Compliance and Responsible Conduct Policy

Mack Holding GmbH

1 Purpose, Objectives and Principles of Conduct

As a globally operating group, Mack Holding GmbH and its affiliated companies have a responsibility towards their employees, customers, suppliers and the public. Responsible corporate governance is founded on Mack Holding GmbH complying with applicable laws, ethical principles, supply chain responsibilities and internal company policies at all times and in all locations, while acting sustainably.
Mack Holding GmbH is also committed to clearly defined principles of conduct for all employees and managers. These principles form the basis for acting with integrity, responsibly and in compliance with the law in day-to-day business.
Compliance with such requirements and principles is hereinafter referred to as compliance and responsible conduct.

This policy aims to prevent violations of legal requirements and applies worldwide to all employees at every level of the organization. We expect our managers and employees to comply with this policy. It is an instruction to all employees, and very employee I aware that any violation will have disciplinary consequences.
Corruption, distortion of competition and other violations of legal requirements pose particularly significant risks to a company and its employees. Mack Holding GmbH is committed to free competition and strictly rejects any unlawful distortion of competition. Compliance with laws and internal company policies takes precedence over commercial success at all times.

This policy forms part of the corporate philosophy of Mack Holding GmbH and its affiliated companies. It applies to all employees, managers and members of corporate bodies, as well as – where contractually agreed – to business partners, service providers and suppliers of Mack Holding GmbH and its affiliated companies.

2 Duties of Managers

All managers must comply with the following requirements:

- Managers must carefully select employees based on their personal and professional qualifications and suitability. The level of care required increases with the importance of the tasks to be performed by the employee (duty of selection). Where applicable, there may be potential for development.
- Within their area of responsibility, managers must monitor compliance with legal requirements, internal policies and the principles of conduct (duty of supervision). Managers must lead by example. If a manager identifies a need for training to enable an employee to comply with these requirements, the manager must arrange appropriate training.
- Managers must clearly communicate to their employees the importance of integrity, compliance with legal requirements and responsible conduct in day-to-day business. They must also make clear that violations will not be accepted and will result in disciplinary action (duty to communicate).

3 Dealing with Staff

Mack Holding GmbH ensures a working environment that is free from physical, sexual, psychological and verbal abuse, threats and any other form of mistreatment. All employees are obliged to contribute to a respectful, fair and appreciative working atmosphere and to actively support the principles of equal treatment.

Any irregularities, breaches or reports of misconduct can be brought to our attention via the designated contact persons or via the option to make an anonymous report. Disadvantageous treatment of individuals who report matters in good faith will not be tolerated.
When selecting our staff, we consider only their qualifications and suitability. Mack Holding GmbH attaches great importance to equality, non-discrimination and decisions free from discrimination.

4 Dealing with Business Partners and Third Parties

Fair competition is a prerequisite for the free development of markets and the associated benefits to society. Accordingly, the principle of fairness also applies to competition for market share. All employees are required to comply with the rules of fair competition.
Cooperation with business partners and third parties is based on integrity, transparency and fairness. Unfair business practices and any form of improper influence will not be tolerated.

As assessments under competition law can be complex, particularly in an international context, all employees are prohibited from:

- discussing with competitors prices, production output, capacities, sales, tenders, profits, profit margins, costs, distribution methods or other factors that determine or influence the company's competitive behavior, with the aim of inducing competitors to engage in similar conduct;
- entering into agreements with competitors not to compete, to restrict business relationships with suppliers, to submit sham bids in tendering procedures or to allocate customers, markets, territories or production programmes;
- influencing the resale prices of our customers or attempting to induce them to restrict the export or import of products within the Group.
- Employees must also not obtain competitively sensitive information through espionage, bribery, theft or eavesdropping, or knowingly disseminate false information about a competitor or its products or services.

4.1 Offering and Granting Undue Advantages

We secure contracts fairly on the basis of quality, price and innovative performance, and not by offering improper advantages to others. No employee may, in connection with business activities, directly or indirectly offer, promise, grant or authorize cash payments or any other undue advantages.
Any form of corruption, bribery or the granting of undue advantages is contrary to the principles of conduct of Mack Holding GmbH and is strictly prohibited. The acceptance of cash gifts or other benefits with a monetary value is generally prohibited. No employee may use their position within the company to obtain, accept or secure advantages, or to have such advantages promised to them.
This prohibition does not apply to occasional gifts of symbolic value or invitations to meals or events within reasonable limits. Gifts may only be accepted if their total value does not exceed €30.00 per person per year.

4.2 Business Relationships with Suppliers

Mack Holding operates a systematic supplier management system that incorporates our sustainability requirements. We expect our suppliers to adhere to our principles and values and to comply with all applicable legal requirements. These requirements are set out in our terms and conditions of purchase and form the basis of our business relationships.

In particular, we expect suppliers and business partners to respect human rights, refrain from using child or forced labour, comply with minimum standards under labour and social legislation, ensure safe working conditions, protect the environment, use resources responsibly and conduct business with integrity. Suppliers should also appropriately address these requirements within their own supply chains. Where there are reasonable grounds to suspect a breach, we reserve the right to conduct an investigation, seek clarification and take appropriate measures, up to and including termination of the business relationship.

5 Conflicts of Interest

5.1 Avoiding Conflicts of Interest

All employees are obliged to make business decisions in the best interests of Mack Holding GmbH and not on the basis of personal interests. Conflicts of interest arise when employees pursue their own activities or personal interests that conflict with or may adversely affect the interests of the company.
Potential conflicts of interest must be identified at an early stage, disclosed transparently and actively avoided. Employees must inform their line manager of any personal interests that relate to the performance of their duties at Mack Holding GmbH. Existing or emerging conflicts of interest arising from business relationships with, or shareholdings in, competitors must be reported to the line manager and generally be avoided. Secondary employment must be approved in writing in advance.

5.2 Use of Company Resources and Information

The companies within Mack Holding have a wide range of equipment and facilities in their offices and operational facilities, such as telephones, photocopiers, computers, software, the Internet/Intranet, machinery and other work tools such as email and voicemail systems. The responsible use of these company resources forms part of the general principles of conduct and serves to protect the company's assets. These resources must generally be used for business purposes and in accordance with the applicable internal regulations.
Under no circumstances may information be accessed, stored or shared that promotes racial hatred or the glorification of violence, supports or incites other criminal offences, or contains content that is sexually offensive within the relevant cultural context.

6 Confidentiality and Data Protection

6.1 Confidentiality

Internal confidential or protected information that is not intended to be made public must be treated as confidential. The protection of confidential information is an essential part of the standards of conduct expected of all employees.
Non-public information relating to the company, as well as information about individuals connected with the company – such as employees, suppliers, customers, agents, consultants or guests – must be protected in accordance with legal and contractual requirements. Confidential or protected information may include, in particular:

- Details concerning the organization and facilities of a company, prices, turnover, profits, markets and other business matters
- Internal reporting data

The obligation to maintain confidentiality continues beyond the end of the employment or contractual relationship.

6.2 Data Protection and Data Security

Effective prevention of data protection risks is an important part of information technology management, the responsibilities of managers and the conduct of each individual. Personal data may only be processed to the extent necessary for specified, explicit and legitimate purposes, e.g. in connection with the employment relationship. If personal data is to be processed beyond what is necessary, the consent of the data subject is required. It must be ensured that personal data is stored securely and protected against access by unauthorized third parties. When transferring data, appropriate state-of-the-art safeguards must be applied. The principles of the GDPR must be observed with regard to the quality and volume of data and the technical and organizational safeguards.

The processing of personal data must be transparent to the data subjects. Their rights of access, rectification, erasure, restriction of processing and to object must be upheld in accordance with statutory requirements. All employees must comply with the applicable laws in order to protect the personal rights of others.

7 Breaches of Compliance Requirements and the Principles of Conduct

7.1 Reporting

Mack Holding GmbH expects its employees and business partners to report immediately any compliance violations or breaches of the principles of conduct set out in this policy of which they become aware. Discrimination against or adverse treatment of whistleblowers will not be tolerated under any circumstances. This policy does not create a legal obligation to report misconduct.
Reports may be submitted via the designated reporting channels, including anonymously.

7.2 Disciplinary Consequences of Violations

Compliance with this policy and adherence to the principles of conduct set out herein are mandatory for all employees of Mack Holding GmbH. Regardless of any statutory penalties, employees who violate this policy or the principles of conduct contained therein must expect disciplinary consequences due to a breach of their contractual employment obligations.

8 Implementation and Monitoring

The management of Mack Holding GmbH actively promotes the comprehensive communication and implementation of this policy, including the principles of conduct set out therein. Compliance with legal requirements, internal policies and the principles of conduct must be regularly monitored at all sites.
The communication of this policy, as well as any necessary training or briefings, must be appropriately documented. Employees must acknowledge receipt of the policy where organizational arrangements provide for this. The policy is reviewed regularly and as necessary in the event of significant legal, organizational or business changes, and is amended where required.

Marksuhl, October 5, 2026

Mack Holding GmbH

Thomas Mack
CEO