

Employee Code of Conduct

1. Preliminary remarks

BLOHM is committed to honesty and integrity in its business dealings with its employees, customers, suppliers and all other interested parties. In order to fulfil this commitment, this Code of Conduct describes mandatory standards for every employee. The BLOHM Code of Conduct is intended to serve as a guideline for daily actions and behavior in everyday working life. As a general rule, each individual employee, across all hierarchical levels, is responsible for their own behavior and actions. We pay particular attention to Article 1 of the German Constitution: "Human dignity is inviolable."

2. Responsibility for our actions and behavior

We take full personal responsibility for our actions and behavior, which we carry out to the best of our knowledge and belief in the course of our work for BLOHM.

3. Compliance with laws and official regulations

We are committed to complying with all applicable legal regulations and guidelines. This applies to all countries in which we operate.

4. Social responsibility; human rights and working conditions

We treat all people with respect and fairness and respect human rights, as enshrined, for example, in the United Nations Universal Declaration of Human Rights and the United Nations Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy of the International Labour Organization (ILO).

BLOHM attaches particular importance to strengthening the rights of women and girls. Guaranteeing the rights and interests of minorities and indigenous peoples is also part of our commitment to human rights. We recognise that respecting the human rights of individuals who interact with our company and/or act on its behalf makes our company a good corporate citizen.

Child labour is prohibited without exception. BLOHM complies with the recommendations of the ILO conventions on the minimum age for employment or work of young people. Slavery, servitude and forced or coerced labour as well as human trafficking are prohibited and will not be tolerated by BLOHM.

BLOHM respects the regulations on minimum wages, working hours, overtime, statutory social benefits and applicable employee rights.

5. Prohibition of discrimination and harassment; Equal opportunities; Ethical recruitment

We promote diversity, equal opportunities and equal treatment. This also includes supporting integration and inclusion. We promote a working environment that fosters respect and a spirit of partnership.

For reasons of better legibility, the simultaneous use of the gender forms male, female and diverse (m/f/d) are omitted. All personal designations apply equally to all genders.

We do not tolerate any discrimination and/or harassment of persons within our sphere of influence and prevent this without exception. No employee may be discriminated against because of their gender, age, skin color, nationality, culture, ethnic origin, sexual identity, disability, religious affiliation or ideology.

The suitability of applicants who wish to enter into an employment relationship with BLOHM will be assessed without discrimination and without prejudice.

6. Fair business practices

Our dealings with customers and suppliers are characterized by fairness and honesty. We do not spread falsehood and derogatory statements about our competitors and/or their products with the aim of harming competitors through improper practices.

We respect intellectual property and attach highest importance to its protection in accordance with copyright laws. Counterfeit products may not be circulated purchased.

We avoid unfair competitive practices and comply with antitrust law and other laws relevant to competition. BLOHM is committed to fair competition in all business relationships. We ensure that no price agreements restricting competition are made with competitors, customers and suppliers. We comply with applicable law, particularly in the context of tendering procedures. Decisions are made without exchanging sensitive information with competitors.

We attach great importance to accurate accountancy and record keeping. Accounting must be carried out in accordance with the statutory requirements and comply with generally recognized accounting principles. Information is provided transparently, accurately, continuously and promptly and communicated in accordance with applicable laws and other guidelines.

7. Anti-corruption; Anti- money laundering

Corruption is prohibited by international conventions, national laws and guidelines. Any form of corruption, bribery, theft, embezzlement or extortion is prohibited for BLOHM employees. Illegal payments, in particular payments or other benefits to an individual, a company or a public official with the aim of influencing decision-making processes, regardless of whether this violates applicable laws or not, will under no circumstances be tolerated. We do not tolerate any kind of benefits that could cast doubt on our integrity or influence business decisions.

We take the necessary measures to prevent money laundering within BLOHM's sphere of influence.

8. Conflicts of interest

Our personal relationships and private interests have no influence on our business decisions in day-to-day operations.

For this reason, we avoid any interactions with suppliers and business partners that could lead to a conflict or potential conflict with our obligations. This may be the case in particular, if financial, personal or family relationships exist with a supplier, customer or business partner. Every employee in our company must disclose any potential conflicts of interest to the management. In the event of a potential conflict of interest, the employee is obliged to inform their superior immediately and to take measures to resolve the conflict of interest.

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9. Company property

We handle the property of "BLOHM" with care and responsibility. Property may only be used for business purposes and not for personal gain. We ensure that company property is protected against misuse, theft or loss.

10. Occupational protection, health and safety

We comply with all applicable laws and guidelines to protect the environment and to ensure occupational safety. We are committed to taking the necessary health and safety measures and comply with regulations on machine safety, emergency preparedness, fault and accident management, workplace ergonomics, the handling of chemical and/or biological substances and fire protection. All employees are obliged to wear the personal protective equipment provided for them.

11. Environment

We are committed to the sustainable use of resources in the manufacture of our products by constantly improving our manufacturing processes in order to reduce greenhouse gas and noise emissions as well as the consumption of energy, water, raw and operating materials.

We comply with all applicable environmental regulations and organize our business operations accordingly. Our business activities aim to minimize the impact on water, air and soil quality and to protect them as much as possible.

We reduce the overall amount of waste, promote re-use and ensure maximum use of recycled products.

12. Data protection, data security and confidentiality

We take into account the protection of personal rights in accordance with the applicable data protection laws in all our business processes.

Personal data of current or former employees, business partners and other affected parties are strictly confidential. They are treated with the utmost care by BLOHM's suppliers. When collecting, processing and using personal data (e.g. address, name, telephone numbers, date of birth, etc.), they always ensure compliance with applicable laws and regulations. The IT systems used in day-to-day business are protected by appropriate security systems to ensure the best possible protection of personal data and intellectual property at all times. Our suppliers require all their employees to protect the IT systems available to them from internal and external misuse. In addition, existing information, reporting and disclosure obligations towards supervisory authorities and affected persons are complied with.

We maintain strict confidentiality about confidential business information or business secrets that we become aware of in connection with business activities with "BLOHM" and do not use it in an unauthorized manner, including third parties. This also applies if we are no longer in an employment relationship with "BLOHM".

We undertake to strictly adhere to all specifications and guidelines that have been and will be created in connection with ensuring the security of information.

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13. Import and export regulations, economic sanctions

We comply with all applicable import and export control laws, including but not limited to all sanctions, embargoes and other laws, regulations, government orders and directives relating to the transport or shipment of goods and technologies.

14. Whistleblowing and protection from retaliation

BLOHM offers whistleblowers the opportunity to contact an internal reporting office. This enables all employees to report any misconduct and breaches of the law in their working environment without fear of unjustified disadvantages.

15. Compliance with the Employee Code of Conduct, Complaints Procedure

We are committed to comply with the rules of the BLOHM Code of Conduct. Violations of the Code will not be tolerated and may result in disciplinary action and/or termination.

Nevertheless, it goes without saying that this Code cannot prevent every legal problem that may arise in everyday working life. - If you have any doubts as to whether a desired behavior is legally compliant, please approach your superior or the compliance officer in advanced. If you are unclear about the contents of this Code of Conduct, you have the opportunity to clarify the requirements of the Code with your superior or the compliance officer at any time.

To protect against violations of this Code, every employee is called upon to report violations. All employees can rest assured that reports of actual or suspected violations will be treated anonymously if requested. We guarantee that reporting employees will not be subject to retaliation or discrimination. Every report will be taken seriously and investigated.

Contact for reports via email: hinweis@kipp.com

All information will be treated as strictly confidential.

A handwritten signature in blue ink, appearing to read "JP Stimac", written over a horizontal line.

Jean-Pierre Stimac