



1. General principles

Integrity, credibility, transparency

The company conducts its business activities and decisions in accordance with generally accepted ethical values, in particular integrity, credibility and respect for human dignity. It fosters transparency, responsible leadership and control in the company in a suitable manner.

Scope

The Code of Conduct constitutes binding rules that are to be observed by every company employee. In particular, the members of the management and all executives bear responsibility for active implementation of this Code of Conduct. They must act as role models in every respect. The Code is the basis and guideline for dealing with ethical and legal challenges in daily work. Every employee may contact their supervisor, the whistleblower system or the managing directors with questions and tips in this context.

Supply chain

The company expects its suppliers to comply with the guiding values of the Code of Conduct and will support them in this to the best of its ability and encourages them to do the same in their supply chains.

Legal compliance

The company complies with the laws and regulations of the countries in which it operates, as well as with embargo, customs and export control regulations.



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2. Conduct towards competitors, business partners and third parties

Competition and antitrust law

The company respects the rules of fair and open competition and does not enter into any agreements that influence competition in any inadmissible way.

Employees

Company employees of the company are obliged to comply with the rules of fair competition. In particular, any agreement or concerted practice with competitors on the following matters is prohibited:

- Prices and price components
- Conditions
- Customers
- Supply areas
- Quotas and capacities
- Agreed market exits
- Coordination of planned innovations
- Boycotts

Tenders

If a contract is awarded on the basis of a formal invitation to tender, the company will neither discuss nor coordinate bids with other bidders. This applies to both public and restricted invitations to tender and regardless of whether these invitations are pronounced by a public or private organisation.

Corruption

The company expressly opposes any form of corruption domestically or abroad and avoids even the appearance of trying to influence business decisions through unfair business practices.

Provision and acceptance of benefits, invitations and gifts

No employee may exploit the company's business connections for their own benefit or to the detriment of the company. This means in particular that no employee shall grant or accept unauthorised private advantages (e.g. money, material assets, services) in business dealings that are likely to influence an informed decision.

Every employee of the company is obliged to seek advice or assistance in the event of suspicions or legal doubts regarding the existence of corruption or white-collar crime. Advice or assistance is provided by the whistleblower system and/or the managing directors.

Invitations, such as to business lunches or events, which satisfy recognised business practices and are appropriate, may be extended or accepted if they do not serve the purpose of undue preferential treatment. The same applies to the acceptance or giving of gifts.

If there is any doubt as to the existence of appropriate grounds or the customary nature of a gift, the employee must first ask one of the managing directors.

Public officials

Benefits of any kind to civil servants and other public officials as well as to agents of state institutions, even indirectly via third parties, are prohibited, regardless of their value.

Parties and elected officials

Benefits to political parties and political organisations, as well as to elected officials and candidates for political office, must comply with applicable laws.

Consultants and agents

The engagement of consultants, agents and other contract intermediaries may not be used to circumvent anti-bribery laws.

Donations and sponsorship

Donations are made on a voluntary basis only and without expectation of any consideration in return.

The donation must be transparent. The recipient of the donation and the specific use by the recipient must be known. It must be possible to account for the grounds for the donation and the intended use at all times.

Money laundering

The company does not tolerate money laundering. All employees are required to strictly comply with anti-money laundering laws. They must also immediately report suspicious forms of payment or other transactions that may indicate money laundering to the whistleblower system or a managing director.

The company prepares tax returns and declarations truthfully. All dutiable goods are cleared properly by the company. The company consistently complies with the legal requirements for export control and customs in the areas of foreign trade and customs law and ensures their proper implementation.

Tax law / customs law / foreign trade law

The company expects its suppliers to provide export, control and foreign trade data in a qualified and timely manner as well as the implementation of adequate standards for security in the supply chain as part of global customs security programmes.

3. Avoidance of conflicts of interest

Loyalty of employees

The company expects loyalty from its employees. It takes care to ensure that its employees do not find themselves in situations where their personal or financial interests conflict with those of the company or its business partners.

Company employees must immediately report to their superiors any personal interest that may exist in connection with their work.

Secondary employment and participations

Company employees are prohibited from managing a company or working for a company that is in competition with the company. This also applies to the participation of a close relative or life partner.

4. Handling of information

Trade and business secrets

Company employees are obliged to maintain confidentiality about trade and business secrets and other internal matters. This applies analogously to information about contractual partners and customers that is not publicly accessible. The obligation to maintain confidentiality endures after termination of an employment relationship.

Privacy

In addition to the general confidentiality regulations (e.g. § 17 UWG (German Unfair Competition Act)), data secrecy in accordance with the GDPR must be observed. In particular, it is prohibited to process, disclose, make accessible or otherwise use protected personal data without authorisation for a purpose other than the respective lawful fulfilment of a task. This obligation to data secrecy endures even after an employee has left the company.

Duty of truthfulness

All reports and other written documentation must be accurate and truthful. This is the case regardless of whether the reports are internal or external.

Data collection and other records must be based on the principles of proper accounting and must always be complete and correct.

5. Principles of social and ecological responsibility

Social responsibility

Social responsibility is an indispensable component of value-based business management and an essential factor for sustainable business success.

Human rights

The company respects and supports internationally recognised human rights. In this context we are also in continuous dialogue with our suppliers in order to avoid that our products contain raw materials from conflict regions.

Child labour

The prohibition of child labour and forced labour in any form is observed.

Prohibition of discrimination

Discrimination against employees and third parties is not tolerated. The company firmly opposes unacceptable treatment of employees, in particular sexual or verbal harassment.

Equal opportunities

The company promotes equal opportunities for its employees.

Employee rights

The freedom of association and assembly of employees is recognised to the extent legally permissible under national regulations. The company observes the applicable national laws and labour standards with regard to appropriate remuneration and maximum working hours.

This naturally includes compliance with all provisions of the law regulating a general minimum wage in Germany. The company ensures fair working conditions overall.

Occupational safety and health protection

Occupational safety and health protection in the workplace are ensured within the framework of national regulations.

Environmental and climate protection

Sustainable environmental and climate protection as well as resource efficiency and sustainable water management are important corporate goals for us. We take care to minimise any impact on the environment and the climate and to ensure that our products make a positive contribution to environmental and climate protection for our customers – both in the development of new products and services and in the operation of production facilities.

Each employee has a responsibility to treat natural resources with care and to contribute to the protection of the environment and climate through his or her individual behaviour.

Consumer interests

As far as consumer interests are concerned, the company complies with the regulations for the protection of consumers.

Social commitment

The company contributes to the social and economic development of the country and region in which it operates.

6. Compliance with the Code of Conduct

Communication

The company familiarises its employees with the contents of this Code of Conduct and explains the obligations arising from it. The company communicates the principles of the Code of Conduct to its business partners.

Guidelines and processes

The behavioural requirements set forth in this Code of Conduct are binding on company employees as part of their employment contract and must therefore be complied with.

The company shall take all necessary steps to implement the fundamental values and requirements contained in this Code of Conduct through appropriate organisational measures and adequate policies and processes in all business areas.

Regular controls

The company undertakes to monitor compliance with the Code on a regular basis.

Reporting of violations

Every company employee is required to report any (potential, including impending) violations of laws, internal regulations and this Code of Conduct that they observe without delay to the whistleblower system or to a managing director.

Reports of a violation of this Code shall be treated in strict confidence and shall not have any negative consequences for the reporting employee, save an untrue fact has been alleged deliberately.

Consequences of violations

Violations of the Code of Conduct and legal provisions may, depending on their severity, result in consequences under labour and liability law and may also result in criminal sanctions.

Günzburg, 01/09/2022

A handwritten signature in black ink, appearing to read "F. Munk", is written over a faint horizontal line.

Ferdinand Munk
Owner and Managing Director
of the MUNK Group