

DRÄXLMAIER Group

Policy for Corruption Prevention and Fairness in Competition



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Preamble

We expect all the employees of the DRÄXLMAIER Group to adhere to all the currently applicable legal provisions and operational directives and to respect the values and culture of the countries in which we operate. All management staff are also specially urged to fulfill their exemplary role in this regard as well. If any queries or doubts should arise on the adherence to certain legal or other specifications that regard the behavior of the employee in his area of responsibility, the employee should clarify these queries or doubts with his supervisor or with the competent department. Moreover, employees can address their queries to the Compliance Organization.

Content

Corruption/Bribery/Extortion

We expect all employees to refrain from corrupt or comparable illegal behavior and not to tolerate it in their areas of responsibility. This means that benefits or contributions should not be offered or granted to employees by public authorities and business partners for the purpose of getting them to carry out illegal or unfair action. In the event that employees receive offers in the afore-mentioned sense, they always have to inform their supervisors of the fact without delay. In the same way, employees should refrain from behavior that endangers the property or assets of the DRÄXLMAIER Group or third parties. Corrupt behavior can have extremely grave consequences for the entire DRÄXLMAIER Group and can therefore never be justified by any commercial advantages. This also applies in the case of extortion. We expect employees to refrain from using their position to demand, accept, gain or approve both externally and internally unjustified advantages or to threaten any illegal disadvantages. In this connection, we also want to refer to the Compliance Program on Corruption Prevention.

Conflicts of Interest

We expect all the employees to make their business decisions in the interests of the corporation and focus their action on the same. Personal reasons, personal relationships or personal advantages may not influence

decisions and actions that focus on the corporate interests. Conflicts of interest like that may occur in particular when business relationships have to be concluded with family members, relatives or close friends or if business is done in which people like this are substantially involved.

Business relationships with such people have to be avoided. In justified exceptional cases, business relations like that may be allowed in consultation with the Compliance Organization if the circumstances justifying a possible conflict of interests were disclosed beforehand to the supervisor.

Gifts and other Benefits, Invitations, Contributions

We expect every employee to refrain from accepting or granted gifts or other benefits if they are inappropriate and unacceptable within the scope of usual business transactions in compliance with the customary practices. Under no circumstances may benefits be connected with demanding or granting return services.

The afore-mentioned principles apply to invitations to business dinners or other events accordingly. Events like that always have to correspond to the occasion of the transaction and be regarded as being customary. Invitations to events that violate the laws or inter-company directives or that are illegitimate or indecent according to common opinion may be neither accepted nor expressed. Accepting or granting benefits or invitations has to be declined even if it leads to just a trace of binding dependence or dishonesty. In cases of doubt, acceptance or granting should be discussed with the supervisor and, if necessary, with the Compliance Organization and approved beforehand. In any case, employees have to inform their supervisors if they are offered inappropriate benefits or corresponding invitations. In this connection, we refer to the [Directives Corruption Prevention](#).

Donations to social projects, clubs, parties or other associations or people always have to be agreed to by the Management of the relevant company and approved according to the [Sponsoring Guidelines](#). Under no circumstances may donations be granted with the aim of receiving direct commercial advantages.

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Fair Competition

We expect all our employees to adhere to the rules of competition in their areas of responsibility. Anti-trust agreements with competitors, for example on prices or other conditions, are forbidden. If an employee is approached with the aim of participating in anti-trust agreements, the employee is required to inform his supervisor and the legal department of this without delay. We are committed to fair competition. Unfair practices are not permitted. Suppliers are assigned according to objective, transparent criteria. Obviously arbitrary reasons may not play a part in the selection.

Furthermore, we focus on the following basic principles:

- We will obtain information on our business partners and competitors by fair means only.
- We will speak of business partners and competitors with fairness only and will behave accordingly, e.g. no discrimination of competitors and disparagement of their products or damage to their reputation.
- We will conclude all agreements with our business partners in writing.
- We will adhere to all the contractual agreements and also expect this to be done by our business partners.
- We will respect legally valid industrial property rights (patents, registered designs, brands and designs) and copyrights of third parties.

Assistance, Monitoring and Penalties

We are committed to ensuring that all employees receive the required support in implementing the aforementioned principles of conduct in their area of responsibility. All members of the management are particularly urged to support their staff, accept suggestions and clarify individual queries on the basis of the principles of conduct and/or to implement action. Furthermore, anyone can turn to the Compliance Organization in their country or to the Corporate Compliance Officer at any time. In the event that any employees of the DRÄXLMAIER Group acquire knowledge of violations against these principles of conduct or against any effective laws and regulations, they are obligated to inform their supervisor or the specified point of contact thereof without delay. Information shall remain confidential and anonymous if so requested by the employee.

Adherence to the applicable provisions, directives and these principles of conduct is essential for the DRÄXLMAIER Group and will therefore be subjected to regular review. Violations by individuals may have far-reaching, serious consequences for the entire organization. This may extend from damage to the reputation of the DRÄXLMAIER Group, right up to high penalties and fines. In individual cases, the responsible employee may also be personally liable. In the interests of the whole corporation, we will not tolerate any violations of the principles of conduct. Violations will therefore result in labor law sanctions or, if necessary, in criminal penalties, depending on each individual case.

Compliance Organization

At the DRÄXLMAIER Group, the Corporate Compliance Officer, who reports directly to the Compliance Board for all compliance matters, is responsible for any questions connected with these principles of conduct. Moreover, responsible local Compliance Officers have been appointed for each country in which the DRÄXLMAIER Group operates. The tasks of the Compliance Organization consists of defining and communicating binding rules and organizing control of their implementation. The Corporate Compliance Officers and the local responsible Compliance Officers are accessible to every employee for queries.

Scope

The contents of this policy apply to all employees of the DRÄXLMAIER Group worldwide. Furthermore, the DRÄXLMAIER Group requires its suppliers to respect and take account of them in their policies.

Further Information

For further information, please contact this mail-address: policy-info@draexlmaier.com

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