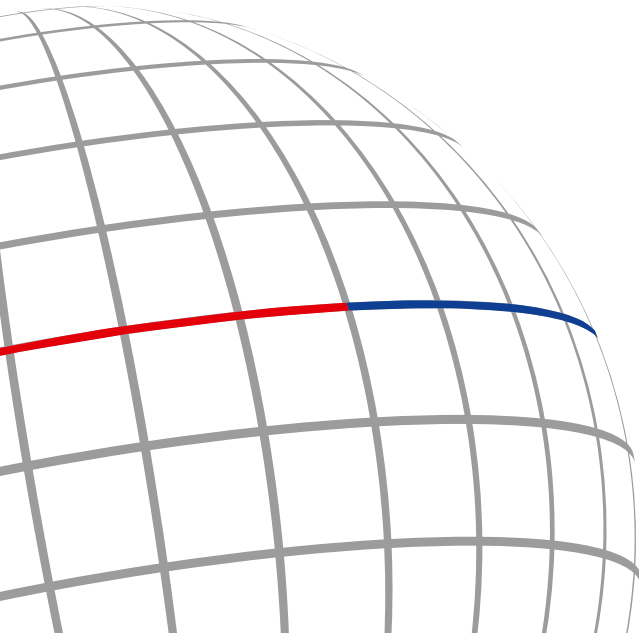


Code of Conduct

Minimax Viking Group



FIRE PROTECTION.

Dear Minimax Viking team,

next year our company will be celebrating its 120th anniversary. That's quite extraordinary when we consider what has happened in this period of time. Two world wars, countless regional conflicts, the East-West conflict and now the COVID-19 pandemic. But Minimax Viking is still around. It has even been a global player and world leader in our industry for some years now.

Nevertheless, rules and regulations within the global economy have changed significantly over the past two decades, alongside increased awareness of social, legal, ethical and environmental issues. This may seem confusing and overregulated in some respects, yet it is the right path for all companies on this planet. Consequently, we have updated our Code of Conduct and adapted it to conform to new legal requirements and social developments.

Please read the attached information carefully and observe its contents in your daily actions on behalf of the company. If you come across any violations of these regulations in your working environment, please contact our Compliance Management team whose contact information is listed at the end of this Code of Conduct. I assure you that your identity will remain anonymous and not even be disclosed to the management. In addition, from 2022 onwards, we will commence the operation of an external point of contact for such notifications.

Of course, we expect our suppliers, customers and service providers to comply with these standards too.

We would like to thank you in advance for your support.

Klaus Hofmann

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1 Introduction

The activities pursued by the Minimax Viking Group¹ on different continents and covering various cultural circles require a uniform understanding by the management board, executives, staff and representatives (termed collectively as “employees” or “Minimax Viking employees”) concerning the principles governing our entrepreneurial behavior and standards to be observed in our daily business routines.

We, at Minimax Viking, are convinced that success in the long term can only be attained if the Minimax Viking Group has a high reputation across the board, not only in terms of the quality of our products and services or our competitiveness, but in ensuring that our business ethics meet the highest standards too.

This means doing what is right and ‘practicing what we preach’. The conduct of all persons acting on behalf of Minimax Viking determines the integrity of the Minimax Viking Group. Consequently, we are committed to the coherent principles set out in this Code of Conduct, which are to be practiced by all employees at all times while acting on behalf of the company.

¹ Where “Minimax Viking Group”, “Minimax Viking” or “we” appears in the text below, this refers to Minimax Viking GmbH and all associated companies.

2 Professional Conduct

Avoidance of corruption

Corruption is the term used to define the abuse of an official function or professional position, in order to obtain a (personal) advantage or achieve another unlawful business objective. This is illegal and will incur serious consequences, irrespective of when and where it occurs while acting on behalf of the company.

We, at Minimax Viking, convince our business partners through the quality of our products and services and not by means of exerting undue influence. Our business decisions are made on the basis of objective reasoning that is rational.

Minimax Viking does not tolerate any form of corruption or other improper business practices whatsoever (e. g. bribery, extortion) that may possibly lead to granting or taking an unfair advantage. Undertaking such business practices is strictly prohibited in business dealings.

It is forbidden for staff to offer, provide, request or accept benefits from / to third parties – irrespective of the nature (e. g. payments, services or gifts) with the intent that the recipient of such items be inclined to favor Minimax Viking or a third party unfairly (bribery in business dealings).

During the course of dealing with employees from official bodies or in companies from the public sector as well as with public officials, the mere appearance of undue influence is to be avoided.

Minimax Viking staff must report any unambiguous inquiries or requests received from third parties to undertake or grant the aforementioned benefits to their superior or the next highest authority.

Gifts and invitations

Within the context of this Code of Conduct, a gift is generally considered to be anything of value which is offered, accepted, received or made available by or to someone outside of Minimax Viking (e. g. supplier, customer, consultant) free of charge and 'without consideration'. This may take the form of gifts, an invitation to an event or corporate hospitality.

We, at Minimax Viking, provide or accept benefits solely for legitimate business reasons and in a transparent manner. Benefits must occur on a voluntary basis, i. e. not as a result of an initiative or due to coercion exerted by a third party, and are solely permitted as a token sum and in accordance with general business practices.

The benefit must not be deemed capable of influencing the behavior or business decisions of a third party or to result in bringing about a dependence in the business relationship. Minimax Viking employees are to refuse benefits if these could result even in the appearance of exerting undue influence.

In this respect, the following must be noted:

Gifts from and to business partners may be given and accepted, insofar as these are seen to be insignificant benefits in kind (e. g. goods, services) that correspond to local and generally accepted business practices.

As far as an **invitation to an event** by the business partner and invitations from business partners to Minimax Viking events is concerned, the occasion must be seen to be appropriate to the actual circumstances in terms of the nature of the occasion, the location and costs as well as, in particular, regarding the reputation of the Minimax Viking Group. Please bear in mind that the staff member of Minimax Viking that has been invited must let the business partner know in good time that personal costs (e. g. flights, hotel accommodation) are to be borne directly by Minimax Viking.

Invitations to / from business partners as well as **corporate hospitality** may generally only be accepted or offered if these are in a business context. Invitations and corporate hospitality may not exceed the framework of normal business and personal circumstances ("social proportionality").

When accepting and offering benefits, locally applicable tax regulations must be observed.

Donations and sponsorship

Donations are voluntary goods and services (monetary or non-monetary donations) that are generally given without consideration, but with a specific purpose. Sponsorship is defined as the provision of financial or material resources, services or know-how, in order to promote e. g. groups of people or organizations under a contractual arrangement of the service carried out by the sponsor and in consideration of the sponsored. The principle of providing a service and consideration distinguishes sponsorship from donations.

Companies within the Minimax Viking Group may offer monetary and material donations as well as sponsor activities for charitable purposes that are worthy of support, such as aspects of science, culture or sport. The allocation of such resources must be transparent and accountable at all times, especially in terms of scope, amount and the recipient of the donation or sponsorship as well as the actual purpose and consideration.

Donations and sponsorship may only be granted by the respective management board, if necessary with the consent of the shareholder, and may not be used to circumvent prohibitions on other benefits or to obtain a vested economic interest.

Prevention of money laundering

Money laundering is the term used to describe the incorporation of illegally obtained funds into the legal financial and economic cycle. Money laundering is a criminal offense. Possible irregularities or suspicions that may point towards money laundering when processing payments include, for example, payments made by a third party that have not been mutually agreed, payments made to or from business accounts not normally used, payments made in a currency that is different to the one agreed on the invoice or exceptional market conditions.

Minimax Viking will undertake all measures necessary to stop any money laundering from taking place within its sphere of influence. Members of staff who are responsible for such business processes are asked to design them such that any form of money laundering is prevented.

Furthermore, all employees who have dealings with business partners are reminded to check the integrity of the respective partner in advance and to notify their superior or Compliance Management team without delay should they suspect possible money laundering or any other criminal economic activities.

International trading

It is essential for Minimax Viking, as a worldwide group, not only to comply with the governing laws and regulations in the countries where we do business, but to ensure strict compliance with foreign trade regulations. Generally speaking, foreign economic regulations must be observed when importing and exporting goods or intangible goods and services and include, inter alia, laws and regulations pertaining to embargoes, import and export controls, trade and other sanctions, money laundering and the financing of terrorism.

In this respect, Minimax Viking will undertake all measures necessary to ensure compliance with foreign economic regulations.

Every Minimax Viking employee must strictly comply with the foreign economic regulations as well as the applicable requirements of internal governing procedures within the scope of their responsibility. Above all, a check against the sanctions list must be carried out for all business dealings, both domestic and international. Where something untoward is suspected, the Export Control Officer is to be contacted immediately.

Competition and anti-trust laws

Competition law basically involves all laws and regulations designed to protect customers and competitors from unfair activities, in order to safeguard fair competition. Among other things, it prohibits agreements between competitors on parameters of competition and limits arrangements between suppliers and buyers to restrict the freedom of competitive activities.

For the Minimax Viking Group, all business activities are based on free and open competition. Our products are able to hold their own against the competition under fair conditions. We convince our customers by means of product quality and our reputation and not by resorting to unfair practices. We are committed to principles governing the market economy and free competition, carry out our business based solely on the principle of performance and abide by the laws in force pertaining to competition and anti-trust laws.

Minimax Viking employees are to refrain from adopting behaviors that violate competition and anti-trust laws, from making illicit agreements with third parties and from accepting offers or requests, which appear to have this kind of arrangement as their aim.

Such illicit agreements include those concerning prices, market shares, technologies, strategies, customers as well as territories and price-fixing when reselling. Agreements undertaken with business partners and third parties concerning non-competition or the submission of bogus offers are not allowed, neither is the preferential treatment or the exclusion of business partners.

Conflicts of interest

A conflict of interest occurs when, regarding a business decision, the employee's personal interest conflicts with, prejudices or takes precedence over the interests of Minimax Viking.

At Minimax Viking, we wish to avoid all actual, potential or apparent conflicts of interest, in order to be able to make objective decisions in the best interests of the company at all times.

Employees are expected to disclose any conflicts of interest which exist or may arise during the performance of their official duties to their superior (or next most senior) and to find joint solutions.

Furthermore, the following apply:

Appointing business partners for private purposes

Minimax Viking employees involved in making decisions relevant to the acceptance or award of orders, or similar, may only commission the respective Minimax Viking business partner(s) for private purposes with the prior consent of the senior executive responsible.

No member of staff may have private jobs carried out by Minimax Viking business partners with whom they have business dealings if this results in the former enjoying unjustified advantages.

Secondary employment and equity investments

Secondary employment is only permitted within the context of prevailing laws after obtaining prior consent from the respective employer.

In particular, secondary employment may be refused on a case-by-case basis if it leads to a significant impairment of the work performance of the employee for Minimax Viking or conflicts with their duties in the company.

Secondary employment by companies or persons that are competitors of the Minimax Viking Group or with whom other conflicts of interest may arise is strictly prohibited.

Direct or indirect shareholdings in undertakings that are competitors of the Minimax Viking Group is generally not permitted unless it is an investment in companies listed on the stock exchange solely for the purpose of asset investment.

Agents / sales intermediaries / consultants

Commercial activities undertaken by Minimax Viking sometimes require the involvement of third parties such as agents, sales intermediaries and consultants. These business activities are given special attention to ensure the legal and ethical integrity of those business partners who work on our behalf.

The appointment of agents, sales intermediaries and consultants is always carried out by means of a written agreement. The fee for the service to be rendered is based on a reasonable and transparent description of the service. The fee is not paid in cash but rather as an electronic payment transaction, paid to the recipient stated in the contract and generally paid in the country, according to the contract, where Minimax Viking's business partner is headquartered.

Detailed internal procedures for dealing with intermediaries are set out in a separate guideline. All Minimax Viking companies and their respective members of staff are required to adhere strictly and without exception to the governing regulations stated in this separate guideline.

Agreements for services performed by third parties may not result in any unjustified advantages for any of the parties involved.

Compliance and integrity

Compliance stands for compliance by companies, i.e. compliance with laws, guidelines and voluntary codes. Integrity implies that the actions and language of an individual correspond to the values that we have presented here.

At Minimax Viking, we conduct ourselves in accordance with the legal system and in an ethical and morally sound manner in all matters related to activities carried out on behalf of Minimax Viking. As a global company, we adhere to all the applicable laws and regulations in all the countries in which we operate.

We ensure legal and regulatory compliance of our processes and products and take into account the sense and purpose of the pertinent laws and regulations.

3 Corporate Culture

Respecting human rights

Minimax Viking and all members of staff respect and uphold human dignity as well as the rights and the privacy of every individual. Equal opportunities are an integral part of our employment policy. We refrain from and do not tolerate any kind of discrimination, harassment or bullying.

It is our common duty to create a fair, respectful and friendly working environment, which promotes equal opportunities and prevents discriminatory behavior. Similarly, we expect our employees to show sensitivity to behavior which, due to culturally different backgrounds and perspectives, may be acceptable in some cultures and business relationships, but not in others.

Conduct towards business partners

In commercial relationships with business partners, the same principles apply as set out for Minimax Viking staff internally. The way in which Minimax Viking employees treat each other in their communication and dealings – i. e. characterized by transparency, honesty and respect – also prevails when dealing with business partners, public authorities and other institutions.

Social responsibility

Minimax Viking respects international, recognized human rights, and advocates that these are safeguarded and maintained where it is able to exert influence. Our actions are based on the principles of the United Nations “Global Compact” as well as the conventions of the International Labor Organization (ILO), which comprise, in particular, the following aspects:

Freedom of association and collective bargaining:

Employees’ rights regarding freedom of association, right to organize and collective bargaining are recognized and respected by Minimax Viking. We work with employee representatives and trade unions in a manner based on mutual respect and trust.

Forced labor: Minimax Viking does not tolerate involuntary prison labor or forced labor of any kind.

Child labor: Minimax Viking condemns all forms of child labor. Children, who have not reached the minimum working age or the compulsory school leaving age in the respective country, are not to be employed. The higher age of the two cited above is applicable. Minimax Viking does not employ youngsters under the age of 18 for work which may harm or damage their health or morals.

Non-discrimination: Discrimination against employees or third parties shall not be tolerated in any way, in particular in terms of ethnic affiliation, color of skin, religion, ideology, gender, sexual orientation, age, physical abilities, state of health, political views, nationality, social or national origin, membership of a trade union or marital status.

Health and safety: Minimax Viking guarantees that employees’ health, safety and morals are not impaired at the place of work or at any other location where production or work takes place.

Wages and social benefits: All Minimax Viking employees are paid at least the minimum wage in accordance with the pertinent local laws and directives as well as all social benefits prescribed locally by law. All employment conditions, remuneration, working hours, annual paid leave, time off work and public holidays comply with locally applicable laws, regulations and mandatory industry standards.

We work to ensure that not only our company but also our business partners, especially suppliers and sub-suppliers, follow these principles. We take appropriate measures and assume responsibility for compliance with human rights.

Sustainability, environment and occupational safety

Minimax Viking conducts its business in a sustainable and safe manner that is friendly to the environment. This means that we provide our members of staff with a safe working environment, take our ecological responsibility seriously through, among others, the resource-efficient manufacturing of our products and by promoting innovative and technological development.

Sustainability

We always take a prudent approach when using natural resources and utilize them in a responsible and efficient manner.

Wherever possible and sensible, Minimax Viking designs its manufacturing processes and plants in accordance with generally accepted codes of practice as well as the efficient use of resources, in order to minimize the impact on the environment and nature. We promote the recycling of materials and strive for continuous improvement in this respect.

As a global company, we meet our responsibilities and make concerted efforts not to purchase or utilize materials containing

minerals, the extraction of which could be used to finance or support non-governmental groups and armed conflicts (including the Democratic Republic of Congo and neighboring states, as well as in other high-risk and conflict areas). Our products do not knowingly contain any so-called "conflict minerals".

Environmental protection

Our products and systems support the ongoing reduction of environmental pollution by preventing environmentally relevant incidents and minimizing the resulting pollution. This is especially the case for the effective use of our fire safety products and systems, since fire protection does not only mean protecting people and valuables, but the environment too.

Minimax Viking complies with all pertinent laws and regulations pertaining to the management, storage and disposal of hazardous substances, substances that are hazardous to water or other chemicals and to deal with such substances in an environmentally sound manner. Energy-efficient and environmentally friendly technologies are used, wherever deemed

feasible and appropriate, to reduce emissions into the air, water and soil as well as amounts of waste and to reduce adverse effects on flora and fauna.

It is the duty of each and every employee to keep harmful effects on the environment to a minimum, to manage resources efficiently and to comply with laws and directives on environmental protection.

Occupational safety

The health and safety of our staff are essential for ensuring optimum performance at work. It is our goal to prevent accidents at work as well as work-related illnesses and to contribute towards preventive health protection. Consequently, our work safety standards are strictly geared towards generally accepted codes of practice and additional regulations set out by our occupational safety department.

Wherever necessary, our employees are required to wear the personal protective equipment (PPE) provided, avoid and immediately remediate unsafe working

conditions, ensure a safe working environment and to report suspected health and safety risks without delay. Every member of staff is obliged to contribute responsibly to their own operational safety by complying with applicable legal and regulatory provisions, regulations, standards and internal guidelines.

Minimax Viking expects all employees to have a high degree of awareness regarding environmental and occupational safety. Members of staff actively contribute to the implementation of valid regulations governing occupational health and safety and protection of the environment and ensure adherence to the relevant provisions. Processes as well as operating facilities and equipment must always comply with statutory and internal requirements.

Minimax Viking also works towards the consistent application of relevant environmental protection laws, occupational health and safety laws and quality standards among its suppliers.

4 Preservation of Corporate Resources

Information security

Information gained and used at work is primarily intended for internal use and may only be divulged to business partners or other external parties to a very limited extent. Confidential information occurs in numerous different forms such as product innovations, financial forecasts, customer or supplier data or other trade secrets.

Information security aims to protect this information, irrespective of whether this information is hard copy, on a data storage device or in an employee's head. The basic principles or aims of information security are confidentiality, integrity and availability.

Minimax Viking employees must maintain the confidentiality of sensitive information and other confidential data, especially personal and unpublished financial, technical and other data. In this respect, particular attention is paid to neither letting technical and organizational data be accessed by unauthorized persons nor systems be misused, damaged, manipulated or lost.

It is the duty of every member of staff not to divulge confidential information, including trade secrets. This is still in force even after the employment relationship has ceased. Privileged information must never be disclosed to unauthorized persons. This includes family members and friends.

Data privacy

Data privacy is intended to protect an individual from having their personal rights impaired by the handling of their personal data. Data privacy refers to the protection of personal data against misuse by a third party and is not to be confused with data security (see "information security"). Data privacy is governed by strict statutory regulations.

Minimax Viking members of staff must observe the pertinent laws and company guidelines when handling personal data, especially that of customers, suppliers, other company employees and other third parties.

Personal data may only be collected, used and processed if this is necessary for business or specified legitimate purposes. Only such data may be used that is absolutely necessary for a predetermined purpose (data economy). Data must be accurate and as up-to-date as possible. Incorrect or incomplete data must be corrected or deleted. The processing of data must be transparent at all times for the person(s) concerned.

Minimax Viking ensures that all data, especially personal data, is protected from unauthorized access and that any necessary technical and organizational measures are in place, taking into account generally accepted codes of practice and the respective risk, to prevent any unauthorized use. We take responsibility for the information we handle.

Publications

Data and information, insofar as they have not already been publicly made known, may only be disclosed via the management board or the Corporate Communications department. This applies to technical specifications, financial and operational data and any other information relating to business conducted by Minimax Viking or its operational activities as well as future plans.

Any employee who voices an opinion in public, at an event, in public online forums or on social media networks, where they can be recognized as a Minimax Viking member of staff, must ensure that personal views are identified as such. Minimax Viking does not tolerate any inflammatory, insulting or discriminatory posts on social media.

Intellectual and company property

The company property of Minimax Viking comprises both tangible and intangible assets. Intellectual property is not defined in the strict legal sense and includes, inter alia, trade secrets, confidential information, copyrights, trademarks and logos as well as customer lists and product specifications. Protected intellectual property ensures, among other things, that we maintain a competitive edge over our competitors.

As regards compliance with the regulations governing our property, it is irrelevant to the employee whether the property belongs to a respective Minimax Viking company where the member of staff is employed (employer) or to another company belonging to the Minimax Viking Group. Assets belonging to our business partners and customers must also be respected.

Every individual employed at Minimax Viking is responsible for protecting and utilizing our property, including intellectual property, in an appropriate manner. Corporate assets and other company resources are to be used solely for official purposes, unless company or individual provisions allow private use.

Accounting and reporting

The Minimax Viking Group bases its decision-making process on the correctness, completeness and accuracy of accounting records. In order to meet our global reporting duties, all necessary information must be documented accurately and with little or no delay.

Minimax Viking employees are to comply with proper accounting practices and procedures in all business transactions. When preparing records, honest, correct and all relevant information must be included. When carrying out transactions, no information is to be intentionally amended or omitted, in order to make the transaction appear in a different light than is actually the case.

Minimax Viking considers compliance with tax obligations to be mandatory for all employees and external third parties and strictly observes the provisions of tax and customs legislation.

5 Responsibility and Implementation

Individual responsibility

Each and every Minimax Viking employee plays an important role in complying with laws and regulations. Consequently, it is imperative that every member of staff knows which regulations, in addition to this Code of Conduct, are relevant to their field of activity. It is the duty of each employee to ensure that they know and adhere to the regulations and internal guidelines applicable to their area of activity and to make sure that this knowledge is kept up-to-date.

Each member of staff is personally responsible for complying with and meeting the principles and goals contained in this Code of Conduct and for acting in accordance with them when on duty – both within and outside of the company – as well as refraining from or preventing any behavior that is detrimental to our reputation or that of our employees.

As no individual or organization is perfect, mistakes can occur. We manage mistakes in a transparent and open manner. We share our experiences with colleagues, in order to learn from our mistakes and continue to develop. If wrong decisions are recognized, these are to be addressed and corrected. Employees who admit their mistakes will be treated fairly and responsibly.

Responsibility of the management board and senior executives

Minimax Viking expects all of its senior managers and executives to conduct business in accordance with this Code of Conduct. To this end, the management board and senior executives will create the corresponding working conditions, bearing a special responsibility, since their behavior with integrity is deemed a role model.

The management board and senior executives will ensure that these principles are adhered to by members of staff. They must consistently address, prevent and punish any misconduct that has been detected. The management board and senior executives at all levels offer guidance and support, so that their subordinates comply with the rules.

All management board members and senior executives are to fulfill the following organizational and supervisory duties with regards to employees under their authority:

Duty of selection: Employees are to be selected on the basis of their personal and professional suitability.

Duty to give instructions: Tasks and work instructions must be as precise, complete and binding as possible.

Duty to supervise: Senior managers and executives must continually check that legal and any other applicable provisions are adhered to.

Duty to impose penalties: Employees are to be made aware that any breaches of the law shall be condemned and may incur consequences under labor law.

Dealing with breaches of conduct

Should there be reasonable grounds for suspecting a breach of the Code of Conduct, each individual is to inform the Compliance Management team, in order to avert any damage to Minimax Viking. Reports can be made to the Compliance Management team anonymously or by filling in the contact form. Information received will be treated in confidence. Where necessary, reasonable and appropriate measures will be taken, whereby every employee is responsible for assisting the Compliance Management team in investigating potential violations.

Minimax Viking assures employees that should they have reasonable grounds for suspecting a breach or potential violation of the Code of Conduct, they will not be subject to retaliation or other discriminatory treatment, and that employees who, contrary to this assurance, take or attempt to take retaliatory measures against the person who has filed the report, will face disciplinary action.

Scope of validity

This Code of Conduct applies to all Minimax Viking employees throughout the Group. Where specifying guidelines or other rules exist, these are also binding.

Implementation and support

Minimax Viking employees are to actively implement this Code of Conduct and also to assist those persons in charge of its implementation and supervision. They are aware that violating the principles contained in this Code of Conduct may result in far-reaching sanctions.

This Code of Conduct is not intended to provide detailed answers to every question or situation that may arise. If you have questions regarding how to behave with integrity at work or concerning this Code of Conduct, further information as well as contacts are available on the Intranet. Alternatively, please contact the Compliance Management team as follows:

Minimax Viking GmbH
Compliance Management
 Industriestraße 10 / 12
 23480 Bad Oldesloe, Germany
compliance@mx-vk.com

Please note

In order to take account of the peculiarities of national law for companies within the Minimax Viking Group that are outside the scope of the laws of the Federal Republic of Germany, regional agreements may be concluded, but these must be based on this Code of Conduct. At the same time, regional legal provisions and cultural practices can be taken into account by making corresponding adjustments. Locally applicable codes can contain additional detailed guidelines or regulations. Terms or wording may not, under any circumstances, contradict this Code of Conduct of the Minimax Viking Group or fail to meet the requirements set out in it. Locally applicable codes are, without exception, subject to review and approval by the board of management of Minimax Viking GmbH in Germany. Where there is no locally applicable code, as described above, in force in a specific country, this Code of Conduct applies directly to the Minimax Viking employees in that country. Amendments to this Code of Conduct may be undertaken at any time by Compliance Management subject to approval by the management board of Minimax Viking GmbH.

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