Code of Conduct

"Our values determine our behaviour."

Canberra Packard
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Principles

Canberra Packard Central Europe GmbH (CP Group) and its subsidiaries commit all their employees to the highest level of integrity in all their actions through their Code of Conduct. This applies to business dealings with customers, suppliers and other partners as well as to interactions within the company with colleagues and superiors.

Impeccable conduct is the basis for our reputation and thus also our business success. As a reliable partner, the entire CP Group takes its responsibility in business dealings seriously. Our Code of Conduct reflects the principles on which all our business relationships are based.

For our employees, the Code has a guiding function. It provides orientation in a compact and clear form and supports the team in their independent work for the company.

Compliance with the principles of the Code of Conduct is the basis for legally, morally and ethically impeccable behaviour by employees in all situations of daily business life.

Respect for the Law

Our group of companies ensures that all employees act in full compliance with the law and regulations in the course of their work for the company. This includes not only the applicable national and international laws, but also internal company guidelines and regulations. Our company adheres to regulations on topics such as human rights, labour law, occupational safety, youth protection, prohibition of forced and child labour, competition and antitrust law, prohibition of corruption and data protection.

To ensure comprehensive compliance with laws and regulations, we also observe tax and official regulations and pay all due taxes, duties and social security contributions on time. We adhere to the principles of proper bookkeeping and accounting and obtain the necessary official approvals for all our activities.

Our employees are required to familiarise themselves with the regulations that apply to their specific area of work. We support them in this by means of a comprehensive

system of representatives and regular internal training on legal provisions, guidelines and regulations. In the event of any ambiguities, their superiors or the persons responsible for their area of expertise are available as contact persons.

Our company also expects such a law-abiding attitude from all business partners and actively promotes compliance with legal and ethical standards in all business relationships.

Respect and Integrity

We consider human rights to be fundamental values that must be respected and adhered to in all company activities. In particular, a person's dignity, rights, personal rights and privacy are considered of paramount importance. The company's employees are committed to mutual respect, recognition, appreciation and tolerance, regardless of gender, age, ethnic, national or social origin, religion or belief, sexual orientation, language, disability, political opinion and social or economic circumstances. Discrimination in any form is not tolerated. The diversity of employees is actively promoted as it strengthens creativity and mutual understanding within the company. The company rejects any form of sexual harassment, such as suggestive comments, gestures, advances or touching. These principles apply both within the company and towards external partners and are expected of everyone.

Responsibility

The Canberra Packard Group of Companies is a globally active company that is aware of its social, ecological and economic responsibility and is committed to sustainable business and the protection of people and the environment.

In terms of social responsibility, the company attaches great importance to the individual development of its employees and offers flexible working time models as well as additional benefits to reconcile family and career. It pays attention to compliance with youth protection regulations and rejects child and forced labour. The company also expects a sense of social responsibility from customers, suppliers and partners.

With regard to ecological responsibility, the company focuses on sustainable business and environmental management. We strive to comply with legal standards in environmental protection and minimise environmental pollution. We attach importance to the responsible use and procurement of resources and focus on the ecological use of

energy, water and materials. The company ensures proper and environmentally friendly disposal and the separation of waste for feeding into various recycling systems.

With regard to economic responsibility, the company focuses on the economic, expedient, sustainable and economical use of resources. Business decisions are made exclusively on the basis of factual and economic arguments. The group of companies acts in a results-oriented manner and uses synergies wherever possible. Through long-term, strategic thinking, it increases the company's performance potential and secures it economically. We are committed to fair and unbiased competition. We pay attention to an appropriate relationship between performance and price in the best or lowest bidder principle.

Every staff member is responsible for avoiding, recognising and asserting bias. Therefore, they are also responsible for the consequences of an unobjective action. Every employee must take responsibility for his or her conduct and cannot shift the responsibility to other colleagues, the manager or the company.

If the employee reports in good faith a reasonable suspicion of a criminal offence to the manager or the management of the enterprise, that person shall not be discriminated against in response to such a report.

Protection and Safety

The group of companies works in many critical areas that are of high importance to modern society. Its aim is to support products and activities in accordance with current health, environmental and quality standards. We place great emphasis on safety in the workplace and ensure that laws and regulations regarding health and safety are strictly adhered to. A comprehensive officer system is anchored in our quality management system.

Business Conduct

We attach great importance to transparency and fairness in business and expect all employees to comply with fair competition rules. It is strictly forbidden to influence the market unlawfully or to violate antitrust regulations. Furthermore, the interests of the company must always be kept separate from the personal interests of the acting employees. In concrete terms, this means that no agreements may be made with competitors on prices, capacities or market shares. Unfair business practices such as

putting pressure on customers or suppliers are also prohibited, as is the exchange of confidential information with competitors or industrial espionage. Finally, the dissemination of false information about competitors is also prohibited. These rules apply not only to direct business activities, but also to participation in associations or committees.
The following guidelines must be observed when working in national or international associations, committees, interest groups and the like:

- No collusion with competitors on market behaviour, including prices, capacities, market sharing or boycotting third parties.
- No industrial espionage.
- No unfair business practices such as direct or indirect pressure on customers, suppliers or other partners.
- No exchange of information with competitors about confidential data such as prices, conditions, capacities or costs.
- No dissemination of knowingly false information, especially about competitors.

These guidelines also apply without restriction when participating in national or international associations, committees, interest groups or similar organisations.

Our company works transparently, i.e. comprehensibly. The disclosure or non-disclosure of information as well as the reasons for a decision shall be documented.

Corruption and Advantage-taking

The CP Group of Companies obliges its employees to avoid all forms of corruption, bribery and the acceptance of benefits. This means that they must not accept or offer money, monetary benefits or other advantages to influence business transactions. They should also not make any statements or take any actions that could cast doubt on their integrity. Our employees demonstrate by their clear conduct that they are non influenceable and not corrupt, nor do they wish to be influenced. In cases of doubt, gifts of little value are rejected and hospitality is politely but firmly refused. This applies to both the acceptance and the passing on of the attentions. Our company also has clear rules regarding donations and sponsoring (giving money or benefits of monetary value). Donations to political parties or for-profit organisations are prohibited, and any sponsorship is for business purposes only and is commensurate with the consideration

given. We also expect a clear commitment against corruption and bribery from our business partners.

Conflicts of Interest

To ensure that the economic and other interests of CP Group employees do not conflict with the interests of the company, all employees must report any existing or potential conflict of interest as soon as it arises or is foreseeable. Conflicts of interest may arise from various factors, such as secondary employment, shareholdings in companies of customers, suppliers, partners or competitors of the group of companies or when related persons are decision-makers in business transactions of the other party. When a conflict of interest arises, our company will take appropriate measures together with the persons concerned to avoid or eliminate the conflict of interest in order to ensure the best interests of all parties involved.

Information

Confidentiality and Secrecy

At the Canberra Packard Group of Companies, confidentiality and non-disclosure of business information is particularly important because of its extensive certifications. All employees must agree to keep all business information confidential, regardless of where they obtain it. This includes, but is not limited to, project, company and/or group-related data, as well as information on research and development, know-how, strategies, goals or investments of the company. Upon joining the company, all employees must sign a confidentiality agreement and a corresponding declaration of commitment is part of the employment contract.

We are obliged to protect the confidential information of its customers, suppliers and partners and to treat it responsibly. When passing on information, care is taken to keep the circle of persons as small as possible. The protection of information has the highest priority, regardless of registered property rights or intellectual property rights. Employees may not derive any personal advantage from information they receive in the course of their professional activities, nor may they use this information for the interests of third parties. We also require our counterpart to make a corresponding declaration of commitment to protect confidential information.

The disclosure of information known exclusively from professional activities may infringe the interests of other companies. For this reason, care is always taken to comply with the regulations on confidentiality obligations and other duties of secrecy. This also applies to internal processes, such as intentions and ideas that can be deduced from conversations or instructions from the management and/or executives that have not yet been made public, but also to decisions or written documents that have not yet been delivered.

Data Security

Our company places great importance on the secure storage of all company-related documents, whether in paper or digital form. Appropriate security measures are taken for this purpose, such as the use of passwords, licensed software and internally approved technologies. The company's IT systems are always state of the art.

Secure storage of digital content is ensured. If documents have to leave the company premises for business reasons, all necessary precautions are taken to prevent unauthorised access and data loss, especially in the case of personal data.

Data Protection

The Canberra Packard Group of Companies is committed to fully complying with the Data Protection Act in any applicable version. The use and disclosure of personal data within and outside the company will only take place within the framework of the legal regulations. All personal data will only be collected, processed and used for clearly defined purposes and to the extent necessary. The data is stored securely and transferred in compliance with all necessary precautionary measures, such as in the case of mailings. Our data applications are transparent for all data subjects and their rights to information, objection, blocking and deletion are guaranteed.

We respect the privacy of all parties involved and ensure that personal data is handled responsibly. We implement appropriate security measures to prevent misuse as set out in our quality management system.

Communication

Trusting cooperation with customers, suppliers and other partners is our top priority. For this, fast and comprehensive communication as well as seriousness are essential. Our employees therefore react promptly to enquiries and information from customers, suppliers and other partners, either by responding immediately or by acknowledging receipt and then processing or forwarding the information. In addition, our team

provides regular updates on the current status of long-term projects and immediately reports any delays that occur or are foreseeable.

IT Use

When using IT, our employees pay careful attention to compliance with our internal company guidelines and security regulations in order to minimise possible risks. All IT devices must be kept secure and protected by passwords. Only necessary data may be taken on business trips. Personal passwords must not be passed on to other team members or third parties. Clear regulations are established and documented for cases of substitution. If loss or theft of company or partner data is detected, this is immediately reported to superiors or other responsible persons who take appropriate measures, such as blocking passwords or informing affected partners.

Quality

Our trading company ensures the quality of our work through a series of certifications that are regularly checked by national and international authorities. Internally, our quality management system is the central element for quality assurance. All important work processes and procedures are recorded and regulated in it. Our employees bear a high level of responsibility, as the quality and reliability of our work has a direct impact on people, the environment and other companies. In our daily work, we pay attention to the highest level of competence and quality in order to achieve the best possible service level.

Our quality principles are designed to understand and meet our customers' requirements and to ensure continuous improvement in our overall business performance. Our work is certified according to ISO 9001 (quality) and we also have other certifications, such as ISO 14001 (environmental management system), ISO 45001 (occupational health and safety management system), as well as other certificates.

Expectations of Our Partners

The CP Group of Companies attaches great importance to legally compliant business management that also meets ethical, moral, ecological and economic obligations of modern entrepreneurship. We expect a corresponding attitude also from our customers, suppliers and partners with whom we cooperate. The following basic principles are to be observed in our cooperation:

- Compliance with laws and regulations

- No tolerance for corruption
- Fair competition
- Respect for human rights
- Prohibition of forced and child labour
- Ensuring occupational safety and health protection
- Protection of data privacy and security
- Maintaining confidentiality and secrecy
- Environmental protection and sustainability
- Correct dealings with employees

Closing Words

This Code of Conduct provides general guidelines for correct behaviour in business. However, in specific individual cases, it may be necessary to clarify further questions or discuss problems and doubts. Employees of Canberra Packard and its subsidiaries are encouraged to contact their supervisors or management if they are uncertain. By discussing and sharing experiences in clarifying disputed or unclear cases, internal policies can be continuously improved.