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1. Introduction and objectives

Coil Innovation specializes in the development and manufacture of dry-type air-core reactors for use in electrical power transmission and distribution. Innovation and Quality are the key elements of our strategic vision.

Coil Innovation has adopted the Mission Statement below to guide our company today and into the future:

- The customer determines our actions. - We assist our customers in increasing their competitiveness; the customer's benefit is our objective.
- We design through innovation and quality. - By following our guiding principle "Excellence through Ingenuity" we cultivate a pronounced culture of innovation in our enterprise
- We operate successfully. - We work with focus on results and pursue permanent added value.
- The potentials lie in our staff. - We understand our enterprise not only as an organization, rather more as a living organism.
- Learning makes us better. - All our staff do their best to learn continuously. We always compare ourselves with the best across the international competition.
- We assume responsibility for the protection of our environment. - We want environmental protection to be a part of corporate culture.
- We are committed to ethics and compliance. - Driven by our culture of integrity we apply a comprehensive Code of Conduct and promote it within our company and to the outside world.

While this model reflects the fundamental philosophy of our company, this code of conduct serves as an essential basis for all business and social actions and decisions in our company. It represents our demands on ourselves as well as on our stakeholders.

2. Scope and responsibilities

This code of conduct applies to all employees of the Coil Innovation Group (hereinafter "our company") and is mandatory for all future employees of our company.

The Coil Innovation Group includes all companies in which Coil Innovation Holding has a direct or indirect stake of more than 50% or in which it exercises control in some other way.

While every employee is fundamentally obliged to adhere to this code, every manager feels it is their responsibility to be a role model in implementing the code through their daily behavior.

In addition, our key business partners, such as customers or suppliers are provided copies of this code of conduct for their review. As part of our decision making process, when selecting our business partners, our company ensures that they will comply with our or a comparable code of conduct.

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3. Compliance with laws and internal regulations

We strictly observe all applicable laws and ordinances as well as internal regulations, even if they are exact economic disadvantages or other difficulties for our company or individual persons.

All employees are required to obtain comprehensive information about the applicable laws and regulations and, in case of doubt, contact the responsible department in the main office (see point 12).

4. Avoidance of conflicts of interest

In the course of our business activities, situations may arise in which our personal or economic interest conflicts with the interests of our company. In such a situation, we will only make business decisions that serve the best interests of our company.

When such conflicts occur, we will be obligated to disclose such conflicts to our respective superior without being asked.

Conflicts of interest particularly come to the fore in connection with the following situation:

- Sideline activities can naturally lead to conflicts of interest and contradict the goals of our company. All secondary activities with business partners, in particular with competitors, customers or suppliers, are thereby prohibited. In individual cases, approval can be requested from the supervisor, who can only grant a waiver in consultation with the HR department.
- An economic participation with business partners, in particular with competitors, customers or suppliers, which is significant, for example in the context of a stock market investment, is prohibited. We undertake to divulge such involvement with our close relatives (such as life partners, parents, children or siblings) to our department heads.

5. Fair competition

Our corporate philosophy can in no way be reconciled with violations of antitrust or competition law regulations. Our company's interests and goals can only be achieved in the long term through transparent and fair behavior in the market.

Corruption or antitrust violations threaten our corporate goals and contradict our philosophy. No business deal justifies possible violations of the law such as cartel agreements or bribery payments. We are aware that such violations of national or international antitrust regulations may not only lead to serious legal consequences for our company, but also high financial penalties or imprisonment for every employee involved.

The following regulations are of particular importance:

- Under no circumstances may written or verbal agreements of any kind be made with competitors that could influence competitive behavior. This applies in particular, although not limited to, agreements on prices, pricing, market allocation, production capacities or submitting offers.



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- The mere exchange of information with competitors regarding confidential information, such as pricing, cost structure, purchasing conditions, utilization and capacities or contract negotiations, is also prohibited.
- Taking into account national and international legal regulations, accepting or offering advantages is strictly forbidden if these can actually or even possibly influence business transactions.

Such advantages are payments (bribes), but can also be gifts, invitations or other benefits if these are outside the limits of hospitality customary in business. Specifically, this means that gifts, invitations and other benefits in any case:

- ✓ are in relation to the occasion and position of the recipient in terms of value, type and frequency.
- ✓ not offered, provided, demanded or accepted in anticipation of any kind of advantage.
- ✓ never give the appearance of dishonesty or inappropriateness.

Public authorities in particular are often subject to their own internal guidelines that completely restrict their options for accepting gifts and invitations. These guidelines are usually very strict and must be followed.

6. Money laundering

We do not participate in money laundering activities and in any case comply with the applicable legal regulations. We undertake to have any unusual financial transactions that could give rise to suspicion of money laundering checked in advance by the Finance and Controlling department.

7. Human rights, labor rights and equal treatment

We regard human rights to be the fundamental values on which our corporate philosophy is based. The interests of our company can only be safeguarded when we respect human rights.

These are fundamentally based on the UN Charter and the European Convention for Human Rights. This means that any form of child and forced labor as well as modern slavery or human trafficking are of course rejected. We only work with suppliers who make a clear commitment to comply with these fundamental rights.

We actively promote equal opportunities for all employees, regardless of their gender, age, skin color, culture, ethical origin, sexual identity, disability or worldview. This equal opportunity is guaranteed by preventing any form of discrimination against employees, whether in terms of employment and promotion, remuneration or the granting of training and further education. Sexual harassment of any kind, regardless of the underlying intent, will not be tolerated in any form.

We recognize the right of every employee to appropriate remuneration, which is at a minimum subject to national and local legal norms and collective bargaining agreements.



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8. Occupational health and safety

The health and safety of our employees is our top priority. In any business decision, all aspects of occupational health and safety must be taken into account.

In addition, our company undertakes to continuously improve our occupational health and safety system. All employees not only have to follow the safety standards and regulations on occupational health and safety, but also must actively promote the further development of health protection in their work environment. Every manager is obliged to actively support their employees in implementing this objective and to promote awareness of all relevant safety issues.

9. Environmental and climate protection

Sustainable environmental and climate protection can only be achieved through efficient resource management and the use of modern and innovative technologies in the production process.

Our company pledges to take into account all aspects of environmental and climate protection in all areas of the production process as well as in the new and further development of products and production facilities. Particular attention is paid to conserving resources where possible.

Existing Processes and procedures are continuously developed that take into consideration environmental and climate protection. Every employee is encouraged to do his or her part to protect the environment and climate.

10. Donations and sponsorship

Our company sees itself as an active member of our society and takes its social responsibility seriously, at the very least through donations and sponsoring. We make donations and all other forms of social engagement solely in the company's interests, primarily to support social, humanitarian, cultural and scientific institutions and projects.

Our sponsorship is primarily for regional sporting events and cultural projects.

We do not make any donations to political parties, party-affiliated organizations or political, non-exclusively social support organizations. This also includes appearances in party media or in the media of party-affiliated organizations.

11. Corporate communication

Any communication of information from our company that is intended for the public takes place exclusively through management. This includes both press releases and corporate communication whether through traditional or digital (social) media.

Every employee is aware that they can also be perceived as representing the Coil Innovation organization in their private lives and are therefore required to protect the reputation and interests of our company whenever they appear in the media, in public or on social media.



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The private opinion of all Coil Innovation employees in no way reflect the views of our company, its management or shareholders.

12. Reporting of violations and sanctions

The rules covered in this Code of Conduct are central to our company's business culture and commitment. Every employee is responsible for compliance with these rules. Furthermore, all employees are obliged to report all suspected or observed violations to this code of conduct. The same applies if they are encouraged to violate the principles mentioned.

Messages and reports can be sent by email to compliance@coilinnovation.com or by post to the following address:

**Coil Innovation GmbH
Compliance Officer**

Nikola-Tesla Strasse 1
A-4070 Eferding
AUSTRIA

Confidentiality is maintained as best as possible.

Retaliation against employees who report illegal or immoral conduct in good faith will not be tolerated and will result in disciplinary action. Any deliberate misuse of these reporting options will also be punished with the same measures. A violation of this code of conduct also consists in not reporting a known, suspected or actual violation or in refusing to cooperate in the investigation an infringement.

If you have any questions about a specific situation, you can contact the above address.

Penalties for violations:

It is the responsibility of an individual employee to ensure that their own behavior, and that of any subordinate employees, is fully in accordance with applicable law and this Code of Conduct. Your own and subordinates' observance of these principles, including business integrity, is a factor that is incorporated into regular performance reviews. Coil Innovation does not tolerate any violations and will take disciplinary action, including the possible termination of employees who violate the law and this Code of Conduct.