

PREFACE

The companies within the ABLE GROUP operate in the five core sectors – General Engineering, Aviation, Automotive, Plant Engineering and IT – either with operational associated companies or divisions, and offer their customers customized engineering and IT solutions in almost all technical fields. The ABLE GROUP is Germany's leading Engineering Services Group and, together with some of its associated companies, has been successful in this market in-part for over 50 years.

As a major employer in Engineering, the ABLE GROUP is aware of its social and ethical responsibility. This Code of Conduct defines the key values we are guided by. We expect our employees to respect these values and to practise these established principles in their daily work. We also expect our suppliers to comply with these standards.

The ABLE GROUP's Code of Conduct is based on the following generally recognized guidelines:

- Universal Declaration of Human Rights of the United Nations
- United Nations Global Compact
- ILO International Labour Standards
- Rio Declaration on Environment and Development
- United Nations Convention against Corruption

THE BASIC GUIDING PRINCIPLES OF THE ABLE GROUP

Principle 1 | Respect for Human Rights

The ABLE GROUP is expressly committed to upholding human rights within its sphere of influence. We undertake not to be involved in any form of human rights violations, neither directly nor indirectly.

We also expect our suppliers to treat all human beings respectfully and fairly and to uphold human rights within their sphere of influence.

Principle 2 | Respect of the Freedom of Association and of Right to Collective Bargaining

The ABLE GROUP respects the right of its employees to freedom of association and to collective bargaining. The ABLE GROUP's employees are free to form or join an employee representation. Being a union member must not result in disadvantages for employees. Employees or their representatives can also negotiate and conclude operational agreements or collective contracts at an appropriate level.

Our suppliers must also respect their employees' rights to freedom of association and collective bargaining.

Principle 3 | Ensuring Fair Labour Conditions

The ABLE GROUP pays attention for fair working conditions for all employees in all associated companies. This includes compliance with the relevant national regulations governing working hours as well as the right to appropriate remuneration, which should at least conform to the respective minimum wage or the applicable collectively agreed wage. Similarly, all salaries and benefits agreed in the employment contract as well as all nationally prescribed social benefits are paid or deducted.

Furthermore, the ABLE GROUP supports the further qualification of its employees.

We also expect our suppliers to offer their employees fair working conditions and to remunerate them appropriately.

Principle 4 | Elimination of all Forms of Forced Labour, Child Labour and Human Trafficking

The ABLE GROUP is committed to the prohibition of all forms of forced labour. This includes all types of work or services that are enforced by a person under threat of punishment or that are in voluntarily provided by a person.

The ABLE GROUP requires that our suppliers do not permit any kind of forced labour within their companies.

The ABLE GROUP is committed to the prohibition of any form of child labour. If minors are employed, the ABLE GROUP observes to the minimum age for admission to employment in accordance with national regulations.

The ABLE GROUP is committed to the prohibition of any form of human trafficking.

The ABLE GROUP demands that its suppliers do not tolerate any kind of child labour or human trafficking within their companies.

We expect that our suppliers do not let young employees carry out dangerous work, that they observe the national employment regulations of minors and that they do not hinder children's education due to their employment.

Principle 5 | Eliminate of all Forms of Discrimination in Recruitment and Employment

The ABLE GROUP rejects all forms of discrimination in the working environment. Therefore, we respect the privacy of our employees. We are committed to equality of opportunity and diversity and advocate that all employment decisions (such as appointment, promotion and training) are based solely on people's skills and qualifications. Aspects such as race, ethnic origin, religion or ideology, gender, sexual identity, age, nationality, disabilities, social background, personal relationships or union affiliation may not influence employment decisions.

The ABLE GROUP rejects any form of sexual harassment of employees and takes all legal measures available against it.

We also expect our suppliers to promote equal opportunity and diversity and to prevent discrimination in employment decisions and sexual harassment.

Principle 6 | Compliance of Occupational Health and Safety

The ABLE GROUP complies with the applicable national legislation on occupational health and safety. Our primary concern is to offer our employees a healthy and safe working environment. We are committed to keeping the risks with employees are exposed to as low as possible by taking appropriate measures to prevent health problems and accidents. The employees' working conditions are designed in accordance with their individual needs and subjected to a continuous improvement process. All applicable legal framework conditions for health protection, workplace ergonomics and work safety are observed.

Also, our suppliers are required to meet the applicable national legislation on health and safety at work. They must take active measures to prevent work-related accidents, diseases and deaths and thus guarantee their employees a healthy and safe working environment.

Principle 7 | Observation of Environmental Protection

Environmental protection is a key concern of the ABLE GROUP, therefore we focus on ensuring that environmental risks and negative impacts on the environment are minimized as far as possible through precautionary measures. These include in particular:

- reduction of energy consumption and greenhouse gas emissions
- keeping the air clean and thus improving air quality
- management of natural resources
- avoidance of waste
- preservation of water quality and the economical use of water as well as
- responsible chemicals management.

We pay close attention to the compliance with applicable national environmental legislation, regulations and standards in all associated companies. Furthermore, we support the use of modern, efficient and environmentally friendly technology.

Our suppliers are also expected to protect the environment and to adhere to applicable national legislation, regulations and standards. Our suppliers must ensure that their activities do not cause avoidable environmental damages.

Principle 8 | Combating all Forms of Corruption

The ABLE GROUP rejects all forms of corruption including bribery and blackmail. Decision-making processes may not under any circumstances whatsoever be influenced by undue benefits (such as cash, benefits in kind, pleasure trips etc.). Conflicts of interest must be avoided. If a personal interest or conflict of interest exists, this must be disclosed. No disadvantages will be incurred by the person concerned disclosing suchlike.

We also expect our suppliers to take action against all forms of corruption and not be involved in unfair competition. Our suppliers may neither bribe nor blackmail third parties, nor accept bribes themselves. They must not participate in pricing rigging with competitors or other agreements of a similar nature.

Principle 9 | Protection of Intellectual Property and Prevention of the Placing on the Market of Counterfeit Parts

The ABLE GROUP protects the intellectual property of customers and employees through appropriate technical and organizational measures.

Internal regulations prevent counterfeit parts from being put into circulation. These regulations must also be guaranteed by suppliers.

Principle 10 | Compliance with the Requirements of Data Protection and Information Security

The ABLE GROUP ensures that the processing of personal data complies with the currently valid data protection requirements and rules. Furthermore, the ABLE GROUP ensures that the information security requirements for processing information from its customers, suppliers and employees are met.

GENERAL REQUIREMENTS

This Code of Conduct defines the minimum standards recognized by all companies within the ABLE GROUP and to which all ABLE GROUP suppliers are expected to adhere. We regard the definition and implementation of this Code of Conduct to be integral part of our socially and ecologically responsible corporate governance. It is also an opportunity for us to support the sustainable development of our company in the long term. It is therefore our concern to continuously improve the implementation of the standards set out in our daily work.

All companies of ABLE GROUP and their suppliers are aware of their corporate ethical responsibility and actively comply with all legal disclosure requirements for corporate accounting. The traceability of all asset-relevant processes and business transactions is ensured by the factually correct and chronological allocation of the records.

It is understood that in all activities, national legislation, rules and regulations as well as customs and export regulations are respected. In this context, we pay particular attention to international legal requirements and restrictions on export control and export restriction of security-related services and goods.

This applies both to the employees of ABLE GROUP and to all suppliers and their subcontractors. If suppliers engage sub-suppliers, they are responsible for ensuring that all sub-suppliers also meet the requirements. The supplier must communicate these standards in an appropriate form to its sub-suppliers and ensure compliance with the standards.

COMPLIANCE WITH THE ABLE GROUP CODE OF CONDUCT

The ABLE GROUP reserves the right to check compliance with the standards defined here in an appropriate manner, for example through audits, and to adapt the standards if necessary.

We take consequent action in case of legal violations or non-observance of the standards set here. This includes taking measures under labour law and the termination of business relationships.

CONTACT

If you have any questions regarding the topic of Sustainability and the Code of Conduct please feel free to contact the Corporate Social Responsibility Officer at all times at csr@able-group.de.

GRIEVANCE MECHANISM AND WHISTLE-BLOWER POLICY

Indications of possible violations of laws or the Code of Conduct can be reported via the company-independent e-mail address csr@able@outlook.com, by telephone at +49 174 1689226, in person by appointment at the office of the CSR Officer at ABLE Management Services GmbH, Steinmüllerallee 2, 51643 Gummersbach or by post marked „personal/confidential“ to: CSR Officer, ABLE Management Services GmbH, Steinmüllerallee 2, 51643 Gummersbach.

The anonymity of the whistleblower and confidentiality are guaranteed under all circumstances. Any whistleblower will be protected from retaliation or reprisal.