

Code of Conduct and guideline for sustainable procurement amixon GmbH / Ruberg-Mischtechnik GmbH + Co. KG

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Preamble

amixon GmbH was founded in 2003 as the sales subsidiary of Ruberg-Mischtechnik GmbH + Co KG. - - Ruberg-Mischtechnik GmbH + Co. KG exists since 1983 as a manufacturing company for the production of processing machines for dispersed goods in dry, wet and suspended state.

Together, amixon GmbH and Ruberg-Mischtechnik GmbH + Co. KG manufacture and market precision mixers, dryers, granulators and synthesis reactors, which are used in almost all areas of material modification and refinement; in particular in the chemical industry, the food industry, the pharmaceutical industry as well as metallurgy, fine ceramics and plastics technology.

The honesty, integrity, respect and fairness of our business partners and employees are essential to the success of our business. With our corporate guidelines, we are consolidating this foundation in order to maintain our trust in each other and build on it in the future.

Compliance with these values and guidelines is expected not only from the members of the management and senior executives, but also from all employees, suppliers and their upstream suppliers.

Together with our suppliers, we want to shape our business relationships in accordance with ecological, social and ethical standards in order to minimize risks and create a stable and long-term collaboration.

1. Basic understanding

This Code of Conduct is based on a common basic understanding of socially responsible corporate governance in accordance with the following guidelines. We, the undersigned company

amixon GmbH und Ruberg-Mischtechnik GmbH + Co. KG -

assume responsibility within the framework of our respective possibilities and scope for action by taking into account the consequences of our entrepreneurial decisions and actions in legal, economic, technological as well as social and ecological terms. In this way, we contribute to the social and economic development of the countries and regions in which we operate.

Our actions are in compliance with the relevant legal regulations. We are guided by ethical values and principles, in particular integrity and honesty as well as respect for human dignity, as laid down in the principles of the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the core labor standards of the International Labor Organization (ILO) as well as the United Nations Guiding Principles on Business and Human Rights.

This Code of Conduct sets out the basic principles of our actions, which we actively require our employees worldwide to observe. The content applies in all business units of our company.

We expect the same basic understanding from our business partners. Rights in favor of third parties shall not be established thereby.

2. Our values of cooperation

We as a team: We support teamwork. Based on our joint experience and expertise, we find differentiated solutions with our business partners. To achieve this, an open, honest communication, listening and mutual understanding is elementary.

Commitment of Superiors: Employees in management positions hold special positions of trust and influence. Their additional responsibility is to ensure an ethical working environment and to act as role models. Employees must feel safe to raise questions and concerns and are taken seriously.

Fairness and respect: We are committed to the equality and freedom of all people. Our company is committed to workplaces that are free from all forms of discrimination such as discrimination based on skin color, gender, religion, origin, sexual orientation, disability, age, etc. We ensure equal opportunities for all employees in a safe and mutually beneficial environment by treating each other with fairness and respect. This protection against illegal discrimination is observed at all stages of employment.

Social responsibility: All company employees should be able to carry out their work in a safe environment without fear of harassment, bullying, insults or violence. We do not tolerate such behavior in any way, whether physical or psychological. Such behavior is strictly prohibited.

Security: Our goal is to prevent accidents. This requires all employees to know, understand and comply with the safety laws and regulations that fall into their area of responsibility. Compliance with these requirements serves to protect one's own safety as well as the safety of business partners and co-workers.

Empowerment of our employees: The market is fast-moving and the pace of development is high. In order to meet changing requirements, we support our employees in their professional development. Appreciating our employees is one of the cornerstones of our success. All employees are empowered to make a positive impact and take responsibility for their behavior and the results they achieve.

Reliability: Our goal at all times is to fulfill our promises. Reliability is demonstrably the basis for harmonious cooperation. For us, this means mutual openness and keeping our promises.

Trustworthiness: Trust grows when the criteria of credibility and reliability have been well developed. This is the basis for any cooperation.

3. Compliance with the law

Compliance with the applicable laws and other legal provisions of the countries in which we operate is a matter of course for us. If local laws and regulations are less restrictive, our actions are guided by the principles of this Code of Conduct. In cases where there is a direct conflict between mandatory local law and the principles contained in this Code of Conduct, local law shall prevail. However, we make all reasonable efforts to comply with the contents of this Code of Conduct.

4. Integrity and compliance

We have taken appropriate compliance measures to ensure that the following topics are adequately covered:

4.1 Corruption

We do not tolerate corruption, bribery or extortion; they prevent fair competitive conditions. Benefits that are connected with the intention or could give the appearance of influencing business decisions or obtaining any other improper advantage are neither promised, offered, granted, demanded or accepted in our business relationships nor do we allow ourselves to be promised such benefits. A particularly strict standard must be applied when dealing with persons to whom special criminal and liability regulations apply (e.g. public officials).

4.2 Fraud and deception

amixon GmbH und Ruberg-Mischtechnik GmbH + Co. KG will not attempt to gain any advantage of any kind by fraudulent acts, deception, false pretenses or by allowing another person representing amixon GmbH and Ruberg-Mischtechnik GmbH + Co. KG to do so. - This includes fraud or theft and any misappropriation of property or information.

We condemn fraudulent activities in any form. All employees are encouraged to participate in the effective combating and prevention of fraud.

4.3 Fair competition

We act in accordance with national and international competition and antitrust law and do not participate in price fixing, market sharing or customer, market or bid rigging.

4.4 Money laundering prevention

Money laundering refers to the process of infiltrating illegally generated money or illegally acquired assets into the legal financial and economic cycle. We comply with our legal obligations to prevent money laundering and do not participate in transactions that serve to conceal or integrate criminal or illegally acquired assets.

4.5 Protection of information and intellectual property

We protect confidential information and respect intellectual property; technology and know-how transfer shall be carried out in such a way as to protect intellectual property rights and customer information, trade secrets and non-public information. We comply with the applicable laws on the protection of business secrets and treat confidential information of our business partners accordingly

4.6 Data protection

Our company processes, stores and protects personal data in compliance with legal regulations. This means that personal data is collected confidentially, only for legitimate, previously defined purposes and in a transparent manner. We only process personal data if it is protected against loss, alteration and unauthorized use or disclosure using appropriate technical and organizational measures.

Our current and complete privacy policy can be found at any time on our websites(<https://www.amixon.com/de/datenschutz>; <https://www.ruberg.eu/datenschutz>; <https://www.clever-cut.com/de/datenschutz>).

4.7 Export control

We undertake to comply with the relevant legal standards for export control - in particular licensing requirements, export and support prohibitions - in the context of the transfer and export of our goods.

4.8 Avoidance of conflicts of interest

We avoid internal and external conflicts of interest that could illegitimately influence business relationships. If that fails, we disclose those conflicts.

4.9 Gifts and courtesies from business partners

Gifts, such as gifts in cash or in kind, benefits, rewards or invitations, may only be accepted if they comply with the applicable laws and regulations, appear appropriate and do not result in personal influence. The following criteria should be considered in more detail: Timing, frequency and appropriateness. If there is any doubt as to whether a gift or courtesy fulfills the conditions, it is necessary to consult with the responsible managers or the management. This serves to protect the employee.

5. Health and safety

We safeguard the health of our employees by taking appropriate health and occupational safety measures (e.g., implementing a company health and occupational safety management system) that adequately cover the following topics:

- Compliance with applicable laws and orientation towards international health and safety standards;
- Appropriate workplace design, safety regulations and provision of suitable personal protective equipment;
- Implementation of preventive controls, emergency measures, an accident reporting system and other suitable measures for continuous improvement;
- Enabling access to drinking water in sufficient quantities and access to clean sanitary facilities for employees.

We ensure that all our employees, suppliers and customers are instructed accordingly.

6. Quality awareness

"Made in Germany" is our claim. With our mixing devices, we focus on the highest quality and the development of innovative solutions. That is why we are committed to manufacturing in Germany for every single part of our amixon® apparatuses. With the greatest possible vertical integration, almost all components are manufactured in-house at our plant in Paderborn.

Our quality management system is based on ISO 9001 and complies with the requirements of DIN EN ISO 80079 Part 34 "Potentially explosive atmospheres - Application of quality management systems for the manufacture of equipment". It is certified by a notified authority for the manufacture of equipment for category 1D (Zone20).

Many details of our machines are patented, most of our work is certified. We have HP-0 approval and are permitted to manufacture pressure equipment of all categories in accordance with the Pressure Equipment Directive 2014/68/EU. In addition, we are certified for the US ASME regulations and have the "U" stamp. As a welding specialist, amixon® is qualified by European, Japanese and American authorities with regard to different materials. We have many years of experience in the welding of a wide range of materials in accordance with international standards such as ISO, EN, ASME or JIS.

Due to our high quality standard, our mixers work reliably for many years despite heavy use. In order to raise this standard in the future, we have the highest aspirations for our company, our employees and our business partners.

7. Remuneration and working hours

Remuneration is based on the applicable laws and, where applicable, existing, binding collective agreements and is supplemented by the relevant, national minimum wage laws. Employees are informed clearly, in detail and regularly about the composition of their remuneration.

We comply with applicable laws and (international) labor standards with regard to maximum permissible working hours and ensure that

- the working hours, including overtime, do not exceed the respective maximum limits permitted by law;
- the weekly working time, including overtime, does not exceed 60 hours, even in exceptional cases, in the absence of such provisions;
- employees have at least one full day off per calendar week.

In the case of secondary employment, the approval of the responsible managers and the management must be obtained first. Secondary employment is always subject to approval.

8. Compliance with ethical and human rights

We respect and support the observance of internationally recognized human rights and

- respect the personal dignity, privacy and personal rights of each individual;
- protect and grant the right to freedom of opinion and expression;
- do not tolerate unacceptable treatment of employees, such as physical and psychological hardship, sexual and personal harassment or discrimination.

8.1 Prohibition of child labor

We do not tolerate child labor. We do not hire employees who do not have a minimum age of 15 years and ask for proof of age. In countries that fall under the developing country exception under ILO Convention No. 138, the minimum age may be reduced to 14 years. We do not hire employees for hazardous work who cannot demonstrate a minimum age of 18 years in accordance with ILO Convention No. 182.

8.2 Prohibition of forced labor

Forced labor, modern slave labor or comparable measures that deprive people of their freedom are prohibited. All work must be voluntary and it must be possible to terminate the employment relationship.

8.3 Freedom of association and collective bargaining

We respect the right of employees to freedom of association, freedom of assembly and collective bargaining⁷, to the extent that this is legally permissible and possible in the respective country in which we operate. If this is not permissible, we seek appropriate compromises for our employees.

8.4 Promotion of variety and diversity, equal opportunities

We promote equal opportunities and do not tolerate discrimination. We treat all people equally, regardless of gender, age, skin color, ethnic origin, sexual identity and orientation, disability, religious affiliation, ideology or other personal characteristics.

9. Environment, energy, water and climate protection

We act in accordance with the applicable laws and are guided by international standards in order to minimize negative effects on the environment and continuously improve our activities for environmental and climate protection. All employees are sensitized to environmental protection and the necessary training measures and courses are offered.

We have taken appropriate environmental protection measures (e.g. the implementation of an operational environmental protection management system) that adequately cover the following topics:

- Objectives, definition and implementation of measures and their continuous improvement;
- Environmental aspects such as reducing CO₂ emissions, increasing energy efficiency and using renewable energies, ensuring water quality and reducing water consumption, ensuring air quality, promoting resource efficiency, reducing waste and disposing of it properly and handling hazardous substances responsibly for people and the environment.

Climate change is one of the greatest threats to humanity. Protecting the climate and the environment is therefore a key task for us and all our suppliers.

Promotion of sustainable consumption / environmental protection

Our suppliers use natural resources responsibly and strive for continuous improvement in order to minimize adverse effects on the environment. Laws enacted to protect the environment must be observed. We oblige our suppliers to sustainable environmental protection for present and future generations. The economical use of resources and reducing the impact on the environment are our top priorities.

10. Dealing with conflict minerals

We take the necessary care to avoid the use of conflict minerals in our products in order to prevent human rights violations, corruption and the financing of armed groups or similar.

11. Supply chain

We expect our suppliers to comply with the principles of this Code of Conduct or to apply equivalent codes of conduct. We also encourage them to enforce the contents of this Code of Conduct in their supply chains. We reserve the right to review the application of this Code of Conduct at our suppliers systematically and on an ad hoc basis. This can take the form of questionnaires, assessments or audits, for example. If doubts persist thereafter regarding compliance with this Code of Conduct, the supplier is requested to take appropriate countermeasures and report the matter to his responsible contact in our company. If necessary, the cooperation will be terminated.

12. Consumer interests

Where consumer interests are affected, we comply with consumer protection regulations and appropriate sales, marketing and information practices. Particularly vulnerable groups (e.g. adolescents or pregnant women) enjoy increased attention.

13. Corporate development and future orientation

From the very beginning, we have stood for a culture of lateral thinking, for the courage to take innovative paths, for individual solutions in order to find the best answers to the most diverse requirements. In order to continue to stand for these values in the future, we are striving to strengthen our market position. This requires a continuous improvement process involving all employees. By creating a corporate culture that is open to innovation, optimizes processes and overcomes obstacles, we achieve a sustainable advantage for our apparatuses on the market. For the development of this process, the close and responsible cooperation of the company, employees and business partners is crucial.

14. Sustainability

An important objective of our company is the conservation of natural resources, environmental protection, the reduction of CO² emissions and sustainable action at all times as well as in all areas of the company. Applicable laws and regulations on climate and environmental protection must be observed.

During our production processes, technical safety, health and environmental protection are fixed guidelines. Therefore, each employee must always do his or her part to achieve this goal.

15. Implementation and enforcement

We make appropriate and reasonable efforts to continuously implement, document and apply the principles and values described in this Code of Conduct. All employees are made aware of the content of the Code of Conduct and receive training on relevant topics as required. Violations of the Code of Conduct will not be tolerated and may lead to consequences under labor law.

15.1 Communication

We communicate openly and in a dialog-oriented manner about the requirements of this Code of Conduct and its implementation to employees, customers, suppliers and other interest and stakeholder groups.

15.2 Indications of violations / compliance organization

Ethical and legally compliant behavior is a top priority for amixon GmbH / Ruberg-Mischtechnik GmbH + Co. KG in its own business activities and in its relationships with all business partners and customers. Therefore, for the entire amixon GmbH / Ruberg-Mischtechnik GmbH + Co. KG has developed a compliance management system.

As part of this system, a compliance organization has been set up whose compliance officers are available as neutral and independent contacts for all questions relating to compliance.

In addition, amixon GmbH / Ruberg-Mischtechnik GmbH + Co. KG has set up a whistleblower procedure that enables individuals, companies and other organizations to report violations of applicable law (e.g. bribery, fraud, violation of human rights and environmental regulations) or of the internal guidelines of amixon GmbH / Ruberg-Mischtechnik GmbH + Co. KG (e.g. Code of Conduct).

- In the event of indications of possible violations of the law concerning amixon GmbH / Ruberg-Mischtechnik GmbH + Co. KG, you have various options for sending us your information - also completely anonymously - via our Compliance Hotline system.

The following reporting channels are available for this purpose:

- Telephone hotline +49 5251 / 68 88 88 -400
- E-Mail: compliance@amixon.de
- Mailbox: Social building (for employees)
- Personal: Reporting office officer (MSB)
- Postal address:
amixon GmbH
Attn. Reporting office officer (MSB)
Halberstädter Str. 55
33106 Paderborn
Germany

Our reporting officer will send you a confirmation of receipt within 7 days and will inform you within 3 months at the latest of the results of the investigation into your report. The case file will be deleted after 3 years.

16. Signature

Stefan Ruberg
Managing Director

Matthias Böning
Managing Director

Bernd Fraune
Managing Director