

TGA . ALL IN ONE



CODE OF CONDUCT

OF THE KONZMANN GROUP
AND OF ALL SUBSIDIARIES

LAST UPDATED APRIL 2024

DETERMINATION

With determination we promote the success of our customers

The principles of conduct that we follow within the company and in our customer relationships are designed to ensure that we continuously and consistently meet our customers' expectations and avoid mistakes that could have a negative impact on our company's reputation. Our customers value technical perfection, reliability and integrity. We are determined to promote the success of our customers, as this is also of fundamental importance for the economic growth of the KONZMANN Group.

Quality is our top priority

We strive to generate significant added value for our customers through reliable performance, high quality, and dedicated service in the field of energy and building technology as well as related services. It is our aim to support our customers in realizing their expectations and energy-related goals in the long term and to position them for the future.

We build trust through sincerity

Trust is essentially based on positive experiences and on integrity without contradictions, and it is created and strengthened through transparency and honesty. It is crucial for our longterm success that we convince every single customer of our genuine trustworthiness. To achieve this, our actions must con-

sistently align with our words. We do not make promises we cannot keep and always strive to ensure that customers, business partners, supervisors, and colleagues can rely completely on our word.

We are committed to fair competition

We believe in a free market economy characterized by competition, which rewards our hard work and the resulting technical innovations. We stand for fair competition and are committed to complying with rules and principles. It is of utmost importance to the KONZMANN Group not to lose the trust of our customers through unfair competition; we act fairly and treat all employees, business partners, and customers equally.

The competitive system, which forms the essential basis of the free market

economy, is safeguarded, protected, and continuously promoted by both national and international competition law. Consequently, our business actions and strategic decisions must always comply without exception with all relevant anti-trust and competition law regulations. We are deeply committed to ensuring open, transparent, and independent competition in all markets in which we actively operate. We will not enter into agreements with competitors, either formally or informally, to fix prices or allocate products, markets, territories, or customers.

We strictly adhere to the principle of not exchanging information with competitors about specific customers or dealers, current or future prices, profit margins, offers, costs, distribution practices, market shares, and sales conditions. Nevertheless, we remain open and transparent toward our customers in the spirit of close cooperation. We refrain from any actions that could unfairly favor one customer over another.

We are firmly opposed to any form of unauthorized payments

Our reputation as an honest and ethical company must not be jeopardized under any circumstances by offering improper payments to third parties and employees. Employees of the KONZMANN Group may not, either directly or indirectly, offer, promise, or grant inappropriate financial or other benefits to public officials,

political parties, or their representatives, or to persons in the private sector, in order to win new contracts, secure existing contracts, or otherwise obtain unlawful advantages in the business process.

We maintain our credibility by refusing favors and gifts

Accepting gifts and invitations from business partners or offering such favors may give the impression that factors other than pure performance play a role in business decisions. This could lead to accusations against the KONZMANN Group and affect confidence in our integrity.

We refrain from offering, demanding or accepting gifts, payments, invitations or services from existing or potential business partners. This is especially true if it can be assumed that they could influence business transactions, go beyond the limits of customary business hospitality, or violate applicable law.

RESPONSIBILITY

We show responsibility by protecting our company's assets

We are all part of the KONZMANN Group and bear responsibility for each other. That is why we always treat superiors and colleagues with respect and support them in their work. By treating our working environment, colleagues, information systems, machines, equipment, and other facilities that are essential for the effective performance of our tasks with care, we can realize our full potential as a company. In order to support each other on the path to success, it is also important that we handle leadership positions, confidential information, and potential conflicts of interest responsibly. Leadership means not only delegating, but also taking responsibility for one's area and the actions of one's employees.

We handle the company's assets with care

The KONZMANN Group strives to provide its employees with the tools, equipment, and information they need to perform their jobs efficiently. Our physical assets, intellectual property rights, and information must be handled with care to prevent loss, theft, or damage. Information includes technologies, processes, manufacturing methods, analyses, studies, and business development plans. These assets of

the KONZMANN Group are intended for business purposes. Limited private use is only permitted if it does not conflict with the interests and code of conduct of the KONZMANN Group. In the event of private use or use of information in public, care must always be taken to protect and maintain the confidentiality of all information provided by the company.

We apply information systems professionally

The KONZMANN Group's information systems are designed to help us work efficiently and professionally. These systems are used exclusively for business purposes – in accordance with company guidelines – to ensure that neither the rights nor the interests of the KONZMANN Group are violated.

DATA SECURITY IS OCCUPATIONAL SAFETY

We work competently with data and technology

The careful handling of data is of fundamental importance to us. We take care not to disclose sensitive or controversial business information that could have undesirable contractual or legal consequences for the KONZMANN Group. This includes complying with copyright, libel, and discrimination laws and other written communication standards in online communications and e-mail correspondence. We refrain from integrating non-approved or unlicensed software into the KONZMANN Group's information systems.

The use of our information systems must not result in the integrity of the KONZMANN Group's networks and data or those of third parties being compromised. This includes the creation or forwarding of chain letters or unsolicited e-mail advertising (spam). In addition, employees are expected to remain vigilant and immediately report any suspicious activities or potential security breaches. Regular awareness and careful handling of data help to prevent risks before they occur. Data that is created and stored using the KONZMANN Group's information systems is considered the property of the KONZMANN Group.

The KONZMANN Group reserves the right to access this data insofar as this is permitted by law or corresponding agreements permit this. Employees are responsible for the proper management of their files and archives.

We protect the confidentiality of information

Information is a valuable asset. Some information is disclosed in press releases, performance reports, annual reports, or other public documents. All other information that employees receive in connection with their work from any internal source must be treated strictly confidentially. This is crucial for the entire KONZMANN Group and its economic success in light of the poaching of valuable customers by competitors who copy our work. This regulation may also include information entrusted to us by suppliers, customers, or partners. We label this information appropriately, store the relevant material securely, and ensure that only persons who are authorized and who need it for their work have access to this information. We do not conduct confidential conversations in places where they could easily be intercepted, such as airports, public transportation, restaurants or bars, elevators, break rooms,

and cafeterias. Every employee shares the responsibility of protecting such information and must act with caution in all professional contexts. Breaches of confidentiality not only harm the KONZMANN Group but can also result in serious personal consequences.

Due to the high value of information, external parties who are given access to confidential information may be required to sign a confidentiality agreement. This agreement must be approved by management and/or your supervisor.

We respect the intellectual property rights of others

The KONZMANN Group carefully and consistently protects its own confidential information and fully respects the intellectual property rights of other parties. We strictly and consciously refrain from any unfair procurement of information from other parties and do not disclose it to the public without explicit prior permission.



AVOIDING CONFLICTS OF INTEREST

We deal with conflicts of interest consciously and openly

We strive to avoid conflicts of interest and to handle this issue sensitively. Conflicts of interest can arise when personal interests, family ties, or other connections conflict with the interests of the company.

To avoid conflicts of interest, we must be aware of the potential risks and take appropriate measures. We strive to avoid situations in which personal interests, activities outside the KONZMANN Group, financial interests, or personal relationships could conflict with the interests of the company or give the appearance of doing so.

In the event of a conflict of interest, the employees concerned must always be kept out of the process and the respective supervisor must be involved as the acting party to clarify the matter. Similarly, our business decisions on behalf of the company are not influenced by personal considerations or relationships..

Conflicts of interest often arise when employees, due to their position, award contracts, hire personnel, have access to information that could be relevant to the financial markets, or receive job offers from competitors. Some examples of possible conflicts of interest are listed below:

- **Extra-professional activities:** Employees accept employment in another company that is similar to the position within the KONZMANN Group and conflicts with their work at the KONZMANN Group. Or employees are employed by an actual or potential competitor, supplier, or customer of the KONZMANN Group, which may create conflicts.
- **Family and close personal relationships:** Conclusion of contracts with a company that is managed or owned by a family member or life partner, which requires careful disclosure and approval to avoid conflicts of interest;
- **Investments:** Acquisition of property or shares in companies in which the KONZMANN Group could have an interest in purchasing;
- **Membership of the Supervisory Board or comparable bodies:** Holding or accepting a position as a senior manager, consultant, or board member of a company or organization that is active in energy and building technology or has business relations with the KONZMANN Group (as partner, supplier, or customer), which may lead to potential conflicts of interest and requires transparency.

- **Significant shareholdings:** Ownership of shares in companies that maintain or seek to maintain business relations with the KONZMANN Group at or in competitor companies of the KONZMANN Group.

Employees who feel they are in a conflict of interest should inform their supervisor. This allows the company to assess whether a conflict of interest actually exists. We will then provide information on the appropriate steps to be taken in accordance with the KONZMANN Group guidelines.

We protect confidential information

Inside information refers to information that is not readily available to the general public but could be considered significant by an investor when faced with a decision to buy or sell a company or shares in a company. Because of the significant value that inside information can have for investors, this issue is governed by laws designed to maintain public confidence, which must be upheld by all employees in all circumstances and at all times. Any misuse or unauthorized disclosure of such information can lead to serious legal consequences for both the individual and the KONZMANN Group.

We comply with money laundering laws

With our strong commitment to fairness,

honesty, and openness, it is essential for the KONZMANN Group to fully comply with all applicable money laundering laws. Money laundering generally occurs when funds from illegal sources are channeled into legal financial channels in order to conceal them or make them appear legal.

We are committed to helping protect the integrity and reputation of the KONZMANN Group by actively helping to detect potential money laundering activities. In doing so, we try to recognize the warning signs early and report them promptly to the relevant department in the event of a suspected case. This may also apply to customers who are reluctant to provide complete information or prefer cash payments. In such cases, the legality of our actions must always take precedence over the conclusion of a potential transaction.

We keep careful and comprehensive accounts

Investors, creditors, and other persons have a legitimate and important interest in the KONZMANN Group's accounts. The credibility of the accounts is determined by the accuracy, completeness, and timeliness of the entries made. We document all business transactions of the KONZMANN Group in accordance with the statutory accounting principles, those of the KONZMANN Group, and other applicable regulations in a complete

and clearly comprehensible manner. We are aware that inaccurate or fraudulent records or reports are illegal.

We act with integrity in business matters

We respect the assets of the company and do not seek personal gain or advantage through the use of property, information, or any position within the KONZMANN Group.

The way in which the KONZMANN Group and its subsidiaries conduct their business has a significant impact on the reputation and success of the Group and the respective subsidiary. Business partners should be regarded as allies.

This section contains guidelines on the appropriate treatment of suppliers, representatives, and consultants, among other things.

As allies, we act fairly in our relationships with partners and suppliers

The KONZMANN Group highly values fair competition in its markets and consistently applies the same high standards in its treatment of all partners and suppliers. When selecting suppliers and/or concluding business deals with them, we never favor or give preferential treatment to any person or company for reasons other than those required by the interests of the KONZMANN Group. We

do not make business decisions based on personal or family interests and do not allow ourselves to be influenced by such interests.

We carefully select our business partners

We negotiate commissions and fees with agents and consultants, which must be proportionate to the services rendered. We do not pay commissions or fees that could be considered unreasonable. Agreements with consultants, brokers, sponsors, representatives, or other intermediaries may not be used to make payments to any person or persons, including public officials, and especially to employees of customers. The legal provisions regarding profit-sharing agreements are always observed.

We establish connections with subcontractors and value them

We rely on subcontractors to help us successfully carry out projects and greatly value the important contribution they make to the KONZMANN Group's long-term customer relationships, overall business success, and continued growth in the market. Their dedication and expertise are essential to maintaining our high standards and delivering excellent results.

To protect and promote the strong reputation of the KONZMANN Group, we care-



fully select subcontractors who consistently act in full accordance with our core values, ethical standards, and our Code of Conduct at all times without exception.

We work with like-minded partners

The KONZMANN Group's success depends on building long-term, trust-

worthy relationships with partners who share our commitment to ethical principles and responsible conduct. We join forces with partners whose values and practices align with those of the KONZMANN Group, ensuring mutual respect and cooperation.

RESPECT

We show respect for one another by helping each other succeed

The people who work in the KONZMANN Group come from different countries with different cultural backgrounds and unique perspectives. In order to properly recognize the valuable contribution of each individual, it is important that we treat and accommodate each other with courtesy, understanding, and respect. External observers will also judge the KONZMANN Group and its subsidiaries on how we treat them during business negotiations and everyday interactions. Clearly defined and regular communication, diversity, equal opportunities, inclusion, and health and safety standards are critical to creating a pleasant and supportive working environment for all employees.

We maintain regular and transparent communication

Regular communication between managers and their teams is crucial for overall business success and team cohesion. To ensure this communication, we usually meet regularly in the form of meetings and discussions and deal in particular with important topics such as corporate strategy, long-term goals, and short-term priorities. Through seminars and presentations, we strive to communicate the contribution made by the employees of the KONZMANN Group and its subsidiaries and to highlight its significance for the KONZMANN Group.

Supervisors regularly provide employees with performance reviews upon request

to facilitate employee development and self-reflection. These reviews serve to track progress and, where appropriate, plan further development.

We value mutual respect and the protection of privacy

The confidentiality of personal information, whether from employees, customers, clients, or distributors, must be respected at all times and under all circumstances. We collect, use, store, and disclose personal information only in strict accordance with the KONZMANN Group's privacy policy, internal data protection regulations, and applicable laws. This is an expression of respect for our partners and customers, i.e., valuing their privacy, trust, and confidentiality. This trust

must never be abused or violated under any circumstances and must always be complied with in accordance with legal regulations.

Employees cannot invoke the principle of privacy protection beyond applicable law when using KONZMANN's own communication facilities. In compliance with applicable law and with due consideration for the rights of employees, the KONZMANN Group reserves the right to monitor and access the use of the Internet and email traffic. All email and Internet communication via KONZMANN's own facilities is considered business information of the KONZMANN Group. Use for private matters is strictly prohibited at all times.

We value diversity

The KONZMANN Group considers diversity to be an asset. Over the years, various companies have been brought together under the umbrella of the KONZMANN Group. It is part of the KONZMANN Group's corporate culture to welcome all people—regardless of gender, nationality, age, or physical condition. Employees must interact respectfully with colleagues, customers, stakeholders, and business partners, regardless of differences or similarities. We promote and hire people based solely on their abilities. We oppose discrimination in hiring, compensation, participation in training, promotion, termination, or reti-

ment based on gender, age, national or ethnic origin, religion, disability, sexual orientation, union membership, or political beliefs. We reject any participation in or support of such actions. In this regard, we also expressly oppose any form of political extremism, whether from the left or the right.

We strive to create a harassment-free working environment

Employees should feel welcome, valued, and comfortable at the KONZMANN Group. We maintain a strict zero-tolerance policy against any form of harassment, whether personal, written, electronic, or verbal, ensuring a safe and respectful workplace for everyone. Harassment can take various forms, including insults, intimidating or aggressive actions or words, derogatory jokes, inappropriate gestures, and unwanted actions or comments. Sharing or disclosing materials that comment negatively on aspects of diversity such as gender, religion, race, nationality, sexual orientation, or physical condition may also be considered harassment. We are fully aware of these issues and do not tolerate any exceptions under any circumstances. In fact, the KONZMANN Group's internal reporting office was specifically established to provide employees with a confidential, safe way to report, clarify, and resolve such incidents promptly and effectively. Furthermore, we actively



K
KONZMA

K
KONZMANN

promote a culture of openness, respect, and inclusion, encouraging employees to speak up without fear of retaliation. We also maintain a trusting and trans-

parent relationship with managers on a mutual basis, emphasizing the importance of support and accountability at every level of the organization.

HEALTH IS THE MOST IMPORTANT ASSET

We set the highest health and safety standards

It is our duty and responsibility to protect and ensure the health and safety of our employees, their families, and communities in the workplace at all times. The KONZMANN Group's strict health and safety guidelines, comprehensive training programs, and transparent reporting requirements are designed to protect the lives, health, and long-term well-being of all employees. Our basic principles are:



Work safely and protect yourself, your colleagues, the community, and the environment. Therefore, we are committed to complying with applicable legal

protection regulations and contributing to environmental protection through advanced technology, while maintaining the KONZMANN Group's commitment.

We are aware of the applicable laws and company guidelines and comply with them. This applies in particular to those of us who are responsible for safety and environmentally areas.

We are committed to immediately reporting hazardous conditions or other unacceptable circumstances relating to health and the environment. We are aware that this is the only way to minimize occupational accidents and take appropriate corrective action.

OBLIGATION

We recognize social responsibility

As members of the KONZMANN Group, we consider it a true privilege and honor to be part of such a diverse and engaged community. Compliance with all applicable laws and regulations is a fundamental principle on which our business ethics are firmly based.

Promoting long-term, sustainable corporate strategies, both in terms of our operations and the innovative technologies we provide, are core competencies of good corporate citizenship and responsible, reliable cooperation. However, we also strive to further strengthen cooperation and collaboration within the KONZMANN Group.

We obey laws

In order to maintain the good reputation of the KONZMANN Group, we comply fully with all applicable laws and regulations. We have a sound and thorough understanding of the relevant laws relating to our professional activities and responsibilities. The responsibility for training, informing, and advising staff lies clearly with management, who are also expected to act as role models in this respect. We are firmly committed to non-discriminatory and fair standards and to protecting the environment, health, and safety of all employees at every level.

We expect our supervisors and colleagues to comply with all laws protecting health, safety, and the environment, to obtain all necessary permits, and to conduct business in accordance with applicable laws.

Due to the often complex legal framework within which the KONZMANN Group operates, legal issues may arise. When such matters occur, they are promptly referred to management for clarification, and if necessary, appropriate external legal advice is sought to ensure compliance.

In cases where legal disputes arise, we will act responsibly, fully comply with legally binding court decisions, and work diligently to ensure that all regulatory requirements are met without exception. We believe that this commitment is essential for maintaining trust and integrity in all our business activities and for safeguarding the long-term success of the KONZMANN Group. It is important to inform the management level about these issues at an early stage without delay. Employees are responsible for informing management

immediately and clearly if there are any signs or indications of such a conflict, ensuring timely intervention and resolution.

We promote sustainable development

We contribute jointly to the achievement of long-term corporate goals by supporting economic progress and assuming responsibility for environmental protection and social development. Part of this responsibility is to engage in appropriate ways to improve living conditions in the regions, cities, and communities in which we operate.

For us, sustainability means that the KONZMANN Group and its subsidiaries treat all stakeholders in a socially responsible and ethical manner. We can contribute to this by maintaining an open and transparent dialog with stakeholders about the KONZMANN Group's economic and social performance, its ongoing efforts, and its significant contribution to environmental protection. Therefore, each individual undertakes to actively familiarize themselves with the KONZMANN Group's principles of sustainable development and the associated economic, social and environmental concerns. This includes, above all, this Code of Conduct and our compliance guidelines.

We support responsible environmental protection

It is the responsibility of each individual to strictly comply with all environmental laws and regulations and to actively contribute to protecting the environment at all locations where they operate.

We are active members of our societies

At company level, we actively support various projects, campaigns and initiatives that help to promote society. At the same time, we encourage each and every one of our colleagues to actively support social issues in a spirit of solidarity and to make a valuable contribution to the community.

When participating in events, we pay attention to the associated legal risks and effects on the KONZMANN Group

We only attend events organized by reputable business or professional associations for appropriate business purposes. We pay attention to the agenda items before attending the event and discuss any questionable agenda items with our superiors before attending. If we encounter activities during the event that appear illegal or suspicious, we leave the event and immediately inform our superiors.

REPORTING LEGAL VIOLATIONS

The KONZMANN Group is a decentralized group of companies in which all participating Group companies can make their own independent decisions on various business matters within the imposed rules of procedure. Despite the decentralized structure, the guidelines set out in this Code of Conduct are central elements of the general and business conduct, culture, and commitment of the entire KONZMANN Group. It is essential that all employees follow these principles consistently and are personally accountable for compliance, ensuring integrity and trust throughout all levels of the organization.

Our digital whistleblower system - internal reporting office of the KONZMANN Group

It is the duty of all employees to promptly report suspected or observed violations of laws, this Code of Conduct, or company guidelines. This also applies if they are encouraged or pressured to violate these important principles.

To facilitate the reporting of violations, a whistleblower system has been set up as a secure and anonymous reporting portal. All incoming reports are carefully examined in full compliance with the necessary procedural principles—such as confidentiality and protection of the whistleblower. In order to conduct an effective investigation, it is important that the report is as detailed as possible.

With our whistleblower system, we offer all employees, business partners, suppliers and their employees, as well as

other third parties with a professional context, a protected communication channel for inquiries and/or information on the topics contained in the compliance guidelines and the Code of Conduct, such as human rights, environmental and climate protection, occupational health and safety, corruption, antitrust and data protection.

Further information on our existing whistleblower system and the anonymous reporting portal can be found at: www.konzmann-gruppe.de/kontakt/#hinweisgebersystem. Here you can report a possible violation confidentially.

We treat all reports confidentially and protect the identity of whistleblowers. In case of reports that fall under the protection of the Whistleblower Protection Act, the relevant legal regulations are of course observed. Furthermore, we do not tolerate any retaliation or adverse ac-

tions against whistleblowers who act in good faith, even if the allegations made are not confirmed after investigation.

In certain cases, the information you provide may be forwarded to the appropriate authorities for further investigation and clarification of the facts. Confidentiality, integrity, and compliance with applicable data protection regulations are always maintained.

All data transmitted will be processed securely in accordance with the current data protection regulations. In addition to our whistleblower system, you also have the option of contacting external reporting offices in accordance with the Whistleblower Protection Act (HinSchG).

You can find further information and the option of making an external report on the website of the Federal Office of Justice www.bundesjustizamt.de.

With your support, we can take timely action against breaches of regulations at an early stage and take effective action against misconduct at the KONZMANN Group and our subsidiaries.

Sanctions for violations of rules

Every employee is responsible for ensuring that both their own conduct and that of their direct reports is fully compliant with applicable laws, this Code of Conduct and the company's principles. Compliance with these principles, including business integrity, is taken into account in regular performance reviews.

In order to maintain a positive corporate culture, we do not tolerate any violations of the law, this Code of Conduct, or the company's principles. In the event of violations, the KONZMANN Group will take disciplinary measures, up to and including possible termination, against any employee, giving priority to a collaborative approach to finding a solution.

YOUR HELP IS IMPORTANT TO US!



Oliver Rennig
CEO



Malgorzata Klingel
Executive member | Head of HR

WHISTLEBLOWER SYSTEM

You can use our whistleblower system to inform us of violations of legal regulations or our compliance guidelines. Compliance with these regulations and principles of conduct is our top priority at all times. In order to fully live up to this claim, it is crucial to learn about possible misconduct by our own employees, suppliers, or third parties as early as possible so that appropriate countermeasures can be promptly initiated. This valuable information serves to prevent potential damage to employees, customers, business partners, the environment, and ultimately the reputation and success of KONZMANN GmbH and all our subsidiaries.

If you have concrete, well-founded indications of a possible legal or regulatory violation, you can easily contact us using the following OR code or alternatively get in touch directly with our designated law firm for further assistance:



Scan QR-Code

Access the link to the anonymous online reporting portal

Law firm

Dr. Niels Gercke - who will also advise you and protect your identity on request. You can reach Dr. Gercke by e-mail: n.gercke@melzgercke.de

TGA . ALL IN ONE

 **KONZMANNGRUPPE**

KONZMANN GmbH . Spatenstraße 14 . 88046 Friedrichshafen . Germany
Tel. +49 7541 93626-0 . E-Mail: info@konzmann.de . www.konzmann-gruppe.de

Equal rights for all people is an unshakeable and fundamental pillar of our philosophy and our corporate culture. We have deliberately decided against gendering because we believe that it can sometimes make texts more difficult to read and understand clearly. All personal designations apply equally to all genders, even if they may not be explicitly taken into account in the text when used simultaneously.