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As an internationally active family-owned company with many years of tradition, the Festo Group has a good reputation in the eyes of the public and among its business partners and employees. Our uppermost priority is to maintain this reputation. We therefore attach great importance to integrity and require a high standard of ethically unimpeachable actions which are in accord with the relevant laws and rules.

With this code of conduct, we declare our commitment to these ideals on behalf of the Festo Group and acknowledge our responsibility towards our commercial and social environment and our staff around the world.

Violations of the code of conduct and incitement to violations will not be tolerated and shall lead to appropriate disciplinary action using all available means. Above and beyond any legal sanctions, violations may also have personal consequences for individual staff members.
1 Objective, scope of application

This code of conduct shall be a binding and mandatory guideline for all members of the Management Board, all managers and staff of the Festo Group in their daily actions on behalf of the company. It is a minimum standard which, as a complement to our values, defines the behavioural principles which we consider appropriate and mandatory in order to justify the high standards of the Festo Group with regard to ethically unimpeachable actions which are in accord with the relevant laws and rules and our own values.

This code of conduct shall apply globally to all sites and companies in the Festo Group, even if in certain countries in which Festo Group companies are active behavioural or business practices which contradict this code of conduct are demanded, expected or tolerated.

If, in any particular country, stricter rules or behavioural principles are in force than those defined in this code of conduct, these stricter rules shall apply.

As a complement to this code of conduct, concrete rules of behaviour relating to specific topics will be defined in separate guidelines and shall apply in addition to this code. In cases where guidelines of this kind have already been issued, copies of the current edition can be viewed and printed out from the „WeNet page „Company, Compliance“.“

Observation of this code of conduct and the complementary guidelines shall be mandatory for the members of the Festo Management Board and Festo managers and staff. They shall be used as the basis for the relationships between the companies of the Festo Group and their staff in order to ensure that Festo’s good reputation and the trust of everyone concerned in the Festo Group is maintained. No rights of third parties are to be conferred by this.

2 Chief Compliance Officer

The Management Board of the Festo Group, with the agreement of the Supervisory Board, has appointed a Chief Compliance Officer (CCO), who in organisational terms reports directly to the Chairman of the Management Board but also has the right to report directly to the whole of the Management Board or the Supervisory Board.

The task of the CCO is to support the individual companies in the Festo Group in realising the requirements of this code of conduct as part of the process of implementing a Compliance Management System (CMS), to monitor conformity to the code with the support of other governance functions (e.g. Risk Management, Internal Control System, Internal Audit), to help develop guidelines for the code of conduct within the context of the CMS and update these from time to time as required, and to be the contact person for all questions relating to the implementation of the code of conduct. The governance function „Internal Audit“ shall also ensure conformity to the code of conduct and complementary guidelines when carrying out its work and shall notify any violations which it identifies to the CCO.

The complementary Compliance Committee which has been appointed shall support the CCO in the discharge of his duties and general work within the framework of the procedural rules of the Compliance Committee.

The electronic reporting system BKMS ensures that loyal staff members can follow their conscience without having to fear reprisals: www.bkms-system.com/festo
3 Behaviour in the business environment

3.1 Conformity to laws, regulations and internal rules

At all Festo Group locations, the locally applicable laws and minimum industrial standards, the UN Convention of International Bill of Human Rights, the UN Convention against Corruption, the Declaration on Fundamental Principles and Rights at Work of the International Labour Organisation (ILO) and all internal Festo rules and regulations (referred to in the following as „standards“) shall be observed.

The Management Board, managers and staff of the Festo Group shall be considered to be acting in the company's interests only if they observe these standards, even in cases where this may appear strategically and economically unfavourable or inappropriate from the point of view of an individual person or the company and even if they are instructed to the contrary by a member of Festo management personnel. Each individual member of staff shall be responsible within his/her area of responsibility for ensuring that his/her behaviour conforms to these standards at all times.

In view of their function, we expect of our managers not only that they communicate these standards in the desired form but also actually practice them themselves (role models) and require their staff to do the same. Our managers are the first point of contact for their staff in all questions relating to this code of conduct.

3.2 Fair competition

The Festo Group is convinced of the quality of its products, its innovative strength, its integrity and the abilities of its employees. It acknowledges the rules of a market economy and fair and open competition, both nationally and internationally.

We also expect this of our business partners and competitors. The Festo Group pursues its corporate objectives exclusively in accordance with the principle of high-quality performance and explicitly eschews all forms of business cooperation, orders or other advantages which could be obtained only through violation of the relevant rules on the market or competition.

3.2.1 Agreements relating to competition

In all its activities, the Festo Group takes care to ensure observance of the principles of competition and antitrust legislation, i.e. by refraining from entering into market agreements, in particular agreements with (potential) competitors regarding prices, capacity or non-competition, the boycotting or support of boycotting of suppliers or customers, the submission of sham quotations during tendering operations or agreements to share customers, areas or production programmes. The above shall apply irrespective of whether such agreements or actions are the result of formal arrangements or are based only on informal discussions (e.g. at trade association meetings), informal „gentlemen's agreements“ or „concerted actions“ aimed at or causing one of the restrictions of competition mentioned above.

Any planned agreements or consultations with (potential) competitors shall be submitted in advance to the Festo legal department for examination and approval. No agreement may be made without the approval from/consultation with the Festo legal department.

3.2.2 No bribery or corruption

The Festo Group will not tolerate any form of corruption and firmly rejects any type of bribery. The Management Board, managers and staff of the Festo Group are prohibited from offering, promising or granting benefits to business partners, the staff or representatives of business partners, office holders, politicians or relatives or associates of any of these groups in return for preferential treatment when procuring goods or services, no matter whether there is entitlement in individual cases to a given service/action or not.

In this context, the Festo Group shall be bound by the currently applicable edition of the guidelines of the International Chamber of Commerce (ICC) for combating corruption in business and the requirements of the US FCPA (Foreign Corrupt Practices Act) and the UK Bribery Act 2010.

3.2.3 Payments

Payments arranged by the Festo Group for deliveries and services received shall be made directly to the relevant contractual partner only and always in the country of the contract partner's registered office. Payments in cash are forbidden, with the exception of amounts up to EUR 100 or the local equivalent and provided that a properly signed receipt is issued for these. Moreover, the CCO shall be informed without delay and in advance of all payments and/or payment agreements that deviate from this principle.
3 Behaviour in the business environment

3.2 Fair competition

3.2.4 Business incentives
Performance-related commissions, bonuses, including those relating to purchasing pool agreements, discounts, and goods made available free of charge are typical business incentives. These or similar incentives may be granted or accepted only with observance of and in compliance with the applicable standards. The granting or accepting of this type of business incentive must be ethically, legally and socially appropriate in each individual case and must be documented in writing. Otherwise, incentives shall be rejected and/or immediately returned.

Remuneration, particularly in the form of commissions, paid to third parties, e.g. salespersons, brokers, consultants or other intermediaries, must be proportionate to the service provided and shall be documented in writing in full, particularly in terms of the subject of the remunerated activity and the settlement date.

These payments must be of such a size that they do not create a basis, or lead to the assumption that a basis has been created, for bypassing the existing rules on the granting of impermissible advantages. Any written agreement with representatives, brokers, consultants and other intermediaries, including any subsequent changes to such an agreement, must include an undertaking by the parties to the agreement to observe the existing principles at all times and not engage in bribery of any kind.

3.2.5 Offering, granting, accepting or requesting of advantages
All agreements or subsidiary agreements which relate to the direct or indirect granting of advantages – of any kind whatsoever – in favour of individual persons or organisations in connection with the facilitating, awarding, approval, delivery, processing or payment of orders (e.g. kick-backs), shall be forbidden. This shall apply in particular to agreements with business partners and their staff or office holders.

Payments may be made or initiated by staff only when contractually agreed goods are delivered or services are performed. Any such payments must be appropriate and must be recorded in accordance with the principles of correct accounting. No payments may be agreed in cases where there is concern or there are grounds for assuming that they are intended in whole or in part for the payment of bribes.

All staff are forbidden to offer, make, request or accept direct or indirect gifts and other donations relating to business activities.

This shall not apply to occasional hospitality and gifts which are of no significant financial value and conform to the usual level of local business etiquette. The offering and acceptance of hospitality and gifts of this kind shall, however, at all times be subject to the requirement that the possibility of influence on business decisions can be excluded from the very outset.

3.2.5.1 Offering and granting of advantages
In accordance with this code of conduct, gifts, hospitality and similar advantages shall be forbidden if, due to their value or for other reasons, they are likely to place the recipient under an obligation which may call into question his/her commercial or professional independence.

The offering and making of gifts of money shall be forbidden in all cases. Invitations to events or other social occasions must be either in line with customary business practice and appropriate in their scope and type or must have a clear business purpose. The amounts of money spent on business hospitality must be appropriate to the nature and scope of the hospitality in question.

3.2.5.2 Requesting and accepting of advantages

The above-mentioned principles of conduct shall also apply to the accepting of advantages: no member of the Management Board, management team or staff of the Festo Group shall use his/her position or function in the company to request, accept or procure personal benefits (including intangible benefits) for him/herself or others close to him/herself.

3.2.5.3 Occasional invitations
In accepting invitations, including those within the context of purchases, the recipient of an invitation shall be requested. In cases of doubt, a statement of approval by the line manager or superior of the recipient in question shall be requested.

In all cases, the Festo Group attaches great importance to the observance by recipients of invitations and gifts which are permissible in accordance with this code of conduct, of the codes of conduct of their companies or organisations also. The attention of recipients shall be drawn to this. In cases of doubt, a statement of approval by the line manager or superior of the recipient in question shall be requested.

Occasional invitations to customer events or meals, particularly during or following official meetings (provided that the criteria of section 3.2.5.1 are met), or the accepting of gifts of a symbolic character or low value shall be permissible.

In accepting invitations, including those within the context of events, it must furthermore be ensured that these invitations are of a clear and predominantly business-related nature and that the amounts of money spent on business hospitality must be appropriate to the nature and scope of the hospitality in question. It shall be permissible to respond to an invitation to attend a charity event or make a donation for a charitable purpose only if it is ensured that this is in conformity with the principles as stated in this code of conduct, in particular those in the first paragraph of section 3.2.5.1.
3 Behaviour in the business environment

3.2 Fair competition

Requesting and accepting gifts of money shall be forbidden in all cases. If a member of the Management Board, management team or staff of the Festo Group is offered gifts and/or other advantages above and beyond the limits described here, including an opportunity to enjoy preferential conditions for him/herself or persons close to him/herself, this shall be refused in all cases. The CCO shall be informed without delay of offers of this kind.

3.2.5.3 Violations

Violations of the regulations stated in sections 3.2.5, 3.2.5.1 and 3.2.5.2 shall not be justified anywhere in the world by the argument that certain actions are simply local customs or that they are practised by everyone concerned.

3.2.6 Donations and sponsoring

Payments without an advantage in return (charitable donations) must always be made in a transparent way, i.e. the recipient and the concrete purpose to which the donation is being put by the recipient must be known and traceable. In the case of sponsoring, it shall be ensured that the financial donation is proportionate to the agreed return.

The Festo Group has issued an international donations and sponsoring guideline for this purpose. Attention is drawn to the current edition of this guideline. This can be viewed on the Festo Intranet page “Company, Corporate Communication, Donations and Sponsoring” and printed out as required.

We follow the principles of sustainability and environmental compatibility. The Festo Group is aware of the scarcity of resources and its responsibility towards future generations. Compliance with all applicable environmental protection laws, including the local provisions of the individual countries in which Festo is active, is a self-evident obligation for corporate management, for managers and each individual staff member of the Festo Group. The Environmental Manager appointed for the Festo Group therefore controls and monitors the environmental management system which has been installed by the Festo Group and which is based among others on the international ISO standards 14001:2004.

We also ensure that environmental regulations are observed during the manufacturing process and throughout the lifecycle of our products. Both during the development of products, the selection of materials and suppliers, and during the production processes we apply high standards with regard to ecological factors and environmental compatibility.
3 Behaviour in the business environment

3.4 Tolerance and equality of opportunity

As a globally active company, the Festo Group works with staff and business partners of various nationalities, cultures and philosophies of life. Our work with one another is characterised by respect, tolerance, esteem, fairness and openness.

The Festo Group rejects without exception discrimination, harassment, disadvantaging, humiliation and all other forms of disrespectful treatment and also discrimination in favour of staff or business partners on the basis of ethnic background, sex, religion, philosophy of life, political opinions, physical disability, age, sexual orientation or any other ethical, social and legally protected characteristics. All forms of harassment in the workplace, particularly of a sexual nature, are fundamentally forbidden. It shall be irrelevant with regard to the above whether or not the affected person is able to avoid the behaviour in question or whether the person violating this principle regards his/her own behaviour as acceptable.

Managers should in this context be aware of their position as role models and take steps to ensure a working environment which is free of discrimination and harassment.

3 Behaviour in the business environment

3.5 Reporting and documentation

All minutes and reports, particularly those that are intended for the information of third parties, shall be technically correct and truthful. Data capture and other records shall always be complete, correct, timely and system-compatible and shall allow the identification of the originator or author and the date of creation. All business transactions, particularly all oral and written agreements reached, shall be documented and filed in accordance with legal and internal requirements.
The Festo Group selects its business partners purely on the basis of objective and economic criteria and examines all offers from its suppliers fairly and impartially. Unprofessional preference or disad

vantage of suppliers, especially for private reasons, is prohibited as a matter of principle. In the case of invitations to tender, contracts shall be awarded to the most cost-effective tenderer unless other reasons (quality, service, long-standing business relations, creditworthiness, etc.) justify a different decision. In these cases, the decisive considerations shall be documented, without enabling third parties to derive claims from this action.

The Festo Group has developed an independent Code of Conduct for Business Partners on the basis of this code of conduct. Festo expects its suppliers, customers, sales partners and all other business partners to respect, for their part, the values expressed in this Code of Conduct for Business Partners, to take note of these in their dealings with Festo and ensure that they are complied with.

The Festo Group attaches importance to the principle that, wherever possible, the requirements of this Code of Conduct for Business Partners should be incorporated into contractual agreements in so far as these do not have their own code of conduct that has been deemed to be equivalent.

A relationship with suppliers and sales partners shall only be possible if there has been agreement with respect to the Code of Conduct for Business Partners or they can demonstrate that they have their own code of conduct for business partners which is based on the equivalent principles. Notwithstanding this, the Festo Group shall in the case of longer-term supplier relations reserve the right to premature termination of the business or supplier relations if there are serious violations of the principles described in this code of conduct, particularly with regard to bribery, inappropriate granting of advantages, or forced or child labour.

All information that concerns the companies of the Festo Group and its business partners shall be treated confidentially and shall not be made available to third parties unless the information is already public knowledge or has been made publicly available by other means. The forwarding of information is the context of official requests for information or within the framework of fulfilling the commercial interests of the Festo Group is excepted. This obligation shall continue to apply after the termination of working relationships.

The direct or indirect use of confidential information for personal purposes is prohibited. All members of the Festo management board, managers and staff shall be obliged to actively safeguard confidential information against unauthorised access in accordance with internal company guidelines. The Festo Group in particular rejects all forms of industrial espionage, no matter whether active or passive.

The Festo Group shall consistently conform to the relevant data protection regulations.

Personal data relating to customers, staff or other business partners which fall within the scope of data protection legislation shall be gathered, processed or used by the Festo Group only when this is legally permissible or the person concerned is in agreement. Protection of privacy in the use of personal data and the safety of all business data shall be safeguarded in all business transactions, taking into account the applicable legal requirements. Confidential information, official documents and data storage media shall, as a matter of principle, be protected against access by third parties. The relevant data protection manager shall provide support in these matters for the areas/departments/companies in question.
The Festo Group shall observe all regulations relating to foreign trade, embargoes, customs duties and the control of terrorism as well as the regulations established in this context relating to payment processes which are applicable in the various countries in which it conducts business. All Festo staff who are involved in the import and export of goods, services or technologies (including technical data) and the processing of payments shall be obliged to observe the relevant laws and regulations applicable to economic sanctions, import and export control and all guidelines and processes connected with their business activities. In particular, the Festo Group shall not undertake, instigate or promote any actions or measures that could even create the impression of deliveries via third countries to embargoed countries.

The Festo Group is aware of its social responsibility in connection with the fulfilment of its fiscal and tax liabilities. In this regard, we fully support the tenet of strict legality for all actions, measures, contracts and other processes; including strict observance of all fiscal and tax regulations and the payment of all owed taxes.

This principle is not only based on the consideration that any violation could result in considerable disadvantages due to prosecution, fines or claims for damages; but rather we affirm and support the principle of legal tax-compliant actions regardless of whether or not this is beneficial for us.

On the basis of an active, permanent, regular exchange of information, the legal representatives of the individual companies of the Festo Group together with the responsible departments in headquarters shall therefore ensure that there is no unlawful reduction in taxation and liabilities, whether national or international, or breach of the associated obligations to cooperate.

These principles shall apply equally to relationships with our business partners (e.g. suppliers and customers). In particular, the Festo Group does not undertake, instigate or promote any actions or measures that could even give the impression of aiding and abetting tax fraud or unjustified, commercially inappropriate tax avoidance by our business partners.
The esteem in which the Festo Group holds its staff and the sense of responsibility which it has towards them are also reflected in the desire to offer its staff in all countries fair and safe working conditions which meet all relevant legal requirements, including local requirements.

The safety and health of all staff is also a top priority for the Festo Group. The Festo Group therefore makes every effort to ensure a consistently high standard of quality in all company divisions, particularly in designing products and workplaces to be safe. Processes, systems and operating resources must comply with the applicable legal and internal health and safety regulations, as well as fire and environmental protection regulations.

In recognition of its international presence, the Festo Group also observes the convention of the International Labour Organization (ILO) with regard to the basic principles and rights at work and, among other things, rejects all forms of forced or child labour. The Festo Group tolerates and respects freedom of association and the right of its staff to be members of or otherwise belong to constitutionally recognised associations, such as duly formed labour unions or other associations which safeguard and protect the interests of workers. The Festo Group will not disadvantage individual staff members because of activities of this kind.

The Festo Group considers its staff to be its most important asset. Accordingly, it invests in its employees’ qualification and expertise; commitment and performance are specifically promoted and rewarded.

The Festo Group has developed and communicated a leadership culture based on the Festo values. In line with these principles, all managers are required to act as role models and behave in accordance with this code of conduct, particularly when working with the staff assigned to them, and display esteem, consistency and an awareness of responsibility. Managers must gain and maintain acceptance by their staff through exemplary personal behaviour, performance, openness and social skills.
4 Behaviour towards colleagues

4.3 Avoidance of conflicts of interest

The Festo Group will not accept violations of this code of conduct (“zero tolerance”).

All managers within the Festo Group shall therefore be obliged to inform their staff of the contents and importance of this code of conduct. Managers must ensure that the staff assigned to them are not only aware of the existence of this code of conduct but have also understood it and realised its importance. Managers shall also be obliged to ensure that their staff adhere to the code of conduct and to assist them in doing so. Managers shall at regular intervals monitor compliance with the relevant standards (see section 3.1) and clarify this as necessary in discussions with staff. If there are indications of violations of applicable laws, managers must look into these resolutely and inform the CCO as appropriate.

The Festo Group shall provide its staff with appropriate information (e.g. in the form of guidelines supplementary to this code of conduct) to allow them to recognise possible violations of laws and this code of conduct in a timely fashion and thus help them avoid these. This shall include, in particular, training courses on certain topics and in specific hazardous areas.

In turn, the Festo Management Board, managers and staff shall be obliged in cases of doubt to act on their own initiative to obtain information on how to act in a legally and ethically unimpeachable way. The CCO is available to answer any queries. The Festo Group may contact their line manager or the CCO directly with any questions regarding the content or interpretation of the code of conduct. This applies in particular to the notification of any violation or suspected violation. Questions concerning this code of conduct and the notification of violations or suspected violations can be forwarded via the WeNet page “Company, Compliance” or directly to this email address compliance@festo.com.

The Festo Group shall actively participate in the verification of violations. The hotline will also be available to external persons for the notification of illegal actions by the Festo Group. External persons can obtain information about compliance within the Festo Group via the Internet address www.festo.com (Responsibility - Compliance) and in particular view this code of conduct and print out a copy of this.

General Act on Equal Treatment note: The masculine form is used for editorial reasons only. All references are to be understood to be gender-neutral and refer equally to all genders.

Esslingen, 05.10.2020