

# CODE OF CONDUCT

The Code of Conduct defines the principles and basic rules of our actions as well as our behaviour towards business partners, the public and the environment.

Within the ASSMANN Group, we commit our employees and managers to these values through our Business Guidelines and live the standards of our Code of Conduct ourselves.

At the same time, we demand a commitment to our Code of Conduct from all our business partners.



## I. LEGAL REQUIREMENTS

### Compliance with legal requirements

As the ASSMANN Group, we comply with all legal regulations at national and international level. Suppliers must ensure that their production, products and services align with the current national and international regulations.

### Anti-Corruption laws

The ASSMANN Group does not tolerate nor engage in any forms of active or passive corruption. Neither does it grant, offer, promise, or ask for any valuable goods, services or gifts and invitations to or from a public official or private-sector to influence actions or to gain improper advantages. Any supplier is expected to conduct reasonable due diligence to prevent and detect corruption.

### Competition

All applicable antitrust, competition and trade practices law and regulations shall be complied by the ASSMANN Group and all suppliers. It shall be refrained from practices of improper exchanges of information and data, pricing arrangements with competitors, bid-rigging, improper customer or territory allocation.

### Environmental, Health and Safety Measures

The Group and any supplier has to make sure to respect their environment and minimize environmental impacts that are resulting from their activities. These must be sustainable, energy efficient and promote the use of renewable energy.

### Intellectual Property

The intellectual property rights have to be respected and any supplier has always to refrain of breaching any third-party intellectual property rights by developing, manufacturing and selling the products or rendering the services to the ASSMANN Group.





## II. HUMAN RIGHTS

Every employee and supplier has to respect Human Rights and ensure privacy and dignity towards every individual. The ASSMANN Group puts emphasis on diversity, dignity, respect and promotes equal opportunities for everyone. As a diverse company, we foster an inclusive and ethical company culture.

### Child labor

As an international company, we prohibit child labor and does not conduct business with business partners using child labor. A “child” is defined by the International Labor Organization and the legal age as a worker has to be consistent with the minimum working age.

### Forced labor

The ASSMANN Group and any supplier has to ensure that no individual works against his or her will or conduct business with business partners that promote or use such practices.

### Employment Practices

The ASSMANN Group and their suppliers shall prevent harassment and ensure that their employees work in an environment free of physical, psychological and other forms of abuse.

The rights of the employees with all laws and regulations in the country or in the countries they operate, have to be complied. This includes the minimum wage for every worker, benefits and working conditions.

Additionally the applicable legal requirements for employee compensation and working hours have to be respected and complied.

### Human trafficking

The ASSMANN Group and any supplier refrain from recruitment, transportation, transfer, harboring or receipt of individuals, by means of force, fraud, coercion for the purpose or exploitation. It should be refrained to using or providing illegal labor or services, especially through migrant smuggling.



## III. REPORTING

We support open disclosure of compliance violations by employees and suppliers towards the Executive Management. The employee or supplier will not be disadvantaged and it is assumed to have received this report „in good faith“ till the report is reviewed by the Managing Directors.

### Personal Data

Employees and suppliers must comply with all applicable laws and regulations regarding the protection of personal data.

### Conflicts of Interest

Any form of conflict of interest has to be avoided by the ASSMANN Group and their suppliers. In case a conflict of interest should arise or if there is any potential for a conflict of interest, this should be discussed with the ASSMANN Group.

### Confidential Information

Employees and suppliers shall take the required measures to protect all the sensitive information and data regarding the ASSMANN Group and any personal information. The information and data must not be used beyond their purposes of business arrangements, without first obtaining the approval in writing of the ASSMANN Group.

### Accurate Records

The ASSMANN Group and their suppliers are expected to maintain accurate records and not misrepresent or falsely change the records of the underlying transaction represented by it. All records have to be made or received as an evidence of a business transaction, which fully and accurately represents the transaction being documented. The records should be retained based on all applicable legal and contractual retention requirements.

## **IV. ACKNOWLEDGEMENT**

We hereby confirm that we have received and read the Code of Conduct, have understood the core values and commitments of the ASSMANN Group and agree with them.

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City, Date

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Signature / Company Stamp