

Compliance – Responsible Conduct



Code of conduct

Principles for ethical and legal conduct

Made for Motion



Introduction by management board

With this code of conduct, we, the management board and shareholders of the KTR Group, giving our employees and our executives a binding guideline that describes the corporate ethics and integrity of our group.

Our code of conduct sets the highest standards by which we measure ourselves every day. Mutual respect, honesty and fairness in dealing with work colleagues, business partners and public officials forms the foundation of our group.

In this sense, the code of conduct applies to all corporate activities and is supported by all employees and managers in our group.

The principles of the code apply to dealings with colleagues, suppliers, customers, business partners, public authorities and other interest groups.

In the case that in specific situations you are asking yourself, how to behave in accordance with the Code, please contact the Compliance Officer at any time. He will advise and support you accordingly.

Compliance with law

Applicable national and international law forms the framework for all business activities of our group. In order to meet this demand at all times, we adhere to the obligations and prohibitions that are relevant to us.

By observing applicable legal provisions, internal instructions and standards, we act in the interests of our group. We observe and comply with legal requirements and prohibitions, even if these appear inexpedient or uneconomical. Accordingly, legal action always has priority in case of doubt, even with conflicting instructions from a manager.

Avoiding conflict of interest

We avoid situations where personal interests, even if only apparently, conflict with the interests of our group. Business decisions must not be guided by private interests and relationships. Should an employee get into an actual or potential conflict of interest, this will be reported to the superior immediately and resolved together with him or her.

Business Relationships

We only initiate and maintain business relationships according to objective criteria. Business relationships and the conclusion of contracts are not influenced by personal relationships and interests. We do not use our position or function in the company to gain personal material or immaterial advantages.

Personal Benefits

Neither we offer nor we grant or accept personal benefits in connection with our business activities. This prohibition on taking or granting benefits applies to any form of financial benefit as well as other benefits that could call into question the independence of the company (e.g. invitations and gifts). The exact specifications with regard to gifts are set out in the gift guidelines.

Sideline Job

We are obliged to obtain approval for secondary employment from the responsible HR manager. The operation and direct or indirect participation in a company must also be communicated to the HR manager in writing. Share purchases for investment purposes are excluded from this rule.

Social engagement and political activities.

We welcome every voluntary commitment. Political activity within the group is not permitted. As part of his or her personal commitment, everyone has to ensure that the group is not involved in political campaigns or public disputes.

Private expression of opinion

Our private expressions of opinion in public must not give the impression that it is the attitude of our group.

Fairness in competition

It is one of our fundamental principles to fully commit to the market economy and free and fair competition. We conduct our business on the global markets according to the highest ethical principles and follow the applicable and binding laws of competition law in these countries.

We reject any agreement on competition that could prevent, restrict or falsify competition. We already prevent the appearance of unfair agreements with other market participants.

Confidential information

The cooperation with customers, suppliers and other business partners is characterized by discretion in dealing with sensitive information. Protecting such business information and secrets is essential to safeguard our interests and our success.

We undertake to use confidential information such as data, specifications or drawings, know-how or trade secrets that we gain knowledge of within the scope of the company only within the permitted framework and to check whether the respective information is passed on within or outside the group. Recipient of this information is authorized.

Just as we handle confidential information internally, we respect and protect the confidential information of our business partners. We respect third party property rights and refrain from unauthorized use. We do not obtain or use any third party secrets.

The obligation of confidentiality applies to all of our employees even after their employment relationship has ended.

Insider information and insider dealing

Insider information is important information from our stock exchange listed business partners that is not intended for the public and which can have a significant impact on the price of their securities.

We do not use such internal knowledge about essential projects and developments of our business partners to enrich ourselves or other people.

Company properties

We support every initiative that aims to promote a legal and regulatory environment in which both intellectual and material company property is protected.

We respect the property rights of our business partners and third parties to the same extent.

In addition to the intangible property of the group, we undertake to use and protect material assets appropriately.

Corruption

We distinguish ourselves through a high level of integrity in our business relationships and adhere strictly to all applicable anti-corruption laws and regulations, including those that deal with the bribery of public officials at home or abroad.

We reject all corrupt acts. This applies equally to the granting as well as the acceptance of benefits that can influence business decisions.

We take care not to enter into any personal relationships of dependency or obligations with customers or suppliers.

Fairness and diversity

We reject any form of discrimination as soon as we are employed. Everyone has the right to be treated fairly and respectfully.

We see diversity as a decisive factor for our company's success as a global player. We are committed to equal opportunities and compliance with fair recruitment practices. We see it as our duty to prevent or eliminate discrimination or unequal treatment based on ethnic origin, nationality, religion or belief, gender, disability, age, skin color or sexual identity. We respect and respect the personal rights and dignity of each individual.

Likewise, behavior such as bullying, harassment of any kind, violence or threats, insults and other social misconduct are not tolerated by us, and are immediately prevented and sanctioned.

Child labor and forced labor are forbidden, we and our business partners reject them without exception and actively avoid them. We also pay attention to fair wages and reasonable working hours in every country.

We undertake to comply with all legal provisions in contact with employee representatives and to maintain a continuous and open dialogue with them.

We guarantee the right to freedom of expression and expression.

We expect from our employees that they are not involved in criminal offenses (e.g. residence, tax, customs or foreign exchange offenses), either in their private or professional life.

Data protection

In order to be able to use systems for processing and exchanging data between companies in our group and third parties, we follow the relevant laws and regulations as well as our principles and guidelines on data protection and information and IT security.

We pay particular attention to the handling of the personal data of our customers, employees and business partners. Personal information is only collected, processed or used if this is legally permitted or if the person concerned agrees and the data is earmarked.

We undertake to comply with the applicable data protection regulations, to handle confidential and personal data carefully and reliably and to protect them against unauthorized access.

If you have any questions about data protection, we contact our data protection officer or IT security officer.

Environmental protection

We are responsible for a clean environment. Environmental law provides binding standards for this, which we implement and maintain.

The careful use of natural resources is a high priority for us. In order to meet this requirement, we are constantly working on improving eco-efficiency.

Even in the development phase of our products, we pay particular attention to an environmentally friendly design and the selection of materials and ingredients. This is done taking into account the current laws and regulations.

When selecting our suppliers, we take into account not only economic aspects, but also ecological and social criteria.

If you have any questions about environmental protection, we contact our environmental protection officer, which is the same person as our compliance officer.

Occupational health and safety

We are committed to protecting the health and safety of our employees in every workplace. To ensure this, we set the highest health and safety standards. The basis for this is provided by the respective legislation of the countries in which we are active.

Every employee is jointly responsible for occupational safety and health protection in their own area. The regulations on occupational health and safety must be consistently and sustainably adhered to.

The relevant company agreements and work regulations must be followed.

Implementation

The Code of Conduct is central to our group.

Compliance with the established principles is binding and indispensable for all employees and managers throughout the company.

It is the task of every manager to ensure that the employees assigned to them are familiar with the content of the code of conduct and that they follow the rules and principles of conduct that apply to them.

Anyone who learns of illegal or dishonest behavior that directly or indirectly affects our group informs the Compliance Officer. Those who act in good faith do not have to fear any disadvantages - not even if the notification turns out to be unfounded. All incoming notices are treated in accordance with the rules for dealing with potential compliance violations, strictly confidential and with the greatest care.

If you have any questions about the Code of Conduct or any other topic relating to compliance or if you have any doubts as to whether behavior is in accordance with the law or this Code of Conduct, please contact the Compliance Officer of the KTR Group directly:

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The management of KTR and the shareholders of "your" company would like to thank you for your personal commitment and contribution that our company fulfills the comprehensive obligation to comply with laws, guidelines and regulations as well as to act with integrity.

Rheine, 24.03.2021



Guido Butscher

Compliance Officer KTR Group