

ElringKlinger Code of Conduct

Our benchmark for
how to do business responsibly



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1. FOREWORD – OUR BENCHMARK FOR HOW TO DO BUSINESS RESPONSIBLY

We firmly believe that our shareholders and business partners need to trust in our expertise, ingenuity and integrity if we are to be successful for many generations to come. This trust is reflected in our company's image, and it relies on us – all employees at ElringKlinger – committing to the company's values and goals and undertaking to comply with and uphold them in our respective areas of the business.

This Code of Conduct is binding for all employees of the ElringKlinger Group. It serves as a guide and reference work and acts as a benchmark for how to do business responsibly, by setting out our responsibility as a member of our society, as a business partner and at the workplace.

2. OUR RESPONSIBILITY AS A MEMBER OF OUR SOCIETY

2.1 WE PROTECT OUR PLANET – ENVIRONMENTAL AND CLIMATE PROTECTION

We protect our natural environment by taking a responsible and sustainable approach to our resources. We take appropriate measures to design our products and processes in a way that reduces our environmental footprint. This includes reducing greenhouse gases and minimising adverse soil alterations, pollution of water bodies and the air and harmful noise emissions.

We strive to comply with all applicable national and international laws governing environmental protection and nature conservation, as well as all other relevant regulations.

We ensure that we label, handle, transport, store, reuse, recycle and dispose of all hazardous substances used and waste materials in accordance with the applicable laws and regulations.

We exercise utmost care when procuring raw materials and minerals and ensure that they do not come from illegal sources or conflict regions.

2.2 WE PROTECT OUR FELLOW HUMAN BEINGS – HUMAN RIGHTS

We respect human dignity and believe it is absolutely essential to respect fundamental human rights. We are aware of our responsibility in this respect and uphold internationally recognised standards, such as the ten principles of the United Nations (UN) Global Compact, the UN International Bill of Human Rights, the Declaration on Fundamental Principles and Rights at Work from the International Labour Organization (ILO), the UN Guiding Principles on Business and Human Rights, and the Guidelines for Multinational Enterprises from the Organisation for Economic Co-operation and Development (OECD). When we do this, we also uphold our own principles, such as the principle of equality, mutual respect, fairness and trust – not just for people within our own company, but also those outside it.

We condemn any and all forms of child labour, slavery and forced labour.

We respect and promote our employees' right to freedom of association and collective bargaining. Employees are entitled to join or establish a trade union without the threat of discrimination or retaliation.

We respect the rights of indigenous peoples and local communities to land, water and resources and ensure that we protect, support and uphold them in compliance with the "United Nations Declaration on the Rights of Indigenous Peoples".

When commissioning and using private or public security forces, we ensure that human rights such as the ban on torture and cruel, inhuman or degrading treatment are strictly observed. People's life and limb are not harmed and their freedom of association and freedom to form a coalition are respected.

2.3 WE PLAY OUR PART – SOCIAL RESPONSIBILITY

We want to foster shared values and promote economic growth and social development in our local communities.

As a responsible company, we want to make a positive contribution to our society by participating in social, sustainable, educational and cultural initiatives. We support charitable projects and help to fund and promote them.

3. OUR RESPONSIBILITY AS A BUSINESS PARTNER AND AT THE WORKPLACE

3.1 WE FOLLOW THE RULES – LAWS AND GUIDELINES

We comply with all applicable legal regulations and operational guidelines. We are role models for colleagues and employees and help to comply with and implement rules and regulations. We immediately clarify any questions about specific laws or guidelines. We do not hesitate to submit reports/tips about violations using our reporting channels (including SHARE WITH US: <https://sharewithus.elringklinger.com/en>).

3.2 WE CONDUCT OURSELVES PROPERLY – CORRUPTION, MONEY LAUNDERING AND INSIDER TRADING

We refrain from corrupt or similar illegal conduct which could be considered bribery, and we do not tolerate such behaviour amongst our employees. We do not request or offer any improper payments, gifts or other benefits and do not accept such benefits either. Any sponsoring or donations always comply with the company's rules.

We also undertake to follow all applicable laws and regulations governing money laundering and terrorist financing.

Corruption and money laundering are strictly prohibited by international conventions, national legislation and internal rules. We ensure that all transactions and business relationships are transparent, responsible and legal.

As a company listed on German stock markets, we recognise that we must comply with the legal regulations governing insider trading. We do not use any non-public information to our personal advantage in the trade of ElringKlinger AG shares. Even if our role has given us special knowledge of circumstances that could influence ElringKlinger AG's share price, we do not draw any personal advantage from this.

3.3 WE ARE RESPONSIBLE – CONFLICTS OF INTEREST, GIFTS AND GRATUITIES

We always take decisions relating to the business in the company's interest and act accordingly. Conflicts of interest may arise if business relationships are established with family members, relatives or close friends or if these parties are closely involved in business activities. Should such a situation arise, we turn to our trusted compliance officers. Our actions are not influenced by personal reasons, personal relationships or personal gain.

We restrict the giving and receiving of gifts and other gratuities to that which is appropriate and customary and are guided by the highest ethical standards in our business interactions. We reject inappropriate gifts or gratuities, for example cash, high-value gifts/gratuities, those which are unlawful or those which could be considered bribery or kickbacks. If such a gift/gratuity is offered to us, we act honestly, appropriately, correctly and morally and we inform our superiors or contact our compliance officers. We preserve our professional integrity and do not request or extend any dishonest invitations.

3.4 WE ARE TRANSPARENT – ACCOUNTING AND FINANCIAL REPORTING

We record our financial information correctly, in full and in a clear and traceable manner in accordance with the legal and official requirements governing proper accounting and financial reporting. We set great store by transparency, accuracy and compliance with deadlines in order to preserve our financial and legal integrity, reputation and credibility.

3.5 WE COMPLY WITH THE LAW – TAX, CUSTOMS AND EXPORT CONTROL REGULATIONS

We comply with all applicable tax, customs and export control legislation and regulations. We ensure that all imports and exports of goods, services and information comply with the applicable regulations and satisfy the requirements set by the relevant authorities.

Through this approach, we help to ensure that no financial or economic resources are made available to people, groups or organisations subject to sanctions.

3.6 WE ARE FAIR AND HONEST – FREE COMPETITION, FAIR PROCUREMENT AND A TRUSTED PARTNER

We are committed to free competition and refrain from unfair practices. We comply with competition and antitrust law and refrain from anti-competitive practices, such as agreements with competitors on prices or other conditions, and do not exchange any competition-related information with them. If we are offered such an agreement, we reject it immediately and unambiguously and report it to our compliance officers without delay.

We select our suppliers and service providers carefully based on clear, objective and factual criteria and involve the relevant Purchasing departments in the procurement process. We place the same requirements on our suppliers as those we place on ourselves. For this reason, we require our suppliers to comply with our “ElringKlinger Code of Conduct for Suppliers”.

We establish fair, positive and productive relations with our suppliers, customers and other business partners and strive to build long-term relationships based on mutual respect and trust.

3.7 WE SET GREAT STORE BY SAFETY AND SECURITY – DATA PROTECTION, INFORMATION SECURITY AND PROTECTION OF INTELLECTUAL PROPERTY

We comply with all applicable data protection and data security laws and ensure that personal data is only processed for the purposes for which it was collected.

We take the necessary measures to keep personal data safe and secure, do not pass any confidential information about the business transactions and projects of the ElringKlinger Group or our business partners to unauthorised third parties, and protect the confidentiality, integrity and availability of data.

We protect our intellectual property and know-how against unauthorised access and misuse.

We are a trustworthy partner, respect the intellectual property of third parties and act in compliance with applicable laws and regulations.

3.8 WE LOOK AFTER OUR STAFF – OCCUPATIONAL SAFETY, HEALTH PROTECTION AND FAIR WORKING CONDITIONS

In all areas falling under our responsibility, we ensure a safe and healthy working environment and comply with the applicable laws and regulations. We design our workplaces so that hazards are prevented wherever possible and risks are minimised. We help to reduce work-related injuries by taking part in regular training courses and providing information and further education programmes, so as to raise awareness amongst our staff and empower them to work safely.

We look after our employees and are committed to fair working conditions. We follow the regulations governing working hours and appropriate remuneration in all our companies.

3.9 WE RESPECT ONE ANOTHER – NO DISCRIMINATION, EQUAL TREATMENT, AND EMPLOYEE DEVELOPMENT

We stand for equal opportunities and fairness and do not discriminate against anyone on the basis of personal characteristics such as ethnic origin, skin colour, age, gender, sexual orientation, disability, religion, nationality, trade union membership or political leanings. We provide jobs that are free from discrimination, harassment and racism. Our physical and mental health is not compromised by physical or verbal attacks. We lead by example and do everything in our power to prevent such behaviour.

Our professional development at the ElringKlinger Group is based on our performance, capabilities and individual suitability. We ensure that all employees are treated equally and, in particular, that they receive the same remuneration for work of equal value.

We invest in the technical, social and methodological development of our employees and foster ideas that improve our own growth as a company and our business practices and help secure ElringKlinger’s future.

4. COMPLIANCE WITH OUR CODE OF CONDUCT

4.1 WE'RE THERE FOR YOU – HOW TO SUBMIT REPORTS/TIPS OR COMPLAINTS

We encourage everyone to report violations of laws, regulations and internal guidelines by our company, managers and staff or by our suppliers or sub-suppliers. These reports/tips help to uncover violations, thereby preventing or at least reducing the damage they cause. We use our reporting channels, in particular our whistleblower system SHARE WITH US: <https://sharewithus.elringklinger.com/en>.

4.2 WE INVESTIGATE VIOLATIONS – CONSEQUENCES

We investigate all reports and tips and review them carefully whilst upholding the principles of due process. Violations of our Code of Conduct are not tolerated and will lead to consequences.

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