

CODE OF CONDUCT

Business partners, shareholders and the public expect MAX Group to act responsibly and in a legally compliant manner in every respect. The manner in which we deal with each other within the company, however, should also be based on these same principles. This Code of Conduct is intended to help us in assuming our responsibilities.

The Code of Conduct has been developed on the foundations of the values of the MAX Group. The code summarizes important basic rules and principles that are already binding for us today in one single document. The values and standards of conduct stipulated in this Code are binding on all employees, managers and directors of the MAX Group (hereinafter collectively referred to as "employees") worldwide and are intended to convey the understanding of the conduct we expect from all our employees. Every employee is an ambassador of our company. With our work and our behaviour, we all contribute to the positive perception of our company and thereby support the economic success of the MAX Group.

Compliance with the decisive legal framework and internal regulations is a matter of course for our management and our business processes. For every employee of the MAX Group this means that his or her actions must be aligned with the applicable legal standards at all times and that violations of the law will not be tolerated.

The MAX Group is committed to conducting its business in an ethical, legal and responsible manner. The company is obligated to ensuring that this code of conduct is respected at all locations of the MAX Group. At the same time, the MAX Group expects its suppliers and contractual partners to also behave in accordance with the rules stipulated in these guidelines.

The Code of Conduct is an essential but not the only component of the comprehensive compliance structure to which the MAX Group is committed. The MAX Group also adheres to the United Nations Universal Declaration of Human Rights (AEMR) and the core labour standards of the International Labour Organisation (ILO).

Legal compliance

Compliance with the law and legislation take utmost priority for the MAX Group. In his or her work for the MAX Group, every employee must observe the legal regulations that are relevant to his or her work. All business activities of the MAX Group must comply with all applicable legal requirements at national and international levels.

Fair competition

The MAX Group is fully and unconditionally committed to fair competition. Our competitive activities on the market are conducted solely on the basis of the price-performance ratio and the superior quality of our innovative products and services. Compliance with all laws and regulations enacted to prevent unfair competition is an integral part of our corporate policy.

The MAX Group endeavours to ensure fairness in all business transactions and does not strive to gain unlawful advantages over customers, suppliers or competitors. Consequently, false statements towards customers or other persons or concerning their products and services (in whatever form) must be avoided.

Statements on sales promotion, marketing materials and all other forms of advertising must be complete, factually correct and readily comprehensible.

Intellectual property / industrial property rights

The MAX Group owns copyrights, patents, trademarks, know-how and other confidential and protected information. This intellectual property is an essential component of our corporate value and is indispensable for our future business success. Consequently, no information may be disclosed without the approval of the management of the Group company concerned. Where such authorisation is granted, appropriate measures must be taken to protect the specific information. Accordingly, the MAX Group respects the intellectual property of its competitors.

Antitrust Law

Compliance with the laws against competition restraints is an integral part of the corporate policy of the MAX Group. We comply with all antitrust laws and restrictions and do not engage in agreements or other practices that violate antitrust laws.

Prevention of corruption

The MAX Group categorically rejects corruption in any form. The employees and authorized representatives of the MAX Group must avoid any form of corruption as well as even any semblance of corruption. Employees and authorized representatives are expected to report all suspected cases of corruption to the Compliance Officer.

Cash transactions / prevention of money laundering

The MAX Group supports all necessary measures to prevent the financing of transactions in connection with or support of criminal activities (through international terrorism, for example). The MAX Group does not execute large scale cash transactions. As a rule, no cash payments and no acceptance of cash amounts are permitted to settle the transactions of the MAX Group.

Cooperation principles

The MAX Group attaches great importance to good cooperation, politeness and fairness in dealing with one another. Respect of privacy and the dignity of the individual are indispensable for a good working environment.

A good working atmosphere is essential for the success of the MAX Group. Loyalty, mutual support, respect, appreciation, openness and fairness are the characteristics of our work ethics.

Diversity and appreciation

The individuality of the employees in the MAX Group contributes significantly to the corporate culture and to a good working atmosphere. Our corporate culture is based on appreciation. Different religious beliefs, sexual orientations or ideological views are treated with respect.

Discrimination is fundamentally contrary to the basic values of the MAX Group. Consequently, any form of discrimination, whether in relation to employees or third parties, is strictly prohibited. Discrimination refers to any form of distinction, exclusion or preference which limits equal treatment or access to work and employment, and which may be based on the grounds of colour, sex, religion, political opinion, age, national, social or ethnic origin, family responsibilities or similar considerations of this kind. The MAX Group is also committed to ensuring workplaces that are free from all forms of harassment and bullying.

Avoidance of conflicts of interest

All employees of the MAX Group must avoid conflicts between their private interests and company interests. Business decisions must not be influenced by private interests or personal relationships but must be based solely on objective criteria and the well-being of the company.

Health, safety and environmental protection

The health and safety of our employees, as well as the sustainable use of resources are of crucial importance for the MAX Group. All operating sites of the MAX Group are planned, set up, equipped, operated and monitored with the aim of preventing occupational diseases, eliminating hazards and preventing accidents.

An appropriate organization of working hours based on the Working Hours Act is important for the health and safety of our employees. The MAX Group complies with all relevant laws and regulations as well as collective agreements on working hours as amended and in their valid version.

All employees are expected to take care of their own health and safety, the health and safety of third parties and the prudent use of resources when conducting their professional activities.

Remuneration

The MAX Group does not pay wages and salaries below the statutory minimum wage applicable at the time and ensures that its employees receive appropriate remuneration.

Prohibition of child labour and forced labour

The MAX Group observes the prohibition of child labour in accordance with the standards stipulated by the International Labour Organisation ILO.

No one may be employed or forced to work against his or her will. The MAX Group does not use forced or compulsory labour.

Handling of information

The MAX Group attaches the utmost importance to transparent and truthful reporting and communication on the company's business transactions to shareholders, business partners, employees, authorities and the public.

Every employee of the MAX Group is obligated to treat internal company information confidentially. As a listed company, MAX Automation is also subject to strict capital market regulations. Among other things, these prohibit insider trading by employees of the MAX Group. In case of knowledge of confidential operations and processes that could have an impact on the stock market price of the shares of MAX Automation (so-called insider information), the personal use and/or disclosure to third parties is prohibited by law and punishable by law. It is also prohibited to recommend the purchase or sale of securities to another person on the basis of insider information. Further details are outlined and regulated in our compliance guideline.

IT systems and data protection

Modern IT systems are of fundamental importance for the MAX Group. They contribute significantly to our innovation leadership and support our business processes. Consequently, the MAX Group considers the competent handling of efficient and secure IT systems as one of the main factors for its business success.

The MAX Group respects the interest in personal data protection and ensures compliance with data protection regulations and data security.

MAX Automation SE

The Managing Directors