

SOLUTIONS TO EASY UP YOUR LIFE.

1. Scope of application

KRAMAR Controls GmbH

2. Responsibilities

All employees of KRAMAR Controls GmbH

2.1 Supplementary guidelines

The Code of Conduct is supplemented by specific guidelines for certain topics, such as the global guidelines on the procurement of goods and services and the guidelines on the prevention of money laundering.

3. Objectives

As an internationally active company, KRAMAR Controls GmbH enjoys a good reputation worldwide. This reputation must be maintained. The trust placed in us by our customers, our suppliers, our employees, and the public interest groups is closely linked to our appearance. Every member of the company is therefore required to deal with our values and goals and to apply them in their individual area of responsibility or to implement them. For this reason, our Code of Conduct provides a mandatory framework for our interest groups. As a responsible company, we hereby describe our framework of action to which all employees of KRAMAR Controls GmbH are committed. By observing the procedures described in this code of conduct, we contribute to securing our long-term corporate success. The basis of all actions at KRAMAR Controls GmbH is compliance with the legally binding regulations at national and international level as well as all voluntary obligations. All employees and executive bodies of KRAMAR Controls GmbH are obliged to inform themselves about the regulations applicable to their area of responsibility within the company, to comply with these regulations and, in cases of doubt, to obtain additional information and advice from the relevant authorities. Violations of the Code of Conduct will not be tolerated. Failure to comply may lead to appropriate sanctions against the persons or groups acting in the respective cases.

3.1 Maintaining fair competition

We stand behind commercial law and the idea of free trade in open markets. KRAMAR Controls GmbH therefore expects its employees to comply with the applicable laws to protect fair competition. It is strictly prohibited to infiltrate legal regulations. Agreements on market prices, customer allocation, market sharing or concerted practices with a view to distorting competition to the detriment of customers, suppliers or the legislator are prohibited. Agreements on unfair practices are generally prohibited.

SOLUTIONS TO EASY UP YOUR LIFE.

3.2 Combating corruption

KRAMAR Controls GmbH convinces with first-class service and outstanding product quality. KRAMAR Controls GmbH strictly prohibits the attempt or support of direct or indirect bribery of business partners or public authorities. We have established an internal guideline specifically about preventing corruption in business dealings, which is presented and explained to every employee of KRAMAR Controls GmbH before signing a contract. This guideline describes, among other things, the behavior when awarding contracts to consultants, agents, and external employees, as well as our behavior when accepting and granting benefits. Employees are not permitted to demand, be promised, or accept benefits in return for the purchase of products or other services. In addition to the general guideline, the internal guideline for the procurement of goods and services also applies to our procurement. This guideline contains separate rules of conduct for the acceptance of gifts from business partners.

3.3 Avoidance of conflicts of interest

KRAMAR Controls GmbH expects its employees not to engage in any activities or perform any duties that are contrary to the interests of KRAMAR Controls GmbH. Activities for a competitor, supplier, or customer, as well as financial investments in such companies, are only permitted with the express written consent of the management. Financial investments, for example in the form of shares or bonds of close family members, must be reported to the management. The background to this regulation arises from the concern of KRAMAR Controls GmbH to be able to prevent preferential treatment of certain business partners for private interests. Even the appearance of preferential treatment of any kind harms KRAMAR Controls GmbH and should be avoided.

3.4. Compliance with the principles governing national and international trade

KRAMAR Controls GmbH complies with all national, multinational, and supranational foreign trade regulations. The employees are obliged to comply with the applicable export and import bans, official approval requirements and the applicable customs and tax regulations. KRAMAR Controls GmbH pays attention to compliance with national and international regulations on money laundering and the handling of potential conflict materials. KRAMAR Controls GmbH has therefore issued binding guidelines in this regard. These guidelines are supplemented by the KRAMAR Controls GmbH procurement policy, which outlines in detail the principles for the selection and monitoring of suppliers.

3.5 Creation and maintenance of safe and fair working conditions

In addition to its general social responsibility, KRAMAR Controls GmbH has an increased responsibility towards its employees and attaches great importance to offering a pleasant working environment and appropriate remuneration for its employees. In all countries where KRAMAR Controls GmbH is active, we make sure that fair remuneration and appropriate working hours are guaranteed for our employees. We condemn any form of forced labor, especially the work of children. The health and healthy maintenance of our employees is very important to us; therefore, we pay attention to a maximum of occupational health and safety at all locations. KRAMAR Controls GmbH expects its employees, especially its managers, to be always committed to occupational safety. KRAMAR Controls GmbH also expects its suppliers to offer their employees safe and fair working conditions to a similar extent as KRAMAR Controls GmbH itself. Checking that working conditions comply with our values is part of the procurement

SOLUTIONS TO EASY UP YOUR LIFE.

policy of KRAMAR Controls GmbH and is an important decision-making criterion in the selection of suppliers.

3.6 Protection of business assets

The management and each individual employee of KRAMAR Controls GmbH must ensure that the trade or business secrets of their own company and of all its business partners do not become known outside KRAMAR Controls GmbH. The intellectual property of KRAMAR Controls GmbH must be protected, and it is therefore forbidden to disclose or pass on trade or business secrets to third parties without permission, or to use them for your own purposes without permission. KRAMAR Controls GmbH places a high degree of trust in its employees and in return expects its employees to treat the resources and the assets of KRAMAR Controls GmbH with equal responsibility. Business decisions are always traceable according to our standards of integrity and must be made based on commercial analysis methods. Business documents, such as accounting records, must present the relevant facts correctly and without error. Employees are only entitled to use the resources of KRAMAR Controls GmbH for private purposes if this has been expressly approved by their supervisor or the underlying employment contract. Generally prohibited is the misuse of the IT infrastructure of KRAMAR Controls GmbH to publish or distribute content, which is prohibited by law, discriminatory or offensive.

3.7 Environmental and product safety

As a responsible company, KRAMAR Controls GmbH supports the sustainable use of natural resources. We feel obliged to protect the environment to the extent possible and comply with all applicable legal regulations. The product quality and product safety of our service portfolio over the entire product life cycle contribute significantly to protecting our environment and not to polluting it unnecessarily. Our environmental protection declaration is the accompanying internal guideline, which breaks down the handling of natural and processed raw materials and sets up corresponding guidelines.

3.8 Prevention of discrimination

KRAMAR Controls GmbH is an open-minded and tolerant company which expects its employees to show respect and tolerance in their dealings with colleagues and former employees and other internal and external employees of KRAMAR Controls GmbH. This applies about different world views or cultural or country-specific customs. The same applies to dealings with business partners and their employees as well as employees in public positions. When selecting employees and business partners, KRAMAR Controls GmbH and its management are guided exclusively by objective and comprehensible criteria. KRAMAR Controls GmbH prohibits any form of discrimination, any form of harassment and the discrimination of individuals or groups based on race, ethnic background, religion, gender, age, sexual orientation, or disability.

SOLUTIONS TO EASY UP YOUR LIFE.

3.9 Data protection

The personal rights of everyone are particularly important to KRAMAR Controls GmbH, which is why it is particularly important to protect them. KRAMAR Controls GmbH treats the processing of data resulting from the collection of data sensitively and in accordance with all applicable laws such as the DSGVO. Personal data of employees and business partners is only collected in accordance with the current data protection regulations and is only used to the extent necessary in the context of smooth operations. The storage of the data is carried out in an appropriate measure and temporarily. They are stored securely and protected against unauthorized access. Furthermore, active, and former employees are granted the right to disclose the stored data. KRAMAR Controls GmbH expects all employees to comply with the applicable data protection regulations. For this reason, we have established an internal guideline at KRAMAR Controls GmbH for the handling, collection, and storage of data, which is mandatory.

3.10. Handling of media

KRAMAR Controls GmbH maintains a consistent dialogue-oriented and transparent approach to conventional and new media. We use the media to make our company better known and to positively influence our image. In order not to counteract this goal, only persons authorized by the management are permitted to make official statements and publications on behalf of KRAMAR Controls GmbH in the conventional and new media.

3.11. KRAMAR Controls GmbH Compliance System

The management of KRAMAR Controls GmbH has appointed a Compliance Officer, who provides support in implementing and monitoring our Code of Conduct. As a divisional unit, the Compliance Officer reports directly to the Executive Board, but is not dependent on instructions. Our compliance guidelines ensure a regular exchange of information between the Executive Board, the Compliance Officer, and the auditing bodies. KRAMAR Controls GmbH has developed a training/induction concept which ensures that employees are informed about the KRAMAR Controls GmbH compliance system and that they are aware of the legal regulations and internal guidelines relevant to their area of activity. If the content or interpretation of individual components of the Code of Conduct is unclear or an employee is aware of a violation of this Code of Conduct, employees can report to the responsible Compliance Officer at any time. In addition, they have the possibility to directly contact the Compliance Officer Mr. Krapf by telephone in English and German (telephone hotline: 06181 / 9683196) and by e-mail in English and German (e-mail: kramar_complianceofficer@kramar-controls.com). Information about a violation will be treated confidentially and no disadvantages or negative consequences will arise for the person reporting the violation.

Responsible person KRAMAR Controls GmbH

