



Code of Conduct of the mk Technology Group



Foreword	3
Corporate Responsibility	4
Law-abiding behaviour	
Responsibility for the reputation of the mk Technology Group	
Honesty and integrity	
Governance, responsibility and oversight	
Social Responsibility	5
Physical and mental integrity	
Human rights and working conditions	
Child labour and forced labour	
Working hours and remuneration	
Anti-discrimination, inclusion and diversity	
Equality/women's rights	
Rights of minorities and indigenous peoples	
Freedom of assembly	
Occupational health and safety	
Use of private or public security services	
Land, forest and water rights and eviction	
Environmental Responsibility	8
Greenhouse gas emissions	
Water and air quality	
Energy efficiency	
Biodiversity, land use and deforestation	
Decarbonisation	
Soil quality	
Sustainable resource management	
Waste prevention, reuse and recycling	
Hazardous materials	
Product safety	
Ethical Responsibility	10
Fair competition/antitrust	
Protection of intellectual property	
Plagiarism	
Whistleblowing/protection against repression	
Data protection	
Information security	
Confidentiality	
Records and reports	
Export controls and economic sanctions	
Money laundering/trade control	
Anti-corruption	
Procurement of raw materials	
Anti-terror	
Conflicts of interest	
Implementation and Control	13
Complaints and tip-offs	
Implementation and control	

Since we were founded in 1966, we have been guided by our motto of “passion for technology”. We are driven by the idea of continuously improving our services, products and processes, and making the benefits to our customers and our own growth sustainable and resource-conserving in doing so.

We are characterised by our decades of experience in the field of factory automation, the continuous development and further development of our products, our problem-solving capabilities for practically every sector, our team of experts and last but not least by our respectful and cooperative collaboration with our customers, business partners and employees.

This Code of Conduct serves not only as a guide and reference in this regard but as a binding set of rules for all our employees, including our managers and executives. It is intended to assist us with the ethical and legal challenges we face in our day-to-day work and to help us act responsibly, appropriately and in accordance with the law. It forms our basic common understanding of how we want to work together and achieve success on the market on the basis of applicable law and international standards. Every single one of us helps to breathe life into the positive social image of the mk Technology Group every day.

Any employee can contact their manager at any time with questions and suggestions relating to the Code of Conduct.



Sascha Krebs
Managing Director

Law-abiding behaviour

Every employee must comply with all applicable law and regulations. Violations of the law must be avoided under all circumstances, particularly violations that are punishable by imprisonment, penalties or fines. In the event of such violations, every employee must face disciplinary consequences if they breach their obligations under their employment contract, irrespective of the sanctions provided for by law.

Responsibility for the reputation of the mk Technology Group

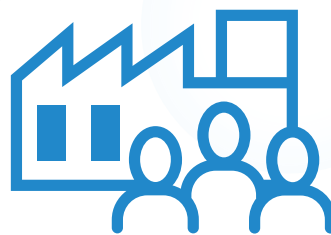
Every single employee shapes the reputation of the mk Technology Group through his or her appearance and behaviour. In public, we are required to represent mk in a dignified manner on the basis of the principles set out in this code of conduct. In all respects, all employees must fulfil their duties on the basis of this principle.

Honesty and integrity

We are reliable partners and only make commitments that we can honour. These principles apply both to internal collaboration and to our conduct with regard to external partners.

Governance, responsibility and oversight

Managers are responsible for the employees entrusted to them, who are expected to gain recognition through their exemplary personal behaviour, performance, reliability and social competence. Clear, ambitious and realistic goals are set, and employees are managed based on trust and given as much personal responsibility and freedom to act as possible. Managers or the human resources department are also available to address any professional and personal concerns that employees may have. Managers have organisational and supervisory duties to fulfil and are responsible for ensuring that no breaches of the law occur in their applicable area of responsibility that could have been prevented or made more difficult through appropriate supervision. Managers retain ultimate responsibility even when delegating individual duties.



Complying with laws is a self-evident necessity for our company.

As the mk Technology Group, we are committed to upholding all the fundamental rights that apply to all employees in accordance with the applicable national and international law (ISO 9001, in conformity with SA8000). Furthermore, we declare that we will comply with the Universal Declaration of Human Rights of the United Nations, the industry standards and all other relevant statutory provisions.

Physical and mental integrity

As the mk Technology Group, we are committed to protecting our employees from all forms of improper physical or verbal abuse (such as bullying, harassment, discrimination, exploitation in any respect, coercion or potentially threatening or abusive gestures and behaviours).

Human rights and working conditions

Complying with laws is a self-evident necessity for our company. As the mk Technology Group, we are committed to upholding all the fundamental rights that apply to all employees in accordance with the applicable national and international law (ISO 9001, in conformity with SA8000). Furthermore, we follow, protect and promote the applicable worldwide provisions for protecting human rights, as set out in particular in the United Nations (UN) Universal Declaration of Human Rights, as fundamental and universal.

Child labour and forced labour

The mk Technology Group categorically rejects all forms of child labour and forced labour, as well as any other forms of compulsory labour in the company, suppliers and business partners. Should child labour, forced labour or any violation of human rights be identified, or if there is any evidence of such, the relevant manager/supervisor must be informed immediately and all the actions required to prevent any such violation must be taken immediately. All work is performed by choice and all employees can terminate their employment relationship with a reasonable notice period.



Working hours and remuneration

Our terms of employment are fair. We pay fair salaries and take the needs of our employees into account in our company actions. We always comply with the applicable labour law and the legal regulations on the minimum wage and working hours.

Anti-discrimination, inclusion and diversity

As the mk Technology Group, we are committed to promoting a respectful and open working environment and maintaining responsible dealings with all the people we employ. There is no place for discriminatory behaviour, harassment or other improper conduct towards employees or applicants on the basis of gender, age, ethnic origin, nationality, political or religious beliefs, social background, physical or mental disability, sexual orientation or any other characteristic protected by applicable law.

We do not tolerate any circumstances in which our employees access or share information that incites racial hatred, glorification of violence or other crimes, or that contains content that is sexually offensive in the specific cultural context. It is important to us to create an inclusive and supportive working environment by taking diversity into account in the selection of our employees.

Equality/women's rights

At mk, we uphold the equal rights of all employees in accordance with article 3, paragraph 2 of the Basic Law for the Federal Republic of Germany. We see the equality of all employees as a self-evident necessity. We have the same appreciation for all our employees, regardless of their gender. Opportunities for advancement and development are not measured by gender, but by personal suitability and performance alone.

Rights of minorities and indigenous peoples

As the mk Technology Group, we respect the internationally recognised international rights of peoples regarding the protection of minorities.



Freedom of assembly

We undertake to respect the right of employees to form a works council or other employee representatives within the framework of applicable national law.

Occupational health and safety

Safety at work is our top priority. We guarantee that the applicable national laws on occupational health and safety shall be fully complied with. This applies to the planning of workstations, facilities and processes, security management and personal conduct in our everyday work. We provide safe and hygienic working conditions that comply with the applicable legal and internal requirements in the areas of industrial safety and occupational health and safety.

Optimisation programs take place regularly with the intention of taking appropriate actions to reduce the risk of accidents and improve working conditions. Every employee should be familiar with the applicable laws, regulations and corporate policies on occupational safety and health. Training courses on occupational health and safety and on safety at work are held on a regular basis. In addition, work is organised to ensure the necessary work breaks so as not to endanger the safety and health of employees.

Use of private or public security services

Outside of normal working hours, the premises and buildings are protected and monitored. Events that occur are registered and tracked by private security services.

Land, forest and water rights and eviction

When purchasing, building or otherwise using land, forests and water bodies, we as mk Technology Group do not participate directly or indirectly in unlawful evictions or the unlawful deprivation of livelihoods.



We are committed to complying with all applicable national laws, regulations and standards with regard to environmental and climate protection. We want to conserve resources, minimise environmental impact and improve environmental protection in our day-to-day business operations.

Greenhouse gas emissions

We are committed to reducing greenhouse gas emissions to a minimum with the goal of decarbonisation, to using primarily renewable energies and to continuously increasing our energy efficiency.

Water and air quality

The natural resources of air and water are the foundations of human life. We are aware of the special need to protect them and are committed to minimising the impact made on them by our production processes.

Energy efficiency

Energy consumption is monitored and documented according to a certified energy management system. Our parent company in Troisdorf, Germany draws 100% of its electricity from renewable energy sources. We find economic solutions to improve our energy efficiency and minimise our energy consumption.

Biodiversity, land use and deforestation

The protection of animals and the preservation of biodiversity are important to us. To preserve biodiversity and ecology, we support the goal of sustainable land use and oppose deforestation.



Decarbonisation

We aim to minimise CO₂ emissions in order to play our part in achieving climate targets.

Soil quality

Soil quality is not affected by our processes. We do not discharge pollutants into soil.

Sustainable resource management

We are committed to protecting the environment, to avoiding environmental impacts to the greatest extent possible and to using materials and products in a sustainable and resource-conserving manner.

Waste prevention, reuse and recycling

As the mk Technology Group, our goal is to prevent waste and conserve resources through reuse and recycling. To this end, all employees are actively encouraged to adhere to our company-wide energy efficiency manual.

Hazardous materials

We undertake to label hazardous materials, chemicals and substances and to ensure safe handling, movement, storage, recycling, reuse and disposal. All applicable laws and regulations regarding hazardous materials, chemicals and substances are strictly observed.

Product safety

Product safety requirements that are stipulated by applicable laws and regulations are compulsorily followed.



As the mk Technology Group, we comply with all laws and regulations regarding corruption, bribery, fraud and prohibited business practices. We make decisions based on objective criteria and avoid conflicts of interest of any kind.

Fair competition/antitrust

We undertake to behave fairly towards competitors and observe the applicable antitrust laws. We do not participate in agreements with competitors that violate antitrust law, nor do we abuse any potential market dominance. Every employee is obligated to observe all rules of fair competition. We grant fair contractual terms to our suppliers, but we also expect them to behave fairly and correctly towards their employees and suppliers.

Protection of intellectual property

We treat all business correspondence as confidential. Confidential information, sensitive data and intellectual property rights are handled properly and in accordance with the law. All employees of the mk Technology Group undertake to do everything they can to protect intellectual property in their everyday business. Only by doing so can we be confident that our intellectual property will also be protected.

Plagiarism

Plagiarism damages our brand and our business. If identified, plagiarism is pursued by all legal means. The same applies if we notice plagiarism of the products of other manufacturers. They must be informed immediately. Plagiarism of any kind is harmful to free and fair competition.

Whistleblowing/protection against repression

To raise awareness and draw attention to wrongdoing, we are shaping a culture that is free of fear of negative consequences for the individual. Employees are encouraged to seek advice and support without fear of punishment or repression. Notifications of breaches of the Code of Conduct are treated with strict confidentiality. Actions or sanctions against persons who report suspected wrongdoing or violations are strictly prohibited. They will neither be placed at a disadvantage, nor will they have to fear termination.



Data protection

We comply with the laws and official regulations on data protection and information security when collecting, storing, processing, transmitting and passing on personal data. A high standard of data quality and technical protection against unauthorised access is guaranteed.

Information security

Employees are not permitted to make or reproduce recordings, files, images or sound documents without the consent of management, unless this is a direct condition of their professional activity.

Confidentiality

Internal company matters that have not been disclosed to the public must be treated as confidential. These include, for example, details concerning the organisation of the company and its entities and internal reporting figures. The obligation to maintain confidentiality continues to apply after the end of the employment relationship.

Records and reports

Open and effective cooperation requires accurate and truthful reporting. This applies equally to relations with employees, customers, business partners, the public and government bodies. All records and reports produced internally or externally must be accurate and true. In accordance with the principles of good accounting practice, data entries and other records must always be complete, accurate, timely and appropriate for the system. The requirement for truthful disclosure also applies to expense reports.

Export controls and economic sanctions

As the mk Technology Group, we operate in compliance with the criteria for export controls and with existing economic sanctions in order to ensure secure trade. We reject any trade outside of these provisions.



Money laundering/trade control

We comply with the applicable legal obligations with regard to the prevention of money laundering and do not participate in money laundering activities. We carefully verify the identity of customers, service providers, consultants and other third parties with whom we have or are establishing business relationships.

Anti-corruption

We abide by the applicable anti-corruption laws and regulations.

Employees are not permitted to use their official position to claim, accept, obtain or promise any advantage. This does not include accepting invitations and gifts of negligible monetary value; other gifts must be rejected or approved by supervisors or management.

Donations

As the mk Technology Group, we promote education and science, art, culture, sport and social causes through financial and in-kind donations. We receive requests for donations from a wide variety of organisations, institutions and associations. When awarding such donations, we observe the principle of altruistic action and clearly differentiate them from sponsorship.

Procurement of raw materials

We declare that all legal regulations concerning conflict minerals (especially gold, silver, tin, tantalum and tungsten) are observed. It is important to us that our suppliers guarantee the traceability and thus transparency of the origin of the raw materials they procure (e.g. RoHS and REACH).

Anti-terror

We undertake to take appropriate actions to ensure that our business activities do not encourage or support any terrorist activity, either directly or indirectly.



Complaints and tip-offs

Any employee can make a personal complaint or point out possible violations of this Code to his or her superior, to the HR department, to another person/body designated for this purpose or to the employee representative. We undertake to follow up on all disclosed tip-offs and to carefully examine any allegations and take appropriate actions where necessary. All records are treated confidentially. The whistle-blowers will not be put at a disadvantage. In the event of disputes between employees, the internal dispute resolution options shall be exhausted.

Implementation and control

The mk Technology Group management actively promotes the broad communication of this Code of Conduct, ensures its sustainable implementation and regularly monitors compliance with it.

This Code of Conduct was adopted by the management on 1 September 2023 and comes into force immediately.

Troisdorf, 01.09.2023

Place, date



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