

Code of Conduct of MBB SE

As a listed family business, MBB has always been committed to the values of sustainability, integrity and social responsibility. MBB's success is the result of our dedication, creativity and sustainable corporate governance. Every single employee is an important building block of this success. An indispensable prerequisite for our company is trust, reliability and acceptance of responsibility among ourselves, towards our subsidiaries, business partners and investors - worldwide. We convey all this through legally compliant and sustainable corporate action - at all times and everywhere.

Our good reputation is our most important asset. It is essential to maintain and build on this reputation by making the right decisions. Just one unwise decision can destroy the value of decades of work.

As part of this joint responsibility, we ask all colleagues to familiarize themselves with the content of our Code of Conduct. The first point of contact for understanding rules and requirements is the immediate supervisor as well as the Compliance Officer of MBB SE. Please contact these persons if you are in doubt, have any questions or wish to share any information. This also applies to our business partners, from whom we likewise expect law-abiding behavior.

Of course, we are also available for you at any time.

The Executive Management of MBB SE

Preamble

This Code of Conduct sets out in binding form the values, principles and actions that govern the entrepreneurial activities of MBB SE for employees, members of the Executive Management as well as the Board. In MBB SE's compliance management system, our Code of Conduct serves as a framework for regulating activities within the company and with third parties. It is substantiated by guidelines and instructions for action.

The goal of the company's management is to comply with legal and internal company requirements and to create a working environment that promotes integrity, respect as well as fair and sustainable behavior. A business policy based on guiding principles and the law serves the long-term interests of the company as well as the protection of employees.

1. Scope

- This Code of Conduct applies to all business units of MBB SE.
- MBB SE also expects its subsidiaries and business partners to comply with the principles of this Code of Conduct.
- MBB SE communicates the requirements associated with this Code of Conduct internally and externally.

2. Conduct in the Business Environment

MBB SE bases its actions on generally applicable ethical values and principles, in particular integrity, compliance with the law and respect. We promote transparency, integrity and responsible management in the company in an appropriate manner.

Compliance

MBB SE complies with the applicable laws of the countries in which it operates and expects its business partners to do the same. For us, compliance with regulations and the law is the fundamental principle of all economic activity.

Integrity and fair Competition

- **MBB SE rejects any form of corruption and bribery.** Neither on the giving end nor on the receiving end is the use of corruption and bribery acceptable by any means. Disregard of this principle poses a considerable risk for both the company and its employees, jeopardizes sustainable economic success and is sanctioned severely. Conflicts of interest and mixing business with private interests - whether of employees or close relatives - will not be tolerated. Transparency is the top priority.
- We are open to competition and comply with all **antitrust regulations** globally. Antitrust violations are incompatible with our claim to technological innovativeness and fair competition.
- MBB SE complies with **regulations against money laundering**. We investigate unusual financial transactions within the scope of the legal requirements and, if necessary, submit them to the responsible bodies for review.

3. Internal Conduct

The continuous dedication of qualified and motivated employees is the key value driver of MBB SE. As a family-run company, we are committed to an open, fair and sustainable corporate culture as well as social responsibility.

Working Hours & Remuneration

- MBB SE **remunerates employees in a fair manner and makes personnel decisions based on criteria such as competence, performance and conduct at work.**
- The remuneration of employees at MBB SE is at least equal to or higher than the amount specified by law.
- MBB SE complies with the applicable laws, regulations and provisions on working hours and expects its business partners to do the same.

Non-discrimination & Respect

- **We treat each other with respect.** This applies to colleagues and third parties such as customers, suppliers and the authorities. Bullying and harassment of any kind are strictly prohibited.
- Abuse of position in the company and hierarchy are inadmissible and will be punished.

- Employee-related decisions, including hiring and promotions, compensation, training, layoffs and terminations, are made on a non-discriminatory basis.
- We do not make employee-related decisions based on non-work-related characteristics such as gender, age, ethnicity, religion, sexual orientation, etc.

Health and Safety at Work

- **Ensuring the safety and health of our employees** in the workplace is an **integral part of our corporate culture**.
- To prevent accidents and personal injury, MBB SE provides safe and healthy working conditions that meet at least the applicable legal requirements. Each employee also promotes the goal of health protection and safety and complies with the occupational health and safety specifications.

4. ESG

Sustainability is a central aspect of MBB SE's corporate culture. As a family-run company, we stand for long-term thinking and entrepreneurship. Environmental protection, social responsibility and sustainable corporate governance (ESG) form an essential part of our corporate responsibility.

Environmental Protection

- **Sustainability and environmental protection as well as the preservation of resources are important corporate goals.** MBB SE pays attention to the use of environmentally conscious practices in order to keep the impact of our actions on the environment and the climate as low as possible.
- MBB SE complies with the regulations and standards on environmental protection and uses natural resources responsibly. We expect every employee to contribute to environmental protection and ask the same from our business partners.

Social Responsibility

- We respect the **human rights, privacy rights and dignity of our employees and all third parties** and expect the same from our business partners, suppliers and service partners.
- Forced labor, child labor, all forms of modern slavery and human trafficking, as well as any form of exploitation are prohibited at MBB, and we pay attention to strict compliance with the relevant laws.

Governance

- We deal responsibly with company assets of any kind. Any form of fraud, embezzlement, theft, misappropriation and tax evasion is prohibited.
- **We communicate in an honest and transparent way.** We disclose potential or actual conflicts of interest in the workplace in a timely manner and take necessary action.
- We encourage our employees to raise concerns openly and without fear of reprisal and address them fairly and without prejudice.

5. Protection of Confidential Information & Intellectual Property

The protection of personal or confidential data as well as intellectual property is a high priority for MBB SE. The following principles apply to treating such information at MBB SE:

Financial Integrity

- Both internal and external **reporting and communication** on business operations **take account of the corporate values of honesty and integrity.** This applies towards investors, employees, business partners and the general public.
- Reports, records and other documents are prepared in compliance with the law and are complete and accurate.

Confidentiality

- All employees shall **protect confidential information and business documents** in an appropriate manner **from being accessed and misused by uninvolved and unauthorized persons.**
- MBB SE expects its business partners and third parties to behave in the same way with regard to such data worthy of protection.

Insider Information

- **MBB SE complies with all capital market regulations.** This applies in particular to those relating to insider law.
- Trading financial instruments of MBB SE or listed subsidiaries based on insider information, passing on insider information or making recommendations based on insider information is prohibited.

Privacy & Intellectual Property Protection

- The protection of personal data of employees, business partners and shareholders is of particular importance to MBB SE, especially in times of ongoing digitization.
- MBB SE respects the intellectual property and know-how of business partners and third parties. In the same way, all employees protect the intellectual property and the know-how of MBB SE.
- **We respect the privacy rights of all people and maintain high standards when processing personal data.** The collection and processing of this data complies with legal requirements and takes into account fundamental principles such as purpose and scope limitation.

Berlin, June 2022

The Executive Management

MBB SE

Joachimsthaler Straße 34

10719 Berlin

Germany