



Never waste an opportunity.

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Code of Conduct



Foreword

from the management of Komptech

Our biggest asset is the **trust** our customers and stakeholders put in our company and our products. This trust is based on our honest, responsible and lawful actions, and ensures the future sustainability of our group, our workforce and the environment.

As a global company with a commitment to sustainability, Komptech strictly adheres to professional **standards** as well as national and international **laws**, including those that aim to combat corruption, promote fair competition and protect human rights. At all Komptech companies, we strive to improve our performance and inspire our customers each and every day.

In doing so, it is important that we keep **our values and principles** top of mind; these serve as the compass and map that will help us navigate to future success. We

endeavour to protect ethical, ecological and social interests in everything we do.

With this Code of Conduct, all Komptech employees agree to uphold the highest ethical standards. Each of us is familiar with these standards and lives by them. It is also important to us that our business partners behave in a way that is in the spirit of this Code of Conduct.

In addition to the Management, the Human Resources departments, and the Compliance Officer of each subsidiary are also available to answer questions on the Code of Conduct. We all assure to do everything we can to create a work environment that makes problems visible and that values feedback and transparency, with no exceptions.

Trust and Responsibility

Our CoC sets out clear and ethical standards

We live on the trust that our business partners, employees and the public place in Komptech's work and integrity.

Our image is affected by each one of us – irrespective of what position we hold – by our **manner, actions and behaviour**. That's why each one of us also bears a special responsibility towards the public, our business partners and towards our colleagues. Inappropriate behaviour by just one employee could cause severe harm to Komptech. It is therefore the aim of this Code of Conduct to prevent situations which may cast doubt over the integrity of our behaviour and therefore Komptech's reputation.

Employees should, however, not only base their interpretation of the Code of Conduct on this standard.

They must also always be guided by **common sense** and employ reasonable **ethical standards** to ask themselves whether specific actions could give rise to criticism.

Particular national practices should be taken into account here but there is no scope for discretion whatsoever where existing legal provisions are concerned. This Code of Conduct applies to all employees of KOMPTECH, including Supervisory Board, Management Board and Managing Directors. We apply our Code of Conduct within every communication between colleagues, customers, suppliers, other companies as well as authorities on all our locations.

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company property

Data protection, IT-security and confidentiality

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Misconduct

Trust and
Responsibility

Fair
Competition

Anti-Corruption and
the avoidance of
conflicts of interest

Safety, sustainability
and environmental
protection

Integrity
and respect

Communication

Integrity and respect

We regard the unique and diverse nature of people as enriching

We regard the contents of the Charter of the United Nations, the European Convention for the **Protection of Human Rights** and Fundamental Freedoms as well as local laws as basic universal principles that determine how we treat each other and our business partners. Our employees accept and respect them and implement them in their actions.

Each person is unique and valuable. The employees' individual skills are appreciated and deliberately encouraged. How we see ourselves and our inner convictions obliges us to acknowledge the **dignity and personality** of each employee and to treat each other respectfully. Discrimination, harassment and oppression of

any kind will not be tolerated. We will not condone violence at the workplace, committed by or against our employees.

Komptech employs both men and women of different age groups with heterogeneous opinions and convictions, different cultural, political and religious backgrounds, with different sexual orientations and diverse intellectual and physical capacities.

The promotion of diversity is a strategically relevant issue for us and therefore affects all areas within our group.

Fair Competition

Fair Play is a major fundamental principle that affects all our actions.

Violations of **competition and antitrust laws** as well as unfair business practices are incompatible with Komptech's corporate philosophy and our high demands on ethical principles. **Transparency and fair competition** help protect the development of our group of companies and the market in the long term. That's why employees at Komptech and its business partners will refrain from any kind of action whatsoever that could constrain or distort free competition.

We especially align ourselves with the following guiding principles that define conduct:

- No agreements will be made with competitors and suppliers about competitively sensitive topics and no coordinated

behaviour will be practised on the market.

- We will refrain from exchanging any competitively sensitive information and confidential business information in our contacts with competitors.
- We will not spread false information about competitors and their products or services.
- Our activities in bodies and professional associations as an important foundation for developing our business and representing our interests will be carried out exclusively on the basis of the above principles.

Anti-Corruption and the avoidance of conflicts of interest

We strictly reject all types of corruption, bribery, and favouritism.

Business relationships will be entered into exclusively on the basis of **objective criteria**. Any type of payment intended to gain unfair advantage will not be permitted. It is mandatory to report even the impression of corruption to the Compliance Officer.

Transparency is a priority where the prevention of corruption is concerned. Only companies and individual enterprises may be selected as business partners (no individuals without corresponding commercial permits). Possible business partners must be submitted to thorough checks and the reasons for choosing to work with them must be documented.

Payments may only be made to accounts held in the name of the contract partner and must be – except in duly justified cases (e.g. central data centre for a group) – made in the country in which the contract partner runs their business.

Cash payments are prohibited. Typical cash payments within customary limits,

e.g. hospitality, taxis, etc., are excepted from the above.

Gifts, events and hospitality are permitted to a limited extent insofar as they do not cast doubt over the independent nature of decisionmaking.

Accepting gifts, issuing or accepting invitations, participating in events and any hospitality are permitted to an **appropriate, proportionate and customary extent**, provided they do not jeopardise the independence of business decisions. Gifts of money are not permitted under any circumstances. If there is any uncertainty in this regard, the executive or management must be consulted.

Conflicts of interest in any form are avoided and prohibited. Transactions with a potential conflict of interest are only permitted if they would also be concluded in the same form with an independent third party („arm's length principle“).

Donations and sponsorships are not granted if they give the impression of inappropriateness – management approval must be obtained in any case.

Safety, sustainability and environmental protection

The prevention and safe control of hazards for people and the environment constitute an essential aspect of our thinking and actions.

The rigorous application of all **safety regulations**, irrespective of whether required by law, issued by the responsible authorities or defined in our company policies is essential in all areas of our company.

We promote the health of our employees and recognise the importance of an appropriate **work-life balance**. We avoid undue physical and psychological stresses. We strictly reject forced and child labour. The consumption of alcohol and other substances that may impair one's responsibility and accountability (drug abuse) is prohibited on company premises.

We protect our environment, are economical with resources and prevent or reduce burdens on people and the environment. We incorporate the requirements of an intact environment in the development and design of our pro-

ducts, in the production process, in packaging and in dispatch as well as in the introduction and improvement of processes. The United Nations' Sustainable Development Goals (SDGs) support us in this endeavour.

We also expect compliance with all laws and regulations designed to protect people and the environment as a minimum standard from our business partners.

Each and every employee bears joint responsibility for safety and environmental protection within Komptech. All employees will be trained and instructed in this regard.

The responsible bodies within the group must be immediately and fully informed of any incident that may cause an environmental hazard.

Communication

We communicate appropriately and effectively.

Good communication is based on mutual trust. We will ensure that we communicate effectively in order to avoid unnecessary or unclear communications. Our communication guidelines are applied both internally and externally. We are aware that we are able to affect our relationships both with our business partners and our colleagues through how we communicate. That is why our communications are always **appreciative** and appropriate to the situation. Communications with the public or press must be effected through the Executive Board, the Managing Directors or the designated Communications Officers or the respective Business Unit.

Respectful behaviour is of utmost importance in social networks. Patronising and insulting statements should therefore never be made! In the context of the employment relationship in particular, this only applies to social media in which a connection with Komptech is recognisable or Komptech has been identified as an employer - however, we assume that employees will always use respectful language.

When posting images, audio and/or video recordings, please ensure that you have the necessary rights to these media.

Data protection, IT-security and confidentiality

Handling sensitive data responsibly is a matter of course for us.

Confidential business information and trade secrets may not be divulged to third parties either during or after termination of the employment relationship. A corresponding **confidentiality agreement** must be concluded in the event that confidential data is used jointly with people who are not bound by the company agreement. Confidential data may only be utilised internally by such people whose work requires knowledge of such data.

Confidential information of any kind may neither be used for personal benefit nor for the interests of third parties. Such information may only be used for the **specific purpose** – without exception. We do not disclose confidential information. These provisions also apply to our business partners' confidential information. The information will be deemed confidential until any uncertainties regarding its status of confidentiality have been clarified.

Any relevant confidentiality provisions as set out in the respective work contracts apply.

We operate in compliance with the applicable **data-protection provisions** and will treat the data entrusted to us as sensitive. Personally identifiable information will only be collected, processed, stored and used in accordance with the law and to the extent that is necessary. Our data privacy statement can be viewed at <https://www.komptech.com/en/data-protection-policy>

Access to digital assets must not be possible for unauthorised third parties under any circumstances. Komptech's Directive for End Users describes our IT-Security measures.

If other regulations apply in the country of an Komptech location, the higher standard shall prevail.

Protection of company property

Company property has the purpose of supporting employees achieve the company's business objectives.

Materials and equipment must be treated with **due care** when using company property. They must be used in a commercially reasonable manner. Excess wear on or the consumption of resources must be avoided. **Operating instructions and safety regulations** for such equipment as well as the instructions from superiors and technical staff must be complied with.

Damaged, stolen, misused or wasted company property harms us all, negatively affects how our company operates and performs financially and puts the safety of employees at risk. Equipment and materials must therefore be adequately protected against theft, loss, misuse and unauthorized use.

Reporting Misconduct

Komptech takes violations of this Code of Conduct seriously.

In order to maintain the standard as set out above, it is the right and duty of each employee to **report transgressions**.

Any observed misconduct must be reported to the Management, the Compliance Officer, the Human Resources department, or the immediate superiors. Any non-compliance with or transgression against legal provisions, internal regulations or the standards set out in this Code of Conduct may result in financial loss and harm to our reputation. Employees must in such cases expect disciplinary, criminal or civil action and claims for compensation from Komptech.

Komptech will not sanction individuals who report problems to us in

good faith. **Individuals who express concerns or who help us resolve reported incidents will be protected against sanctions.** Everyone who uses the Code of Conduct and the Guidelines for conduct in Business to spread lies, threaten others or damage another's reputation will be subject to disciplinary action. It is forbidden to prevent staff from making a report or from seeking the help that they need, and any such undertakings will result in disciplinary action.

For anonymous reporting of any misconduct the internal whistleblowing-tool can be used. The link can be found on <https://www.komptech.com>. Reports are processed in accordance with the legal requirements.

Taking action

We are obliged to act in accordance with our ethical principles.

Our Code of Conduct has been developed by employees from all group divisions. It is our opinion that our executives and employees bear joint responsibility for acting in accordance with our Code of Conduct and our business ethics.

Managers act as first contact person to their employees for any questions or concerns about behavior, and they support their employees in acting according to laws and our values. We all must continually remind each other to act upon questions about ethical behaviour and compliance with it in a timely fashion, to **lead by example**.

We continually emphasise the necessity of compliance with laws, regulations and directives that are relevant to our business. **We encourage each other:**

- to ask questions and seek advice before we act.
- to introduce checks that allow compliance risks to be detected.
- to listen attentively when colleagues express questions or concerns about ethical matters.
- to promote a trusting environment in which each one of us may speak openly without the fear of facing sanctions.

Responsible persons in our company:

Theresa Heuberger
Bernhard Muhr

