



POWER
IN MOTION

CODE OF CONDUCT



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THE CODE OF CONDUCT AT A GLANCE

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FELBERMAYR

A TRADITIONS-BASED, FAMILY-OWNED COMPANY

Dear colleagues! (*)

Thanks to your dedication, our group of companies has been able to establish itself as one of the leading companies in Europe.

Our group of companies operates according to a distinct set of values. We aim to conduct ourselves with integrity, respect and fairness both internally and externally, and to conduct our business in compliance with national and international regulations.

This code of conduct sets out the principles of our conduct. All corporate institutions and employees of the Felbermayr Group must adhere to the code of conduct.

Above all others, managers are responsible for ensuring that this code of conduct is adhered to by all employees. They are role models and must ensure that their subordinates understand the requirements of the code of conduct. They should also check that the code of conduct is being adhered to.

Wels, Octobre 2020

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(*) For ease of reading, only the term “employee” will be used in the remainder of the document.

(**) First edition: September 2011

I. SUBJECT MATTER AND SCOPE

This code of conduct is a guideline which applies to all commercial activities of the Felbermayr Group and sets clear standards concerning integrity and proper business conduct. It is binding for all corporate institutions and employees of the Felbermayr Group.

All corporate institutions and employees are required to use their judgement in a responsible and prudent manner, guided by

honesty, reliability and integrity. No corporate institution or employee may use his or her position for unjust personal gain, nor may he or she encourage or tolerate conduct that is not in the spirit of this code of conduct.

Consultants, sales partners such as representatives and retailers, and suppliers or other persons who work for the Felbermayr Group shall also adhere to this code of conduct.

II. COMPLIANCE WITH APPLICABLE LAWS

All corporate institutions and employees must abide by the applicable laws.

III. EMPLOYEES

The employment relationship should be characterised by decency, mutual respect, fairness and trust. Open communication must be maintained at all times.

Every employee will be treated with respect. The appropriate level of consideration must be shown for the privacy of each employee.

Employees should be hired and developed (career) based on their qualifications for the intended job, regardless of race, age, gender, nationality, religion, sexual orientation and health status.

The safety of employees in the workplace must be held in the highest regard.

IV. OPEN AND FAIR COMPETITION

The Felbermayr Group is committed to fair and open competition. Anti-competitive practices such as price fixing with competitors, agreements on production output, distribution,

tenders, resale prices or market sharing are prohibited, as is the abuse of a dominant market position.

V. GRANTING AND ACCEPTANCE OF UNDUE BENEFITS

The Felbermayr Group only maintains business relationships with customers, consultants and business partners who have a good reputation.

Employees may grant and accept benefits within the given statutory framework in order to maintain business relationships.

As a matter of principle, the granting of benefits to public officials is not permitted, with the exception of inexpensive tokens of appreciation that are customary in the country in question.

More detailed provisions are set out in the latest applicable version of the internal "anti-corruption" directive. In all cases, however,

it must be ensured that even the semblance of influence is avoided when benefits are granted or accepted.

VI. RELATIONS WITH CUSTOMERS AND SUPPLIERS

Objective and transparent assessment criteria shall be applied when selecting customers and suppliers. In its dealings with

suppliers and customers, the Felbermayr Group shall conduct itself in the correct manner and with integrity.

VII. CONFLICTS OF INTEREST

The corporate institutions and employees must act in the best interests of the Felbermayr Group and not in their own personal interests. Accordingly, situations in which personal interests could conflict with the interests of the Felbermayr Group must be avoided.

In particular, corporate institutions and employees are prohibited from taking a stake in competitors, suppliers or customers if this could lead to a conflict of interest. Existing conflicts of interest must be disclosed to the respective superior.

VIII. SAFEGUARDING OF EXPERTISE AND COMMERCIAL SECRETS

To a very large extent, the commercial success of the Felbermayr Group is based on expertise, amongst other things. As such, all corporate institutions and employees are duty bound to safeguard this expertise and our commercial secrets with respect to third parties and to refrain from any conduct that could put this capability at risk.

All corporate institutions and employees are duty bound to treat commercial information about the Felbermayr Group or its business partners that is not public knowledge as confidential, to take precautions against unintentional disclosure and to use the information only to the extent necessary for commercial purposes.

Corporate institutions and employees shall respect the commercial secrets of competitors. Information about competitors shall be acquired in a fair and legal manner.

When information is exchanged electronically, effective measures must be put in place to uphold data security and the right to privacy.

The public relations work of the Felbermayr Group, e.g. with the press and other media, is exclusively reserved for the employees responsible for this.

IX. PROTECTION OF ASSETS

The Felbermayr Group shall provide its employees with the resources they require to perform their duties.

Employees must treat these assets with care and protect them from loss, theft or damage.

As a matter of principle, the assets of the Felbermayr Group may only be used for commercial purposes. Private use is only permitted with the written consent of the respective superior.

X. SAFETY, HEALTH AND THE ENVIRONMENT

The Felbermayr Group shall undertake to prevent harm to people, the environment and property at all times.

This applies in particular to the development and use of new products and technologies.

It is committed to taking a responsible and considerate approach to the environment and its use of natural resources.

XI. MONEY LAUNDERING

The Felbermayr Group complies with national and international regulations to combat money laundering and corruption.

XII. ACCOUNTING RECORDS

The commercial activities and transactions of the Felbermayr Group must be recorded correctly in the accounting records. The accounting practices must comply with the laws and accounting standards applicable in the respective countries.

Accounting entries must be complete and involve an appropriate level of detail. All financial transactions must be properly documented in the appropriate accounts.

XIII. ENFORCEMENT

The general management of the companies that make up the Felbermayr Group must ensure that their employees take note of this code of conduct and adhere to it.

If an employee identifies a breach of this code of conduct, he/she must report the breach to the general management of the respective company or the general management of Felbermayr Holding GmbH. Such reports shall remain confidential. Reports

made in good faith shall not entail adverse consequences.

A breach of this code of conduct by an employee may result in disciplinary action pertaining to employment law, which could culminate in premature termination of the employment relationship, as well as other legal consequences.

XIV. COMPLIANCE OFFICER

The general management of Felbermayr Holding GmbH has appointed a compliance officer for the entire Felbermayr Group.

In exercising his/her duties, the Compliance Officer reports exclusively to the general management of Felbermayr Holding GmbH and is not bound by any instructions in this function.

All employees of the Felbermayr Group must, to the best of their ability, assist the compliance officer as he/she performs

his/her duties and are obliged to provide him/her with all necessary information pertaining to matters relevant to the code of conduct and the instructions issued in this connection whenever they are requested to do so, and to disclose documents and allow him/her to inspect data carriers in any form whatsoever.

