



Code of Business Conduct and Ethics

PREAMBLE

As an international company, Fischbach is in constant relationship with a large number of different people and organizations and thus with the representatives of a wide variety of interests. As a consequence, the development and success of our company depend on how our employees conduct themselves in everyday business.

For this reason, we as a company have addressed what is important to us, how we act and how we want to be perceived.

We are committed to sustainable business practices and adhere to the 10 principles of the United Nations Global Compact.

We require high standards of professional and ethical conduct from all our employees. This Code of Business Conduct and Ethics (the "Code of Conduct") reflects our commitment to a culture of honesty, integrity and accountability and outlines the basic principles and policies with which all directors, officers and employees of Fischbach and the entities controlled by it are expected to comply. In this Code of Conduct, Fischbach and the entities controlled by it are referred to as "Fischbach" or the "Company" and the directors, officers and employees of such entities are collectively referred to as "employees".

This Code of Conduct is designed to assist those individuals to whom it applies in understanding their legal and ethical obligations and to encourage:

- avoidance of conflicts of interest;
- the integrity of Fischbach financial records and public disclosure documents;
- protection of Fischbach assets, including its confidential information;
- compliance with applicable laws;
- fair and ethical conduct in Fischbach business dealings; and
- accountability for compliance.

This Code of Conduct is not exhaustive, and no statement of principles and procedures can offer a complete guide to cover all possible situations. Fischbach employees are expected to observe both the spirit and the letter of this Code of Conduct and to consult this Code of Conduct or an appropriate representative of Fischbach when faced with an ethical issue.

Engelskirchen, September 1, 2026

Martin Herrenbrück
CEO

A blue ink signature of Martin Herrenbrück, CEO, written over a light blue grid background.

Martin Schilcher
CFO

A blue ink signature of Martin Schilcher, CFO, written over a light blue grid background.



1. CONFLICTS OF INTEREST

Each Fischbach employee must avoid any conflict, or perception of conflict, between his or her personal interests and the interests of Fischbach in transacting Fischbach business. A conflict situation can arise when an employee (a) has a personal interest that would be likely to interfere with or appear to interfere with Fischbach interests or the employee's loyalty to or judgment on behalf of Fischbach, (b) chooses or may appear to have chosen a personal interest over the interests of Fischbach, or (c) takes actions or has interests that may make it difficult or appear to make it difficult to perform his or her work objectively and effectively.

Some examples of a conflict of interest might include:

- having an interest in or relationship with a company with which Fischbach does or proposes to do business or a competitor of Fischbach;
- having an interest in a transaction in which Fischbach is or may be interested;
- passing confidential information to others;
- investment activity using confidential information;
- using the employee's position at Fischbach to obtain personal benefits;
- accepting gifts, payment, or services from those seeking to do business with Fischbach; or
- engaging in outside activities, which place significant demands on the employee's time, energy or attention at the expense of Fischbach.

Employees should fully and promptly disclose all circumstances that could reasonably be construed or perceived as a conflict of interest. Full disclosure creates an opportunity to resolve unclear situations and deal with conflicting interests before any difficulty can arise.

Corporate Opportunities

Employees and directors are expected to advance the Company's legitimate business interests when the opportunity to do so arises. Employees may not (a) take for themselves (or direct to a third party) a business opportunity that is discovered through the use of the Company's property, information or position or indeed any other opportunity which it reasonably believes may be of interest to Fischbach, (b) use the Company's property, information or position for personal gain or (c) compete with the Company. Employees owe a duty to Fischbach to advance its legitimate interests whenever the opportunity to do so arises.

Giving and Receiving Gifts or Benefits

Modest gifts and reasonable entertainment may be given and received, where legally permitted and in accordance with local business practices, to and from persons doing business or seeking to do business with the Company. No gift or entertainment should be of such nature or value as to constitute a real personal enrichment of the recipient or to create an obligation on the part of the recipient, or as would reflect unfavourably on the Company or the donor or recipient if subjected to public scrutiny. Cash or equivalents are not to be given or accepted. However, Fischbach recognizes that employees have personal relationships outside the Company and that there are many circumstances in which personal and business relationships may overlap. Employees are encouraged to be thoughtful with respect to gifts given and accepted in the context of those relationships to ensure that they are appropriate, and would reasonably be perceived as appropriate, in the circumstances.



Employees must not give or accept bribes, directly or indirectly, under any circumstances.

2. FINANCIAL INFORMATION AND DISCLOSURES

Financial Reports and Accounting Records

Investors, creditors and others have a legitimate interest in Fischbach financial information. The integrity of Fischbach financial reporting is based upon the validity, accuracy and completeness of the information upon which our accounts and records are based. The Company expects employees involved in creating, processing or recording such information to take responsibility for its integrity. Without limiting the foregoing, employees may not be involved in the submission of false invoices or expense reports, the forging or alternation of cheques or misdirection of payments, the unauthorized handling or reporting of transactions, the creation or manipulation of financial information so as to artificially inflate or depress financial results, or any improper or fraudulent interference with or coercion, manipulation or misleading of the Company's auditors or the Audit and Corporate Governance Committee of its Board of Directors.

Integrity of Public Disclosure

Information in Fischbach public communications, including communications with investors, must be full, fair, accurate, timely and understandable. All employees who are involved in the Company's disclosure process, including all senior financial personnel and all employees with supervisory responsibilities with respect to Fischbach public disclosure documents, are expected to act in furtherance of this requirement. In particular, these individuals are required to be familiar with and to comply with all applicable disclosure requirements and are prohibited from knowingly misrepresenting, omitting, or causing others to misrepresent or omit, material facts about Fischbach to others, whether within or outside the Company.

3. CONFIDENTIALITY

In carrying out the Company's business, employees often have access to confidential or proprietary information about the Company, its investors and business partners, or other third parties. Employees must protect the confidentiality of such information, except when disclosure is authorized or legally mandated. Confidential information includes, among other things, any non-public information concerning the Company, including its businesses, financial performance, results or prospects, financial and other information about potential acquisitions and any non-public information provided by a third party with the expectation that the information will be kept confidential and used solely for the business purpose for which it was conveyed. All information regarding the business, affairs and activities of Fischbach should be considered confidential by employees unless and until it is properly made available to the public. Any employee who receives confidential information is prohibited from disclosing such information to any other person unless it is necessary to do so in the conduct of Fischbach business and then only if the employee takes appropriate steps to protect the continuing confidentiality of such information.

In order to prevent the misuse or inadvertent disclosure of material information, the procedures set forth below should be observed at all times:



- confidential matters should not be discussed in places where the discussion may be overheard, such as elevators, restaurants, airplanes or taxis;
- confidential documents should not be read in public places, left in unattended conference rooms, left behind when a meeting is over or discarded where they can be retrieved by others. Similarly, employees should not leave confidential information at their homes where it can be accessed by others;
- care should be taken in communicating confidential matters on wireless telephones or other wireless devices;
- transmission of confidential information via electronic means, such as by fax or e-mail, should be made only where it is reasonable to believe that the transmission can be made and received under secure conditions;
- access to confidential electronic data should be restricted through the use of passwords;
- unnecessary copying of confidential documents should be avoided and extra copies of confidential documents should be shredded or otherwise destroyed;
- documents and files containing confidential information should be kept in safe and controlled locations;
- all proprietary information, including computer programs, analyses, models and other records, are the property of the Company and may not be removed, disclosed, copied or otherwise used except in the normal course of employment or with prior authorization.

When leaving the employ of the Company, an employee must return all confidential information in his or her possession and is required to continue to protect any confidential information learned during the course of his or her employment.

Without in any way limiting the generality of this Code of Conduct or an employee's obligation of confidentiality to the Company, employees should have regard to the Company's Insider Trading and Reporting Policy with respect to certain securities laws prohibitions on disclosing confidential information and the legal sanctions and penalties for improper disclosure.

4. COMPLIANCE WITH LAWS, RULES AND REGULATIONS

Generally

Fischbach is committed to operating within the framework of the laws, rules and regulations applicable to its business. This also applies to laws and regulations in other countries. All employees are expected to understand and adhere to the laws affecting their work and must not encourage other employees or persons with whom Fischbach does business to breach the law.

Destruction of Documents

Altering, shredding or otherwise destroying documents or records (written or electronic) that are relevant to any breach of law or any pending, threatened or anticipated government investigation, audit, regulatory proceeding or lawsuit is strictly prohibited. Similarly, we must cooperate fully in any authorized internal or external investigation by or on the order of Fischbach auditors, government or law enforcement officials, regulators or courts and must not make any false or misleading statements or otherwise engage in misleading conduct.



5. PROTECTION AND PROPER USE OF FISCHBACH'S ASSETS

All employees should protect Fischbach's assets and ensure that they are used efficiently and for legitimate business purposes in the interests of the Company. Fischbach's assets include not only equipment, materials, systems, data, supplies and services that are purchased by Fischbach but also its confidential information and the information entrusted to it by persons with whom it conducts or seeks to conduct business.

6. FAIR DEALING

Internationally recognized human rights (UN Charter of Human Rights, UN Doc. 217) are expressly and steadfastly supported.

Employees are expected to compete vigorously in business dealings on behalf of the Company but also to deal fairly with the Company's investors, service providers, suppliers, competitors and other employees. Decisions in the purchase of goods or services should be made only on sound business principles and in accordance with ethical business practices. No employee should take unfair advantage of any other person through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice. No employee should unfairly disparage or misrepresent competitors of Fischbach either generally or in respect of a particular matter or transaction and should never seek to induce another party to breach a contract in order to enter into a transaction with Fischbach.

Employees are required to select and deal with service providers, suppliers and others doing or seeking to do business with the Company in an impartial manner and should be perceived by others to be acting impartially, without favour or preference based upon any considerations other than the best interests of the Company.

Child labour and any form of exploitation of children and young people (minors) are prohibited. The relevant laws are observed.

Any form of forced labour, debt bondage, serfdom, slave labour or modern slavery is prohibited. Employees must not be forced to work, either directly or indirectly, through the use of violence or intimidation.

7. EQUAL EMPLOYMENT AND OPPORTUNITIES AND HARASSMENT

The Company supports the spirit and intent of applicable human rights and anti-discrimination laws and will not accept any behaviour, which conflicts with these principles and laws. All employees should treat each other with courtesy, dignity and respect. Harassment will not be tolerated in any part of the Company's dealings with its employees, including in recruitment, promotion, opportunities, salary, benefits or terminations.

All employees receive a fair wage that is sufficient to meet their basic living costs. Wages are paid in a practical manner and a payslip of an appropriate standard is provided. Employees' rights to freedom of association, freedom of assembly and collective bargaining, in accordance with the relevant legal provisions, are respected.



8. HEALTH AND SAFETY AT WORK

Working hours comply with applicable national law.

National and international regulations designed to ensure health and safety at work are observed. Appropriate systems are in place to prevent risks to health and safety.

9. ENVIRONMENTAL PROTECTION

We adhere to the objectives of sustainable environmental protection. In this context, we strive to use environmentally friendly production methods. In accordance with the principles of the United Nations Rio Declaration, the company manages natural resources responsibly.

This includes the protection of air and water.

10. EMPLOYEE PRIVACY

Access to personal information about Fischbach employees is restricted to people with a “need to know” within Fischbach and will be transmitted to other employees or third parties only for legitimate and necessary business purposes or to satisfy legitimate investigative or legal requirements. Employees who are responsible for maintaining personal information must ensure that the information is not disclosed inappropriately or misused.

11. USE OF COMPANY COMPUTERS AND THE INTERNET

The Company's computer resources and information technology systems are intended to be used for business purposes. While employees are generally permitted to also use such resources and systems for incidental personal purposes, they must use them in a responsible manner and in a manner that would not reasonably be expected to expose them to loss or damage. Further, employees are not permitted to use the Company's technology resources to engage in communications that contain, promote or constitute illegal or obscene information or activities, matters that could reasonably be expected to expose the Company to any criminal, civil or regulatory censure or liability whatsoever, matters that would be embarrassing to the Company or its directors, officers or employees or damaging to its or their business and affairs if publicly disclosed, or information or conduct that unduly interferes with the work of the particular employee or of other employees.

12. POLITICAL AND CHARITABLE ACTIVITIES

Fischbach recognizes the legitimate interests of employees in being involved in political activities, including the support of political candidates and the expression of opinions on political or public issues. Similarly, Fischbach recognizes and encourages employees' involvement in charity and community service and the making of charitable donations. However, employees should make it clear that they are acting or speaking on their own behalf and not on behalf of Fischbach in engaging in such activities or making such donations unless they are authorized by the Company to act on its behalf. Donations of Fischbach's funds or assets



and the use of Fischbach name in support of political or charitable causes may only be made with proper authorization.

13. WAIVERS

The Company may waive certain provisions of the Code of Conduct when deemed appropriate under the circumstances. Any employee who believes that a waiver may be called for should initially discuss the matter with any one of his or her company's Chief Financial Officer.

14. CONSULTATION AND REPORTING

Employees should report all violations of law, regulation or this Code of Conduct of which they become aware to the company's Chief Financial Officer. Similarly, an employee who is unsure as to whether a violation has occurred or who needs guidance as to whether to take a particular action that may be, or may appear to be, a violation, should consult any of those individuals. No individual who reports a violation or potential violation or who cooperates in the investigation of a violation or potential violation will be subject to harassment, discipline or retaliation as a result of such report. Employees should have regard to the Company's Whistleblower Policy for details as to how to report a concern, including the procedure for confidential, anonymous reporting, and the protections to which they are entitled in making such a report. Fischbach's Whistleblower Policy has been made available to all employees.

15. CONSEQUENCES OF VIOLATION

Breaches will be dealt with promptly and fairly in a manner that takes into account the seriousness of the violation and the conduct of the employee in response thereto. Self-reporting by employees is encouraged and will be given due consideration by Fischbach in dealing with any violation. Disciplinary action can include, but is not limited to, an impact on the applicable individual's record or remuneration, suspension or termination of employment, pursuit of any and all remedies available to Fischbach for any damages or harm resulting to it from a violation, and referral to the appropriate legal, regulatory or law enforcement body.

It is ultimately the responsibility of the Fischbach board of directors to monitor compliance with this Code of Conduct. The monitoring of compliance is achieved through systems and processes implemented by Fischbach management that are designed to result in wide dissemination of the Code of Conduct, to encourage compliance with its provisions and to facilitate the reporting of actual or suspected breaches. Such breaches are investigated by management as appropriate and, depending upon the nature of the breach and other relevant circumstances, either dealt with by management with the results reported to the board or referred to the board for further action.