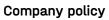
CODE OF CONDUCT



Foreword

As one of the world's leading manufacturers, K2 Systems ("K2") develops and sells high-quality mounting systems for solar technology. Highly standardized mounting system solutions make it possible to tap the enormous potential for PV systems on roofs through simple, more reliable and economical fastening system solutions. In combination with our digital services, we make it even easier for our customers to implement an increasing number of PV systems.

Our daily values form the basis for the success of K2.

This Code of Conduct is our guide in everyday working life and describes the values, principles, and behaviors that all K2 Systems employees worldwide stand for and thus create a working environment that is characterized with integrity, respect, fair and responsible behavior.

We expect the same behavior from our business partners.

1. Compliance with applicable law

We observe the applicable law as well as internal company regulations. We comply with all relevant laws, regulations, and guidelines of the countries in which we operate economically.

Our common goal is to take responsibility for our company and protect the reputation of our brand. Violations of applicable law and the rules of conduct set out in this Code of Conduct will not be tolerated and will be sanctioned with appropriate consequences.

We undertake to inform ourselves about and comply with the regulations applicable in our areas of responsibility. The same applies to this Code of Conduct. In case of ambiguity, we will notify known business partners, their respective superiors, and/or through the use of external consultants.

2. Fair competition and antitrust law

In our day-to-day business, we act in the sense of free and fair competition and comply with applicable competition and antitrust law, which prohibits agreements or practices that unduly restrict trade or competition. In conversations or other contacts with competitors, we avoid topics that are important for the competition among ourselves. This includes, in particular, agreements on offers, prices, pricing, business planning, sales quotas and market shares. This also applies to informal exchanges. We do not make any statements that could lead to a concerted practice and remain with integrity.

3. Conflicts

We strictly separate business and private interests. Business conduct is based exclusively on the interests of the company. Secondary activities require the prior written consent of K2. Consent is not refused without good cause. If conflicts of interest are unavoidable, we inform our supervisor or the HR department to find a fair and transparent solution.

4. International trade and services

We comply with the rules applicable to cross-border trade. The legal requirements for our commercial products and services in international trade are binding for us. Accordingly, we observe existing import and export restrictions as well as all national and international official approval requirements. In case of doubt, our customs officers must be consulted, or external customs experts consulted.

5. Corruption and bribery

We grant donations to business partners, customers or other external third parties only within the framework of the legally permissible framework conditions. Before we make or accept gifts, we inform ourselves of our own responsibility relative to our own internal regulations. We do not accept any benefits from customers or other business partners that could impair an objective and fair business decision and, conversely, do not offer any such benefits.

We do not tolerate corruption. This applies to persons, companies, authorities and other institutions. Corruption and bribery are prohibited. We will report any indications of corruption or bribery without delay. We also comply with the legal provisions on money laundering and terrorist financing.

6. Social responsibility and human rights

As a globally active company, we work together with a large number of suppliers and service providers. We carefully select these according to objective criteria. In addition, we attach great importance to social, sustainable, and fair economic criteria.

We respect and observe human rights and comply with the laws and regulations that apply to us. We explicitly adhere to the ban on child employment and forced labour. To live up to our social and corporate responsibility, we expect our business partners to follow these values.

7. Equal opportunities and equal treatment

Diversity is absolutely a matter of course for us and enriches our company. Equal treatment is the basis for the fair, unprejudiced and open dealings we maintain with each other and with our customers and business partners.

We do not discriminate against anyone or tolerate discrimination based on gender, color or ethnicity, age, disability or sexual identity, religion, belief, or other personal characteristics.

8. Fair working conditions

We comply with employee laws and corresponding regulations and attach great importance to fair working conditions. This includes compliance with applicable working time regulations as well as appropriate remuneration. The desire for further training or further qualification is expressly encouraged and supported.



9. Safety, occupational safety, health protection

We adhere to the regulations on occupational safety and health protection and take our own health and safety and that of our colleagues very seriously. Within the scope of our powers and responsibilities, we take all reasonable measures to minimize risks, prevent health impairments and accidents and to enable safe work. Our goal is to promote the health, performance, and job satisfaction of all.

10. Environmental and climate protection

As a company in the field of renewable energies, we are aware of our responsibility for the environment. We are responsible for the environmental compatibility and sustainability of our products, locations and services and pay attention to the careful use of natural resources, a continuous reduction of environmental impacts and compliance with environmental protection laws and regulations.

When developing our products, we pay attention to resource efficiency, optimized use of materials and durability of the materials used. We cover our electricity needs from renewable energies, look for potential savings and strive to continuously reduce consumption. We promote and build on the personal responsibility of each individual employee to do their part to protect the environment.

11. Confidentiality

Our know-how forms the basis of our business success and is confidential or legally protected. We are aware of the value of the company's own knowledge, handle all company information carefully, never pass it on without authorization and undertake to maintain secrecy about all trade and business secrets. We maintain the confidentiality of sensitive information of our customers, business partners and other third parties alike.

12. Privacy

The respectful handling of personal rights and the protection of privacy include the protection of personal data. We treat personal data of employees, customers, suppliers and other third parties in accordance with the legal requirements and thus ensure confidentiality and verifiability in the handling of useful information. In cases of doubt or if something is unclear, we will contact the body responsible for data protection. In this way, we ensure compliance with the applicable data protection regulations.