

## **ROBUR Compliance Policy**

Version June 2020

### **Principles of Integrity-Based Conduct**

Impeccable ethical conduct in business is a prerequisite for creating and maintaining a trustful and fair environment to the benefit of everything. We, the employees of ROBUR, live these principles ourselves, and expect the same of our suppliers and business partners.

These principles of integrity-based conduct pursue two objectives:

- to engender a common understanding with respect to integrity in business dealings which is upheld by all ROBUR companies and ROBUR employees;
- to prevent breaches of integrity in business dealings by defining unacceptable conduct in business life for all ROBUR companies and ROBUR employees.

### **The “Principles of Integrity-Based Conduct” deal with the following topics:**

- prevention of money laundering
- data protection
- business relationships with customers, suppliers and business partners
- cooperation with public-sector customers
- international trade controls (ITC)
- observance of competition law
- Handling the property of the company and of our business partners
- controlling
- environment protection and work safety
- active and passive bribery
- gifts
- handling conflicts of interest

### **Definition of integrity-based conduct**

“Integrity in business dealings” is defined as ethical conduct in business matters that is in line with the ROBUR corporate principles and complies with local, national and international laws as well as all relevant ROBUR regulations. The prerequisites that determine appropriate conduct in business dealings must be judged on a case-by-case basis, taking into account the respective circumstances of each individual case. It should be noted that legal and social standards change over time. The necessary conduct must therefore be continually redefined.

### **Responsibility of employees and employers**

Every ROBUR employee is personally responsible for preserving integrity in business dealings. All employees must ensure that they are familiar with and understand the relevant laws and ROBUR regulations. The employees are therefore responsible for behaving in accordance with the provisions of these guidelines. Where questions or ambiguities arise with respect to the interpretation of the policy, employees must contact their superiors or the ROBUR Compliance Manager. ROBUR assists its employees as necessary to enable them to comply with these guidelines.

ROBUR stands for the entire group and refers explicitly to all subsidiaries, participations and joint ventures affiliated with ROBUR.

No ROBUR employee may be disadvantaged if he or she complies with the provisions of these guidelines or draws the Compliance Manager’s attention to possible violations or conflicts.

The following rules are not all-encompassing, but should, rather, encourage us to contemplate; this should help further and reinforce our critical scrutiny and our openness towards recognizing and solving problems.

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### The foundation of our action: Our ROBUR 4x4

#### 1. Our Values

##### **We work like entrepreneurs**

With their decisions and actions, each member of the Group and each colleague contributes to achieving the goals of the individual company, to the growth of the Group as a whole, to the satisfaction and safety of our colleagues, and ultimately to the success of our customers.

##### **We work together as partners, stay curious and shape the future**

We are stronger and better together. We respect one another, listen to each other, and solicit and respect the opinions and experience of every colleague at all levels. We are always looking for new, innovative and efficient solutions, and encourage our people to think and head in new directions. We are only satisfied when our customers are satisfied. We don't stop at the company's boundaries in the search for new ideas and developments. Close cooperation with our business partners and suppliers along the entire value chain is crucial to our success.

##### **We deliver quality**

We are specialists, and advise customers as equals. We are certified and bring about long-term success for our customers.

##### **We offer job security and opportunities for advancement**

Our people are what makes us successful. We give them the freedom to further their professional development, ask for and promote their own initiatives. Through the right tools and sound work organisation, we create a secure working environment and so ensure the professional future of every colleague.

#### 2. Our partner manifesto: Growing together successfully!

##### **Personal growth**

The independence, performance and success of the individual entrepreneur is the foundation of our group. As entrepreneurs, we continuously scrutinise the status quo and proactively develop new strategies for our company, our business unit and the Group as a whole. We take back our own sovereignty/strategy for the success of the Group and our business unit.

**This is how we transcend ourselves.**

##### **Growing together**

Our cooperation is focused, pragmatic and solution-oriented. But above all, we are respectful, concentrated and appreciative in our dealings and interactions with one another. Common guidelines provide support for our decisions and regulate cooperation. Guidelines can be re-examined, and breaking them might even make success possible initially – but we take this decision together with the Managing Partners in the interest of the business unit and the Group. **Because we can only grow together.**

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### **Growing into a champion**

We learn from each other and through the inclusion of partners close to us; we learn from our customers, colleagues and suppliers. Because we listen actively, review and continuously optimise our products and services and incorporate our customers' wishes into our solutions, we are constantly improving. We are a valued, long-term partner for our customers. **And thereby champion of our business field.**

### **Growing further as a group**

Our shared vision is to develop ROBUR into a leading industrial service provider in terms of quality and innovation, together with our partners. This objective defines our behaviour and is the guiding principle for all our decisions. Our vision is the driving force behind internal growth and a catalyst for the Group's further growth through the integration of new partners. Partners who improve our service portfolio for our customers and provide inspiration for our own optimisations. **Meaning everyone can grow.**

## **3. Our leadership principles**

### **Participation, appreciation, trust, transparency: The ROBUR management principles**

We are all committed to our colleagues and encourage achievement. We provide credible orientation and focus not only on short-term economic results, but combine these with long-term objectives and visions.

We treat each other fairly and with the greatest respect. We are clear, honest and give constructive feedback promptly. We engage in active listening and respectful communication with each other. We create a constructive conflict culture based on an ethos of mistakes and learning.

We support networking across organizational boundaries. In doing so, we encourage the influence of the individual beyond our own company. Our basic principle is: It's influence, not position that counts. Positions without influence impede success.

We weigh all relevant rational and intuitive information and justify decisions in a transparent manner. This increases the quality of decisions and supports their acceptance.

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### **4. Our service principles**

#### **We are customer-centric**

We place the needs of our customers and business partners at the centre of everything we do. We are constantly looking for improvements and new solutions. We create value through the quality of our work.

#### **We act safely and successfully over the long term**

We place the safety of our colleagues, combined with the safety of our customers' systems, at the heart of our work. We not only see the short-term success of a project, but also want to work successfully, trustingly and in partnership with our customers over the long term. The creativity, energy and experience of our people form the basis of our success.

#### **We work ethically and socially**

We act in accordance with ethical principles and in compliance with international conventions and standards. We treat our customers, colleagues and business partners loyally and fairly. We acknowledge our social responsibility to society and the environment.

#### **We are passionate and forward-thinking**

We are at home with a wide range of industrial technologies, so that we can offer our customers first-class service in a time and cost-saving manner. There is a reason for our passion for technological innovations and consistently successful work: We are curious about the future and want to play an active role in shaping it.

#### **We are guided by the following principles:**

##### **Equal treatment**

We work with other people regardless of their gender, sexual orientation, skin color, religion, culture, education, social background or nationality.

##### **Contractual and legal fidelity**

We fulfill our agreements and contracts. We observe the laws in Germany and all other countries in which we operate.

##### **Transparency**

We ensure that our actions and motivations are understandable and verifiable.

##### **Loyalty**

We are loyal to the company. For us, this also includes constructive criticism of ROBUR which we discuss in an appropriate form and openly within the Group.

##### **Confidentiality**

We treat business information as confidential where it is of a nature that requires confidentiality or where confidentiality is expressly demanded.

##### **Cooperation based on partnership**

We work together with our customers, suppliers and business partners in a trustful, fair and dependable manner.

**This also applies to our conduct towards our colleagues.**

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### **We observe these rules:**

#### **1. Prevention of money laundering**

Various countries, amongst others, the Member States of the EU including Germany, have enacted laws against money laundering. No employee may take measures, either alone or in cooperation with third parties, that violate domestic or foreign anti-money-laundering (AML) regulations. "Money laundering" within the meaning of these regulations is in particular the introduction – e.g. by exchange or transfer – of funds or other assets originating directly or indirectly from criminal offences into the legal economy. Where doubts arise concerning the legitimacy of financial transactions, the competent finance department must be consulted at an early stage.

#### **2. Data protection**

We undertake to comply with the applicable laws, guidelines and other regulations. The following regulations are binding: The collection, processing and use of personal data is permitted only for business purposes. Where appropriate and necessary, only anonymous data (name not identifiable) or a collection of data (aggregated data that can no longer be traced back to a specific person) will be used instead of personal data.

Access to personal data is limited to those individuals who need them for legitimate business reasons. Maximum care must be taken to prevent unauthorized persons from gaining access to, and the loss or destruction of, personal data.

#### **3. Business relationships with customers, suppliers and business partners**

Customers, suppliers and business partners must be treated fairly. ROBUR expects the same of its business partners. The private interests of employees and the interests of the company must be strictly separated. Personal relationships or interests must not influence objective business considerations.

Our business relationships with customers and suppliers are based on quality, dependability, competitive prices and other objective criteria. Consequently, no employee may demand or accept personal benefits such as payments, gifts or other benefits of value when dealing with suppliers, customers, other business partners or public officials, if this could lead to, or be construed as, biased or give rise to the appearance or sense of a contractual or moral obligation on the part of the company. It is, however, recognized that entertainment and gifts are occasionally offered in the ordinary course of business and do not necessarily constitute an unfair incentive (see also section "Acceptance of gifts and other benefits"). ROBUR expects all employees to inform their superiors or the Compliance Manager if they receive such offers from a business partner. Invitations by business partners that are not related to business appointments must be approved in advance by the supervisor or the Compliance Manager.

We expect our suppliers and business partners to comply with all laws and legal requirements, to treat their employees fairly, to provide for safe and healthy working conditions, and to protect the environment.

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### **4. Cooperation with public-sector customers**

Our daily work can bring us into contact with public-sector customers, civil servants and international public authorities. ROBUR employees and ROBUR business partners are obliged to apply the highest ethical standards at all times and in all circumstances, and to comply with all applicable laws and regulations, including certain special regulations to be observed for government officials.

No personal benefit of any kind may be offered or granted to any public official domestically or abroad!

We are committed to using procedures that ensure that reports, confirmations and attestations, statements and bids are up-to-date, accurate and complete and that contractual requirements are accurately communicated to those responsible.

It is prohibited to substitute contractually agreed goods or services with non-authorized goods or services, or to deviate from the contractual arrangements without the prior consent of the competent official.

### **5. International trade controls (ITC)**

National and international laws restrict or prohibit the import, export or domestic trade of certain goods, technologies or services, the handling of certain products and the movement of capital and payments (embargo). The restrictions and prohibitions can be ascribable to the characteristics of the goods, the country of origin or use, or the identity of the business partner.

### **6. Observance of competition law**

Competition law and antitrust law:

- prohibit agreements or understandings between competitors which may restrict competition;
- regulate the conduct of market-dominant companies;
- demand prior scrutiny and, in some cases, authorization of mergers, acquisitions and certain other transactions in order to prevent anticompetitive business transactions

Such laws and regulations are complex and have a global reach. It is also often important to seek early legal counsel when developing new trading initiatives, as the applicability of these laws may be unclear.

### **7. Handling the property of the company and of our business partners**

Every employee is obliged to handle company property responsibly. Corporate property also includes communication equipment and intangible assets such as know-how and industrial property rights. Our inventions, patents and know-how are particularly important for the long-term success of our company. Confidential company information must always be kept secret and protected against unauthorized access by third parties. This also applies to information which is made available to us in confidence by third parties. Every employee must observe the relevant guidelines, such as the Information Protection Policy and the Policy on Intranet & VPN Usage.

Without the express consent of the competent authority, the company's facilities and items may not be used for private purposes or be removed from the company's premises.

This consent is not required for laptops / notebooks / tablet PCs (for business purposes) or for mobile phone / PDAs / smartphones.

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### **8. Controlling**

Employees in the finance division and all other employees involved in commercial matters are required to pay particular attention to the following rules:

- ensure timely and accurate documentation of all transactions in the financial statements, in full compliance with relevant internal rules, policies and accounting guidelines and all applicable generally accepted accounting principles and standards and rules for accounting and financial reporting;
- ensure responsible use of and control over assets and resources with which ROBUR has been entrusted or which ROBUR uses or owns;
- observe all relevant laws, guidelines and regulations
- regularly exchange knowledge and partake in further training measures so as to attain the necessary specialist knowledge needed for our internal and external business partners;
- act in good faith and responsibly, with care, prudence, competence and commitment, without misrepresenting facts or allowing your own judgment or decisions to be subordinated to, or guided by, non-relevant considerations such as compensation. If in doubt, any decision should openly exhibit a conservative evaluation of the business transaction concerned.

### **9. Environment protection and work safety**

Compliance with all laws for the protection of humans and the environment is an elementary principle for our company that is derived both from legal and ethical principles. This applies both to our products as well as to our processes.

Every employee is jointly responsible for the protection of humans and the environment in his or her working environment. All relevant laws and regulations relating to environmental protection or plant and occupational safety must be strictly observed. The same applies to the company's internal guidelines and regulations. Every supervisor is obliged to instruct, supervise and support his or her employees in the exercise of this responsibility. In areas in which safety, health and environmental regulations and internal company policies and guidelines do not exist, a decision must be made autonomously, or possibly in consultation with the supervisor.

### **10. Active and passive bribery**

It is prohibited, either directly or indirectly, to demand, accept, offer or make bribes or give gifts of value or benefits.

The following special rules apply to the acceptance of gifts and other personal benefits and to giving gifts and granting other benefits.

Our agents, suppliers and other contractors will receive reasonable compensation for the services rendered. We do not pay bribes to third parties. This also applies to direct and indirect "acceleration payments".

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### **11. Acceptance of gifts and other benefits**

The acceptance of gifts and other personal benefits from business partners, project partners and target groups of ROBUR is not permitted, unless low-value gifts are involved or the written consent of the supervisor or the Compliance Manager has been obtained.

The supervisor or Compliance Manager may consent to the acceptance of gifts and other benefits where, in exceptional circumstances, the acceptance meets the requirement of courtesy. In this case, it must be used for business or humanitarian purposes or – especially in the case of consumer goods – also communally for employees (e.g. for an employee party, prize draw). Private use can only be authorized in exceptional cases. The procedure must be documented.

Business trips to contractors or to companies with which ROBUR has a business relationship will be paid for by ROBUR. The payment of travel expenses by the aforementioned contractors is not permitted, unless otherwise contractually agreed with the contractor.

### **12. Giving gifts and granting other benefits**

ROBUR will only make gifts within the framework of due courtesy and will only grant personal benefits insofar as this does not create the appearance of dishonesty, incorrectness or a binding dependency.

### **13. Dealing with conflicts of interest**

#### **General:**

In our work, conflicts can arise between our personal interests and the corporate interests of ROBUR or those of our customers, suppliers and partners. We immediately disclose these conflicts of interest to our superior or the Compliance Manager and resolve them in a manner that is verifiable and plausible to all parties involved.

We exercise the prudence necessary for separating business and private matters.

#### **Conflict of interests – secondary activities**

Secondary activities require the prior consent of ROBUR. A remunerated activity (cash or non-cash) for contractors or organizations with which ROBUR has a business relationship can only be authorized if prejudice to ROBUR's interests would appear to be ruled out.

Non-profit or honorary activities do not fall under this authorization rule as long as they do not prejudice ROBUR's activities.

#### **Conflict of interests – personal or financial connections**

Where an employee has personal, family, financial or other connections to ROBUR business partners, competitors or their employees, which could impair the objectivity of the decisions or actions within the context of the employee's work for ROBUR, the superior and the Compliance Manager must be informed so that they can decide on the further course of action.

Where a procurement process is involved, the employee is excluded from participating in the decision-making in the procurement process, unless such participation would not result in a conflict of interest for the persons concerned or the activities would not affect the decision-making in the procurement process.

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### **Employment of closely associated parties**

Where an employee intends to conclude a contract (employment relationship, expert opinion etc.) with the (common-law) spouse or another person closely associated with the employee, the employee must disclose this to the superior and the Compliance Manager for decision. The employee should not decide personally on the terms of employment or any amendments thereto.

### **Separation of business and private life**

Private business relationships with ROBUR contractors are not permitted for employees who are involved in awarding contracts. As an exception, the services of contractors may be used privately if they are also made available to the entire workforce under specified conditions. Further exceptions and details can be regulated by the work directives of the affected departments in consultation with the Compliance Manager.

### **Explanations of the rules (assistance):**

#### **a. Prevention of money laundering:**

You must observe all applicable laws and regulations on preventing money laundering and preventing the support and financing of terrorist activities that require the reporting of cash transactions or other suspicious transactions. Familiarize yourself thoroughly with how these laws are applied to your business activities. Follow your “Know Your Customer” (KYC) policies.

Collect and review information and documentation about potential customers, agents and business partners to ensure that they are reputable and that their funds also originate from legal and reputable sources. Follow your business policies that deal with the proper handling of payments. Familiarize yourself with the payment methods associated with money laundering (e.g., multiple remittances, traveler's checks, or checks issued on behalf of a customer by an unknown third party).

#### **b. Data protection:**

If you receive this information in a country where data protection laws apply – for example, in most European countries – you may be prohibited by law from using or sharing this information with others without the express consent of the data subject concerned. If you are uncertain, please contact your organization's data protection officer.

#### **c. Competition law**

Do not propose to a competitor any agreements which could impair the competitive situation, and refrain from entering into any anticompetitive agreements with competitors – either explicitly or implicitly, formally or informally, in writing or verbally. Never discuss with a competitor or its representative:

- prices
- bids
- contract territories, allocation of customers and product lines
- terms of sale
- production, sales capacities and volumes
- costs, profits and profit margins
- market shares
- product and service ranges
- customer and supplier classifications
- sales techniques

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Never propose collusive arrangements and never enter into agreements with competitors, agents, intermediaries, customers etc. concerning whether a bid should be prepared, or to the terms of the bid, if it is apparent that the bid is being made for reasons other than for being awarded the order. Avoid contacts with competitors that could give the appearance of unfair competition or collusion.

### **d. Bribery and benefits**

The acceptance and granting of gifts and other benefits in many cases constitutes a criminal acceptance of a benefit or bribery. Beyond aspects of criminal law, the appearance of an inadmissible obligation on the part of the recipient should also always be avoided.

The rules governing the acceptance and granting of gifts and other personal benefits provide information on demarcating what is permitted, and what constitutes an illegal or criminal act.

### **e. Acceleration payments**

We reject any direct or indirect payment of “acceleration payments”. Under no circumstances will ROBUR use acceleration payments, even in small amounts, to enforce legal claims. ROBUR places the same demands on all its agents and other business partners.

### **f. Gifts and other benefits**

Benefits are not just gifts, but all performances to which employees have no claim and which improve their situation economically, legally or personally. These include, for example, free or discounted travel, car usage, admission tickets and other discounts, unless they are expressly granted to the entire workforce on the basis of contracts.

The acceptance of benefits can also be given where the benefits are granted to a “third party” (spouse, children, etc.).

### **g. Low-value gifts**

Low-value gifts are occasional gifts and other benefits in which the value per donor, calendar year and employee does not exceed EUR 35.00 net.

Dinner invitations by business partners – even where the 40.00 EUR limit is exceeded – are regarded as low-value gifts, provided they are within the customary and reasonable bounds of business. For reasons of transparency, employees should inform their superior and the Compliance Manager if they are invited to dinner frequently by a business partner or if ROBUR often assumes the costs for business invitations.

### **h. Personal or financial connections**

The objectivity of an employee’s work is generally impaired if, for example, the employee awards ROBUR orders to relatives or companies in which the employee or persons close to the employee hold an interest. Parties deemed close to the employee are: the fiancé, the (common-law) spouse, direct relatives and in-laws by blood or marriage, siblings, children of siblings, (common-law) spouses of siblings and siblings of (common-law) spouses, siblings of parents as well as foster parents and foster children.

### **i. Cases of doubt**

In cases of doubt, employees should contact their superiors or the Compliance Manager, who will then decide.

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### **f. Integrity consulting**

ROBUR employees should first contact their superiors or the Compliance Manager.

ROBUR will check all information meticulously and, if requested, treat it confidentially. For the protection of employees, the principle applies that any accusations must be conclusive and verifiable.

No employee of ROBUR may be disadvantaged for complying with the provisions of this guideline or for drawing the Compliance Manager's attention to possible violations or conflicts.