



## Code of Conduct

As of: 25.08.2022

## 1. General principles

Volkmann Elektromaschinenbau GmbH bases its business actions and decisions on generally accepted ethical values, in particular integrity, credibility and respect for human dignity. It appropriately promotes transparency, responsible management and supervision in the company.

**Integrity, credibility,  
transparency**

The Code of Conduct sets out binding rules to be observed by every employee of the company. In particular, the members of the management and all executives are responsible for the active enforcement of this Code of Conduct. They must act as role models in every respect. The Code is the basis and guideline for tackling ethical and legal challenges in our daily work. Every employee can contact his or her supervisor or the managing directors with questions and comments in this context.

**Scope**

The company expects its suppliers to comply with the guiding values of the Code of Conduct, supports them in this to the best of its ability and encourages them to do the same in their supply chains.

**Supply chain**

The company complies with the laws and regulations of the countries in which it operates. This expressly also applies with regard to the provisions of national, European and international chemicals law as well as to embargo, customs and export control regulations.

**Compliance with laws**

## 2. Conduct towards competitors, business partners and third parties

The company respects the rules of fair and open competition and does not enter into any agreements that might unfairly influence competition.

**Competition and antitrust  
law**

Employees of the company are obliged to comply with the rules of fair competition. In particular, any agreement, but also any coordinated practices with competitors are prohibited with regard to the following subjects:

- prices and price components
- conditions
- customers
- delivery areas
- quotas and capacities
- agreed market withdrawals
- coordination regarding planned innovations
- boycotts

Where a contract is awarded on the basis of a formal invitation to tender, the company neither discusses nor coordinates bids with other bidders. This applies to both public and restricted tenders and regardless of whether the award is made by a public authority or by a private entity.

**Tenders**

The company expressly opposes any form of corruption in Germany or abroad and avoids even the appearance of trying to influence business decisions through unfair business practices. No employee

**Corruption**

may exploit the company's business connections for his or her own benefit or to the detriment of others. This means in particular that no employee may, in the course of business, grant or accept unauthorised private benefits (e.g. money, material assets, services) that are likely to influence an objective decision. Every employee of the company is obliged to seek advice or assistance in the event of any suspicion or legal uncertainty regarding the presence of corruption or white-collar crime. Advice or assistance can be obtained from the compliance officer and/or the managing directors.

Invitations, for instance to business meals or events, which are in keeping with recognised business practices and appropriate, may be extended or accepted if they do not serve the purpose of improper preferential treatment. The same applies to the acceptance or bestowing of gifts. If there is any doubt as to whether there is an objective reason for a benefit or whether it is customary, the employee must first ask the compliance officer or a managing director. This point is comprehensively and conclusively dealt with in-house.

The granting of benefits of any kind to civil servants and other public officials or to agents of state institutions, even indirectly via third parties, is prohibited, regardless of their value.

In the case of donations to political parties and political organisations as well as to mandate holders and candidates for political offices, the respective applicable laws are observed.

Consultants, agents and other intermediaries may not be engaged for the purpose of circumventing the prohibition of bribery.

Donations are made on a voluntary basis only and without expecting anything in return. Donations and sponsorships must not be aimed at covertly encouraging decisions in the interest of the company. The donation must be transparent. The recipient of the donation and its specific use by the recipient must be known. It must be possible to account for the reason for the donation and the intended use at any time. No donation-like remuneration may be paid. Donation-like remuneration is a benefit that only appears to be granted as remuneration for a service, but whose value clearly exceeds the value of the service.

The company does not tolerate money laundering. All employees are obliged to strictly comply with anti-money laundering laws. Furthermore, they must report any suspicious forms of payment or other transactions suggestive of money laundering to the compliance officer or a managing director at once.

The company draws up its tax returns and declarations truthfully. All dutiable goods are cleared by the company in accordance with the applicable law. The company consistently complies with the legal requirements for export control and customs in the areas of foreign trade and customs law and ensures their proper

**Granting and acceptance of benefits, invitations and gifts**

**Public officials**

**Parties and mandate holders**

**Consultants and agents**

**Donations and sponsoring**

**Money laundering**

**Tax law / customs law / foreign trade law**

implementation. The company expects its suppliers to provide qualified and timely export control and foreign trade data and to implement adequate supply chain security standards within the scope of global customs security programmes.

### **3. Avoidance of conflicts of interest**

The company expects loyalty of its employees. It sees to it that its employees do not get into situations where their personal or financial interests collide with those of the company or its business partners. Company employees must report any personal interest that may exist in connection with their work to their superiors without delay.

**Employee loyalty**

Company employees are prohibited from managing or working for any enterprise that competes with the company. The same applies to the participation of a close relative or life partner.

**Secondary activities and participations**

### **4. Handling of information**

The company employees are obliged to maintain confidentiality about corporate and business secrets and other internal matters. This applies equally to information about contractual partners and customers that is not publicly accessible. The confidentiality obligation continues to apply after termination of the employment relationship.

**Corporate and business secrets**

In addition to the general secrecy provisions, data secrecy must also be observed in accordance with the GDPR. In particular, it is forbidden to process, disclose, make accessible or otherwise use protected personal data without permission for any purpose other than the purpose corresponding to the lawful fulfilment of the task in hand. This obligation to data secrecy continues even after leaving the company.

**Data protection**

All reports and other written documentation must be accurate and truthful. This applies no matter whether they are internal reports or are distributed outside of the company. Data records and other records must follow the principles of proper accounting and must always be complete and correct.

**Truthfulness**

### **5. Principles of social and environmental responsibility**

Social responsibility is an indispensable component of value-based corporate governance and an essential factor for sustainable corporate success.

**Social responsibility**

The company respects and supports internationally recognised human rights. In this context, we are in constant dialogue with our suppliers to avoid our products containing raw materials from conflict regions.

**Human rights**

The prohibitions of child labour and forced labour in any form are obeyed.

**Child labour**

Discrimination against employees or third parties is not tolerated. The company strongly opposes any unacceptable treatment of employees, in particular sexual or verbal harassment.

**Non-discrimination**

The company promotes equal opportunities for its employees.

**Equal opportunities**

Workers' freedom of association and assembly is recognised to the extent legally permissible according to national provisions. The company complies with applicable national laws and labour standards with regard to adequate remuneration and maximum working hours. This of course includes compliance with all the provisions of the law governing a general minimum wage in Germany. The company makes sure of fair working conditions overall.

**Employee rights**

Occupational safety and health at the workplace is ensured in accordance with national provisions.

**Occupational safety and health**

Sustainable environmental and climate protection as well as resource efficiency are important corporate goals to us. Both in the development of new products and services and in the running of production facilities, we strive to minimise any impact on the environment and the climate and to ensure that our products make a positive contribution to environmental and climate protection for our customers. Every employee is responsible for treating natural resources with care and contributing to the protection of the environment and climate through his or her individual behaviour.

**Environmental and climate protection**

As far as consumer interests are concerned, the company complies with the regulations on consumer protection.

**Consumer interests**

The company contributes to the social and economic development of the country and region in which it operates.

**Social engagement**

## **6. Compliance with the Code of Conduct**

The company will familiarise its employees with the issues covered by this Code of Conduct and explain the obligations it imposes on them. The company will communicate the principles of the Code of Conduct to its business partners.

**Communication**

The behaviour requirements laid down in this Code of Conduct are binding for the company's employees as part of their daily work and it is therefore essential that they be observed.

**Policies and processes**

The company will take the steps necessary to implement the core values and guidelines contained in this Code of Conduct by means of suitable organisational measures and appropriate policies and processes in all business areas.

The company undertakes to check compliance with the Code on a regular basis.

**Regular checks**

Every employee of the company is obliged to report without delay any (potential, also threatened) violations of laws, internal regulations and this Code of Conduct that he or she observes to his or her superior or a managing director.

Any report of a violation of this Code will be treated in strict confidence and will not have any negative consequences for the employee reporting it, unless a falsehood was deliberately alleged.

Any violations of the Code of Conduct and legal provisions may, depending on their severity, result in consequences under labour law and liability law and also entail criminal sanctions.

## **Reports of violations**

## **Consequences of violations**