



# CODE OF CONDUCT



of ATN Hölzel GmbH

# Code of Conduct within the company and with respect to business partners

## Preamble

As the world is evolving into a networked global community, geographical, cultural and economic boundaries are becoming ever more blurred. As a consequence, we are increasingly confronted with different cultures, religions, world views and diverse social and economic models. It is in this global landscape that we are continually developing and expanding our business activities. In meeting the needs and challenges we are faced with both at home and abroad, we aim to take a forward-looking, responsible and legally compliant approach.

International competition necessitates many trade-offs that manifest in areas such as product quality, performance, market requirements, regional conditions, process optimization, reliability, innovative strength, sustainability and costs. In view of this wide range of challenges, it is vital to formulate clear, binding rules of conduct that promote a sustainable and respectful approach to nature and to natural resources. We must furthermore firmly embed ethical and moral principles in our company practices to ensure responsible, sustainable action.

We respect internationally recognized human rights and regard their protection and promotion as fundamental to our business activities. We strive to actively contribute to the observance of these rights and to uphold and support them in all our business activities. As a dynamic, continually developing resource, our Code of Conduct reflects these values. It will be updated to align both with new legal frameworks and with changing social and economic needs. The rules of conduct set out in this Code of Conduct are binding and non-negotiable for all employees. Any action that violates these rules will not be tolerated and will result in due consequences. As well as serving to ensure compliance with the regulations, any such sanctions aim to ensure that our company acts with integrity and responsibility at all levels.

With this Code of Conduct, we are building a firm foundation for sustainable, ethically responsible corporate governance that meets the challenges of the global world and actively helps shape the future.

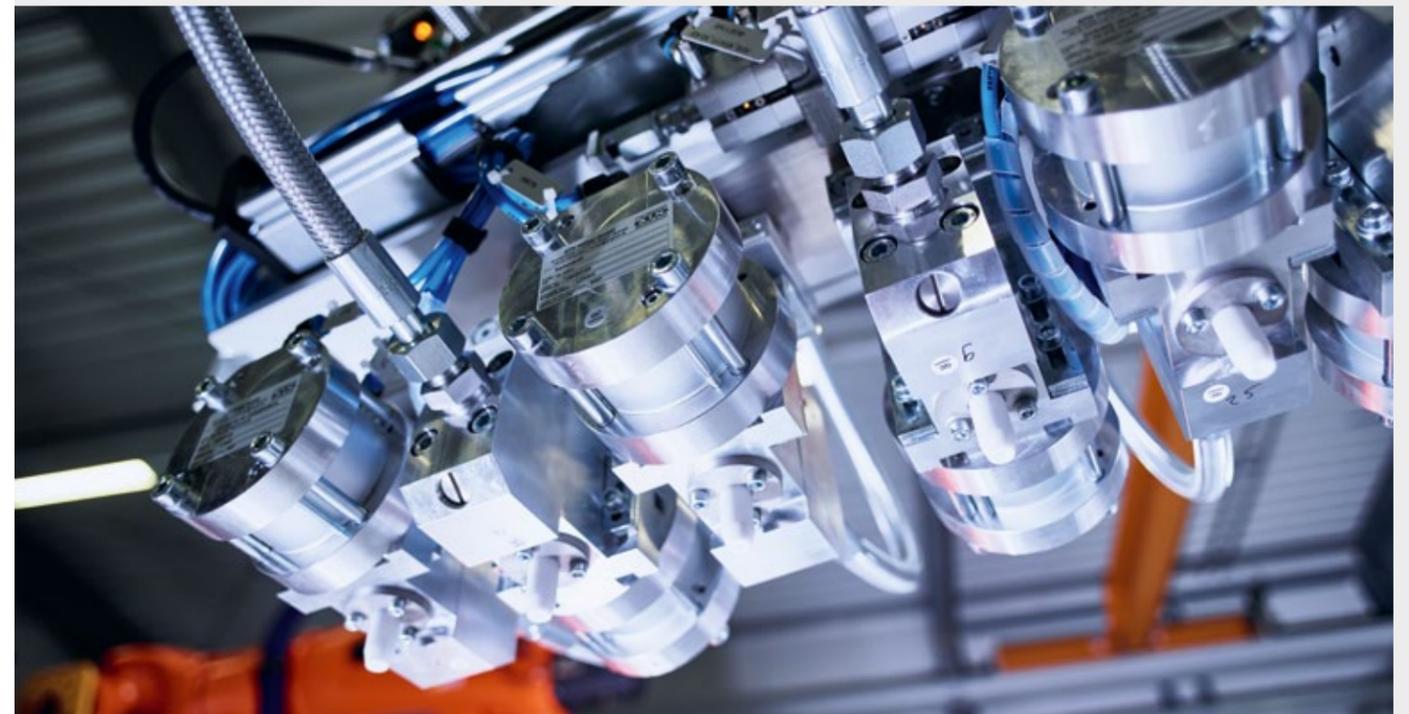


Torsten Hölzel  
Managing Director

Oppach, January 2026

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## 1. Scope

The rules of conduct apply to the entire ATN Group, including subsidiaries and affiliated companies, as well as to all companies in which the Group holds shares (hereafter referred to as ATN).

We expect all ATN employees as well as our suppliers and partners to comply with the rules of conduct and principles laid out below.

## 2. Rules of conduct

### 2.1 Fair treatment of employees

ATN undertakes to adhere to the basic labour rights of applicable national legislation and the acknowledgement of the core labour standards of the International Labour Organization (ILO), taking into account the laws and legal norms in force in the various countries and locations.

### 2.2 No child labour

ATN condemns and expressly dissociates from child employment. The same applies for the direct or indirect exploitation thereof.

### 2.3 No discrimination

ATN stands for equal opportunities and equal treatment. Discrimination of employees, for example in recruitment, promotion or facilitation of further education and training measures is not permissible. No employee must be disadvantaged on the basis of their gender, age, skin colour, culture, ethnicity, sexual or gender identity, disability, religion or world view.

### 2.4 No forced labour

ATN condemns and expressly dissociates from forced labour. The same applies for the direct or indirect exploitation thereof.

### 2.5 Appropriate remuneration and working times

ATN honours the applicable national laws regarding working hours. Employees shall receive remuneration that complies with the applicable national legislation.

### 2.6 Ensuring health protection and occupational safety

ATN undertakes to comply with the applicable national regulations on health and safety at work. Occupational health and safety management pursues two key aims: to reduce actual and potential occupational safety risks; and to promote the continuous training and further education of employees to effectively prevent accidents, operational disruptions and work-related illnesses.

In the event of an accident, emergency plans, fire protection equipment and first aid materials are available. All employees, suppliers and partners must actively contribute to compliance with health and safety regulations in their working environment and must comply with all relevant regulations. Managers have a responsibility to train and support their employees in fulfilling these requirements. ATN operates an ISO 45001 certified occupational health and safety management system.



### 2.7 Sustainable use of energy and the environment

ATN takes responsibility for continuously improving the environmental compatibility of its products and services and for reducing its products' use of natural resources over their entire life cycle, taking into account economic considerations. All relevant environmental laws and regulations must be complied with by business partners in all countries in which they operate.

- ATN lives by an ISO 14001 certified environmental management system.
- ATN approaches environmental challenges prudently and with foresight.
- ATN works towards developing and disseminating environmentally friendly technologies. To improve air quality, we minimize emissions of all kinds to the extent possible using the latest technology.
- ATN improves the environmental performance of products and services by setting targets and monitoring environmental indicators.
- In procurement decisions, ATN takes the sustainability of products and services into account.
- In all our activities throughout the entire lifecycle of our products and services, we avoid or minimize environmental impacts, such as

impairment of animal welfare, biodiversity, soil quality, land use and deforestation, and prioritize the health of our employees.

- We respect land, forest and water rights in all activities throughout the entire lifecycle of our products and services. Forced evictions are prohibited.
- The efficient use of energy, water and raw materials, the use of renewable resources, the minimization of environmental damage and the protection of health are taken into account in the development, procurement, manufacture, usage phase and recycling of products as well as in other activities.
- In the development, procurement, manufacture, usage phase and subsequent recycling of products as well as in other activities, the avoidance of noise and waste, and the reuse, recycling and safe, environmentally friendly disposal of residual waste, chemicals and wastewater are taken into account.
- All products and services must fulfil the contractually agreed quality and safety criteria upon delivery and be safe to use for their intended purpose.

### 2.8 Prohibition of corruption and bribery

ATN undertakes to not tolerate corruption and to adhere to the conventions of the United Nations (UN) and the Organization for Economic Co-operation and Development (OECD) for combating corruption to and upholding the relevant anti-corruption laws.

ATN observes the international anti-corruption standards as well as applicable local anti-corruption laws.

In particular, unlawful advantages must not be offered, promised or granted to employees and/or public servants in the public, state or municipal sector in Germany or abroad or to employees and/or decision-makers of other companies with the aim of achieving actions or decisions beneficial for ATN or to gain personal advantages.

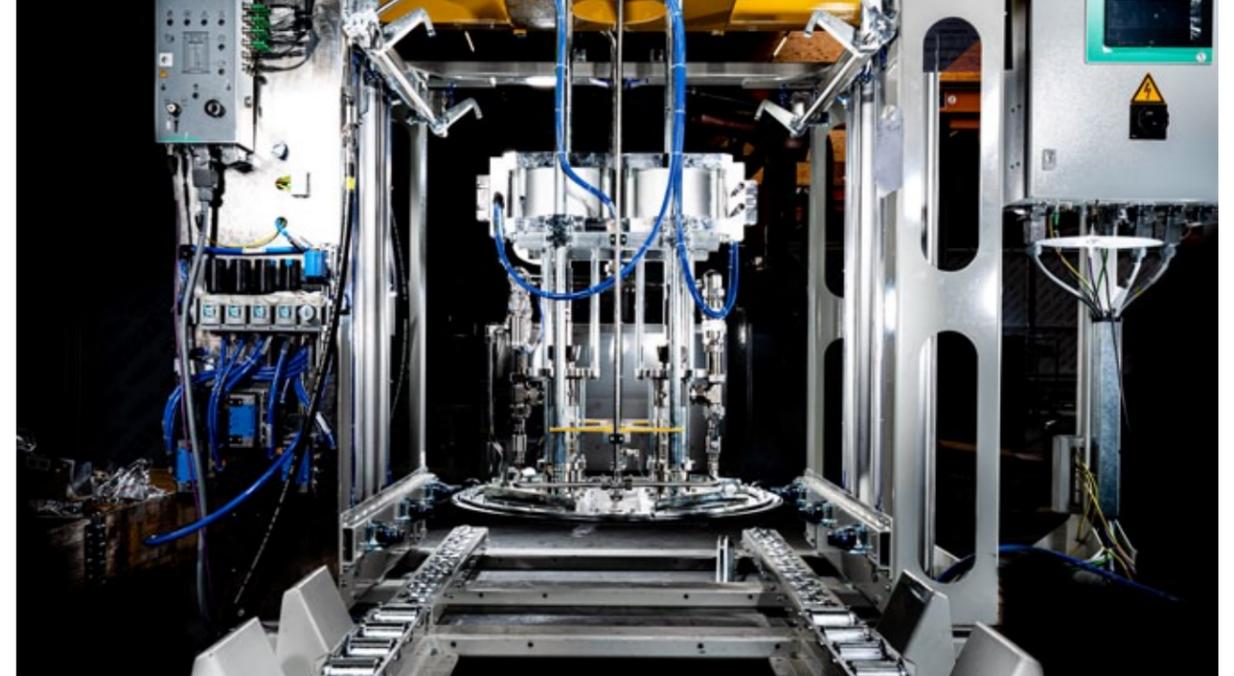
### 2.9 No personal advantages through invitations and gifts

In certain circumstances, contract partners are invited by ATN employees, or ATN employees by contract partners, to business lunches or dinners, or small gifts are presented as a thank you for good cooperation. Neither of these must result in personal advantages and/or dependencies or influence business decisions in any way or form.

If an employee is unsure whether they are permitted, for example, to accept a gift from a supplier, partner or customer, they should consult general management.

### 2.10 Avoidance of conflicts of interest

Business decisions must be taken only on the basis of factual criteria. Conflicts of interest with private concerns or other activities, of a commercial nature or otherwise, including by relatives or other related persons or organizations are to be already prevented at their inception.



### 2.11 Free competition

ATN engages in fair commercial competition. It observes the applicable antitrust laws. Unlawful agreements with competitors are prohibited. Any market-dominating positions, if existent, will not be improperly exploited.

### 2.12 No money laundering

ATN adheres to the relevant legal obligations regarding the prevention of money laundering and does not participate in money laundering activities.

### 2.13 Freedom of association and collective bargaining

ATN recognizes the fundamental right of all employees to form and join trade unions and employee representative bodies.

### 2.14 Observation of data protection and data security

The protection of confidential, secret and personal data is among the principles upon which we form our relationships with our employees (including former employees) and their relatives as well as applicants, customers, suppliers and other person subgroups.

We collect, process or use personal data only to the extent necessary for specified, clearly defined and lawful purposes. We make sure that the use of data is transparent for those affected, and that their rights to disclosure and rectification and, if applicable, to objection, blocking and erasure are upheld.

### 2.15 Use of private or public security forces

Deployed security forces must not be used to restrict freedom of association.

### 2.16 Protection of intellectual property

Patents and other property rights count among the most important corporate resources. They ensure our company's ability to innovate, act and compete. We therefore ensure that they are not misused by third parties. We furthermore prohibit the unauthorized use of third-party intellectual property.

### 3. Adherence to the Code of Conduct

To the extent possible by law and circumstances, the compliance with the rules of conduct and the resulting requirements will be monitored both within ATN and externally at suppliers and partners. Any violation of the rules of conduct outlined here and requirements resulting from them will be investigated and must, following the investigation, lead to a procedure (measures and/or sanctions) that will effectively prevent future violations. In any case, violations can lead to disciplinary action against ATN employees, in particular to cautioning and/or termination of the work relationship.

Violations of suppliers and partners will be regarded by ATN as a significant impairment of the contractual relationship. ATN can demand that these violations be terminated promptly and prevented in future. Should, following a suitable deadline set by ATN,

### 4. Supplier and partner relations

ATN maintains a fair relationship with its suppliers and partners. ATN expects all of its suppliers and partners to also observe and adhere to the rules of conduct laid out herein. In addition, suppliers and partners must pass on these rules of conduct to their subcontractors and suppliers to an appropriate extent. In agreement with the suppliers and/or partners, ATN can instruct a third party to verify the adherence to the rules of conduct by means of on-site audits on behalf of ATN.

If a violation is identified, the costs of the audit must be borne by the supplier and/or partner. Violations are regarded as a significant impairment of the contractual relationship. Child employment, forced labour, corruption and bribery are considered to be especially severe violations of the rules of conduct laid out in the Code of Conduct.

the violations not have been terminated, ATN has the right to make use of its extraordinary right of (instant) notice (right to contract termination).

Rules of conduct make sense only when their observance is monitored and violations are appropriately penalized. A precondition for this is that violations are identified. Every single person is therefore called upon to report any violation or the suspicion of a violation against the applicable rules of conduct, legal regulations or guidelines. Following the communication of information according to the best of their knowledge and belief and in compliance with the applicable rules of conduct and legal regulations, informants must not incur any disadvantages. Informants should contact the general management.

ATN can demand from its suppliers and/or partners that these violations be terminated and prevented in future. Should, following a suitable deadline set by ATN, the violations not have been terminated, ATN has the right, under preclusion of liability towards the supplier and/or partner (whereby the disclaimer shall not apply in the event of wrongful intent or severe negligence on the part of ATN nor for damages resulting from loss of life, physical injury or damage to health) make use of its extraordinary right of notice (right to contract termination). In the event of especially severe violations, a deadline can be dispensed with in individual cases.



## 5. International conventions

In addition to national laws and regulations, a series of agreements and recommendations of international organizations exist. These are addressed primarily at the member states and not directly at individual companies. They do, however, represent an important guideline for the conduct of internationally active companies and their employees. The compliance of our business activities with these guidelines is therefore important to us. The most important agreements in this category are listed below:

Universal Declaration of Human Rights from 1948 (UNO) and European Convention for the Protection of Human Rights and Fundamental Freedoms, 1950

International Covenant on Economic, Social and Cultural Rights, 1966

International Covenant on Civil and Political Rights, 1966

Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy of the ILO (International Labour Organization), 1977, and the ILO Declaration on Fundamental Principles and

Rights at Work, 1998 (in particular regarding the following topics:

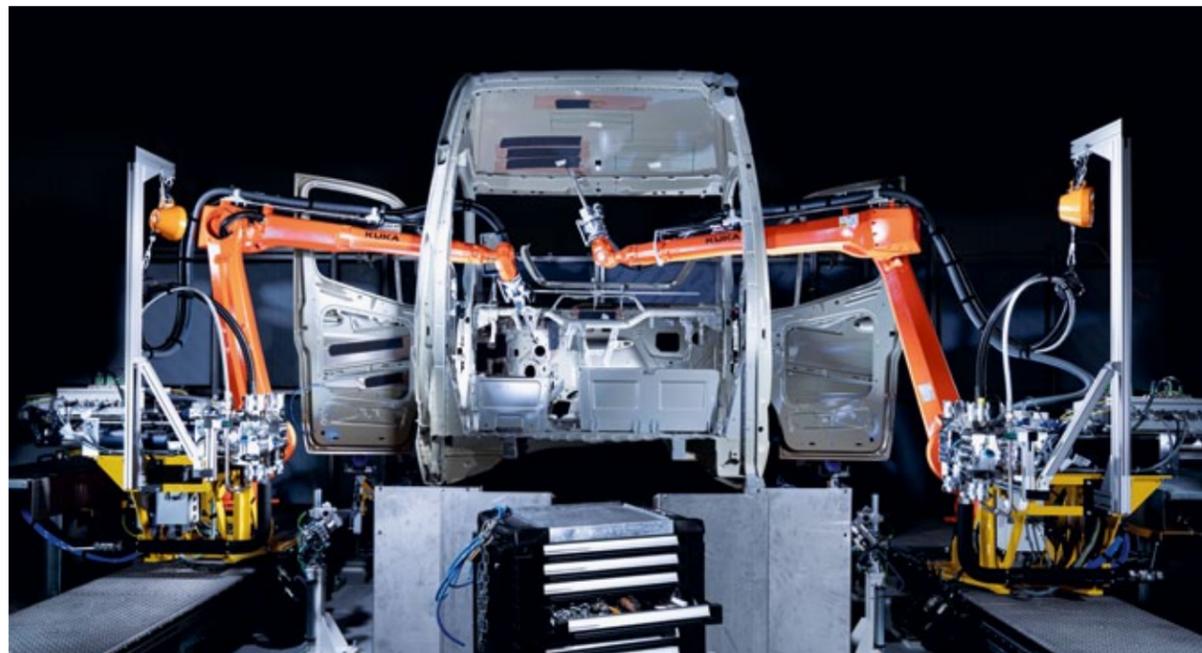
Prohibition of child labour, abolition of forced labour, prohibition of discrimination, freedom of association and the right to collective bargaining)

OECD Convention on combating bribery of Foreign Public Officials in International Business Transactions, 1997

Agenda 21 on sustainable development (final document of the UN Conference on Environment and Development, Rio de Janeiro 1992)

Principles of the UN Global Compact for a more social and ecological globalisation, 1999

We expect all ATN employees as well as our suppliers and partners to comply with the rules of conduct and principles laid out in this document. This includes compliance with all ethical standards, legal requirements and internal company guidelines to ensure responsible, trust-based cooperation.



## Branches and Service Places



**.01**

### Germany

Oppach (Headquarter)  
Dresden

**.02**

### Spain

Valencia

**.03**

### Bulgaria

Ruse

**.04**

### USA

Chattanooga

**.05**

### Brazil

São Paulo

**.06**

### China

Changchun  
Shanghai  
Beijing  
Wuhan

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