



DRÄXLMAIER

Code of Conduct Corruption Prevention and Fairness in Competition

Code of Conduct

Corruption Prevention and Fairness in Competition

Foreword by the Executive Management

The Code of Conduct of the DRÄXLMAIER Group defines the Standards that we take as a basis for our ethical conduct. We thereby want to ensure mutual respect, honesty and fairness in dealing with our business Partners and suppliers.

This Code applies for all the corporate activities of the DRÄXLMAIER Group worldwide. It takes the diversity of cultures and values of people all over the world into account and is a clear commitment to the social responsibility of our globally operating family-owned Company.

In Order to maintain the excellent reputation our Organization has among customers, business Partners and the public, flawless, responsible conduct by each and every person is essential.

The Code of Conduct of the DRÄXLMAIER Group is binding for all our suppliers and Service providers.

Adhering to Laws and Directives

The DRÄXLMAIER Group expects all its suppliers and Service providers to adhere to the currently applicable legal provisions and operational directives and to respect the values and culture of the countries in which the DRÄXLMAIER Group operates. All the suppliers and Service providers are also specially urged to fulfill their obligations in this regard as well.

If any queries or doubts should arise on adherence to certain legal or other obligations, all the suppliers and Service providers are urged to clarify them with the purchasing Organization of the DRÄXLMAIER Group.

Corruption, Bribery, Extortion

The DRÄXLMAIER Group expects all the suppliers or Service providers 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 in business relations for the purpose of getting people to carry out illegal or unfair action. The employees of the DRÄXLMAIER Group are expected to inform the Purchasing Organization of the DRÄXLMAIER Group and their immediate Supervisors of any offers in the aforementioned sense without

delay. This also applies to cases of extortion.

In the same way, suppliers and Service providers are expected to 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.

The DRÄXLMAIER Group expects suppliers or Service providers to refrain from using the business relations to demand, accept, gain or approve both externally and internally unjustified advantages or to threaten any illegal disadvantages.

Conflicts of Interest

The DRÄXLMAIER Group expects all the employees of the DRÄXLMAIER Group 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 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, suppliers or Service providers have to be avoided. In justified exceptional cases, business relations like that may be allowed in consultation with the Purchasing Organization of the DRÄXLMAIER Group if the circumstances justifying a possible conflict of interest were disclosed beforehand, tested and if no concerns were raised.

Gifts and other Benefits, Invitations, Contributions

The DRÄXLMAIER Group expects its employees and the employees of suppliers and Service providers to refrain from accepting or granting gifts or other benefits if they are inappropriate and unacceptable within the scope of usual business transactions in compliance with

customary practices. Under no circumstances may benefits be connected with demanding or granting return

Services. The afore-mentioned principles apply to invitations 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 employees of the DRÄXLMAIER Group to events that violate the laws or intercompany directives or that are illegitimate or indecent according to common

opinion may be neither accepted nor expressed.

Accepting or granting benefits or invitations to employees of the DRÄXLMAIER Group should be refrained from, even if it leads to just a trace of binding dependence or dishonesty. In cases of doubt, the award

or benefit has to be agreed with the Purchasing Organization of the DRÄXLMAIER Group and approved beforehand.

Fair Competition

We expect all the employees of the DRÄXLMAIER Group and all the suppliers and Service providers 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.

The DRÄXLMAIER Group is committed to fair competition. Unfair practices are not permitted.

Suppliers and Service providers are assigned according to objective, transparent criteria. Obviously arbitrary reasons may not play a part in the selection. Furthermore, the DRÄXLMAIER Group focuses on the following basic principles and also expects the same from suppliers and Service providers:

The DRÄXLMAIER Group

- will obtain Information on suppliers, Service providers and competitors by fair means only.
- will speak of suppliers, Service providers and competitors with fairness only and will behave accordingly, e.g. no discrimination of competitors, no disparagement of their products and no damage to their reputation.
- will conclude all agreements with suppliers and Service providers in writing.
- will adhere to all the contractual agreements.
- will respect legally valid industrial property rights (patents, registered designs, brands and designs) and Copyrights of third parties.

Information Security

The DRÄXLMAIER Group expects all the suppliers or Service providers to maintain the information security based on the international Standard DIN/ISO 27001. The basic protection objectives of confidentiality, integrity and availability create the framework for fulfilling our corporate task while at the same time maintaining profitability. This specifically means protection the intellectual property of the DRÄXLMAIER Group and that of our Customers and Partners against data abuse, cybercrime attacks and data destruction. In doing so, we also specifically safeguard the values of our customers with regards to design, research, development and prototypes.

Area of Application

The contents of these guiding principles apply for all the employees and for suppliers and Service providers of the Companies of the DRÄXLMAIER Group worldwide.

Assistance, Monitoring and Penalties

The Purchasing Organization of the DRÄXLMAIER Group is committed to ensuring that all suppliers or Service providers receive the required support in implementing the afore-mentioned principles of conduct in their areas of responsibility. All members of the management of the DRÄXLMAIER Group are particularly urged to support their suppliers or Service providers, accept suggestions and clarify individual queries on the basis of the principles of conduct and/or to implement action. In the event that any employees of suppliers or Service providers acquire knowledge of violations against these principles of conduct or against any effective laws and regulations by employees or members of the management of the DRÄXLMAIER Group, the DRÄXLMAIER Group expects the suppliers and Service providers to inform the Purchasing Organization of the DRÄXLMAIER Group thereof without delay. Information shall remain confidential and

anonymous if so requested by those involved.

Adherence to the applicable provisions, directives and these principles of conduct is essential for business relations with the DRÄXLMAIER Group. Violations by individuals may have far-reaching, serious consequences for suppliers and Service providers.

Organization

As a supplier or Service provider of the DRÄXLMAIER Group, please contact your responsible contact person in the Purchasing Organization for any questions on the responsible person in connection with this Code of Conduct. Our Governance function in Purchasing is available to clarify any individual cases.

Key contact:

Michael Haas

Head of Governance - Global Procurement

E-Mail: Governance.Procurement@draexlmaier.com

T +49 8741 47- 1666