

CODE OF CONDUCT FOR EMPLOYEES OF VOLLERT HEAVY DUTY SOLUTIONS GMBH

1. VOLLERT GROUP

Vollert Group comprises the companies Vollert Heavy Duty Solutions GmbH and its subsidiaries.

Our actions are based on the values we have defined in our corporate principles (mission statement).

The following code of conduct of Vollert Group clarifies these principles. It is targeted at preventing any situations that could call the integrity of our conduct and confidence in our performance into question.

2. TRUST BASED ON HONEST AND FAITHFUL MANAGEMENT OF BUSINESS – A PERSONAL CHALLENGE AND THE RESULT OF JOINT EFFORT

We can only continue to achieve these objectives through cooperation of everyone involved. Therefore, the code of conduct stipulates binding requirements for all employees.

Employees must comply with all relevant laws and authority provisions in their work environment, as well as with any internal instructions and policies.

Employees must act honestly and fairly in their work environment and avoid any conflict between private and business interests of Vollert Group or the interests of our customers.

All employees are explicitly encouraged to approach the FA management or their direct supervisor if they notice anyone acting in violation of the rules. This may prevent small issues from turning into big ones. No employee who submits such a report in good faith needs to fear any disadvantages from this – even if the report turns out to be unfounded. Reports can also be made anonymously.

Leaders serve as role models. They are responsible for their own conduct and the conduct of the employees in their areas of responsibility as well as for proper compliance with all procedures provided there to avoid any reputational and legal risks.

3. RESPECTFUL TREATMENT OF EACH OTHER – NO DISCRIMINATION – DEVELOPMENT BASED ON PERFORMANCE AND POTENTIAL

Our success also is essentially based on respectful interaction with each other. We are willing to learn from mistakes and value open communication. Performance and potential are the essential criteria for development of employees.

Vollert Group does not tolerate any discrimination or harassment of any kind in the work environment, be it based on age, disability, origin, gender, political views or trade union membership, ethnic origin, religion, or sexual orientation.

4. PROTECTION OF PERSONAL DATA AND CONFIDENTIAL INFORMATION – INFORMATION REQUESTS FROM AUTHORITIES

We strictly observe the provisions regarding protection of personal data.

All confidential information and documents concerning customers or employees of Vollert Group must be adequately

protected against disclosure to third parties as well as to any colleagues who are not involved in the respective process.

Personal data must only be collected, processed, or used to the extent necessary for specified, explicit, and legitimate purposes. Use of data must be transparent for the data subjects. Their rights to information and rectification and, if applicable, to objection, blocking, and erasure, must be safeguarded.

An appropriate standard that meets the requirements of the Vollert IT policy must be maintained where technical protection against unauthorized access to data and information is concerned.

Vollert Group cooperates with all relevant public bodies and supervisory authorities. Any communication in this context is only permitted through the employees appointed for this purpose.

5. COMMUNICATION WITH CUSTOMERS, BUSINESS PARTNERS, AND THE PUBLIC

All announcements and reports by Vollert Group must be complete, fair, accurate, made in a timely manner, and comprehensible. This applies towards business partners as well as towards customers or the public.

This applies in particular to any information and advertising material about our products.

Information to business partners, customers, or the public regarding Vollert Group, our products, our customers, or our business partners must only be provided by employees authorized to do so.

6. SOCIAL NETWORKS

Anyone who speaks about any issues that affect Vollert Group or our business partners in a public discussion or on social media should make it clear that they are acting as private individuals and have the interests of Vollert Group and its business partners in mind. The provisions of the Vollert IT policy must be observed at all times (see also item 15 of this agreement).

Please consider that while statements made in emails or social networks may be made informally and spontaneously, they will nevertheless be recorded and available to the recipient or the public on the internet for a long time.

7. NO CONFLICTS OF INTEREST WITH CUSTOMERS AND BUSINESS PARTNERS

Vollert Group strives to maintain sustainable business relationships with its customers and business partners for mutual benefit.

All employees must, therefore, ensure that the interests of our customers are fairly considered. Interests of some customers or business partners must not be given priority to the detriment of other customers or business partners.

8. CUSTOMER COMPLAINTS

Customer complaints provide valuable information on opportunities for improvement in our business and – if handled properly – may offer opportunities to strengthen or recover customer relationships.

Vollert Group ensures that all significant customer complaints are handled promptly in a fair and comprehensible manner.

9. PERSONAL CONFLICTS OF INTEREST

Any conflict between employees' personal interests and their professional duties or interests of Vollert Group or our customers may harm the reputation of the employee and of Vollert Group as a whole.

Employees should, therefore, avoid such situations in the interest of Vollert Group as well as in their own interest. Specifically:

- No secondary employment that affects the time scope of the duties under the employment contract or the competitive interests of Vollert Group. Secondary employment must be reported to the supervisor and the Human Resources Department in advance. Volunteer positions of limited duration do not need to be reported.
- No financial interests in companies that may be affected by any professional decisions made by the employee or by Vollert Group (exception: listed public companies).
- Awarding of contracts to relatives, life partners, or any other relatives of employees – if known – must be reported to the supervisor or the FA management in advance. This also applies to any transactions with companies in which relatives hold a direct or indirect interest.
- If possible, no direct reporting lines between children, parents, spouses, or civil partners.
- No assumption of positions of entrepreneurial responsibility (e.g., member of a governing body, managing director, board of directors, supervisory board, advisory board) with any customers, business partners, or competitors without the management's prior consent following notification to the FA management.

If there is any doubt, please contact the FA management. The decisive factor is the perception by third parties. Even the appearance of a personal conflict of interest will cause damage.

10. GIFTS, BUSINESS MEALS, AND EVENTS

Gifts, business meals, and events for information, representation, or entertainment purposes may be legitimate means of building and supporting business relationships. However, they must never be used to gain any unfair commercial advantage. They also must not be on a scale or conducted in a manner that is likely to compromise the professional independence and judgment of the persons involved.

Employees can protect themselves from misunderstandings by observing the following rules:

- There are no objections to hospitality and meal invitations directly related to business to a reasonable extent.
- There are no objections to give-aways.
- There generally are no objections to gifts with a gross market value of up to EUR 40 (reference value)
 - unless the gifts are not given as a general attention but very specifically with the intention of acquiring an advantage,
 - or the gifts are presented in a non-transparent manner, i.e., for example if it is clear that no one is supposed to know that such a gift has been given to a business partner.
- No cash or money substitutes, e.g., checks, gift vouchers.
- Invitations for representation purposes or with a predominant or partial entertainment part are only permitted
 - following special examination of customary business practice and appropriateness,
 - if representatives of the host are present,
 - if participation is not a frequent occurrence, and
 - provided that the travel and accommodation costs are not covered by the inviting business partner.
- Consult the FA management if there is any doubt about this.

Particular care is required with public officials. The rules for gifts and invitations of the respective employer must be observed.

11. DONATIONS AND SPONSORING

Any decisions on donations and sponsoring are to be made by the management. They must not be used to indirectly obtain unfair advantages from business partners.

12. NO TOLERATION OF CORRUPTION, SPECIAL CAUTION REQUIRED WITH PUBLIC OFFICIALS

Our success in the market is based on performance, flexibility, and service. It must not be acquired unlawfully by providing unfair benefits. Our business partners trust in the professional judgment of our employees.

Vollert Group, therefore, does not tolerate any form of bribery or corruption, acceptance or granting of benefits.

Anyone who does not observe the rules on gifts and invitations in item 10 may be liable to prosecution for corruption offenses. Even the promise or demand of any unfair advantages can be punishable.

Where invitations and benefits to public officials are concerned, their internal rules for gifts and invitations must be observed in all cases. The granting of advantages to public officials may be punishable as acceptance or granting of an advantage simply because it is done with regard to the official position. It is not necessary that the exercise of office is unfairly influenced by it. Anyone charged with performance of public duties may be a public official, rather than only civil servants and public employees.

13. PREVENTION OF MONEY LAUNDERING AND FINANCING OF TERRORISM

Vollert Group has established risk-appropriate precautions in accordance with legal requirements and specifications of the supervisory authorities to prevent money laundering and the financing of international terrorism.

14. PROTECTION OF COMPETITION

Vollert Group does not engage in any illegal agreements and practices that restrict competition, in particular any agreements on prices, terms, and market sharing with competitors. Employees must coordinate with the FA management before they deviate from any standard contracts or procedures stipulated in cooperation agreements to ensure that no inadmissible effects under competition law will result from this.

Employees shall not discuss any internal matters, such as prices and terms of sale or financing, costs, market overviews, organizational procedures, or any other confidential information from which competitors or business partners may derive competitive advantages in any contact with competitors and business partners, without advance clearance by Compliance.

15. PROTECTION OF CORPORATE ASSETS

Technical trade secrets and commercial business secrets are important corporate resources. Every employee is, therefore, obligated to protect them. This includes strict compliance with the IT policy of Vollert Group (compare in particular item 2.12 of the Vollert IT policy).

The assets and business equipment, business documents, and working materials of Vollert Group must neither be misused for private purposes nor provided to any third parties if this may impair the interests of Vollert Group.

16. ENVIRONMENTAL PROTECTION

Protection and safety of people and the environment and all measures necessary for this are integral parts of our daily work. This is the only way the following generations can also experience a stable environment and growth. Our environmental policy regulates and describes such measures.

Employees shall strive to protect natural resources and to ensure that the impact of Vollert Group's business activities on the environment is minimized by material conservation, energy-saving planning, and reduction and recycling of waste in their work. Every employee should consider ecological and social criteria in addition to economic aspects when selecting suppliers, advertising materials, or other external services.

17. HUMAN RIGHTS

We commit ourselves and our business partners to observance of internationally recognized human rights and act in accordance with the CHARTER OF FUNDAMENTAL RIGHTS OF THE EUROPEAN UNION.

All of our employees and business partners can access it in their native language at http://data.europa.eu/eli/treaty/char_2012/oj.

We generally respect human rights as a supreme asset. We strictly reject child labor, forced labor, modern slavery, and all forms of human trafficking.

18. OCCUPATIONAL HEALTH AND SAFETY

All processes, facilities, and equipment must comply with the applicable legal and internal requirements for occupational safety as well as health, fire, and environmental protection, or, as in the case of fire protection, there must be a plan of action for how these are to be implemented.

We maintain and promote the health and job satisfaction of our employees by prevention and ongoing health promotion measures.

19. WAGES AND SOCIAL BENEFITS

The wages for our employees' work are subject to the provisions of the ERA TV §§14 to 21. We ensure social equality for our employees and contribute to maintaining their standard of living in old age by way of social benefits such as retirement benefits (TV AVWL) and company agreements (Vollert pension).

20. WORKING TIME

Our works agreement on organization of working hours is aimed at improving adaptation of working hours to changing requirements and needs in the processing of orders. At the same time, it is made possible to consider individual wishes of the employees when determining working hours.

Coordination between employees, supervisors, and staff should promote mutual understanding of each other's needs.

Expansion of the framework conditions for time accounts makes it possible to react more flexibly to order peaks and bottlenecks. The collectively agreed working hours are based on §7.1 of the collective agreement for employees in the metal and electrical industry of Nordwürttemberg/Nordbaden.

This provision is targeted at reconciling customer satisfaction and the employees' working time wishes.

21. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

All employees of Vollert have the right to form or join trade unions and employee representations. Interaction with employee representations is open and trusting and based on constructive and cooperative dialog.

Infringements can be reported at <https://www.vollert.de/de/compliance> or directly to the employee representative or the human resources department.

22. DATA PROTECTION

Data protection and information security are central components of our corporate policy.

The protection of your privacy in connection with processing activities involving personal data, as well as the security of all business data are important concerns for us. We consider these in our business processes. We process any personal data confidentially and only in accordance with the statutory provisions. Our privacy policy can be viewed by anyone – employees, customers and suppliers – on our website <https://www.vollert.de/de/datenschutz>.

23. FINANCIAL RESPONSIBILITY FOR CORPORATE ASSETS

Our corporate assets ensure that we and our business partners can achieve our common business goals. We use our business assets with diligence and care and for business purposes only.

24. INTELLECTUAL PROPERTY AND COUNTERFEIT PARTS

We respect the intellectual property of our competitors, business partners, and other third parties. We do not infringe any patents. We only use components from original manufacturers or patent holders in our products. Use of counterfeit parts or parts from origins that cannot be clearly documented is forbidden.

25. EXPORT CONTROLS AND ECONOMIC SANCTIONS

We perform export controls for all foreign transactions and thereby ensure compliance with all provisions for the import and export of goods and services. Transactions with any persons or companies on sanctions lists are generally prohibited. We determine the export restrictions applicable to the respective country to be supplied and comply with any applicable laws and regulations.

26. WHISTLEBLOWING AND PROTECTION FROM RETALIATION

Compliance with laws, provisions, and directives is essential for Vollert Group within the scope of responsible, ethical, and sustainable conduct. This is the only way to practice our values and social responsibility. We will do anything necessary to ensure that Vollert Group acts in compliance with these principles.

Employees may discuss any questions concerning anomalies with our managers directly. We also offer all employees, customers, suppliers and any other third parties the opportunity to submit reports on potential breaches of compliance, complaints, or defects of any kind anonymously via our contact form on our website <https://www.vollert.de/de/compliance>. All information will be treated confidentially.

27. CONSEQUENCES OF VIOLATIONS

Violations of these rules may lead to significant reputational damage and legal disadvantages for the employees in question, their colleagues, and for Vollert Group, up to and including fines, criminal prosecution, or restrictions on official permits. In addition, violations may lead to measures under labor law by Vollert Group.



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