

AUCOTEC AG

Code of Conduct

Corporate Principles
and Code of Conduct

AUCOTEC AG

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1 Introduction

Dear colleagues,

The AUCOTEC Code of Conduct describes the basic rules and principles that are equally binding for the Management Board, managers and employees*. It forms a guidance framework for responsible behavior towards business partners, the public, society, the environment, but also in dealing with each other within the company, as we are jointly responsible for the reputation of our company.

Every employee will be familiarized with the Code of Conduct when joining the company. Corporate training courses are held to ensure that the content is understood and internalized.

We also all act in the overall interest of the company. Mutual appreciation and openness characterize how we deal with each other; the values that determine our actions are reliability, honesty, integrity and credibility.

The requirements of our customers determine our thinking and actions; we break new ground and develop innovative products and services in order to offer our customers added value. We take an entrepreneurial approach with confidence, courage and geared towards performance – always with the goal of being the best. The commitment and know-how of each individual form the basis for this, which is why the personal development of our employees is very important to us.

The Management Board

* Attempts are being made to use gender-neutral terms. Where this is not possible, the masculine form includes all genders.

2 Responsibility in the business environment

2.1 Compliance with law and regulations

For us, compliance with the applicable law and regulations is the basis for acting in an economically responsible manner. We observe the applicable law and our obligations in this regard at all times.

2.2 Fair competition

We act according to the principle of fair competition; we would rather give up an order than obtain this through breaches of applicable law.

2.2.1 Corruption / Money laundering / Antitrust law

We do not tolerate corruption or other unfair business practices – neither by employees nor by third parties instructed by us. Benefits, incentives, or bribes to influence business decisions are not asked for, offered or accepted by us either directly or indirectly.

Cartel agreements are also not a means for us to get orders. We have a zero tolerance attitude here.

All employees are taught about the zero tolerance consequences by the extensive compliance program.

2.3 Financial responsibility and disclosure of information

Compliance with legal requirements for proper accounting and financial reporting is a matter of course for us. We work transparently, openly and correctly. Insofar as statutory provisions require the disclosure of information, we are very happy to comply with this obligation.

2.4 Protection of company property

We use the property and resources of the company properly, carefully and protect them from loss, theft or misuse. The intellectual property of AUCOTEC AG represents an immense competitive advantage for the company, which we defend against any unauthorized access by third parties.

Company property, both tangible and intangible, is used exclusively for business purposes.

2.5 Avoidance of conflicts of interest

Business decisions are made only in the best interests of the company. Nevertheless, it may happen that the interest of the company is in conflict with the personal interest of an employee. Conflicts of interest with personal concerns or other business matters must be communicated immediately to the supervisor or the management in order to clarify them as soon as possible.

2.6 Confidentiality

All information about AUCOTEC and the company's activities that has not been published and is not generally known is to be treated confidentially and may not be used for personal or other business interests.

2.7 Intellectual property of third parties

We respect the intellectual property of third parties and attach great importance to protecting it from unauthorized use and disclosure. This includes business secrets, confidential information, trademark, patent and design protection rights, customer lists, business opportunities and product specifications. We only use the intellectual property of third parties if we have properly secured the corresponding rights.

2.8 Plagiarism

We prohibit the use of plagiarized or counterfeit products. Detected counterfeit products will not be put into circulation and will be reported to the appropriate authorities.

2.9 Export control and economic sanctions

Through international business, AUCOTEC is actively involved in the international world market. We comply with all applicable trade controls, including economic sanctions and export controls. We regularly check all business activities for compliance with the regulations.

3 Responsibility towards employees

3.1 Human and workers' rights

We respect and uphold internationally recognized human rights and fundamental freedoms in accordance with the principles laid down in the UN Global Compact and support their compliance.

We recognize the right of all employees to form employee representative bodies on a democratic basis. Our employees have a right to appropriate remuneration, with pay corresponding at least to the respective national and local legal standards or the level of the national economic sectors.

The AUCOTEC Management Board and the managers maintain an open, constructive and respectful dialog with the employee representative body.

3.2 Child labor and forced labor

We strictly oppose child labor and any form of forced labor.

3.3 Equal opportunities

For us, a culture of equal opportunities, mutual trust and mutual respect is very important. Our company structure is internationally construed, we practice diversity, different cultures, different languages and reflect the diversity in society.

3.3.1 Non-discrimination

We prevent discrimination in all parts of our company. Whether when recruiting employees, promoting them or considering further training and development measures. We treat all employees equally – regardless of gender, skin color, culture, ethnic origin, sexual identity, disability, religious affiliation or world view.

3.4 Working conditions / Occupational safety

We take the safety and health of our employees very seriously. In addition to the quality of our products and the economic success of the company, they are an equally important target. AUCOTEC complies with the applicable regulations and laws on occupational safety and health protection. We ensure a healthy working environment for all employees.

3.4.1 Working time

For us, fair working conditions also include compliance with the respective national regulations on working hours. Overtime is remunerated at least in accordance with the relevant statutory regulations, and the ordering of overtime remains an exception. In addition, we grant our employees the right to rest breaks on every working day and observe the relevant public holidays. Each employee also receives 30 days of vacation per year.

3.5 Whistleblowing and protection against retaliation

All employees, board members, managing directors and managers at AUCOTEC undertake to comply with the Code of Conduct.

Breaches of these guidelines and also serious violations of the law that entail significant damage to AUCOTEC, are to be reported to a supervisor immediately. Employees who report such violations must be protected. We do not tolerate any actions taken against them.

Employees who violate the Code of Conduct and applicable law must expect disciplinary and criminal consequences.

4 Responsibility to society

4.1 Environmental protection and sustainability

Every employee bears responsibility for the careful treatment of natural resources and is called upon to contribute to the protection of the climate and the environment through their individual behavior.

Our corporate goal is also to be climate-neutral in the near future. With the construction of the new building in Isernhagen, we have laid the foundation for our sustainable development strategy. Our head office is equipped with state-of-the-art air conditioning technology and CO₂-neutral recycled tiles are laid throughout the building. In addition, we obtain our electricity exclusively from renewable energy plants. This means that all kilowatt hours consumed at the AUCOTEC headquarters are climate-neutral. By purchasing green electricity, regional projects for the promotion of renewable energies and sustainable climate protection measures are supported. A certificate from our energy supplier confirms that the generation of our annual electricity usage releases up to 203 tonnes less CO₂ than energy sources for the average electricity mix in Germany.

4.1.1 Climate protection project

In the Indian state of Rajasthan, we support a recognized climate protection project that is certified to international standards. The two wind farms supply clean electricity to around 100,000 people in one of India's economically weakest regions. A number of social and environmental programs have been linked to the project. With these, it contributes to the UN Sustainable Development Goals (SDGs). For example, for more gender equality, high quality education, clean water and decent work. More about our climate protection project can be found here: [ClimatePartner](#)

4.2 Donations / Sponsoring

We see ourselves as an active member of society and get involved in various areas in the form of donations / sponsoring. For example, we have been supporting the Disabled Sports Association of Lower Saxony for years and every year we sponsor one of the nominated disabled athletes of the year.

We do not make any financial contributions to political parties – neither at home nor abroad.

4.3 Public communication

We respect the right to freedom of expression as well as the protection of personal rights and privacy. Every employee should be aware that they can also be perceived in the private sector as a part and representative of AUCOTEC and are therefore asked to behave accordingly.

5 Handling of information

5.1 Reporting

We attach great importance to open and truthful reporting and communication on the company's business transactions to employees, customers, business partners, the public in general and state institutions.

5.2 Confidential information

We take all necessary steps to protect confidential information and business documents - in particular data of customers and interested parties - from access and insight by non-involved colleagues and other third parties.

The unauthorized transfer or disclosure of confidential information is prohibited both internally and externally in accordance with the relevant laws. The category of such information includes all non-public, financial, strategic, business and technical information. It also includes trade and business secrets of us and all our business partners.

5.3 Privacy

The protection of personal data – in particular belonging to employees, customers and suppliers – is of particular importance to AUCOTEC. We collect personal data only if this is absolutely necessary for the fulfillment of the business purpose or is required by law. No personal data may be collected or processed without the consent of the data subject or legal admissibility.

5.4 Information security incidents

Information security incidents must be reported to the Incident manager immediately upon discovery.

These include, but are not limited to:

- Loss of laptop, cell phone, or data carrier containing sensitive information.
- Malfunction of security devices (alarm, fire doors, etc.)
- Malfunction or suspicious function of hardware and software
- Data leakage, intrusion into IT systems or takeover of accounts
- Violation or infringement of policies
- Data access violations

5.5 Preventive protection of information

Sensitive and confidential information must not be left openly accessible and unmonitored, inside or outside the office premises. This also applies to vehicles or places otherwise located in public spaces.

When leaving the desk, protectable information must be kept secure from access and the screen must be closed to prevent access.

When printing documents containing sensitive information, the printouts must be removed from the printers immediately.

5.6 Use of social media

The use of social media in the context of and for the purpose of work is permitted, but it must always be based on the assumption that the actions taken are in the interest of the company and are understood.