



Code of Conduct

Foreword

Dear colleagues,

Working together in a respectful and cooperative way and the conscious acknowledgement of social responsibility constitute the basis for our long-term business success. We can maintain this basis only if we assure that unfair practices on the part of both executives and employees¹ of Montanhydraulik are excluded. Because even individual unfair practices of individual employees can put at risk the economic success of Montanhydraulik and all our companies.

Hence compliance is an essential element of successful management for Montanhydraulik. With this in mind, we have established a compliance system at Montanhydraulik that meets the requirements and international standards, which have become more stringent the world over.

With this Code of Conduct and the other compliance policies of Montanhydraulik, we have defined the basic rules of daily collaboration for executives, employees and business partners. We see these rules as the backbone of our corporate policy, which have a significant impact on the reputation of Montanhydraulik. The rules apply to every single one of us.

Please adhere to the regulations, speak to us when you have questions or comments and support us actively in their implementation. This is the only way for us to remain successful together!

March 2026

The Management

Montanhydraulik GmbH

¹ For the sake of linguistic simplification and better legibility, the designation of persons or groups of persons refers to persons of all genders.

I. Scope of application

This Code of Conduct applies to all companies, executives and employees of Montanhydraulik Group. Montanhydraulik Group (below: “**Montanhydraulik**”) includes all companies associated with Montanhydraulik GmbH under company law.

All further policies of Montanhydraulik referred to in this document always apply in addition to this Code of Conduct.

All provisions in the Code of Conduct are binding. Any variances from the provisions in the Code of Conduct are permitted only upon prior approval by the Chief Compliance Officer (“**CCO**”) of Montanhydraulik.

II. General principles of our actions

Violations of laws and other binding regulations as well as of internal rules may have consequences under criminal law, labour law and civil law for the acting employees of Montanhydraulik. For Montanhydraulik, such violations may result in high fines, exclusion from calls for tender, official sanctions, claims for damages by customers or competitors as well as in a severe damage to our reputation. Investigations by the authorities, internal examinations or negative reporting in the media due to violations of applicable law or other regulations negatively impacts the business operations of Montanhydraulik as well.

Such risks and losses can have a lasting impact on the profitability and viability of an affected company. Ultimately, such behaviour patterns jeopardise the jobs of all Montanhydraulik employees.

Montanhydraulik expects its employees to behave in a lawful, honest and loyal manner in their business activities and in all situations related to these activities.

III. Important individual regulations

1. Combating corruption

Corruption prevents progress and innovation, distorts competition and can considerably damage the reputation and financial integrity of Montanhydraulik.

For this reason, Montanhydraulik rejects and fights all forms of corruption.

Every employee of Montanhydraulik is prohibited from exerting influence on decisions by granting advantages of any kind. This applies with respect to public officials as well as employees of other companies and institutions in Germany and abroad.

Corrupt conduct is often directly related to the granting of gratuities from and to business partners (invitations, gifts, donations, etc.). This is why these matters are subject to special requirements. They can be found in the **Anti-Bribery and Corruption Policy** and in the **Gifts & Entertainment Policy**

2. Prohibition of money laundering

A targeted fight against terrorism, drug-related crime and organised crime begins on the financial side.

Montanhydraulik expressly forbids any form of money laundering and participation in it.

Money laundering is the introducing of illegally generated money, or illegally generated assets, into the legal financial and economic cycle. Montanhydraulik fights all forms of money laundering and takes precautions to avoid being involved in money laundering. It can be punishable if someone accepts, invests or holds assets when these assets originate from certain criminal offences.

It is particularly important to note that anyone who carelessly fails to identify the origin of an object is liable to prosecution. So if you ignore a suspicion that actually suggests itself about the origin of certain assets due to particular carelessness or particular indifference, you may be liable to prosecution.

This is why you should always collect information about your customer or other business partner in accordance with legal requirements (“know your customer” principle).

In this context, the specific requirements of the **Money Laundering Policy** must be complied with.

3. Fair competition and purchasing

Fair and free competition is protected by national and international competition and antitrust laws. Throughout the world, violations of competition and antitrust laws are prosecuted by antitrust and law enforcement agencies and may result in existence-threatening sanctions in the millions; companies involved may be excluded from calls for tender, and severe penalties can be imposed on executives and employees.

Anti-competitive and competition-restricting conduct is not tolerated at Montanhydraulik. Instead, customers and the market are won over by the quality of services.

Detailed provisions on the conduct of Montanhydraulik can be found in the **Fair Competition Policy**.

4. Avoiding conflicts of interest

In everyday business, Montanhydraulik depends on the performance of its employees. Successful business activities are therefore only possible if the employees act in the interests of Montanhydraulik. Montanhydraulik trusts that all employees make their decisions solely on the basis of objective criteria and are not influenced by personal interests and relationships when making business decisions.

Detailed provisions on the avoidance of conflicts of interest can be found in the **Conflict of Interest Policy**.

5. Fair employment

Montanhydraulik commits to fair employment conditions and fights illegal work and other forms of illegal employment of workers. Illegal employment may jeopardise legal jobs and prevent the creation of new legal jobs.

The protection of children is an essential concern of international human rights. Montanhydraulik commits to the fundamental rights of children and absolutely rejects any form of child labour.

Employees of Montanhydraulik can only render the services expected of them in a safe and secure working environment. Hence every Montanhydraulik employee is obligated to comply with safety and health regulations.

Be alert and notify your supervisor, the Management or the CCO immediately if you notice any risks that might imperil the safety of your own workstation or other workstations.

6. Protection of company assets, business and trade secrets and confidential information

The company assets of Montanhydraulik are used to achieve the business goals of Montanhydraulik. They are allowed to be used solely for operational purposes; the use for non-operating purposes is expressly prohibited. Montanhydraulik expects its employees to handle company assets with care and in the interest of Montanhydraulik. Every employee is responsible for company assets not being damaged, misused or wasted.

In addition, every employee is required to be vigilant and report theft, embezzlement, misappropriation, fraud and other offences.

These rules apply in equal measure to assets of Montanhydraulik and to third-party assets to which you are granted access as part of your work or from time to time.

Montanhydraulik possesses valuable know-how and extensive business secrets. This knowledge forms the basis of our economic success and is therefore particularly in need of protection.

Confidential information is any and all information about Montanhydraulik and about customers and business partners of Montanhydraulik that is not known to the public and is disclosed to our company on a confidential basis or otherwise. The existence of a contractual relationship with a customer may already be such information.

Montanhydraulik fully recognises the intellectual property of competitors and business partners. Every employee is obligated to maintain secrecy on know-how as well as business or trade secrets of third parties and to use them only in the context of business disclosure and within the agreed framework.

Employees are not allowed to misuse confidential information for their own benefit or disclose it to third parties without permission.

You are not permitted to disclose such confidential information during the contractual term and after termination of the contract; in case of doubt, it is only permitted upon consultation with Management. Even with the consent of Management, such information is only allowed to be given to individuals who have a justified and appropriate interest in the disclosure of the information (“need to know” basis).

It may also be punishable to obtain confidential information of third parties (e.g. competitors or customers) without the consent of the third party. This would be the case, for example, if you asked a woody employee to secure the competitor’s customer base or other data before leaving the competitor.

If in doubt, please contact the CCO.

7. Data protection, data security and IT security

Separate legal regulations are in place for the protection of personal data. Montanhydraulik is aware of the special importance of data protection and data security and is fully committed to compliance with these regulations. Personal data of any type must therefore be protected from unauthorised access and misuse.

The company continuously checks whether data protection and data security rules are applied and how they are handled in actual practice; the rules are updated, if necessary. Montanhydraulik is supported by a Data Protection Officer who is available if you have questions related to this topic.

Information technology (IT) and electronic data processing (EDP) are indispensable in the daily routines of Montanhydraulik. However, they also entail a number of risks. Montanhydraulik takes these risks very seriously in its own interest and in the interest of its business partners, eliminates vulnerabilities immediately after they become known and takes precautions for protection. The employees of Montanhydraulik are required to familiarise themselves with applicable IT/EDP directives and take the

requirements contained in them in consideration. Always make sure that the computer systems used by you are sufficiently protected from access by third parties. Never leave your workstation without locking the screen. Change your passwords at regular intervals and only use passwords that meet current security standards. Do not give passwords to third parties.

Be aware that an e-mail is not a secure means of communication. This is why confidential information should be sent by e-mail only in exceptional cases and be encrypted.

Do not use the data processing systems provided by Montanhydraulik for your private affairs. In particular, do not store and download content from the Internet or other third-party systems in the network of Montanhydraulik, unless it is required for business reasons. It is not permitted to use our data processing systems for illegal purposes.

If in doubt, please contact the Data Protection Officer of Montanhydraulik.

8. Equal opportunity, equal treatment and mutual respect

We recognise the principles of respectful, fair and loyal dealings with each other. Here the principles of equal opportunity, equal treatment and mutual respect are of overriding importance. All employees are offered an equal opportunity when hired and when working for Montanhydraulik. Montanhydraulik rejects any form of discrimination and intervenes when it occurs. Nobody is allowed to be put at a disadvantage or harassed because of their origin, gender, sexual orientation, religion or beliefs, disability, age or similar factors. Instead, we expect of our employees to treat one another with tolerance, courtesy and respect, thus contributing to a productive and pleasant working environment.

9. Dealing with business partners

Montanhydraulik works together with its business partners on a basis of trust and fairness for both sides. Montanhydraulik expects its business partners to behave in a lawful and honest way.

In particular, the suppliers, subcontractors, distribution partners and other third parties of Montanhydraulik are obligated to acknowledge the **Code of Conduct for Subcontractors, Suppliers and Other Contractual Partners of Montanhydraulik** and comply with the regulations laid out therein before they become active.

10. Environment

Montanhydraulik is aware of its environmental responsibility, recognises the value of global environmental protection and complies with all statutory provisions and principles for environmental protection.

11. Social media

Publications on the Internet and/or in social media that refer to Montanhydraulik, the responsibility of Montanhydraulik, our business partners or your colleagues may affect not only you but also Montanhydraulik and may constitute a breach of data protection laws, misuse of confidential information or a violation of other regulations.

If you use social media, e.g. Facebook, Instagram, LinkedIn, etc., the following principles must be observed:

→ **For business purposes, social media are only allowed to be used to maintain contacts.**

Communication on the content of business matters does not take place on social media. Always use secure passwords and change them at regular intervals. In addition, never trust that behind a profile with which you are currently chatting or digitally communicating in other ways online that the person stated in the profile is really this particular person. Because third parties might misuse such profiles.

→ **The private use of social media is also restricted if there is a connection with Montanhydraulik.**

Even in the private area, you are not allowed to compromise our legitimate interests as your employer. Above all, the reputation of Montanhydraulik must not be damaged in any way that is inadmissible by law. Direct or indirect references to Montanhydraulik should therefore be avoided. Private images or texts are not prohibited, of course. But please take care not to create any recognisable contact

with Montanhydraulik. A clear-cut separation between work and private life is very important to us.

12. Comments about Montanhydraulik in public

As you know, you are only allowed to speak on behalf of Montanhydraulik if you are expressly entitled to do so. If you are permitted to make statements about Montanhydraulik, these statements must be true. In addition, you should pay heed to the following: Texts, photographs, drawings (including drafts) and film material are usually protected by copyright. Normally, the use of such material is only permitted with the prior consent of the author or other rights holder. Without such consent, such content, in particular, is not allowed to be copied and/or made publicly available. The use of logos, company names and product names is frequently only possible upon prior consent of the rights holder. This is also true for logos and lettering of Montanhydraulik protected by trademark law. Pictures of other persons (including employees of Montanhydraulik) are normally not allowed to be published without their prior consent.

IV. Compliance organisation

1. Compliance responsibility

Compliance is a task of the entire Montanhydraulik Group to be exercised in equal measure by executives and employees. In addition to meeting their function as role models, it is the task of executives to ensure, with the support of the CCO, that all employees in their area of responsibility know and comply with this Code of Conduct and the associated compliance policies.

It is important that every Montanhydraulik employee assume responsibility for compliance with laws, regulations and company principles.

Never forget that violations of the law may entail serious consequences for yourself and for Montanhydraulik.

2. Compliance reports

In the event that there are indications of a violation of this Code of Conduct or the associated compliance policies of Montanhydraulik, we expect all employees to report such indications to their supervisor, the responsible Management or the CCO of Montanhydraulik. The respective Managements and the CCO shall inform one another about reports they receive.

An external Ombudsman is also available to Montanhydraulik to answer questions and receive reports (anonymously on request).

3. Questions of doubt

This Code of Conduct cannot answer all questions you may encounter on a daily basis. Hence the Code is supplemented by other policies applicable in the company as well as by arrangements in the employment contracts. You should always be aware of the topics dealt with in this Code.

We trust you to seek advice from Management, the CCO or the external Ombudsman in cases of doubt and to report any infringement of laws or company principles you have identified.

Persons who ask for advice or make a compliance report when they harbour a suspicion do not have to fear any actions on the part of Montanhydraulik. Important to our company is that all problems be addressed promptly. The overriding objectives are to comply with the law and to protect the company. With a prompt and, from your point of view, justified question or report, you not only protect the company but also yourself and the security of your job.

4. Investigation of suspected cases of lack of compliance

Montanhydraulik investigates all suspected cases of lack of compliance without prejudice. As appropriate, Montanhydraulik works together with authorities and third parties. If required, the responsible works councils will be involved in the respective investigations early on.

5. Training

Montanhydraulik conducts training courses and information events at regular intervals that deal with the content of this Code of Conduct and the associated compliance policies in order to ensure and foster the requirements contained in them.

6. Monitoring/auditing

Montanhydraulik checks observance of this Code of Conduct and the associated compliance policies in corresponding audits, if required, with external support.

V. Contact

Alongside the responsible supervisors, the following persons are contact persons regarding all questions about the Code of Conduct of Montanhydraulik and the associated compliance policies.

1. Chief Compliance Officer

The CCO of Montanhydraulik is the competent internal contact for all questions revolving around the topics of compliance, corporate governance and internal rules and regulations.

You can reach the Chief Compliance Officer via the following contact details:

Mr. Jesko Trahms

BDO Legal Rechtsanwaltsgesellschaft mbH

Zielstattstr. 40

81379 Munich

Telephone: +49 173 3091491 / +49 89 74325-234

E-mail: jesko.trahms@bdolegal.de

2. External Ombudsman

The external Ombudsman of Montanhydraulik is available as the external contact person for the topics of compliance, corporate governance and internal rules and regulations. On request, the Ombudsman handles all inquiries or information on a basis of anonymity.

You can reach the Ombudsman of Montanhydraulik via the following contact details:

Mr. Jesko Trahms

BDO Legal Rechtsanwaltsgesellschaft mbH

Zielstattstr. 40

81379 Munich

Telephone: +49 173 3091491 / +49 89 74325-234

E-mail: jesko.trahms@bdolegal.de

Or via the whistleblower portal: <https://portal.bdolegal-whistleblower.de/#/?lang=en>

3. Data Protection Officer

The Data Protection Officer of Montanhydraulik is available to you as a contact person for all topics concerning data protection at Montanhydraulik.

You can reach the Data Protection Officer of Montanhydraulik via the following contact details:

Mr. Tobias Sorge

Montanhydraulik GmbH

Bahnhofstraße 39

59439 Holzwickede

Tel.: +49 2301 916-280

E-mail: tobias.sorge@montanhydraulik.com

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