

75
YEARS



We are
committed to
sustainability
**and essential
values.**

PROLOGUE

Acting with foresight.

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Prologue.

Acting with foresight.

We think in interdisciplinary terms, always with the aim of optimizing the entire cleaning process. Whether cleaning equipment or systems, chemicals or accessories – our products and services must deliver significant added value to customers in different industries.



For 75 years. Thinking ahead strategically. Remaining a role model.

01 The guideline for our activities.

We are Elma, an owner-managed family business. For us, this means a pioneering spirit, living innovation, striving for perfection and being a role model for employees, society and the region. For more than 75 years.

With its innovative products and services in the fields of ultrasonic and steam cleaning technology, our company has achieved a leading position in the field of industrial parts cleaning. We want to continue to live up to the responsibility that has grown in this context over three generations. Existing processes are regularly scrutinized and optimized together with internal and external whistleblowers. This is how real progress is made. We are all committed to complying with applicable laws and making daily decisions based on our values and the principles of this Code of Conduct. The Code of Conduct applies to all employees without exception as well as to dealings with customers, business partners, suppliers, competitors and public officials – it defines the principles and requirements for the processing of orders, so to speak. We stand for **tolerance** and **mutual respect** in line with our corporate culture. This document is intended to provide us with guidance and advice on how to achieve the high goals we have set ourselves. It also helps us to recognize misconduct and grievances and to react appropriately.

We, the shareholder family and all Elman employees, are convinced that trust, curiosity, cohesion and determination are the basis for the future of the company. They also transfer our values to our products, services and technologies. In the face of global competition, these values are an indispensable component of sustainable success. In order to continue to consolidate our position as market leader with innovative products and services, we source raw materials, goods and services from suppliers worldwide.

Our basis for this is responsible corporate management geared towards long-term value creation. In addition to the four basic pillars – human rights, working conditions, corruption prevention and environmental protection – we also pay attention to organizational, economic and technical criteria in every procurement activity.

Sincerely
Cornelia and Mirja Schmidbauer



Milestones



1948



1966



1969



1999



2008



2009



2010



2013



2016



2021



2023



Strategy. Defining binding commitments.

Thanks to our position in society, we as Elma have a special responsibility in dealing with recognized standards. The Code of Conduct is therefore a non-negotiable self-image for us. Because we always want to be and remain a role model.



Passion for the highest purity. Since 1948.

02 Shared values and goals.

Trust, curiosity, cohesion and determination: these are the guiding principles of our company. That is why we, as employees, managers and business owners of Elma, are fully committed to fair, responsible and compliant behavior as well as compliance with national and international legal regulations. The guidelines of this Code of Conduct are flanked by internal guidelines and regulations as well as employment contract agreements, with which we naturally familiarize ourselves sufficiently and align our actions accordingly.

In particular, we reject any involvement in business activities based on or aimed at fraud, embezzlement, theft, embezzlement, extortion or corruption or any other financial damage to our customers, suppliers or other business partners.

In our actions, we undertake to comply with these rules of conduct at all times and to avoid any disadvantages and damage caused to others by non-compliance with this Code of Conduct.

In order to avoid possible violations, we will take the guidelines set out in this Code of Conduct into account in all our decisions and seek competent advice in cases of doubt.

With the Code of Conduct, we want to work together to firmly anchor these principles in our everyday lives. In this way, together we will secure the path to the future for ourselves and future generations – as a responsible employer, reliable partner and passionate cleaning technology manufacturer.



4 Principles



SOCIETY

We live an open corporate culture and promote equal opportunities.



BUSINESS PARTNER

We treat each other with respect, fairness and trust in our daily work.



EMPLOYER

We are committed to fair and open competition in the markets.



ENVIRONMENT

We are committed to a responsible approach to the environment.





Responsibility. Implementing with determination.

Wherever people are working together, it is important to have rules to ensure that they can interact effectively. This ensures that no group is excluded or unilaterally favored. They also define the performance of a society shaped by diversity and uniqueness.



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ENVIRONMENT

We are committed to a responsible approach to the environment.

Protect rights. Enable opportunities. Create trust.

03 Social responsibility.

As employees, managers and directors of Elma, we are aware of our social responsibility and not only respect the welfare of people and animals, but also ensure that our company makes a contribution to environmental protection and sustainable development.

We are therefore committed to the principles of the United Nations Global Compact, which corresponds to this Code of Conduct. We also expect our business partners and suppliers to comply with these principles. The same applies to the recognition of the core labor standards of the International Labor Organization (ILO) and the International Bill of Human Rights of the United Nations, taking into account the laws and legal standards applicable in the various countries and locations.

In detail, the following principles result from this responsibility of our company as a member of society:

At a glance

- 1 Human rights.
- 2 Equal opportunities and equal treatment.
- 3 Product conformity and safety.
- 4 Donations and charity.
- 5 Communication, marketing and social media.

1 Human rights.

We respect, protect and promote the applicable regulations for the protection of human and children's rights in accordance with the European Convention. We reject any violations of the ban on (modern) slavery and human trafficking as well as any kind of child, forced and compulsory labor and expect our customers, suppliers and other business partners to comply with the provisions of the UN Convention on Human Rights on humane working conditions. With our social commitment, we actively promote intercultural exchange and, as a company, want to make a sustainable contribution to promoting the common good.

2 Equal opportunities and equal treatment.

As a family business, we attach great importance to good training and development opportunities in life. We have an open corporate culture and are committed to equal opportunities for all. We therefore do not tolerate discrimination on the basis of ethnic or national origin, gender, religion or ideology, age, disability, sexual identity, political, trade union and civil society views or social background. In our company, we create an environment in which our employees are selected, hired and promoted in accordance with international labor standards and in a fair and transparent manner and exclusively on the basis of their qualifications and skills. In this way, we live an integrative and inclusive corporate culture.

3 Product conformity and safety.

We demand that the products we manufacture not only comply with the applicable legal regulations, but also adhere to our high internal quality standards. We use suitable structures and processes, ISO certifications and product monitoring to ensure that our quality management is fully complied with throughout the entire process chain. Based on the customer requirements we identify, we develop tailor-made product solutions "Made in Germany" for the individual requirements of our customers. In addition to technical design and an uncompromising price-performance ratio, the highest quality, functionality and product safety are the essential building blocks for us. We ensure that appropriate measures are taken in good time in the event of any deviations or feedback on individual applications.

03 Our employees are available to answer any questions our customers may have about our products. We implement appropriate security measures and access controls to protect and secure our site and operations.

4 Donations and charity.

We make donations in cash and in kind to charitable causes, sport, culture, science and research, education and church institutions. The focus is particularly on regional facilities and institutions.

5 Communication, marketing and social media.

We ensure consistent, professional and clear communication with employees, business partners, company management and the public. No statement is made on behalf of our company to customers, suppliers, other business partners and, in particular, the press or other public bodies that has not first been agreed internally with the responsible departments and decision-makers and approved for public comment.

Before agreeing to communication and marketing measures, we coordinate these with the responsible specialist and marketing department. Even if it is made clear that statements are clearly our subjective opinion, statements at public, professional or cultural events in discussions with business partners or on rapidly spreading communication channels such as social media must be refrained from if they could have a detrimental effect on Elma's business or damage trust in our company.

The responsible employees always ensure that factual and objective information is provided – without disclosing sensitive data. Offensive and legally critical messages are prohibited.

My contribution



The Elma Codex

If I discover a breach of one of the principles outlined in this section, I draw the attention of the persons involved to their misconduct. If I am not in a position to influence the processes directly, I report the incident to our contact point for whistleblowers or contact the Compliance Officer directly.



04



SOCIETY

We live an open corporate culture and promote equal opportunities.



BUSINESS PARTNER

We treat each other with respect, fairness and trust in our daily work.



EMPLOYER

We are committed to fair and open competition in the markets.



ENVIRONMENT

We are committed to a responsible approach to the environment.

Acting fairly. Fighting corruption. Gain respect.

04 Elma as a business partner.

As a globally active company, we maintain business relationships with customers and partners all over the world. We are aware that these international cooperations are subject to commercial law. Our primary aim is to prevent the misuse of our products. We therefore attach particular importance to implementing and clearly communicating the legal framework, internal guidelines and corporate values.

This results in the following principles and legal requirements for us:

At a glance

- 1 Conflicts of interest and customer relationships.
- 2 Whistleblowers and protection from retaliation.
- 3 Gifts, hospitality and invitations.
- 4 Supplier relationships.
- 5 Prohibition of corruption, competition & antitrust law.
- 6 Prohibition of money laundering & terrorist financing.
- 7 Fair and free competition.
- 8 Export duties.
- 9 Conflict substances.

1 Conflicts of interest and customer relationships.

We only make decisions regarding business activities on the basis of objective criteria and do not allow ourselves to be influenced by personal interests and relationships. We avoid conflicts of interest with private interests or other business activities, including those of relatives or related persons or organizations.

2 Whistleblowers and protection from retaliation.

If misconduct by employees is identified with regard to behavior, disclosure of information, violations of guidelines, regulations or statutory provisions, this is reported immediately via the contact point for whistleblowers or directly to the Compliance Officer.

3 Gifts, hospitality and invitations.

Insofar as gifts, hospitality, invitations or other financial benefits are granted to or received from business partners or customers, this is always done cautiously and to an appropriate extent in compliance with the applicable guidelines.

This therefore excludes from the outset the acceptance of cash amounts or financial benefits of not inconsiderable value, as well as the granting of such benefits to business partners or customers. When dealing with gifts, hospitality and the like, we adhere to the applicable tax regulations and amount limits within the legal framework.

4 Supplier relationships.

We carefully select suppliers and service providers according to objective criteria. Our suppliers must therefore ensure compliance with the United Nations (UN) and Organization for Economic Cooperation and Development (OECD) conventions on combating corruption and the relevant anti-corruption laws.

In particular, suppliers must ensure that their employees, subcontractors or representatives do not offer, promise or grant any benefits to our employees or related third parties with the aim of obtaining an order or other preferential treatment in business dealings. When purchasing products and services, we involve the relevant purchasing departments.

04 **5 Prohibition of corruption, competition & antitrust law.** We do not tolerate corruption under any circumstances. The sustainability of our company over generations is based on the quality of our products and services. Corrupt behavior by employees, customers, suppliers or other business partners is punishable by law and leads to financial and reputational damage. For this reason, we distance ourselves from any kind of corruption and grant benefits to business partners, suppliers or customers restrictively and only within the legally permissible limits. If a business partner engages external consultants, in particular those with an intermediary or representative function, to initiate or handle a business relationship, we must be informed of this in advance. In all cases, the applicable statutory provisions must be observed. In particular, our business partners must ensure that any remuneration to be paid to consultants is not misused as a means of corruption and is paid exclusively for consulting and agency services that are actually and demonstrably provided. An important characteristic of this is an appropriate relationship between the remuneration to be paid and the service or work to be performed.

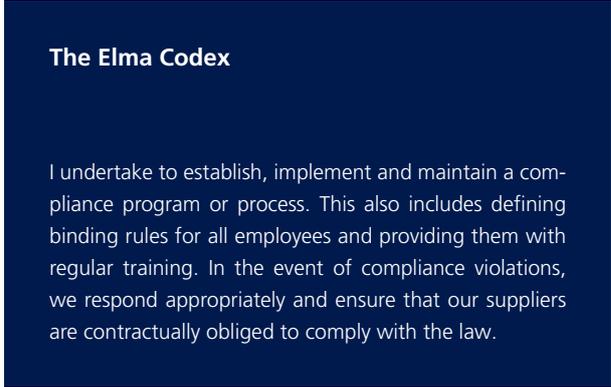
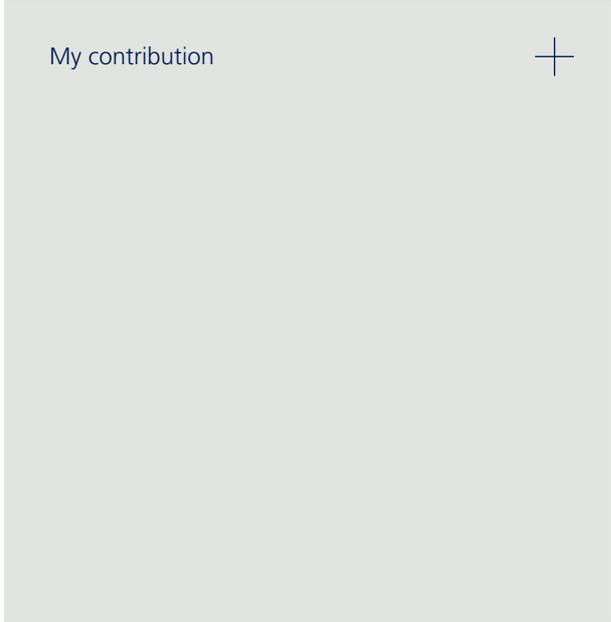
6 Prohibition of money laundering & terrorist financing. We carefully check the identity of customers, business partners and other third parties with whom we wish to do business. Our aim is to maintain business relationships only with reputable partners whose business activities comply with legal regulations and whose intentions and activities are in line with our value system.

7 Fair and free competition. In competition, we conduct business exclusively on the basis of the merit principle and comply with the applicable antitrust laws. We do not participate in agreements with competitors, suppliers or customers that violate antitrust law, nor do we abuse any dominant market position we may have. We compete with our competitors, but always adhere to legal and statutory regulations and ethical principles, which are also anchored in our value system.

8 Export duties. We comply with the procurement principles regarding restrictions on the export or re-export of products and services

as well as applicable restrictions on trade with certain countries, regions, companies or organizations and individuals.

9 Conflict substances. With regard to conflict substances, suppliers must comply with all applicable legal regulations. In the event that a product contains one or more of the so-called conflict materials (tin, tantalum, tungsten, gold or the corresponding ores), we expect our suppliers to be able to ensure transparency across the entire supply chain upon request.





05



SOCIETY

We live an open corporate culture and promote equal opportunities.



BUSINESS PARTNER

We treat each other with respect, fairness and trust in our daily work.



EMPLOYER

We are committed to fair and open competition in the markets.



ENVIRONMENT

We are committed to a responsible approach to the environment.

Secure values.

Leading corporate dialogue.

Increase motivation.

05 Elma as an employer.

It is in our own best interests to protect the health and well-being of our employees and to ensure their safety.

1 Occupational health and safety.

Our suppliers must comply with the applicable national legislation on health protection and occupational safety. Suppliers must establish and apply an appropriate occupational safety management system (e.g. in accordance with ISO 45001). This includes both the containment of actual and potential occupational safety risks and the training of employees in order to prevent accidents and occupational illnesses in the best possible way.

2 Data protection.

We protect the personal data of employees, former employees, customers, suppliers and other data subjects.

3 Security and protection of intellectual property.

We develop products and services based on appropriate methods and processes and implement precautionary measures to minimize the risk of introducing counterfeit and pirated materials into our products. If plagiarism and counterfeit materials are detected, we review the available information and take further legal action.

4 IT security.

We pay attention to IT security and ensure the implementation of necessary measures in this regard, including regular updates, continuous digitalization measures, the improvement of IT processes and regular training and further education.

5 Principles of corporate governance.

We ensure the reporting of relevant information for our employees and see it as the responsibility of managers to ensure a clear flow of information and to exemplify the corporate values. In our view, cohesion and trust as values also include proactive conflict management. Our managers are the point of contact for all employee concerns.

At a glance

- 1 Occupational health and safety.
- 2 Data protection.
- 3 Security and protection of intellectual property.
- 4 IT security.
- 5 Principles of corporate governance.

The Elma Codex

I follow the health and safety guidelines and do not endanger my own safety or that of others. I support my team, accept help and act responsibly. I observe company rules, treat company assets with care and protect confidential information, especially technical know-how and trade secrets.



06



SOCIETY

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BUSINESS PARTNER

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EMPLOYER

We are committed to fair and open competition in the markets.



ENVIRONMENT

We are committed to a responsible approach to the environment.



Think ecologically. Invest sustainably. Setting an example.

06 Responsibility for the environment.

We attach particular importance to sustainability. We use environmentally friendly, advanced and innovative technologies to ensure the careful use of natural resources, a sustainable reduction in environmental impact and compliance with environmental protection laws and regulations.

A large number of people around the world come into contact with our products every day. Our products and services are used in a wide range of industries. The risks and dangers to the health and safety of users arising from the use of our products must be counteracted in the best possible way. The same applies to environmental protection.

1 Ecological innovation.

For us, innovation and environmental awareness as well as the demands we place on our products and services go hand in hand. Our responsibility for the environment and the sustainable existence of Elma is reflected in our sustainability strategy. We are constantly committed to keeping our technology and innovation at the highest technical level and to using ecologically compatible and degradable materials. We use our product development technologies to reduce environmental impact, reuse or recycle materials and conserve resources. In addition, we continuously check and evaluate the environmental compatibility of our products and manufacturing processes and, if necessary, adjust our sustainability targets.

2 Investment in sustainability.

We ensure compliance with environmental laws and regulations and invest in a sustainable contribution to improving and reducing our emissions, such as waste, CO₂ emissions and water consumption. In doing so, we ensure water quality, the use of land, forests and water bodies and take a sustainable approach.

The Code of Conduct came into force on 29 February 2014 by the management of Elma Schmidbauer GmbH.

At a glance

- 1 Ecological innovation.
- 2 Investment in sustainability.

The Elma Codex

In my work, I prioritize environmental protection by using resources and energy sparingly and efficiently. I make sure that my activities have minimal environmental impact and strictly follow environmental laws and regulations. My goal is to reduce my ecological footprint and promote environmentally conscious behavior in my day-to-day work.



Support. Mindful guidance.

People who have the courage to point out misconduct or unacceptable conditions deserve our special and full protection. They are the ones who ensure that we always act responsibly and lawfully. Many thanks to them for their outstanding commitment.

Contact points for whistleblowers.

07 Integrity – with no exceptions.

It is customary for us to openly address inappropriate behavior. Both employees and external parties are encouraged to raise their concerns freely and without fear of negative consequences. Any retaliation against employees who raise concerns in good faith is strictly prohibited. This also applies to external persons who contact Elma. The following communication channels are open to both employees and external parties.

1 Whistleblower system.

Violations of our Code of Conduct can be reported at any time via our whistleblower system:

Elma Schmidbauer GmbH
Gottlieb-Daimler-Straße 17
78224 Singen (Germany)

We consistently follow up every report of misconduct, taking proportionality into account. We carefully examine every report. Based on the results, we transparently decide which measures are necessary and appropriate.

2 Personal contact.

Fabian Merk
Compliance Officer
compliance@elma-ultrasonic.com

Version history:

Version 1.1 / as of 26/05/2024

Version 1.0 / as of 29/02/2024

We are committed to sustainability **and essential values.**

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