



Code of Conduct of OAS AG

Joint responsibility – joint success

Table of contents

Introduction	02
Our principles	03
Cooperative	03
Dedicated	03
Target-oriented	03
The business environment	04
Compliance with laws	04
Export control	04
Transparent business relationship	04
Diligence along the supply chain	04
Anti-corruption	04
Fair market behaviour	05
Dealing with government agencies and third parties	05
Donations and sponsoring	05
Confidentiality, data protection (GDPR), and intellectual property	05
Working together	07
Human rights	07
Diversity and equal opportunities	07
Responsibility of managers	07
Freedom of choice	07
Environment, quality, health and safety	08
Acting responsibly	08
Quality requirements	08
Promotion of health and safety	08
Implementation of the code of conduct	09
Obligation to comply	09
Creating awareness	09
Scope of application	09

Introduction

Dear employees,
Dear business partners,

as a family-run company, our actions are influenced by the ideas and values of the founder of our company, Otto A. Schwimmbeck. Today, our success is the result of the dedication of our employees and the trusting cooperation with our business partners. Our workforce has seen a strong increase over the last decades and today we have over 250 employees. Many of them have been with our company for a long time and have known each other for years; this is by no means a given anymore.

We want to keep growing steadily in a healthy manner in the future. In this context, acting responsibly and lawfully is the basic requirement for the company's success. High expectations with respect to our products, services, and the process of working together form the basis of the trust placed in us by our customers, business partners, and the public. The excellent and untainted reputation of OAS AG is key to the future positive development of our company. Therefore, every single employee and every single business partner is called upon to behave responsibly and to comply with applicable rights.

The purpose of this Code of Conduct is to maintain our values and develop new ones that guide our actions. In addition, it shall offer guidance and protect against engaging in improper conduct. In cases of doubt, however, you should always approach your superior or your contact person at our company.

The contribution of each individual employee and business partner is invaluable for our joint success and our joint future!

Management board of OAS AG
in Dezember 2025

Our principles

Cooperative

Trust, loyalty, and satisfaction are based on cooperation. This applies both to working together within our company and to dealing with other companies. If you want to establish a good business relationship, you need to be credible, honest, and reliable. This includes

- comprehensible and clear behaviour,
- not to promise more than you can keep,
- treating people with respect and offering assistance as needed, and
- compliance with human rights along the supply chain.

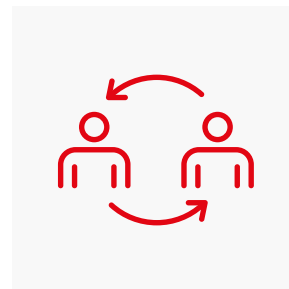
Our objective is to strengthen each other in our teams in order to jointly achieve our goals.



Dedicated

In accordance with the motto *“The customer determines our actions, both internally and externally!”* we rely on the dedicated conduct of our employees. This means we need to know our customers’ needs and offer them the best solution. It also includes

- congenial and uncomplicated behaviour,
- presenting new ideas for discussion, and
- keeping a firm eye on sustainability and climate protection.



Target-oriented

Pursuing objectives jointly is the basis for the success of the company. We always aim to set clear and realistic objectives in this context. This applies to implementing projects at our customers’ companies, but also to our own objectives.



The business environment

Compliance with laws

OAS AG and its employees have an obligation to always comply with the applicable national and transnational laws and regulations. We also expect this from our business partners.

Export control

The export control policy of OAS AG takes into account compliance with all prohibitions, restrictions, and reservations of official approval for the trade and export of goods, services, technologies, and software. Transactions with persons or companies against whom/which sanctions have been imposed are prohibited. The Client shall assume the duty of care towards OAS AG for the accuracy of any information required for the performance of the control.

Transparent business relationship

Sustainable and healthy business relationships are based on credibility and trust. The key factors to establishing credibility and trust are transparency and openness – conflicts of interest must be avoided. This specifically requires that business decisions be made objectively and in the interest of OAS AG, and not be influenced by personal interests or relationships.

Situations that may create a conflict could be that family members or other related parties work for business partners or competitors and have a personal and/or financial interest. If such a conflict exists, you need to consult with the respective supervisor in order to find an appropriate solution.

When business relationships are initiated or purchasing or hiring decisions are made, the selection must

be transparent and based on factual and objective criteria. In this process it is important to check the business partner's integrity as much as possible. OAS AG strictly rejects improper business practices, money laundering, and fraud.

Diligence along the supply chain

The management as well as our employees are aware of their social responsibility – also towards the employees of our suppliers. This awareness results in a duty of care along the supply chain. The United Nations Sustainable Development Goals (SDGs) on people, prosperity, earth protection, peace and partnership serve us as a guideline for our choice of suppliers.

Anti-corruption

The success of OAS AG is based on the high quality and value of the services we offer as we take on the day-to-day competition. If we engage in bribery or corrupt conduct, we do not just harm ourselves, but also our business environment. Therefore we radically reject corruption, conduct that harms our company, and improper business practices.

This means that employees of OAS AG must not offer, promise, or accept any incentives, benefits, special treatment, or other advantages in the context of business activities for the purpose of influencing the decision of a business partner.

Relationship management and open, fair, and reliable dealings with our business partners are part of the ordinary course of business. Invitations, business meals, gifts, or other gratuities must not be provided to gain or grant a benefit, but rather as a courtesy with a low financial value. Overall, invitations and

The business environment

gifts must be related to business dealings, must be given in a transparent manner, and must be consistent with customary social and business practices. Employees are prohibited from accepting financial benefits.

Fair market behaviour

OAS AG is a fair market participant that acts responsibly. In this context, we and our employees naturally engage in free competition and comply with the applicable antitrust and competition law.

Antitrust and competition laws protect performance-oriented companies, such as OAG AG, and the common good and thus facilitate free market development. Illegal and anticompetitive activities, such as anticompetitive agreements or the exchange of information with competitors through prices, offers, business terms and conditions, market shares, capacities, or refraining from competition, are strictly prohibited.

Dealing with government agencies and third parties

Employees must exercise special sensitivity when dealing with government officials, politicians, judges, or other representatives of public institutions. When participating in public tenders, employees shall observe the respective statutory requirements and the rules of free and fair competition.

Civil servants, politicians and other representatives of public institutions may not receive gifts, benefits or invitations that could compromise their independence. Gifts or invitations to this group of persons shall be coordinated with the Executive Board.

Consultants and intermediaries may only be used in accordance with the applicable laws. The amount of the compensation must be proportional in relation to the value of the service rendered and the personal qualification.

Donations and sponsoring

For the purpose of strengthening the region and society, OAS AG supports charitable projects related to education, science, cultural subjects, arts, social issues, sports and other social activities. Donations may only be made if they are made altruistically and in a transparent manner and are voluntary and legally defensible. Decisions with respect to donations and sponsoring activities may only be made by the management board.

Information security, confidentiality and intellectual property

To OAS AG, information security is of utmost importance. We have therefore implemented a wide range of technical, administrative and physical practices to protect our information assets.

We comply with the applicable laws and regulations of the General Data Protection Regulation (GDPR) when we research, store, use, or transmit personal data and information. When researching, storing, using, or transmitting personal data of natural persons, such as employees and customers. Persons involved, who handle personal data, receive advice and support from the responsible data protection officers of the company as required.

In addition, all company-related business secrets are subject to absolute secrecy. This applies not only for

The business environment

the duration of the employment relationship, but also after it has ended.

A fundamental component of information security are the internal regulations which regulate in detail how to handle the respective interaction (IT systems, artificial intelligence, e-mail, Internet, intranet, and telephone systems). These principles are binding for all employees of OAS AG. We accompany technological progress by continuously raising the awareness of our employees on how to deal with cyber security and have taken precautions to ensure that business operations can be resumed as quickly as possible in the event of an emergency. We expect the same from our business partners.

Intellectual property and confidential information of third parties and their know-how must be respected and protected. The use of external knowledge is only permitted to the extent that it is lawful or known from generally accessible sources.

Working together

Human rights

Human rights are the highest good. OAS AG respects and protects the globally applicable regulations for the protection of human rights, especially with regard to forced labour and child labour, and expects the same from its business partners.

Compensation and working hours

The most precious capital we have to ensure the success of our company is our employees. Therefore, OAS AG naturally complies with national laws and regulations regarding working hours, wages, salaries, and benefits. In addition, we address compliance with compensation in accordance with national legislation along the supply chain.

Diversity and equal opportunities

Every human being is unique and their dignity must be fully respected. The working environment at OAS AG is characterized by mutual appreciation and understanding. Our interactions are open and fair. Every employee has a right to be treated with respect. Discrimination and harassment are not tolerated at our company.

No employee may be discriminated against on the basis of ethnic or national origin, sex, religion, ideology, age, disability, sexual orientation or other characteristics.

This applies in full to dealings with business partners.

Responsibility of managers

The management board and the managers of OAS AG shall act as role models. The management style is characterized by trust, open communication, and appreciation. Any potential for improvement that is submitted is considered constructively. Management principles shall be implemented and adhered to independently and very responsibly vis-à-vis the employees for whom the manager is responsible. In addition, managers have an organizational and supervisory duty for their respective area of responsibility. They set clear, ambitious, but realistic goals that shall be achieved in a constructive working environment.

Freedom of choice

Our employees decide and act at their own discretion. They are free to solve problems, dangers, risks, and hazards they have identified themselves in an independent manner and at their own discretion, as long as no danger to their own health or danger to third parties arises from this.

A decision taken independently is justifiable if – on examination – the following key questions can all be answered in the affirmative:

- Is my execution legitimate and in line with company and business partner regulations?
- Does it comply with our company and legal requirements?
- Is it free from personal interests and compatible with my own conscience?
- Does my action or decision stand up to third-party review?
- Does my implementation safeguard the reputation of the company and the business partners?

Environment, quality, health and safety

Acting responsibly

The protection of people and the environment is an important part of our corporate policy. Only those who operate sustainably can survive in the long run. Our company is aware of its responsibility for climate protection. We actively contribute to climate protection not only through concrete measures, but also by developing innovative strategies. Legal regulations regarding ecological, economic and social sustainability provide OAS AG with the necessary standards. In addition, the conscious selection and responsible use of resources, such as water, energy and raw materials, must be observed by every employee.

Environmental and safety aspects are always taken into account when evaluating and selecting business partners. We act in accordance with the globally recognised requirements for an environmental management system and hold a corresponding ISO 14001 certification.

Quality requirements

The quality of our products, services and performance has always been of great importance to our company. In the competition for the favour of our customers, we convince them with the quality of our products and services. We owe it to ourselves as well as to our customers and business partners to continue this quality standard in the future. To ensure this, we maintain a quality management system in accordance with ISO 9001. The safety of our delivered products and services is an elementary part of this and is based on legal and internal requirements.

Promotion of health and safety

For OAS AG, the employees are the path to success. For this reason, promoting health and ensuring safety at work is of great importance to the company. Preventive occupational health and safety and health-promoting measures should contribute to the well-being, satisfaction and long-term performance of our employees. Each individual actively supports this goal by behaving prudently to promote their own health and that of others. Managers play an important role as role models. In particular, accidents and work-related illnesses are to be avoided and prevented. Deficiencies and other disturbances with regard to a safe and health-promoting workplace and working atmosphere must be reported immediately to the respective manager or alternatively to the safety coordinator. By maintaining an occupational health and safety management system in accordance with ISO 45001, we are working to continuously improve our efforts.

If you have any questions or suggestions for improvement, please contact the safety coordinator and management systems officer on **+49 421 2206-0**.

Implementation of the code of conduct

Obligation to comply

All members of the management board, managers, employees, temporary workers, and consultants have a duty to comply with this Code of Conduct and regard the Code and its principles as a binding standard in their daily working environment. This requires seeking information about the existing requirements actively and continuously and taking part in safety training. Especially in situations of doubt, it is very important to make decisions in accordance with applicable laws, regulations, internal regulations, policies, and our Code for the protection of the individual and the protection of our company.

The managers of OAS AG have an important role in this context as they have a duty to ensure compliance with the Code of Conduct in their area of responsibility. This includes informing employees about the content and meaning of this Code of Conduct and creating their respective awareness and making the best efforts to support them in its implementation. In this context, creating a positive work environment and open communication is the basis of lawful behaviour and cooperation in accordance with our Code of Conduct.

Creating awareness

All employees must be familiarized with our Code of Conduct upon the commencement of their employment. During the employment, managers have a duty to ensure the awareness of their employees through preventive measures and exchanges regarding any existing weaknesses.

Scope of application

Compliance with the Code of Conduct of OAS AG is mandatory in our daily actions and the Code is binding for our daily actions and applies to all board members, managers, employees, temporary workers, business partner and consultants of OAS AG.

Contact person

If you have any questions about individual aspects of the Code of Conduct, please contact your superior or partner in our company at any time. The superordinate contact within the company is the Board of Directors of OAS AG.

Alternatively, you can report any misconduct under this Code anonymously via the OAS whistleblower system at www.oas.de.

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