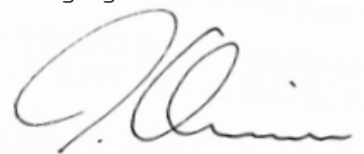
Conflicts of interest.

Personal relationships or interests of employees must not influence business activities at the Klimmer Group. Actual conflicts of interest, as well as the appearance of a conflict of interest, must therefore be avoided. All employees are required to report actual or potential conflicts of interest in order to avoid possible consequences under labour law or criminal law for themselves and disadvantages for the company.

Complaint mechanisms.

We have established effective complaint mechanisms in the respective companies. The procedure is described in the process description 'Suggestion box (ethics escalation policy)'. Employees who lodge a complaint about violations of regulations or laws may not be subject to disciplinary measures of any kind.

Torsten Klimmer
Managing Shareholder



Ernst Klimmer GmbH
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