

# Corporate Guideline

## Preface

Dear employees,

In our company, we not only want to set standards in quality, flexibility and reliability, but our behavior should also be unobjectionable at all times.

In order to live up to this claim, we want to provide you with the company guideline in order to support you in coping with questionable situations and making the right decision.

The Oetinger corporate guideline is based on the values of our society, as well as existing guidelines, contracts and laws.

The guiding principle is that of a prudent businessman. Based on this guiding principle, the corporate guideline specifies concrete behavioral patterns. In this way, we want to enable you to maintain orientation at all times and protect you from problematic behavior or make you aware of it. If a situation is not clearly defined for you, we ask you to clarify the matter with your supervisor, the HR department or a member of the management.

The behavior of each employee can have a significant impact on the success and visibility of our company. We suppose that you are aware of this responsibility and act in accordance with this policy at all times. In this way, you can not only prevent damage to the company but also protect yourself from unpleasant consequences.

Weißenhorn, September 2021

Uwe Bodenhausen

Lubomir Pajonk

## **Acting in accordance with the law**

We fully comply with the laws of the countries which we operate in. Unlawful acts jeopardize the interests and success of our company because they might lead to the loss of reputation, criminal prosecution, damages and loss of contracts.

Employees not acting lawfully are at risk of criminal prosecution. Acting in accordance with the law therefore serves to protect the employees as well as the company. This is particularly true in countries where criminal prosecution does not always meet the principles of the constitutional rule of law. All employees are obliged to be aware of the laws and regulations applicable in their area of responsibility and to comply with them.

In cases of doubt, please contact the relevant department or your manager.

## **Compliance with fair competition and prohibition of corruption**

We comply with the laws for the protection of competition and do not collude on our supply and competitive behavior with competitors.

In particular, agreements on prices and conditions, the division of markets and regions, the allocation of customers and the coordination of supply development or production strategies are prohibited. In this respect, not only agreements but also concerted practices are illicit. Exchanging information with competitors, which may form the basis of such concerted practices, such as prices, costs, margins, customers, production capacities, etc., is prohibited. Violations of these prohibitions are consistently pursued by the antitrust authorities and can lead to risks threatening the existence of the company.

We fight corruption in all its forms, including antitrust violations, money laundering, unfair advantages, blackmail and bribery.

Accepting and giving gifts as well as other benefits exceeding a value of €40 are not allowed as a matter of principle. Doubtful cases are to be clarified with the supervisor.

Commissions and compensation received by dealers, agents or consultants may only be paid for permissible services actually rendered and must be commensurate with the services rendered

Any secondary business activities of an employee require the prior approval of the management. This particularly applies to secondary activities for competitors, customers or suppliers as well as financial interests in these. The involvement of close family members in such activities or interests must also be reported to the management.

Business and private interests must be strictly separated and may not be used to obtain private benefits. The contracting of business partners for private purposes is to be avoided or must be reported in advance and without request. Business partners must never be given preferential treatment for private interests or be provided with internal information.

## **Taxes and subsidies**

We comply with all legal requirements regarding taxes and subsidies and do not assist in tax evasion or subsidy fraud.

Suspicious circumstances very quickly lead to investigations and a significant disruption in the orderly conduct of business. In case of involvement of customers and suppliers, control notifications are made to their designated tax authorities and vice versa.

We comply with the regulations applicable to cross-border business. This particularly concerns the observance of existing import or export restrictions, the obtaining of necessary permits and the payment of established customs duties and taxes. In the event of any uncertainties, the export representatives are to be consulted.

Compliance with these regulations is subject to regular audits. In the event of violations, significant penalties / sanctions may be imposed on the responsible parties and the company.

The assessment of facts under tax or subsidy law is often difficult. In doubtful cases, assessment by the supervisor and / or clarification by the finance department is required.

## **Quality and reliability of delivery**

We set the highest demands on the quality, delivery reliability of our materials and services. Careful and close control of quality is our top priority to protect our customers from harm and to secure our business basis.

## **Occupational safety, health and environmental protection**

Oetinger is committed to complying with applicable occupational health and safety law, international standards and ILO conventions on occupational health and safety, including ILO Conventions 155 and 176. Regulations designed to ensure compliance with occupational safety, health and environmental protection must be strictly adhered to and constantly reviewed for their effectiveness.

Workers have the right to understand the hazards associated with their work and the related safety practices, and are entitled to refuse or to discontinue unsafe work.

Malpractices must be reported and eliminated without delay. Deliberate violations will not be tolerated and may lead to consequences under labor and criminal law. We provide health protection in the workplace within the framework of the legal provisions or beyond.

We use natural resources economically and strive to do the same in regard to our products and services.

We avoid any negative impact on the environment and adhere to all legal regulations regarding cargo securing and behavior in freight traffic for the transport of our products. In addition, we only commission shipping companies that feel bound by these rules.

## **Corporate property and business secrets**

We protect the intellectual and material property of Oetinger.

We treat operating resources carefully and in accordance with their purpose. We use operating equipment including PCs, laptops, mobile and landline telephones in accordance with the specifications.

We always deal with Oetinger's property in a trustworthy manner, thus avoiding additional costs. We make business decisions on the basis of commercial action and the analysis of opportunities and risks. In this context, we pay attention to the integrity of our business partners.

We handle business secrets with particular care. Confidential information must not be disclosed to unauthorized parties. This applies equally to confidential information we receive from our business partners.

## **Human rights, prohibition of discrimination**

We respect and support the observance of human rights based on international laws and procedures, as well as the United Nations Declaration of Human Rights.

Respecting human rights, including women's rights and labor rights, forms the foundations of our corporate culture. We are clearly committed to compliance with the law and strictly reject any form of discrimination. This applies to all employees, service providers and business partners.

We see the diversity of our employees as an enrichment. Employees, employee representatives and executives are aware of their responsibility and role model effect.

If there are any indications of violations, we will track them and take action within the framework of the legal provisions. Unequal treatment or disparagement on the basis of gender, skin color, race, origin, age, sexual orientation, social status, religion or ideology, disability and any other discriminatory behavior is prohibited. Mental and physical violence is condemned in the strongest possible terms.

We do not tolerate discrimination against our employees. If misconduct is suspected or actually occurs, it must be reported to the supervisor or the human resources department.

## **Prohibition of forced labor and child labor**

Employees shall be protected from physical punishment and physical, sexual and psychological harassment. The privacy of each employee shall be respected.

The prohibition of forced labor of any kind is observed. In particular, the Forced and Compulsory Labor Convention 1930 (Convention 29 of the International Labor Organization) is observed. We observe the applicable regulations prohibiting child labor.

## **Wages, benefits and working hours**

Remuneration and benefits are in line with the collectively agreed regulations of the Bavarian metal and electrical industry.

Any additional social benefits and special arrangements are set out in company agreements.

## **Employee rights and freedom of association**

Humane work and gender equality are overarching goals and set out in the standards of the International Labor Organization (ILO).

- Create workplaces
- Guarantee rights in the workplace
- Ensure safe working conditions for women and men
- Conduct social dialogue
- Freedom of association and tariff negotiations

Oetinger is committed to complying with these standards. A regular dialog takes place between the works councils, IG-Metall and the executive board.

Every employee has the possibility to personally contact the works council in case of complaints, uncertainties and questions or to submit concerns anonymously via the "works council mailbox".

## **Documentation of business transactions and data protection**

Both internal and external documents must not be falsified or incorrect. They must contain the full facts so that the recipient can get an accurate picture. In this context, we adhere to the presentation of facts and factual expression.

Documents, for current or past business transactions, must be kept in an orderly and timely manner and may not be altered or destroyed.

We use personal data of our employees and contractual partners exclusively in accordance with the law on handling of personal data.

When processing company data, each employee must comply with the obligations set out in his or her employment contract, corporate guidelines and company regulations.

## **Sustainable procurement**

Oetinger places sustainability in practice at the center of its activities.

With a sustainable procurement in action, compliance with social and ecological requirements is ensured throughout the entire supplier chain on the basis of economic sustainability. To guarantee this, sustainability aspects, such as respect for the rights of indigenous peoples, are integrated into our procurement and contracting criteria.

Our suppliers are required to comply with the principles set out in this guideline and to ensure constant improvement.

## Scope and implementation

These guidelines are binding for all employees at Oetinger. Violations of these will not be tolerated and will result in disciplinary action.

All indications of violations will be investigated. Reports of misconduct or complaints will be treated anonymously and confidentially.

We will not tolerate retaliation of any kind against any person in response to a report.

The first point of contact for any employee with questions or uncertainties about the code of conduct is his or her supervisor.

For reporting misconduct a compliance address is available to all employees and external stakeholders at [konflikt@oetinger.net](mailto:konflikt@oetinger.net).