

PROBUS Maschinenbau GmbH

Code of Conduct

Framework for Lawful, Ethical and Responsible Business Conduct (Compliance)

Version 1.0.1 – July 2026

INNOVATION, made HERE!



Westerwald
00°40'50"N 00°50'7"E

FOREWORD

Dear colleagues, dear business partners,

As an internationally active family business, PROBUS Maschinenbau GmbH stands for responsible, principled and sustainable conduct. Our company's success rests not only on technical competence and innovative solutions, but equally on the values that shape our actions every day.

Our corporate culture is shaped by three core principles: integrity, reliability and responsibility. They guide our daily conduct toward our employees, customers, business partners and society at large. These values form the foundation of our Code of Conduct.

This Code of Conduct provides orientation for our everyday work and helps us make the right decisions, even in demanding situations. It applies worldwide to all employees and business partners of PROBUS Maschinenbau GmbH and supplements the applicable statutory requirements.

Every individual bears responsibility for putting our values and principles into practice and exemplifying them in daily conduct. Misconduct and violations of these rules can significantly damage our company's reputation and cause substantial economic harm. We will therefore not tolerate such conduct and will take appropriate action in the event of violations.

The values and objectives of our Code of Conduct can only take effect if we put them into practice together. We therefore expect all employees and business partners to consistently apply the principles described here in their everyday work. In doing so, we strengthen our corporate culture, remain a reliable partner, and jointly lay the foundation for the long-term success of PROBUS Maschinenbau GmbH. We sincerely thank you for your commitment and support.

Marienrachdorf, July 2026

Simon Pusch

Managing Director, PROBUS Maschinenbau GmbH

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1. PURPOSE AND SCOPE

PROBUS's success is built on sound know-how and the conviction that technical excellence and responsible conduct are inseparably linked. The values, principles and standards of conduct that matter here are set out in this Code of Conduct.

This Code of Conduct defines the standards for how all employees behave, both in dealings with customers, business partners, shareholders, authorities and the public, and in day-to-day interaction within the company. It is based on applicable national and international legal and ethical principles and forms the binding framework for our everyday conduct.

This Code of Conduct applies worldwide to all employees of PROBUS Maschinenbau GmbH, regardless of their function or position within the company. It forms the basis for all further internal policies and regulations and supplements the applicable statutory provisions as well as labour and works-constitution law requirements. To the extent legally permissible, this Code of Conduct supplements the applicable statutory, collective-bargaining, employment-contract and internal company regulations. Where differing requirements exist, the stricter requirement applies in each case, unless mandatory law provides otherwise.

Responsibility for complying with and implementing this Code of Conduct rests with all employees. At the same time, it is the responsibility of management, executives and the heads of the respective business units to create a working environment characterised by openness, integrity and mutual trust. This includes consistently preventing unlawful or unethical conduct while strengthening awareness of ethical questions and responsible decision-making.

Executives have a particular role-model function in this regard. They are responsible for exemplifying the principles of this Code of Conduct within their area of responsibility and for actively promoting compliance with them. Independently of this, every individual employee is obliged to consistently apply the values and principles of conduct set out in this Code of Conduct in their everyday work and to contribute to compliance with legal and ethical standards.

2. COMPLIANCE WITH APPLICABLE LAW

Every PROBUS employee is expected to comply with the laws of Germany and of every country in which they act on behalf of the company, as well as with the internal rules and instructions that apply to their role. All employees are required to inform themselves, within the scope of their duties, about the statutory and internal requirements relevant to them. If in doubt, management should be consulted before a decision is made.

3. FAIR COMPETITION

We compete on the strength of our engineering, our service and our prices, never through arrangements that restrict competition. In line with German and European competition law, in particular the Act against

Restraints of Competition (GWB) and Article 101 of the Treaty on the Functioning of the European Union, PROBUS employees must not, directly or through a third party:

- agree with competitors on prices, terms, market shares, customers or territories;
- exchange competitively sensitive information — such as prices, costs, capacities or bidding strategy — with competitors, including in informal settings such as trade fairs or industry associations;
- participate in bid-rigging or any other form of tender coordination.

Even the appearance of such conduct can damage the company. Any contact with a competitor that touches on these topics, however informal, should be avoided; any doubt should be clarified with management beforehand, not afterwards.

4. ANTI-CORRUPTION AND ANTI-BRIBERY

Because PROBUS supplies technical equipment to the international oil and gas industry, we regularly interact with public officials, state-owned enterprises and their representatives. We hold ourselves to a strict standard here, consistent with the German Criminal Code (in particular Sections 299 and 331 to 334 StGB) and with the anti-corruption expectations of the international markets we serve:

- No PROBUS employee, and no one acting on our behalf, may offer, promise or grant any bribe, kickback or other improper advantage — to a public official, a customer's employee, or any other business partner — in order to obtain or retain business or any other improper advantage. This applies equally to facilitation payments, however small.
- No PROBUS employee may request or accept such an advantage.
- Agents, distributors and other intermediaries who represent PROBUS in a market are selected transparently, on the basis of documented qualifications, and must contractually commit to complying with this Code and with applicable anti-corruption law.
- Gifts, invitations and hospitality connected to PROBUS business must be appropriate, transparent, permitted under the recipient's own rules, and never capable of improperly influencing a business decision. When in doubt: decline it, or disclose it to your supervisor.
- Donations and sponsorship are made only in the company's name, only for lawful and legitimate purposes, and require the prior approval of management.

Any demand for a bribe or improper advantage, as well as any well-founded suspicion of one, must be reported immediately through the channels described in Section 13.

5. EXPORT CONTROL AND TRADE SANCTIONS

A significant proportion of the products, equipment and technologies developed and manufactured by PROBUS is exported outside the European Union. PROBUS is committed to full compliance with all applicable export control and sanctions law requirements.

Every employee working in sales, logistics, procurement, engineering, project management or a comparable function involving cross-border business relationships is required to observe the following principles:

- Exports, re-exports and the transfer of goods and technologies are subject to the applicable provisions of the German Foreign Trade and Payments Act (AWG), the Foreign Trade and Payments Ordinance (AWV), the directly applicable export control and sanctions law provisions of the European Union — in particular the Dual-Use Regulation (EU) 2021/821, as amended — as well as other relevant national and international legal provisions.
- Before concluding a transaction, and before exporting or providing any goods or technologies, customers, end users, beneficial owners, business partners, destination countries and any financial institutions involved must be screened against the current sanctions and embargo provisions and the relevant sanctions lists.
- Goods, software or technologies must never be supplied, exported or provided, whether directly or indirectly, to sanctioned or listed persons, organisations or entities, to embargoed destination countries, or for prohibited or licence-requiring end uses — in particular in connection with military, defence-related, nuclear, chemical or biological applications — where this would violate applicable law or where the necessary authorisations have not been obtained. This applies even where the immediate contracting party is based in a country not subject to corresponding restrictions.
- New sales markets, new distribution partners, intermediaries, agents, as well as unusual transaction structures or ones that are not economically comprehensible, must be submitted to management before any binding commitment or contract signature.

Where there is uncertainty regarding a destination country, a business partner, an end use, or a specific export transaction, management should be consulted at an early stage. Export control questions should generally be resolved before a transaction is concluded and before export takes place. Deliveries or other forms of provision may only proceed once all statutory requirements have been met and any necessary authorisations have been granted.

6. CONFLICTS OF INTEREST

Employees must avoid situations in which a personal interest — financial, family-related or otherwise — could influence, or appear to influence, a business decision made on behalf of PROBUS. This applies in particular to:

- decisions on suppliers, customers, agents or contractors in which the employee or a family member has a financial interest;
- hiring, promoting or supervising a family member or close personal contact;
- side activities, directorships or consultancy relationships that compete with, or draw significantly on time or resources owed to, PROBUS.

Any such situation must be disclosed to your supervisor or to management in writing and requires approval before you proceed.

7. CONFIDENTIALITY AND PROTECTION OF BUSINESS INFORMATION

The engineering know-how, technical drawings, pricing models and customer information that PROBUS has built up are among its most valuable assets and are protected, among other laws, under the German Trade Secrets Act (GeschGehG). All employees are required to treat trade secrets and other confidential information as strictly confidential for the duration of their employment and, to the extent provided by law or contract, after its termination as well. Such information may only be disclosed, passed on or used within the scope of official duties and only to persons who genuinely require it to carry out their professional tasks. Particular care must be taken in conversations with customers, suppliers, business partners, authorities or other third parties, as well as at trade fairs, conferences, business trips, public events, and when using electronic communication tools. Confidential information must not be made accessible to unauthorised third parties, whether unintentionally or deliberately. PROBUS likewise respects the trade secrets, patents and intellectual property of others and does not seek to obtain them through improper means.

8. DATA PROTECTION

PROBUS processes personal data of employees, customers and business partners in compliance with the EU General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG). Personal data is collected only for legitimate business purposes, kept secure, and accessed only by those who need it for their work. Employees who handle personal data as part of their role must follow the company's data protection instructions and report any suspected data breach immediately.

9. RESPECT AND FAIR TREATMENT IN THE WORKPLACE

PROBUS is committed to a workplace built on mutual respect. In line with the German General Act on Equal Treatment (AGG), no one may be disadvantaged, favoured, harassed or excluded on the basis of gender, ethnic origin, religion or belief, disability, age, or sexual identity. Discrimination, bullying and sexual harassment will not be tolerated; anyone experiencing or witnessing such conduct should contact a supervisor. Open, honest communication between colleagues at every level is the basis for good decisions and a healthy working environment.

10. OCCUPATIONAL HEALTH AND SAFETY

Manufacturing, testing and maintaining heavy technical equipment involves risk, and the safety of our employees comes first. Every employee working with machinery, equipment or in hazardous areas is instructed by their supervisor, in line with the German Occupational Safety Act (ArbSchG) and related regulations, in the applicable safety rules and must follow them without exception — for their own protection and that of their colleagues. Hazards, whether identified or suspected, arising from our facilities, our products, or the way our products are used by customers, must be reported to a supervisor immediately.

11. ENVIRONMENTAL RESPONSIBILITY

PROBUS pursues the goal of continuously reducing its environmental impact and using resources as efficiently as possible. We comply with applicable environmental regulations, use resources efficiently, and design our products with durability and efficiency in mind. Every employee is expected to support this commitment within their own area of work and to bring forward suggestions for improvement to management.

12. PROTECTION OF COMPANY PROPERTY AND IT SYSTEMS

Tools, machinery, vehicles, computers and data carriers provided by PROBUS are company property made available for business use. Private use is only permitted with the prior approval of your supervisor, and company property may not be removed from company premises without authorisation. Theft or misappropriation of company property will be pursued under criminal and civil law. IT systems, email and internet access are provided for business purposes; visiting websites with unlawful, discriminatory or violent content is prohibited. Employees must take reasonable care to protect company systems and data from unauthorised access, including through the use of strong passwords and cautious handling of external devices and links.

13. REPORTING VIOLATIONS AND WHISTLEBLOWER PROTECTION

PROBUS promotes an open corporate culture in which potential violations of the law, this Code of Conduct, or internal policies can be reported at an early stage. Employees are encouraged to report any such concerns promptly to their supervisor, to management, or to the designated contact person.

Reports may be made in writing or verbally. To the extent legally permissible and practicable, anonymous reports are also accepted and investigated. All reports are treated confidentially.

No one may be disadvantaged for reporting a potential violation in good faith or for cooperating in its investigation. Deliberately or knowingly false reports are excluded from statutory protection and may result in consequences under labour law.

14. CONSEQUENCES OF VIOLATIONS

Violations of this Code may result in disciplinary measures proportionate to the severity of the conduct, up to and including termination of employment. They may also be referred to law enforcement or regulatory authorities where legally required or permitted. The same standard applies regardless of an individual's position within the company.

15. RESPONSIBILITY, REVIEW AND CONTACTS

Management is responsible for communicating this Code, providing appropriate training, and leading by example. Every employee is responsible for understanding and applying it in their own work.

Management reviews this Code regularly and updates it as PROBUS's business, or the legal environment in which we operate, evolves.

If you have questions about how this Code applies to a specific situation, please speak to your supervisor in the first instance. For matters that cannot be resolved that way, or that you would prefer to raise directly, please contact:

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