

## Code of Compliance

This Code of Compliance applies to all employees in the ARNOLD GROUP.

### General principles

**We act with integrity.**

Mutual trust, predictability, honesty, and straightforwardness both inwards and outwards guide our actions. We safeguard the image of ARNOLD and avoid conflicts of interest.

**We comply with applicable laws and internal rules.**

Applicable laws and internal rules are to be strictly complied with at all times. Members of management view it as their duty to ensure that everyone is aware of and complies with relevant laws.

**We treat each other in a responsible manner and with respect.**

We assume responsibility for our actions, work in mutual respect and appreciation and are straightforward and predictable in everything we do.

**We honor human rights and respect human dignity.**

We respect personal rights and human rights, we reject child labor and forced labor, and make decisions based only on considerations that can be weighed objectively.

**We handle company property responsibly.**

We handle the tangible and intangible property of the ARNOLD GROUP with care and do not make use of it for personal purposes.

**We work to ensure safety in the workplace.**

We ensure that our workplaces comply with the legal standards set for workplace and occupational safety and the regulations regarding working hours.

**We protect the environment.**

We protect the environment by handling non-renewable resources sensibly from an ecological standpoint and advocate the protection of nature.

### Dealing with business partners

**We reject every form of corruption and bribery.**

We reject corruption and bribery in all of their forms. We comply with all relevant laws and regulations. Unambiguous internal standards of conduct are spelled out to provide for improved orientation.

**We support fair competition.**

We stand in support of fair, performance-based competition and do not take part in arrangements with other market participants that are restrictive of competition.

**We do not allow ourselves to be abused for illegal ends.**

We do not participate in activities aimed at money laundering or the financing of terrorism, and we report any appropriate, suspected incidences of such.

**We follow all applicable laws on export controls and customs.**

When conducting international commerce, we obey export bans, sanctions, and embargos. When there are questions or uncertainties, we approach the relevant offices.

## Avoiding conflicts of interest

### Prohibition of competition

We do not compete with companies in the ARNOLD GROUP.

### Equity interests in companies

Equity interests in other companies are permitted provided no decisive influence can be exerted on such companies.

### Secondary employment

Secondary employment must not harm the ARNOLD GROUP and must be approved.

## Handling information

### We handle the company's data responsibly.

We maintain the confidentiality of information. Only the appropriate and authorized offices in the Würth Group communicate information to external parties.

### We do not exploit our knowledge of internal matters.

We may not use insider information for our own advantage or for the advantage of third parties.

### We comply with data privacy and data security regulations.

We handle personal data and other data with care and ensure that privacy rights are not infringed.

## Implementation of the Code of Compliance

### How do we make decisions?

When we are uncertain about our decisions, we listen to our own conscience and talk things over with the appropriate points of contact.

### The duties of our management

Members of management in the ARNOLD GROUP are role models and should act accordingly. They are available to their staff members for questions, and help employees fulfill their responsibilities and perform their duties.

### What should I do if I notice something illegal?

All employees are urged to report violations of the Code of Compliance or applicable law or other binding rules or regulations. Tips will be handled confidentially.

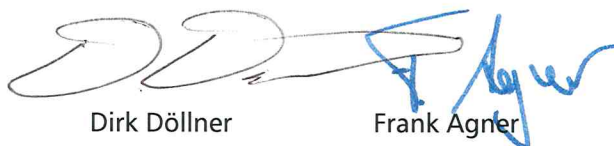
### Potential consequences of a violation

Violations of the Code of Compliance will not be tolerated and may have serious consequences.

Forchtenberg-Ernsbach, December 17, 2020

A handwritten signature in blue ink, appearing to be 'Gert-Thomas Höhn'.

Gert-Thomas Höhn

A handwritten signature in blue ink, appearing to be 'Dirk Döllner'.

Dirk Döllner

A handwritten signature in blue ink, appearing to be 'Frank Agner'.

Frank Agner