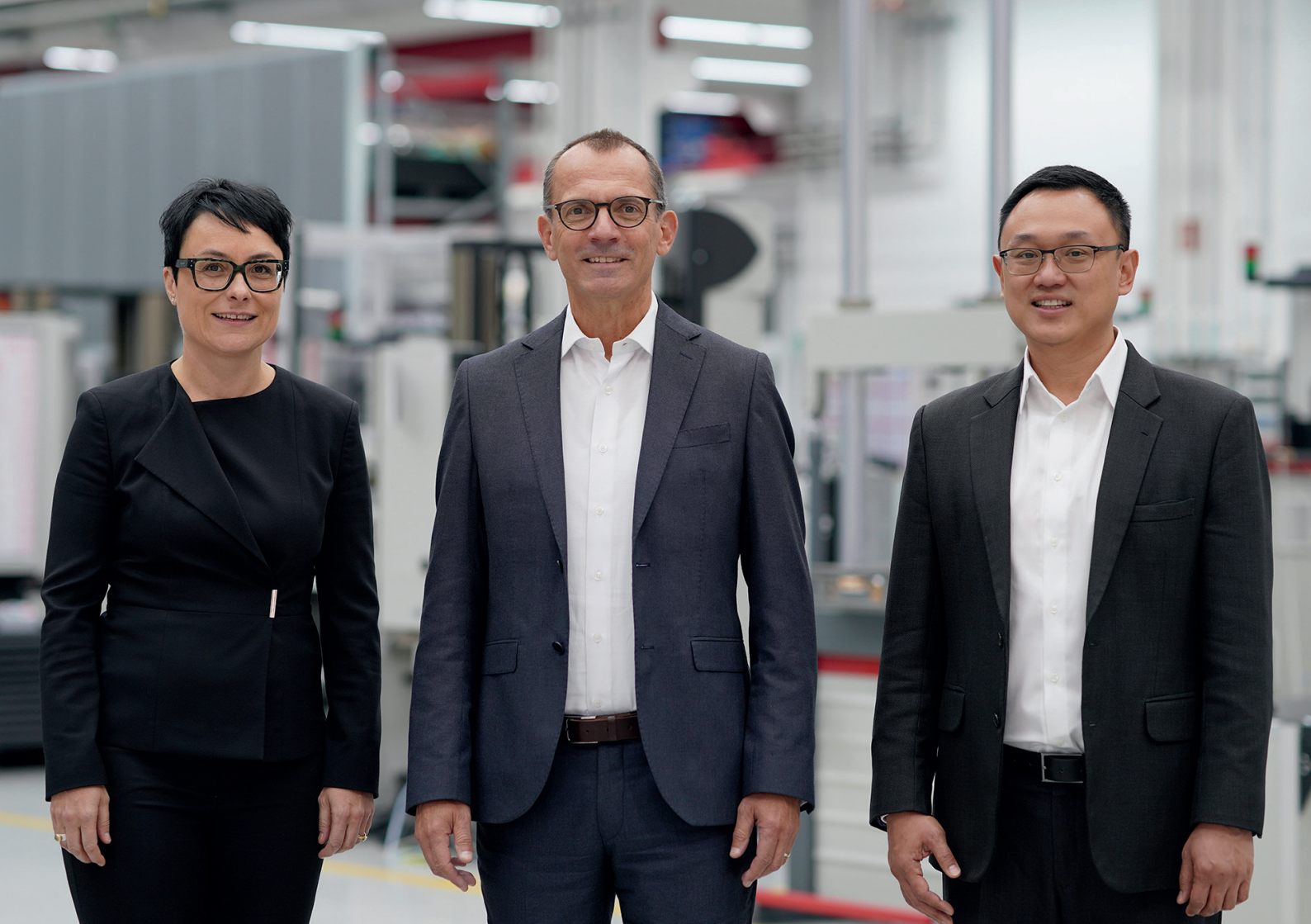


Code of Conduct





**Dear Employees and Management,
Dear Sales and Service Partners,**

When Jacob Amsler, Paul Roell and the brothers Zwick built the first testing machines, the requirements set forth on a business entity were completely different. More than 160 years later, ZwickRoell is still one of the worldwide leading manufacturers of testing machines.

A look back at our company history shows that regardless of economic crises, changes in technology, and increasing competition, we always persevered. Every new generation at ZwickRoell took on the challenges of their time, while remaining true to our fundamental company values.

So, what challenges do we face today? Industry 4.0, evolving customer needs and requirements, climate change or pandemics—since the founding of our company, our environment has continuously changed. The economy has become more global and test requirements have become far more diverse and demanding. As technology demands increase, expectations in terms of our conduct as a responsible entity also continue to develop. Our conviction however remains unchanged: integrity and responsible conduct are important to us. They are the basis for our actions and the foundation of our economic success.

These guidelines provide all of us with direction in everyday life and in critical situations and help us make the right decisions. As an employee or sales and service partner of the ZwickRoell Group, you play a crucial role in the success of our company. Responsible conduct is the foundation for long term economic success. Together, let us take on this responsibility for the future of the ZwickRoell Group.

January 2025

Klaus Cierocki
Chief Executive Officer
CEO ZwickRoell SE

Christine Dübler
Chief Sales & Service Officer
CSO ZwickRoell SE

Ping Pu Loke
Chief Technology Officer
CTO ZwickRoell SE



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1. Our main principle

We comply with the law.

All employees and managers as well as all sales and service partners of the ZwackRoell Group are responsible to comply with the applicable laws and internal guidelines and observe all regulations within their area of responsibility. We are convinced that beside our technical and commercial knowledge and understanding, compliant behavior is essential for all our actions. This is the only way we can successfully assert ourselves in the market.

Law abiding behavior protects every individual as well as the company as a whole, as unlawful conduct can lead to criminal prosecution, damages, loss of contracts, in addition to serious damage to the reputation of both the employee and the company.

Management is responsible to ensure that applicable legal requirements and internal guidelines are understood and observed within their area of responsibility. We expect that all employees refer to their supervisors to obtain all necessary information on these requirements, and that they adhere to them.

In the course of operations for the ZwackRoell Group, we will use our code of conduct as the foundation for our actions, with the expectation that not only we, but also our business partners observe its principles. In the event of violations against our code of conduct, we will immediately address this with our business partner. Some of the regulations on the global marketplace continue to be insufficient (child labor, degrading working conditions, lacking protection for the environment and natural resources, etc.). We support the ongoing development of better conditions and overtly try to exclude unacceptable conduct, or any conduct that goes against our company guidelines.





2. Fairness with employees and business partners

We work together in partnership and fairness.

In collaboration with our employees and business partners, we rely on a working relationship based on trust. We respect each person as an individual and interact with courtesy and respect. We are committed to diversity and tolerance. By being open-minded, independent and self-motivated, and making decisions that are reasonable and justifiable, we are able to achieve transparency, acceptance and trust. Applicable human rights regulations are an integral part of our operations and corporate responsibility.

We respect each other's efforts and accomplishments and resolve conflicts objectively and constructively. We treat our co-workers and employees with fairness and respect. Any form of harassment or discrimination will be met with resolute opposition; this type of behavior is not tolerated within the ZwickRoell Group.

We stand up for fundamental rights and principles at work. This particularly includes but is not limited to the prevention of discrimination in the course of the hiring process and during employment, and the rejection of forced labor and child labor.

A healthy balance of family life and career is an essential cornerstone for the success of our employees. We always aim to find an appropriate balance between the economic interests of the ZwickRoell Group and the private interests of our employees.

We strive to build and maintain long term relationships with our business partners, where mutual trust and concern are essential prerequisites. In close cooperation, we are able to develop and optimize our products and services, with the goal of achieving the highest possible availability and quality of our testing systems and maximum reliability of test results. We always advise our customers with the objective of finding the perfect solution for their testing challenges. Cooperative relationships in research and development help us work together with our customers to assure mutual long term success.

3. Prohibition of bribery, corruption and money laundering

We stand for free and fair competition.

Our vision is to achieve growth and profitability through a passionate commitment to our customers. We want to convince our customers of the quality of our products, our expertise, our innovation, and reliability. A prerequisite for this is free and fair competition. We are committed to comply with competition and anti-trust laws.

We therefore reject any form of price agreements or the allocation of production and sales quotas just as resolutely as any other anti-competitive practices. The exchange of confidential information including pricing, margins, conditions, customers, product development or capacity is prohibited.

We do not accept any type of bribery and will not tolerate corrupt behavior or behavior that could lead to suspicions of improper influence. Within the ZwackRoell Group, the knowledge of any such type of issue will be addressed and corrected immediately, which may include criminal charges and consequences under civil or labor law.

We do not accept personal benefits from third parties, nor do we offer benefits to influence the decisions of third parties. Accepting or extending gifts, invitations and any other benefits must follow compliance with our internal rules and guidelines. In dealing with officials, authorities both domestically and abroad, as well as any public institutions, we strictly comply with legal requirements.

Within the framework of our business relationship, we verify the identity of our customers, suppliers, and any other business partners, and seek to ensure that their business operations adhere to legal requirements and that funds are of legitimate origin. This way we can prevent any type of money laundering. In all our international dealings we follow the applicable import and export regulations. We observe applicable foreign trade regulations, as well as economic embargoes and make sure that our end customer is not subject to an embargo. In addition, we consult with our business partners regarding any regulations to be observed in their respective regions.





4. Prevention of conflicts of interest

We avoid anything that may negatively affect the interests of our company and our business partners.

We select suppliers and service providers based on objective criteria such as expertise, dependability, availability, and cost-performance ratio. Business decisions may not be influenced by personal interest or relationships. We separate private concerns from professional matters when fulfilling our duties for the ZwickRoell Group.

Through transparent and clear communication and documentation of business operations, we ensure reasonable and justifiable decisions and actions.

This gives us the ability to ensure compliant, proper, and ethical business practices. In all business processes, we expect our employees and managers to proceed with a high degree of diligence, and compliance with applicable rules.

We do not exploit our position within ZwickRoell for personal gain. Company resources are used solely and specifically for business purposes. We provide information on secondary employment according to required procedure and obtain necessary consent where applicable.

5. Protection of business property and business secrets

We protect our business property as well as third-party property.

For us, protecting ZwickRoell property is a matter of course. This includes operating facilities as well as operating resources and equipment and other company property. All employees make a commitment to handle operating equipment and other company property with care, and to only use these within the framework of jobs and tasks carried out for the ZwickRoell Group. Improper, non-permitted or incorrect use or theft of such property is detrimental to the company and may be reported on an individual basis.

Protection of company property also includes intangible and intellectual property, some of which is covered by commercial property rights.

Non-protected innovations, new products and other information including company strategies, current sales figures and planning are company trade secrets that must be handled with confidentiality and may not be shared with third parties. By keeping operation-related information private, we secure our competitive position.

In cooperation with our business partners, we ensure that our partners' trade secrets are also observed according to agreement. This particularly applies to confidential customer documents needed to fulfill the specifications of a customer order. Our employees are obligated to consistently adhere to non-disclosure agreements.





6. Data privacy and IT security

We handle data responsibly.

We protect and respect the privacy of every individual. This applies to all those who work for the ZwickRoell Group, as well as customers, suppliers, and other business partners. We also preserve the necessary security when processing data, in particular personal data.

We collect, process, and use personal data entrusted to the ZwickRoell Group within the extent permitted by law and additionally adhere to our internal guidelines. Personal data is only used for clearly established, legal and transparent purposes. We securely store information entrusted to us, we ensure data integrity and implement security measures to prevent unauthorized access by third parties.

We continuously update and improve our IT security measures in accordance with the latest technology. All employees are obligated to stay informed about applicable security measures and internal requirements and adhere to these and apply them as necessary. In support, we provide our employees with corresponding security training. Any technical failure or personal misconduct, for example triggered by phishing attacks are to be reported to a supervisor, the data protection officer, or the IT security officer immediately.

7. Environmental protection, work, health and product safety

We avoid hazards to people and the environment.

For us, compliance with legal requirements for the protection of people and the environment is a matter of course. Our commercial use of land, air and water is in accordance with the law and other governmental regulations and guidelines; we keep necessary emissions to a minimum. Internal guidelines substantiate the legal requirements.

Together, we work to provide a safe work environment with the objective of keeping health hazards to a minimum. Our highest priority is safety in the workplace during the production and use of our products. Therefore, we ensure safe and sanitary working conditions that comply with the applicable legal requirements in occupational health and safety. Every employee is asked to be alert and use the available safety equipment.

In the event of grievances, the responsible safety officer or supervisor must be informed immediately. Just as we do within our own company, we also look for safety gaps at the customer site when using our machines, and resolutely notify them to the customer.

Through constant product quality control, we want to recognize any defects or deficiencies in the operation of our machines early, and remedy them promptly. Compromises at the expense of product safety are unacceptable.





8. Sustainability / social responsibility

We operate with sustainability for the future of our children.

It is our intention to actively contribute to providing a healthy and livable environment for future generations. We are therefore dedicated to harmonizing corporate success with environmental protection and social responsibility.

Our goal is to take responsibility for every aspect of our products and processes, and to use natural resources responsibly through targeted planning and action. This means using raw materials sparingly and utilizing residual materials in the best way possible. We therefore strive to reduce the environmental impact of our products through the whole life cycle starting from the development and continuing in the optimization stages.

For us, our technical and business expertise is also linked with the responsibility to work for the benefit of people, to engage socially, and to make a positive and sustainable contribution to an innovative and environmentally friendly future. We support various social organizations and projects through donations and active involvement. We offset the company's CO₂ footprint of our production site in Ulm by purchasing high-quality climate protection certificates from a partner's project portfolio.

9. Contact

If you have any questions about the code of conduct, please contact your supervisor or our compliance officer at **compliance@zwickroell.com**.

ZwickRoell SE

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