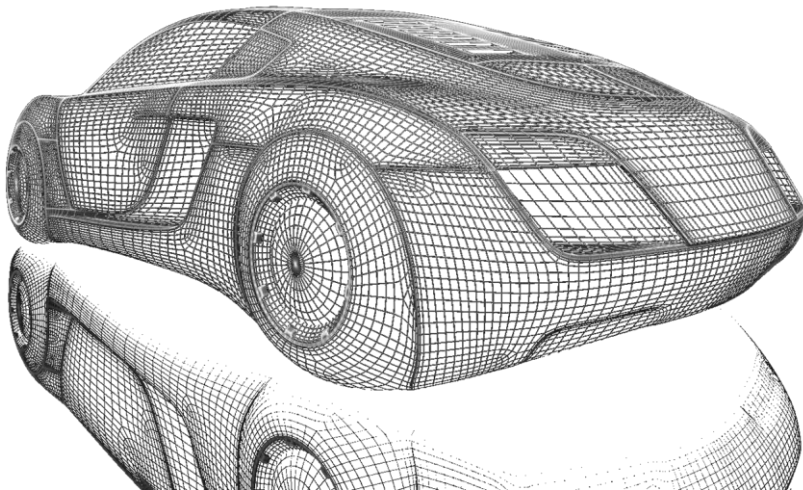




S&B Automotive
Engineering



Code of Conduct

www.sub-automotive.de



Principles on Corporate Responsibility, Anti-Corruption Policy, Code of Conduct and Ethics Escalation Policy

Compliance with ethical values is necessary for long-term economic success. This includes dealing fairly with each other and acting within the framework of the specified standards in everyday business.

We regard the success of our customers as the key to achieving long-term and sustainable business and see it as a matter of course to meet the requirements of all stakeholders in the process.

The management bears responsibility for a sustainable corporate strategy and its corresponding implementation. Integrity and compliance with the law as well as ethical principles are essential elements in maintaining the authenticity of our company (in an ethical and socially responsible manner).



When combined with leadership principles and quality, safety and environmental guidelines, standards and directives are established to ensure respectful and dignified treatment of our employees, safe working conditions and a sustainable approach to the environment.

The Code of Conduct contains the following:

- The responsibility hold by our management,
- the treatment of our employees and colleagues,
- our relationship with suppliers,
- and our behavior towards the environment.

Each manager and each individual employee is responsible for behaving in accordance with this Code. The behavior of our managers is exemplary, because they live the principles of our Code of Conduct and stand up for them in every situation.



Human Rights

We respect and promote the dignity of every human being and are committed to the protection and observance of international human rights. It is self-evident for us not to use child labor of any kind and to reject all forms of forced labor. We do not tolerate any working conditions that conflict with international or local laws and practices.

Discrimination

We do not tolerate any form of discrimination in hiring, compensation, training opportunities, promotion or retirement based on race, ethnic origin, gender, age, marital status, religion or belief, disability, pregnancy, sexual orientation, trade union membership or political party affiliation of our employees and also require our employees to firmly oppose such discrimination.



Disciplinary Actions

We strongly disapprove the use of corporal punishment, mental or physical coercion, and verbal abuse.

Motivation and further Training of Employees

We regard motivated employees and their identification with the goals of our company as a key success factor. Particular emphasis is placed on the development of our employees. We focus on job-related training and continuing education that can be applied in the company and on developing and promoting future leadership potential.



Health and Safety

The health and safety of our employees is protected to the highest degree by providing a healthy and safe working environment. By complying with the safety regulations in our company, each individual ensures a safe and healthy working environment.

Compliance with Antitrust and Competition Rules

With our high-quality services, innovative solutions and reliability, we compete openly and fairly in the global markets. In doing so, we do not engage in any illegal and/or criminal practices, such as bid rigging, which exclude, distort or restrict competition.



Conflicts of Interest and Bribery / Corruption

All of our employees avoid situations in which their personal or financial interests come into conflict with those of the company. Our employees will distance themselves from requesting and accepting unjustified or unlawful advantages that could influence business decisions or transactions. Likewise, none of our employees will offer, provide or attempt to provide improper advantages to business partners, their employees or other third parties in business activities of any kind or enter into agreements to this effect.

Asset Protection and Confidentiality

Each individual is expected to protect the company's tangible and intangible assets, to treat trade and business secrets and customer-related business information confidentially, and to comply with applicable data protection principles.



Suppliers

We have high expectations of our suppliers and require them to adhere to the same strict principles in the conduct of their business, particularly in the treatment of employees, as we apply ourselves. We set further behavioral requirements for our suppliers in our Supplier Code of Conduct.

Environmental Protection

We comply with applicable national environmental laws, regulations and standards to minimize environmental impacts and hazards and to improve environmental protection in our daily business operations. Compliance with our Environmental Protection Policy is mandatory.



Export Controls and Economic Sanctions

We comply with all import and export control laws, sanctions and embargoes that provide for the export or re-export of goods, software, services and technology to or from certain countries.

Data Privacy

We use and protect the personal data of our employees and contractual partners exclusively for business purposes. Any processing of personal data of employees, customers and business partners shall be carried out in accordance with the applicable statutory provisions on data protection and our Data Protection Policy. Employees must be made aware of data protection through regular training.



Disclosure of Information and Financial Responsibility

We are committed to truthful reporting and are aware of our responsibility towards our stakeholders. Any business documents and records are prepared completely, accurately and truthfully in accordance with applicable regulations and generally accepted disclosure principles.

Plagiarism and Intellectual Property

We protect intellectual property of third parties by respecting and acknowledging intellectual creations. Thus, if necessary, rights of use are always obtained. Furthermore, plagiarism is not tolerated and, if detected, is always reported to the responsible authorities.



Whistle-Blowing

The identity of employees, business partners and other third parties who report known misconduct or violations must be protected. No retaliatory measures, direct or indirect, may be taken against any person who reports an actual or suspected violation.

Compliance

This Code of Ethics and Business Conduct has been developed by management and has been brought to the attention of all employees. Our employees will comply with this Code in the performance of their duties without exception. Questions regarding its application or interpretation, as well as reports of potential violations, will be directed to the respective supervisor.



Measures in case of Non-Compliance

Procedures, practices or actions by employees that are in conflict with this Code must be corrected and will result in disciplinary action. Depending on the severity of the violation and previous history (e.g. repetition), this may result in an admonishment, warning or even termination.

If suppliers or other business partners do not adhere to the guidelines, this would be discussed with the supplier and remedial action urged. Depending on the severity of the violation and previous history (e.g. repetition), it may also lead to termination of the business relationship.

If employees, suppliers or other business partners of S&B Automotive Engineering GmbH & Co. KG violate the rules or their behavior gives cause for concern, the management must be informed immediately.



Friedberg, 1st of April 2023

Michael Böhler – Managing Director

Martin Weber – Managing Director

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