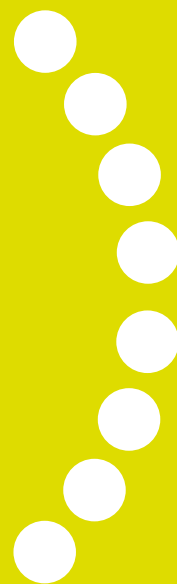
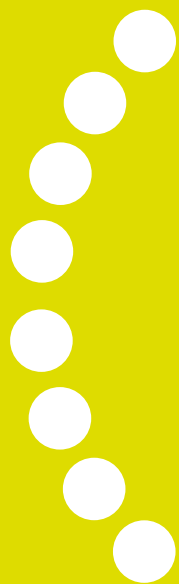


# Code of Conduct

**Our Values  
and our Responsibility  
in Society,  
as a Business Partner  
and in the Workplace**



**FETTE**  
COMPACTING



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## Foreword by Management



Integrity is the foundation of our business activities. The trust of our employees, customers, business partners, and society is essential to our long-term success. Maintaining and strengthening this trust is both our aspiration and our responsibility.

As the Management of the Fette Compacting Group, we are fully committed to acting in compliance with the law and in a responsible and transparent manner. We conduct our business in accordance with national and international laws as well as generally accepted ethical principles. We expect the same from our business partners.

Our corporate governance is clearly structured and transparent. Responsibilities and accountabilities are clearly defined. We make decisions based on transparent processes and a consistent awareness of risk.

An effective risk management system and a comprehensive compliance management system (CMS) are integral components of our governance. They enable us to identify risks at an early stage, assess them appropriately, and manage them effectively.

By regularly reviewing and continuously developing our governance practices, we respond to evolving regulatory requirements and societal expectations and ensure the long-term orientation of our actions.

Our Code of Conduct provides a binding framework for our actions. It translates our shared values into clear standards and principles of conduct and provides guidance across the company. The Code ensures that we comply with laws, internal policies, and ethical standards and promotes a working environment characterized by integrity, respect, and fair and responsible conduct.

Compliance is a given for us. It is not optional, but a binding standard for our daily actions and the foundation of our long-term success.

We expect that integrity guides our decisions, that responsibility is actively assumed, and that risks or potential violations are addressed openly. Managers bear particular responsibility

in this regard: they act as role models, promote a culture of integrity, and serve as the first point of contact for questions or uncertainties in day-to-day work.

Every employee is responsible for implementing the principles described in this Code of Conduct in their daily work and for seeking guidance in a timely manner if questions or uncertainties arise.

The Code of Conduct is supplemented by binding policies and regular training on key legal areas such as anti-corruption and antitrust law and is accessible to all employees and business partners via our website and intranet.

Integrity is a commitment shared by all of us. Together, we shape the future of our company.

The Management  
of the Fette Compacting Group

  
Joachim Dittrich

  
Anke Fischer

  
Dr. Marten Klukkert

## Our Corporate Values

Fette Compacting's machines and systems make an important contribution to people's health and quality of life worldwide. Our business activities are consistently aligned with this goal.

Our shared values reflect this understanding. They guide our daily actions within the company as well as in our dealings with customers, business partners, and society, and they define the standards we set for ourselves and for our business partners.

At Fette Compacting, we are united by a shared understanding of our values: we treat one another with respect, work together in a spirit of trust, communicate openly and fairly, and take responsibility for our decisions and actions.

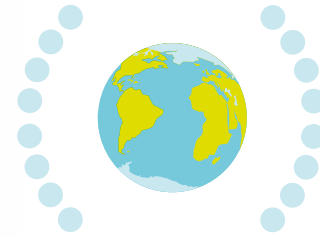
Our values form the foundation of our corporate culture and guide our behavior in our daily work. Managers bear particular responsibility in this regard: they act as role models and strengthen these values within their areas of responsibility.

They are the foundation of our shared success: **together – for quality of life.**



### Passion

We pursue our goals with heart and soul. Outstanding technology inspires us as much as the common good we achieve with it.



### Integrity

Our word means our commitment – always and everywhere. In relationships with each other or with customers and partners: 100 % genuine – 360° reliable.



### Appreciation

Excited Customers are the result of teamwork – Our cooperation is characterized by mutual understanding and trust: respectful, open and fair.



### Zukunftsfreude

Variety makes us strong. When knowledge, curiosity and courage are coming together, innovation and progress will happen – for generations to come.

## Scope and Purpose

This Code of Conduct defines the binding principles for lawful and responsible conduct in the business environment. It establishes a uniform framework for all business decisions and activities within the Group.

The Code applies worldwide to Fette Compacting Holding GmbH as well as to all domestic and foreign subsidiaries (hereinafter referred to as the **“Fette Compacting Group”**). It is binding for Management, all managers, and all employees of the Fette Compacting Group. Furthermore, it forms the basis for responsible cooperation with our business partners along the entire value chain.

As an internationally operating company, we are subject to various legal, regulatory, and societal requirements. Compliance with all applicable laws, other legal requirements, and internal regulations is mandatory. Even minor violations may result in significant legal, financial, or reputational consequences for our company.

The Code of Conduct does not replace the wide range of legal and regulatory requirements applicable worldwide. It consolidates the key principles of our business conduct and provides binding guidance for dealing with legal and ethical matters.

All persons to whom this Code of Conduct applies are required to be familiar with its contents and to comply with them. In cases of uncertainty or potential violations, they should seek advice or report them.

To support this, mandatory compliance training is conducted on a regular basis. Managers bear particular responsibility to act as role models for the principles of this Code of Conduct and to ensure compliance within their areas of responsibility.

The Code of Conduct is reviewed regularly and, where necessary, updated to reflect new legal, regulatory, or organizational developments.



## Our Responsibility as a Member of Society



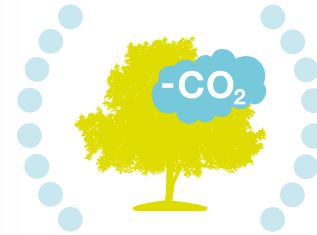
### Respect for Human Rights

We are committed to internationally recognized human rights, as set forth in particular in the Universal Declaration of Human Rights, the ILO Core Labour Standards, and other relevant international conventions. These include, in particular, the right to equal treatment, protection against discrimination, safe and healthy working conditions, the abolition of child and forced labor, and the responsible handling of environmental impacts that may affect people's livelihoods.

All employment relationships within the Fette Compacting Group are based on the voluntary and free choice of employment. We do not tolerate child labor and reject any form of forced labor.

Through structured and careful selection procedures in the hiring process, we ensure that no child labor takes place in our company. Furthermore, we strictly ensure compliance with legal requirements regarding the protection of minors, in particular the provisions of the "German Youth Employment Protection Act" as well as regulations governing working hours and vocational training.

These principles apply both to our own business operations and to our suppliers and business partners throughout the entire value chain. We expect them to adhere to these standards as well.



### Environmental and Climate Protection

As a manufacturing company, we bear particular responsibility for the environmental impact of our business activities. We are committed to avoiding environmental impacts, using resources responsibly, and continuously improving our contribution to climate and environmental protection.

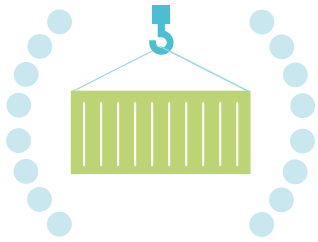
Our focus is in particular on reducing energy consumption and greenhouse gas emissions, the responsible use of materials, and the promotion of resource-efficient solutions along our value chain. In doing so, we also ensure the responsible handling of chemicals and other potentially environmentally hazardous substances.

Sustainability is an integral part of our corporate strategy. We take environmental aspects into account in investment decisions, in product development, and in the selection of and cooperation with business partners.

We take appropriate precautionary measures to identify and avoid potential environmental impacts at an early stage. In doing so, we comply with all applicable environmental laws and internal policies and continuously improve our environmentally relevant processes.

To systematically manage our environmental performance, we use appropriate management systems to meet legal requirements, manage environmental risks, and continuously improve our environmental performance.





### Sustainable Procurement

We take responsibility for the impacts of our procurement decisions along the entire value chain. Sustainable procurement is therefore an integral part of our corporate responsibility.

Our Supplier Code of Conduct specifies these requirements and forms the basis for the responsible management of our global procurement processes.

When selecting our business partners, we consider their integrity, reliability, and compliance with applicable legal requirements. We only enter into business relationships with partners who respect our fundamental compliance and sustainability standards.

We maintain a partnership-based relationship with our suppliers and rely on continuous dialogue and close cooperation to jointly further develop sustainability standards.

Our goal is a responsible and stable supply chain that meets our customers' requirements and contributes to the protection of the environment and society.

We expect our suppliers and business partners to recognize and comply with our standards for integrity, human rights, and environmental and social responsibility. This includes, in particular, respect for internationally recognized human rights, fair working conditions, and the protection of the environment and natural resources.



### Product Safety and Quality

We continuously strive to develop innovative and high-quality products for our customers. Quality is not only a decisive factor for our long-term business success, but also a central component of sustainable business practices. Quality forms the basis of our customers' trust in our capabilities. For us, quality therefore includes not only the quality of our products and services, but also the continuous improvement of our business processes along the entire value chain.

Our quality policy defines the objectives and principles of our actions in the area of quality and contributes to fostering awareness of quality throughout the company. We encourage and motivate our employees to actively contribute to the continuous improvement of processes and products.

In this way, we ensure that our products and services meet our customers' requirements, comply with all applicable legal and regulatory requirements for quality and product safety, and are developed and manufactured in accordance with the highest quality and safety standards.

All employees and managers are responsible for complying with our quality and safety standards and are required to report potential quality or safety risks at an early stage so that appropriate corrective measures can be taken.



### Donations and Sponsorship

The Fette Compacting Group engages in social responsibility through donations and sponsorship. Such contributions are made exclusively in accordance with applicable legal requirements and internal approval processes and may not be used to obtain improper advantages. Political parties, public officials, or political organizations are not supported through donations.



## Our Responsibility as a Business Partner

### Fair Competition

In competition, we rely on performance, customer orientation, and the quality of our products and services. We comply with all applicable domestic, supranational, and foreign antitrust laws as well as laws against unfair competition, and we expect the same from our competitors, customers, suppliers, and other business partners.

Where we hold a dominant market position, this position must not be abused vis-à-vis customers or competitors.

Price or conditions agreements with competitors are just as impermissible as agreements on the allocation of markets, customers, or territories, as well as the exchange of competitively sensitive information (e.g., on prices, costs, capacities, or strategic planning).



Agreements prohibited under antitrust law may not be replaced by coordinated conduct with competitors or by discussions within the framework of associations.

Violations of antitrust law may result in significant fines and claims for damages and may cause substantial harm to the company and the individuals involved.

Further binding regulations on conduct in competition and on dealing with competitors are set out in the Fette Compacting Group's Antitrust and Competition Law Policy.



### Prevention of Corruption

We do not tolerate corruption in business activities – neither domestically nor abroad. As an internationally operating company, we strictly reject any form of bribery and the granting of undue advantages, both in our dealings with public officials and in our interactions with customers, suppliers, and other business partners.

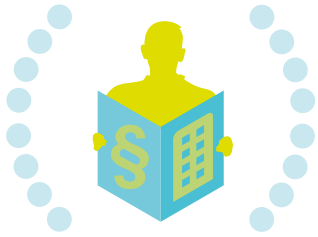
Our employees and governing bodies perform their duties independently and exclusively in the interest of the company. Gifts, invitations, or other benefits must not influence decisions or create the appearance of improper influence. Therefore, inappropriate gifts, invitations, or other benefits are not permitted. Likewise, such benefits may neither be requested nor accepted.

These principles apply equally in dealings with customers, suppliers, service providers, and other business partners of the Fette Compacting Group. No improper benefits may be granted or accepted through third parties – such as consultants, intermediaries, or other representatives.

Political activities or representation of interests on behalf of the Fette Compacting Group are carried out exclusively by authorized bodies and in compliance with applicable legal requirements.

Particularly strict requirements apply when dealing with public officials due to legal provisions. Even the appearance of improper influence must be avoided. Facilitation or expediting payments to public officials – that is, payments intended to expedite routine official acts – are not permitted.

Further binding regulations on corruption prevention, in particular regarding the handling of gifts, invitations, and other benefits, are set out in the Fette Compacting Group's Anti-Corruption and Integrity Policy.



**Fraud Prevention**

The Fette Compacting Group does not tolerate any form of fraud or other deceptive conduct.

Fraud occurs in particular when an unlawful financial or other advantage is obtained through deception or false statements, or when damage is caused to the company or third parties.

This includes, in particular, the manipulation of business documents, false statements in invoices or reports, as well as attempts at fraud through phishing emails or other deceptive conduct in the digital environment.

Business documents and reports must be prepared in a complete, accurate, and traceable manner. False or misleading information, as well as the concealment of business transactions, is not permitted.

We act honestly and transparently and comply with applicable laws and our internal regulations. All employees and managers are required to avoid potential fraud risks and to report suspected cases through the designated reporting channels.



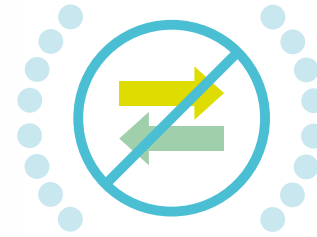
**Prevention of Money Laundering and Terrorist Financing**

The Fette Compacting Group does not participate in money laundering or in the financing of terrorist activities. We comply with all applicable legal requirements regarding the prevention of money laundering and terrorist financing.

Money laundering refers to the attempt to introduce assets derived from illegal activities into the legal economic cycle or to conceal their origin. We ensure that our business activities are not misused for such purposes.

We conduct business exclusively with reputable business partners whose business activities comply with applicable law. As part of our business processes, we review business partners on a risk-based basis and pay attention to unusual or unexplained transactions or payment structures.

All employees and managers are required to be vigilant in cases of suspected money laundering or terrorist financing and to report relevant information through the designated reporting channels.



**Avoiding Conflicts of Interest**

It is the duty of all governing bodies and employees of the Fette Compacting Group to avoid conflicts of interest. Conflicts of interest may arise when personal interests – directly or indirectly – conflict with the interests of the Fette Compacting Group or when related persons or companies are affected.

The interests of the Fette Compacting Group always take precedence. Decisions must be made objectively and in the best interest of the company. Personal relationships or private interests must not influence business decisions or lead to improper preferential treatment. Even the appearance that individuals are being favored due to personal relationships must be avoided.

Conflicts of interest may arise, for example, from secondary employment, shareholdings in companies, or business relationships with related persons.

Transparency is key to the responsible handling of conflicts of interest. Potential or existing conflicts of interest must therefore be disclosed. Affected individuals are required to report potential conflicts of interest to their supervisor or the responsible compliance function as early as possible, in particular before a business transaction takes place.





**Accounting and Financial Reporting**

Transparent and accurate accounting is an essential basis for the trust of our business partners, employees, owners, and the public.

All business transactions must be recorded in our books and records in a complete, accurate, traceable, and timely manner.

We comply with all applicable legal requirements as well as relevant national and international accounting standards and fully and timely fulfill our tax obligations. Financial reports must accurately reflect the actual course of business.

All employees and managers involved in the recording or processing of financial information are responsible for ensuring that records are properly maintained and that relevant information is accurately documented.

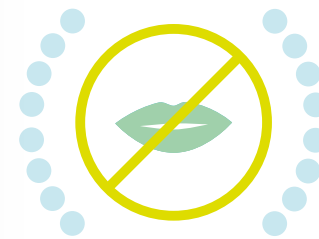


**International Trade and Export Controls**

We comply with all national and international regulations applicable to our products and services in international trade. These include, in particular, export and import control regulations, customs regulations, sanctions and embargo provisions, as well as official approval requirements.

We carefully review our business partners and transactions and ensure that our products and services are not used or transferred in an unauthorized manner.

In doing so, we pay particular attention to ensuring compliance with legal requirements regarding the control of recipients, countries of destination, and the end use of our products.



**Protection of Trade and Business Secrets**

The knowledge, information, and developments acquired during activities for the Fette Compacting Group constitute a key component of our company's success. The protection of our trade secrets, confidential information, and innovations is therefore of central importance.

All employees and governing bodies of the Fette Compacting Group are required to strictly protect confidential information as well as trade and business secrets and not to disclose them to third parties without authorization. This applies in particular to information relating to business processes, technologies, developments, customers, or business partners.

This obligation also applies to confidential information received from our business partners. Such information may be used exclusively for legitimate business purposes and must be protected with equal care.

The protection of our innovations and the safeguarding of intellectual property rights – particularly patents, trademarks, and know-how – are a key component of our sustainable business success. Employees involved in relevant findings or developments should therefore examine whether an application for intellectual property rights should be considered.

The obligation to protect confidential information continues even after the end of activities for the Fette Compacting Group.



## Our Responsibility in the Workplace



### Equal Opportunity and Diversity

Diversity strengthens our company. The Fette Compacting Group is shaped by diversity. We are convinced that our company can only be and remain successful if we create an environment that promotes equal opportunity and embraces inclusion.

We aim to preserve our diversity and to promote it even further in the future. We take a clear stand against any form of discrimination and do everything in our power to ensure fair working conditions for all people in our company worldwide.

We expect all employees and managers to treat one another with respect. This includes not only consideration for the social customs of a country but also the unconditional protection of each individual's personal integrity. Degrading remarks, personal insults, violations of dignity, or sexual harassment will not be tolerated.

The requirement for fair working conditions excludes any form of discrimination against employees on the basis of ethnic or social origin, skin color, gender, nationality, language, religion, beliefs, age, physical or mental disabilities, gender identity, sexual orientation, political views, or other legally protected characteristics.

Living diversity also means inclusion. We place great importance on integrating people with disabilities into the daily working life of our company on an equal basis.

The selection, hiring, and development of our employees are based on their qualifications, performance, and abilities.



### Fair Working Conditions

We treat our employees worldwide with respect and fairness. Compliance with all applicable labor laws forms the basis of our actions.

Fair and appropriate compensation is a central component of our responsibility as an employer. The compensation of our employees exceeds the legal minimum requirements and is based on market standards as well as standards ensuring a living wage.

We support flexible working time models and ensure that working hours, overtime, and rest periods are regulated in accordance with legal requirements. At the same time, we place great importance on our employees being able to achieve a healthy work-life balance.

We respect our employees' right to organize into unions and recognize the right to collective bargaining. An open and constructive dialogue with employee representatives is a matter of course for us.



### Occupational Safety and Health

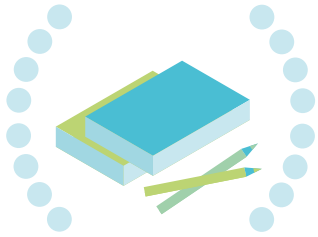
The protection of the health and safety of our employees is a top priority for the Fette Compacting Group. We create safe working conditions and are committed to identifying and minimizing work-related risks at an early stage.

We comply with all applicable legal requirements as well as internal policies on occupational safety and health. Through appropriate preventive measures, clear responsibilities, and regular training, we promote a safe working environment.

All employees are required to comply with applicable safety regulations, actively contribute to a safe and healthy workplace, and address potential hazards at an early stage.

Managers bear particular responsibility for ensuring safe working conditions and for raising their employees' awareness of occupational safety and health.



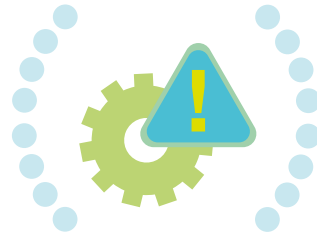


**Training and Development**

We view our commitment to training as a sustainable investment in the future of our company, our employees, our industry, and our business location. We therefore ensure across all departments that our employees can develop in line with their skills and potential and continuously expand their knowledge.

Professional and personal development are of high importance at Fette Compacting. Our employees should have the opportunity to continuously develop their skills throughout their professional activities.

We therefore offer our employees a wide range of opportunities to deepen their personal and professional competencies in line with their respective requirements and to become familiar with related fields of work.



**Handling of Company Property**

The assets of the Fette Compacting Group constitute an essential basis for our business success. These include both tangible and intangible company assets. Tangible assets primarily comprise machinery and equipment, IT systems, devices, materials, documents, and other work equipment. Intangible assets include, in particular, intellectual property, technical know-how, confidential information, trademark rights, and the reputation of our company.

All employees and managers are required to handle company property with care and responsibility. Company assets must be protected against loss, damage, theft, or misuse and used exclusively for legitimate business purposes.

The use of IT systems, machinery, and other work equipment must be in accordance with applicable legal requirements as well as the internal policies of the Fette Compacting Group.



**Data Protection and Information Security**

We respect the personal rights of our employees, customers, and business partners. This includes, in particular, the protection of personal data.

We are committed to handling personal data and confidential information responsibly and to complying with applicable data protection requirements as well as information security requirements.

To protect our data, information, and IT systems, we implement appropriate organizational and technical measures to safeguard them against unauthorized access, loss, manipulation, or misuse.

All employees and managers are required to handle personal data, confidential information, and IT systems with care and to comply with internal information security requirements.

The Fette Compacting Group uses digital technologies and artificial intelligence systems responsibly and in accordance with applicable law and internal requirements. When using AI, we pay particular attention to the protection of personal data, confidential information, and the security of our IT systems.



**Open Communication and a Culture of Learning from Mistakes**

We aim to learn from mistakes and continuously improve. We therefore promote a culture of open communication in which problems, risks, or inconsistencies can be addressed at an early stage.

If we notice something in our daily work that does not appear to be correct or could be improved, we address it openly and objectively. A constructive error culture helps us to identify causes, develop solutions, and avoid similar situations in the future.

We expect all employees to take responsibility for their actions and to seek advice in a timely manner in case of uncertainty. A respectful and trusting approach to one another forms the basis for openly expressing different perspectives.

Managers bear particular responsibility for exemplifying this culture. They create a working environment in which questions can be asked, concerns can be raised, and problems can be addressed openly.



## Whistleblower System ("Speak-Up")

Open and transparent communication within the company as well as with authorities is of great importance to us. All governing bodies and employees of the Fette Compacting Group are therefore required to provide complete, truthful, and timely reporting. Violations or potential suspected cases in connection with applicable laws, our Code of Conduct, or internal policies should be addressed or reported at an early stage.

To this end, we have established a whistleblower system ("Speak-Up"). It enables employees, managers, governing bodies, and business partners to submit reports of potential compliance violations through various reporting channels. The whistleblower system serves to identify and investigate potential violations at an early stage and to prevent harm to our company as well as to employees and business partners.

In particular, the whistleblower system can be used to report violations of applicable laws, our Code of Conduct, or internal policies. These include, for example, suspected corruption or fraud, violations of competition law, human rights or environmental regulations, as well as other serious violations.



Reports can be submitted to supervisors, the responsible compliance function, via the central compliance email address, or through the "Speak-Up" compliance hotline. Reports may also be submitted anonymously upon request. We encourage all employees and business partners to report potential violations or suspected cases through the designated reporting channels.

If you have any questions or concerns, your supervisors and the relevant contacts in the Legal and Compliance functions are available to assist you.

All incoming reports are treated confidentially and reviewed by the responsible compliance functions in accordance with a defined procedure. In doing so, we ensure both the protection of whistleblowers and a fair and thorough investigation of the reported matters. At the same time, the interests of the persons concerned are safeguarded. They are presumed innocent until a violation is proven.

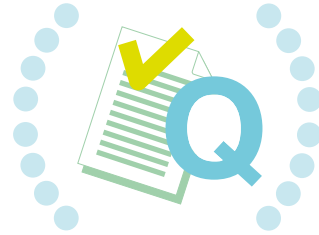
Whistleblowers need not fear any adverse consequences if they report a possible violation in good faith. Retaliation against individuals who provide information or support the investigation will not be tolerated.

Violations of this Code of Conduct or of applicable laws and internal policies will be reviewed and may result in consequences under employment law. Depending on the severity of the violation, civil or criminal consequences may also apply.

Further information on reporting channels and the whistleblower procedure is described in the "Rules for the complaints procedure" for the Whistleblower System and is available via the following link or QR code.



Compliance Hotline:  
[https://www.lmt-group.com/compliance\\_hotline/](https://www.lmt-group.com/compliance_hotline/)  
Mailbox: [compliance@fette-compacting.com](mailto:compliance@fette-compacting.com)



**Self-Assessment to Aid Decision-Making**

If I am unsure in a specific case whether my conduct is in line with the principles of our Code of Conduct, the following questions can provide guidance:

1. Have I considered all relevant aspects in my decision and weighed them carefully? (Professional judgment test)
2. Does my conduct comply with applicable laws, our Code of Conduct, and our internal policies? (Legality test)
3. Is my decision in line with our values and our commitment to integrity? (Integrity test)
4. Would I support that the same decision is made across the company in all comparable cases? (Generalization test)
5. Would I still consider my decision to be correct if my company had to represent it in public? (Public test)
6. Would I consider it fair if someone treated me in the same way? (Affected party test)
7. What would people whose opinion is important to me – such as my family or close friends – say about my decision? (Conscience or social environment test)

If I can answer questions 1 to 6 with “Yes” and question 7 is also positive, my conduct is most likely in line with the principles of our Code of Conduct. If questions or doubts remain, I will contact the points of contact listed in this chapter.



## Legal Notice

Publisher:

Fette Compacting GmbH

Grabauer Str. 24

21493 Schwarzenbek, Germany

Phone: +49 4151 12-0

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Responsible for content:

Volker Reinsch

Editing and Production:

Sabrina Reinsch

Design:

Braun Engels Gestaltung GmbH