

»» Introductory remarks



Dear customers, suppliers and service providers,

Trust, reliability and integrity are fundamental values of our company. They are the foundation on which our long-term success as a company is built and remain core tenets of our corporate philosophy to this day.

binder also stands for reliability and a pragmatic approach.

In this brochure we set out the standards by which we operate in our day-to-day interactions with co-workers and with customers, service providers and suppliers. It is my firm belief that we can only grow as a company if we observe clearly defined, straightforward rules with verifiable compliance.

A handwritten signature in black ink, appearing to read 'M. Binder', written in a cursive style.

Markus Binder
Managing Partner

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To aid readability, only the masculine form is used. This, however, refers equally to both men and women.



Basics of compliance

What is compliance?

Compliance means acting according to the law. More specifically, it is necessary to observe the laws, regulations and internal company rules to ensure your actions are legally compliant.

Why do we need rules of conduct?

Non-compliance with official and business rules and regulations can have serious consequences for the company and each of its employees. We are collectively seeking to minimise the risk by implementing rules of conduct. Instead of a top-down approach where employees are actively monitored, the brochure seeks to raise employee awareness of the issue of compliance.

To whom do the rules of conduct apply?

To all employees, executive staff and managing directors of Franz Binder GmbH & Co. Elektrische Bauelemente KG. When used in the brochure, 'employees' shall mean members of each of these groups.

Rules can be established by way of formalised internal regulations covering specific topics adopted in individual departments. The standards set forth in this brochure represent minimum requirements. For more information please refer to the Employee Guide and to the individual works agreements.

Is it necessary for staff to confirm or accept the rules of conduct?

All employees and executive-level staff are required to confirm that they have read and understood the guidelines. By doing so, employees also declare that they will observe the guidelines and report any incidents where rules are violated. If an employee does not do so, this does not mean that he is exempt from any obligation to observe the compliance guidelines.

What is the process involved in reviewing and updating the rules of conduct?

Compliance guidelines are regularly reviewed in view of changes to the law, changes within the company and changes in the business climate that occur. Where needed, they are adapted to the new conditions. Management's approval is required for any changes that are made.

How can one report violations? Where can this be done?

When we are young, we all learn that there are rules. Without them, disputes would occur and chaos would ensue. Penalties are imposed when rules are violated.

At the company as in life itself, rules are needed to ensure order. These have to be accepted, respected and observed. There must be personal consequences for anyone who violates the rules.

binder encourages all employees to come forward and report any violations of the compliance guidelines to their direct superior. This can be done anonymously, if the employee so desires.

How are violations investigated?

Fines may be imposed on the company or each of its employees for any violation that occurs. Based on the relative severity of the violation and where permitted by law, employees may be subject to consequences under criminal and labour law, including disciplinary measures up to and including termination of employment.

Every report is taken seriously and will be investigated objectively. To establish the facts of the case, interviews are held and documents reviewed. Based on the findings, measures are then taken to rectify the situation. binder will make every effort possible to ensure information on the case and the parties involved is treated confidentially, where permitted by law. The accused employee will be informed that an investigation is being conducted except in cases where this has the potential to harm the investigation. He will also be given access to the documents in order to check and make changes where necessary.

Seek support and advice to help prevent violation

What is expected of me?

Get the information you need.

Are my actions legal?

For many of us, it has been quite a while since we took our driving exam. Because it has been so long, we are not really sure whether or not we are breaking any laws while driving. Whilst we are not trained lawyers, we trust our instincts and have a good sense of what is right and wrong. Ask yourself whether your actions could have a negative impact on binder, on you or on others. If you get the sense that something is not right or have any misgivings that it may not be legal, seek advice.

What is my responsibility as an executive?

Executives are required to act in accordance with the ethical guidelines and take action to ensure their employees receive the necessary training. They are also responsible for ensuring that all employees reporting to them receive the support and advice they need to comply with this compliance policy.

This should be made part of employee performance reviews to allow any errors or omissions to be identified and remedied quickly.

01

» Human rights and labour/social standards

Introduction When you're a child, you either like or dislike someone. Whether the person is young or old, white or black, Christian, atheist or Muslim, it does not matter. Simply put, they are (still) free of prejudice and open to everyone.

Theoretical framework binder undertakes to ensure that all employees observe internationally accepted human rights and key labour and social standards. This includes the United Nations Universal Declaration of Human Rights and the ZVEI Code of Conduct.

Any form of child or forced labour is of course prohibited. The principle of non-discrimination is respected, freedom of association is recognised, employees are given fair pay benefits based on local market conditions, employees are assigned reasonable working hours, paid leave is granted and proportionality in disciplinary and safety measures is observed.

binder is an equal opportunity employer and complies with all applicable laws against discrimination on the basis for age, race, skin colour, gender, sexual orientation, identity, background religion or disability. This principle applies to all executive-level staff who make HR-related decisions, including decisions on recruitment, hiring, training, job transfers, promotions, remuneration, extended benefits, disciplinary action and termination. For that reason we are open, honest and respectful towards our superiors, colleagues and employees. Sexual and other forms of harassment at the work place are strictly forbidden.

» **In relation to binder** We respect these rights at all times. **We do not discriminate, exclude or act with prejudice.** Everyone is treated equally and enjoys the **same rights.** Success requires a **team** effort. We **respect** people of every **religion, gender, sexual orientation** and **skin colour.** We observe the **ZVEI Code of Conduct** internally at the company and **when selecting our suppliers.**

Employees can contact their direct superior, the equal opportunities officer, the works council or the HR department if they have any questions or concerns relating to conflicts in this area.





02

»» Environmental protection, health, quality and safety

Introduction How would we explain the meaning of environment protection to a small child? We would tell them that we need treat our planet like we treat those who are near and dear to us, that is, we should be attentive, respectful and considerate. In addition, it is important to look out for yourself and those around you.

Theoretical framework Environmental protection is one of binder's core business values and one of our annual corporate goals. We act in a responsible manner every day to uphold this value. More specifically, we are constantly working to boost our energy efficiency, increase our use of renewables, reduce the emissions and noise we produce and decrease our consumption of materials and other resources.

All necessary technical safety measure will be taken and preventive maintenance carried out on all machinery and equipment in order to reduce health- and safety-related risks. All necessary protective clothing and safety information regarding hazardous materials will be made available for training and to keep staff safe.

To create a safe and healthy work environment, binder has established the availability of drinking water, adequate lighting, an appropriate temperature, good ventilation and quality toilet/washroom facility as minimum standards.

In order to avoid mistakes, increase safety and ensure energy and resources are used in a sustainable manner, processes and products are constantly being upgraded as part of quality management.

»» **In relation to binder** This is how we define **environmental protection** – we **think** before we print, we **are conscientious about** when and how much we heat and we **avoid creating unnecessary waste**.

We take all the steps that are appropriate and prescribed by law to protect the health of our employees and business partners and **ensure** their safety. **Employees** have a shared responsibility for **safety in their department or unit**.

In accordance with the legal requirements, **binder informs** customers **about the proper use** and **possible impact** of its products on people and the environment.

Employees can contact their direct superior, the environmental management officer, the safety officer, the quality management officer or the HR department if they have any questions or concerns relating to conflicts in this area.





03

»» Bribery and corruption

Introduction Two small children are sitting in the sandbox, arguing about whose turn it is to play with the digger. At the moment, someone else is playing with it. In fact, it should be obvious who's up next since one of them was there first. Despite this, the child who came second takes the digger while the one who was playing with it before him now has a lollipop in his hand.

Theoretical framework Any abuse of power, office or resources for personal gain constitutes corruption. This can be done by making threats or bribing the other person, for example, by extending invitations or giving gifts, with the aim of influencing and gaining an undue advantage or with the goal of harming others.

»» **In relation to binder** We respect the independence of public officials and are committed to fair competition. Corruption in whatever form it may take is prohibited. We choose only business partners who have sufficient staff or who are qualified to carry out the requested service.

Employees can contact their direct superior if they have any questions or concerns relating to conflicts in this area.



BRIBERY
CORRUPTION

PROHIBITED!

04

» Gifts, benefits and invitations

Introduction Children learn the special value of gifts. They are given to bring joy to another person, not to gain or acquire something.

Theoretical framework Gifts and invitations may only be given or accepted if, as a courtesy, they are in line with general business practices and it is possible to rule out any improper exercising of influence. This also applies to gifts and invitations on the occasion of or in connection with official company events or business conferences. Gifts may be of minor value only, while hospitality must remain within appropriate limits. If you have any doubts or concerns, always contact your superior.

» In relation to binder

This is our policy on dealing with gifts and invitations. We do not **accept gifts or hospitality** if they are **inappropriate** or **not socially acceptable**. We **observe** the **laws, regulations** and **directives** issued by the country in which the other person is located. It is **prohibited** to **accept cash** or **non-cash benefits**. The customer pays us for our products and we in turn pay our suppliers and service providers. **Gifts** are only permitted on **special**, socially acceptable **occasions**, and they may only be of **minor value**. We are **open and transparent** wherever we **give** or **receive gifts or hospitality**. For that reason we never **send gifts** to a **private address** or **have them sent** to our **home address**.

Employees can contact their direct superior or the HR department if they have any questions or concerns relating to conflicts in this area.





05

» Data protection

Introduction Do you have children? Are you proud of them?

We like to show photos of our children and family to friends, relations and acquaintances. But we only show it to certain people whom we know and trust. That's because we want to protect our children whom we cherish and love at all times.

Theoretical framework Because we share information increasingly online, it is essential that we take appropriate measures to protect personal data.

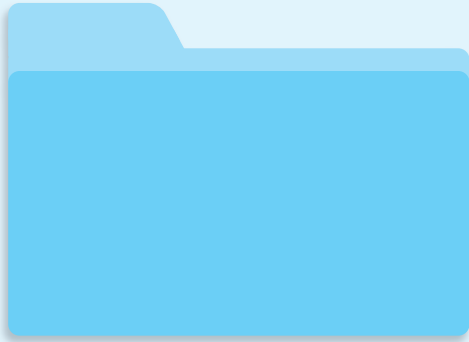
Personal data, such as information regarding employees or business partners, may only be collected, processed or utilised where this is necessary for defined, clearly established and lawful purposes. In addition, it must be stored in a secure manner and may only be transferred if the necessary precautions have been taken. The quality of the data and the associated technical safeguards to prevent unauthorised access must meet the highest standards. Employees must be given clear information on how their personal data is being used. They shall be granted a right of access and, where applicable, the right to object, block and erasure at any time.

» In relation to binder

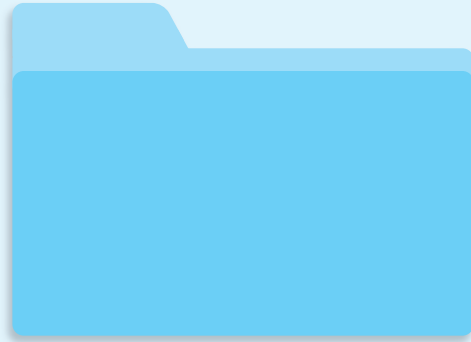
This is how we define data protection – photos or important personal data include confidential information from a person's private life. We treat this data with care and process it in accordance with the data protection regulations. We take extreme care and attention when handling this type of data and protect it from being accessed by third parties.

Employees can contact their direct superior, the data protection officer or the HR department if they have any questions or concerns relating to conflicts in this area.





Photos_summer_party



Photos_Christmas_party

CONFIDENTIAL!



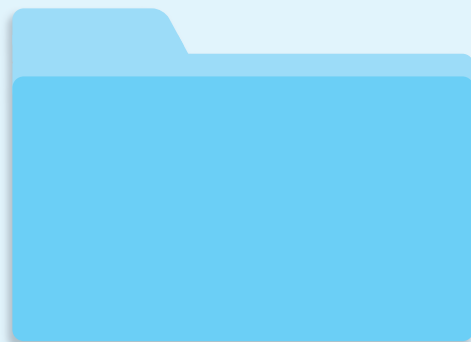
Photos_employee_anniversaries



Employee files



References



Misc.

06

» Protection of business assets

Introduction Are you careless in how you treat your valuables and other home furnishings? Is your house messy? Do you simply shrug your shoulders when something gets broken? Most probably not.

Theoretical framework Every employee is required to handle company property responsibly and protect it against loss, damage, theft, misuse and unauthorised use. This also includes intangible assets such as proprietary knowledge, intellectual property and copyrighted works (e.g., patents, inventions and trademarks). IT and communication systems, fixed assets, machinery and other equipment are for company purposes only and must be used appropriately. They are not intended for personal use. Company property may not be used for private purposes or removed from company grounds without approval.

» **In relation to binder** We are **entrusted with valuable property and information** by our company. We handle company information and property **with the same level of care and confidentiality we do our own personal property and data**. This also extends correspondingly to the **property of our business partners and other third parties**.

Employees can contact their direct superior if they have any questions or concerns relating to conflicts in this area.





07

» Conflicts of interest

Introduction Everyone set priorities, either consciously or unconsciously. The only question is where you place them.

When you're young and in school, you'd rather spend time with friends than doing homework. This quickly leads to a conflict of interest which we need to examine in terms of the relevant pros and cons.

Theoretical framework A conflict of interest occurs when our personal interests are not in line with the interests of the company.

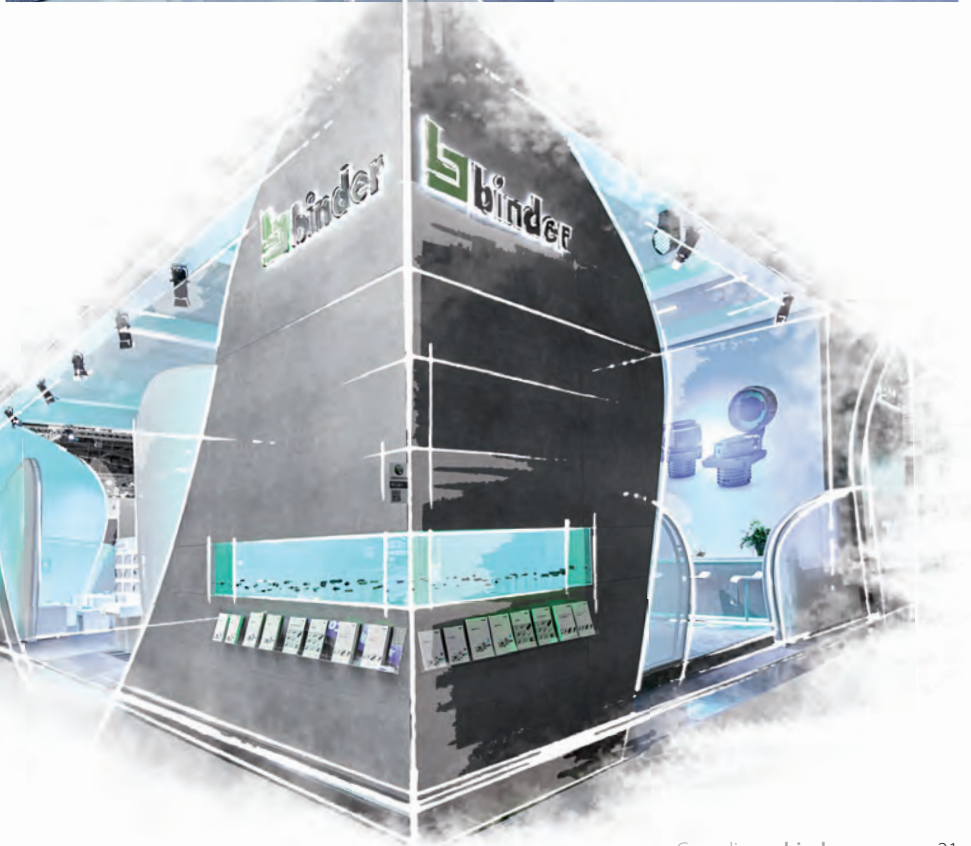
binder employees may not use their position at the company to gain personal advantages or acquire benefits for family members or close associates. Especially when it comes to activities outside of your regular employment, it is necessary to carefully review any conflicts of interest. Professional activities outside of binder, including membership on an executive committee, can lead to conflicts of interest. Employees are not required to seek approval to serve as members of executive committees of charitable or not-for-profit organisations such as sports clubs and charities. If you have any doubts or concerns, always contact your superior.

» **In relation to binder**

We have no conflicts of interest. We **identify** with the **values** and **philosophy** of the **company** and make **objective** and **impartial decisions in the interest of the company.**

Employees can contact their direct superior, the works council or the HR department if they have any questions or concerns relating to conflicts in this area.





08

» Personal integrity

Introduction As the saying goes, honesty is the best policy.

Theoretical framework Integrity suffers when promises are made but not fully met or when you get the impression that someone is inconsistent and changes their opinion based on the person they are speaking with. When this happens, the person no longer seems trustworthy. People who have integrity exhibit the opposite behaviour. They are reliable and make good on their promises, have consistent values no matter who they are speaking with and they are open to re-examining their positions as merited.

» In relation to binder We define integrity to mean: We are **open** and **honest**, act in a **fair, proper and upright manner** and are a **reliable partner at all times and without exception**.

Employees can contact their direct superior, the works council or the HR department if they have any questions or concerns relating to conflicts in this area.





09

» Dealing with government authorities, business partners and society as a whole

Introduction “You’re my best friend.” That’s the greatest compliment a child could make to a friend. But it takes time and hard work to become someone’s best friend. Good friendships are built on trust, openness and, most importantly, are long-lasting.

Theoretical framework We are committed to the following in our dealing with business partners, customers, suppliers, service providers, government authorities and society as a whole:

- Being open, honest and transparent – we are objective and straightforward in our discussions.
- Taking a solution-orientated approach – problems are clearly defined, realistic targets are set and responsibilities are discussed.
- Acting in unity – we show a unified front when supporting our decisions to outsiders.
- Treating others with esteem – we show respect, are accepting and communicate on an equal basis with others.
- Acting responsibly – we seek to support regional charities.

» In relation to binder This is **our approach** to dealing with **public authorities** and **business partners** – we **strive** for **long-term partnerships** marked by **trust, respect** and **reliability**. It is **essential** for **business** and **society** to **work together**. That is why we seek to play an active role on a **social** and **societal level**.

Employees can contact their direct superior if they have any questions or concerns relating to conflicts in this area.

