



Geschäftsleitung

## CODE OF CONDUCT AND CORPORATE POLICY FOR THE CRAEMER GROUP

### 0. Introduction

The Craemer Group is an independent, modern family-run company, noted for its innovative strength and emphasis on lasting values, global orientation and tradition. Our name, our brands and products stand for supreme quality.

Our company history goes back over one hundred years and has been marked by constant developments, continued investments and forward-looking decisions, which have in their turn propelled Craemer's growth to become a successful international corporate group.

### 1. Principles

We only get involved in areas where we know we can claim to be among the best in the market. We aim to secure our profitability so as to have the strength to achieve steady growth over the long-term and maintain our independence.

We feel committed to our company's tradition, our employees and business partners. Continuity, partnership, quality and innovation are the principles that guide us. These principles pertaining to our corporate policy are elementary components of our distinctive corporate culture and help us to achieve the declared goal. Our corporate policy and the associated code of conduct are therefore binding for all our employees and business partners.

### 2. Collaboration with employees

#### 2.1. Satisfied employees

For enabling the continued development of our company in the future, we wish for employees at all levels who think and act entrepreneurially and who consider it a pleasure to work with us. The advantages of being a family company with short decision-making processes and of having a culture of collaboration based on partnership are the best prerequisites.

We respect and uphold human rights. We nurture a working environment characterised by tolerance, fairness and equal opportunities, irrespective of social background, skin colour, nationality, any disability, sexual orientation, diversity, political or religious beliefs, gender or age. The recruitment and promotion of employees are based on their skills and qualifications.

We are opposed to any form of child labour or exploitation of children and adolescents. Individuals must be of legal working age to be employed. Likewise, we are strongly opposed to forced and compulsory labour. Every employee works for us voluntarily and nobody is forced to work for us by means of violence or intimidation. We do not tolerate any form of violence or sexual harassment.

We respect the statutory minimum wages applicable to the location of the respective Craemer site and adhere to the labour laws valid in the respective country with regard to working hours and annual leave. We also respect our employees' freedom of association and their right of being represented.

#### 2.2. Responsibility of the individual person

Our reputation is shaped and influenced by the behaviour of every single employee. Any unlawful or inappropriate behaviour by an individual employee can cause lasting damage to the company. Every employee acts as a representative of the company and is obliged to treat colleagues and business partners correctly and in an irreproachable way.

#### 2.3. Leadership and collaboration

We are of the firm belief that good leadership is a significant factor in ensuring the success of the company since it positively influences the employees' engagement and satisfaction, as well as the extent to which they identify with the company.

**Craemer GmbH** | 33442 Herzebrock-Clarholz | **Verwaltung:** Brocker Straße 1 | **Logistik – Anlieferung u. Abholung:** Alte Ziegelei 2 | Deutschland | Telefon: +49 5245 43-0  
www.craemer.com | info@craemer.com | **UST-Nr.:** 347 5712 2349 | **UST-Id-Nr.:** DE811204630 | **Amtsgericht:** Gütersloh | **Handelsregister:** HRB 5557  
**Geschäftsführung:** Sebastian P. Brandenburg, Christoph J. Brandenburg, Siegbert Geldner

**Deutsche Bank AG, Münster**  
IBAN: DE97 4007 0080 0040 0021 8000  
SWIFT-BIC: DEUTDE33HAN30

**Commerzbank AG, Gütersloh**  
IBAN: DE58 4788 0031 0503 2623 0000  
SWIFT-BIC: COMDE33HAN30

**Bankhaus Lampe KG, Bielefeld**  
IBAN: DE20 4802 0151 0000 1938 9950  
SWIFT-BIC: LAMPDE33HAN30

**Volksbank Bielefeld-Gütersloh**  
IBAN: DE12 4786 0125 4338 2192 0000  
SWIFT-BIC: GENODEM1GTL

**HypoVereinsbank, Bielefeld**  
IBAN: DE09 4802 0086 0020 5786 9000  
SWIFT-BIC: HYVEDE33HAN30

Thus, in our leadership and collaboration guidelines, our focus is on a cooperative leadership style, i.e. on a style characterised by trust, appreciation and the unambiguous desire to collaborate. Our leaders are reliable, consistent and predictable. They set a good example in terms of performance and motivation and provide orientation; they inform their employees and practice open communication; they shape collaboration, give feedback, take decisions and responsibility for promoting and developing their respective employees according to his or her needs.

### **3. Collaboration with business partners**

#### **3.1. Satisfied business partners**

We create the conditions required to maintain an open and honest communication with our customers and suppliers, that is characterised by partnership, tolerance and appreciation. This form of communication is the basis for allowing us to offer high-quality products which meet customers' needs in ever shorter development cycles.

In order to achieve a high level of customer satisfaction, customer orientation and customer requirements are always at the forefront. When it comes to finding solutions, we embrace a people-to-people approach in the development, manufacture and production of products and services. Together with our suppliers and customers, we form innovative value-added partnerships.

#### **3.2. Corruption, undue advantage or claiming of benefits**

Our quality, prices and innovative products and services are convincing and attractive. In connection to their work, no employee shall offer, promise or grant unjustified advantages to other persons.

Cash payments or other benefits which influence or may influence decisions are forbidden. Likewise, every employee is prohibited from accepting monetary or non-monetary benefits or any form of invitation that exceeds reasonable limits or the usual or local customs. Reasonable limits are exceeded if the impression arises that the person offering the benefit expects to receive a benefit in return.

#### **3.3. Whistleblowing and Protection against Retaliation**

We will not tolerate retaliation against anyone who, in good faith, reports violations of the law, this Code of Conduct, or any other policy or practice. Such a report may be made confidentially and, if so requested, anonymously to the direct superior, a member of the Works Council, the compliance officer (§6.3.) or to the Board of Directors at any time.

#### **3.4. Donations**

We understand donations and sponsorship to be voluntary benefits in the form of monetary or non-monetary allowances to external companies or institutions for social, charitable, humanitarian, cultural or scientific goals. A donation or sponsorship is not associated with the expectation of a benefit or service in return. The decision on the type and scope of a donation falls exclusively to our Board of Directors.

#### **3.5. Anticompetitive/ Antitrust practice**

We undertake to comply with the most important principles for a practice that is lawful under antitrust law. This includes – especially in connection with competitors – neither price-fixing agreements, market-sharing agreements, the exchange of sensitive information under antitrust law nor any other agreement that would restrict competition.

### **4. Quality, environmental protection and occupational safety**

#### **4.1. Quality assurance**

We are committed to providing the highest quality products and services. In order to guarantee this, we make all our measures and processes transparent and systemise them by using an integrated quality management system which we continuously develop and improve by means of regular system, process and product audits.

We provide all the necessary equipment required for testing products in our in-house laboratories, where our employees make sure that every article meets the requested quality standard by inspecting incoming goods, products and initial samplings.

#### **4.2. Environmental protection**

Protecting the environment is our top priority. We use natural resources in a sustainable and future-oriented way. It is our goal to reduce the ecological impact of our business activities to the necessary minimum in order to save resources and costs. In doing so, we focus on the following guidelines:

- Reduction of greenhouse gas emissions through energy efficiency and renewable energies (e.g. optimal usage of daylight and control of artificial lighting as well as energy-efficient heating and air conditioning);
- Maintaining the quality of the water in the municipalities in which we are present, a sustainable water management and the reduction of water consumption;
- Preservation of air quality;
- Sustainable resource management by minimising the use of raw and auxiliary materials and by returning resources;
- Waste minimisation;
- Responsible Chemicals management.

Every employee must contribute to the achievement of our goal with his or her own behaviour.

#### **4.3. Occupational safety**

We respect and value our employees and see it as our responsibility to protect and promote their health and well-being. By using the best technology available and complying with the respective national legal provisions, we make sure that a healthy and safe working environment is created at all our sites. Among others, the measures include the following:

- the constant further development with regard to the design of ergonomic workplaces,
- health and safety provisions for handling machines and hazardous substances (chemicals),
- emergency preparedness,
- internal incident and accident management and
- fire protection.

We provide every employee with his or her own personal protective equipment that meets the requirements for the safety of the respective workplace. At the same time, we take appropriate measures to protect our employees from hazards such as noise and vibration. For the safe handling of hazardous substances and chemicals, we have created and implemented appropriate operating instructions and user manuals.

Every employee is required to immediately report any violation of health and safety rules and regulations to the head of the department, to the acting Safety Officer and/or to a member of the Board of Directors. As a matter of principle, the causes for work accidents are always investigated and appropriate corrective measures implemented. In addition, a working group made up of employees from different departments is continuously working on identifying factors at work which may be hazardous to health and on developing solutions. Alongside other initiatives, this health circle organises the annual health day which contributes to keep employees in good health.

In order to ensure an adequate hazard prevention and emergency preparedness as well as a faultless incident and accident management, every manager and team leader is obliged to sensitize his subordinate employees to the responsibilities resulting therefrom and to instruct and support them in their perception. For monitoring purposes, the respective managers and team leaders regularly carry out inspections and organize corresponding drills for their employees.

The internal fire protection ordinance ensures adequate fire protection. Furthermore, an internal, specially trained fire protection officer is entrusted with fire protection tasks and with preventive fire protection.

#### **4.4. Continuous Improvement**

Continuous improvement and the protection of the environment are the ultimate goal of all of our company's sites, departments and processes. This applies to quality, productivity, manufacturing processes and efficiency as well as to avoiding negative impacts on the environment, to our energy-related performance and the reduction of our specific energy requirements as a result thereof. We undertake to provide the information and resources required for this purpose. As a matter of course, we comply with laws, regulations and licensing requirements and orders. The intensive training provided to our employees in all areas is an important supporting factor and promotes their active participation by submitting suggestions for improvement.

#### **4.5. Requirements on suppliers and service providers**

Not only do we make demands on ourselves to meet the appropriate quality, environmental, energy and health & safety requirements, we also expect our existing and potential suppliers and service providers to do so. We expect them to protect the environment by preserving natural resources and reducing the negative impact of their business activities on the environment to the necessary minimum. We expect that the raw materials supplied to us are procured in a responsible manner, that they do not contain any conflict minerals and that they are sourced in preservation of human rights.

### **5. Information, data and assets**

#### **5.1. Data protection**

We respect our customers', employees' and suppliers' personal data and protect these from unauthorised access and inappropriate use.

Protecting confidential information, expertise as well as business and operational secrets is our top priority when collaborating with customers, suppliers and business partners. Every employee is obliged to process customer and company data with due care and confidentiality and to use these data for the purposes intended by the company only. The transfer of data to Third Parties is strictly prohibited.

We ensure that data and information are only processed on systems which have adequate information security measures in place. These measures include adequate protection against malware, unauthorised system access, unauthorised data access and data loss. When using mobile data carriers for the purpose of data storage or data exchange, we only utilise systems which encrypt data. Connections to our network are exclusively made via the communication options we provide. The downloading or distribution of internet content, which is harmful to minors, racist, sexist or in any other way unlawful or discriminating is prohibited.

#### **5.2. Assets**

Employees entrusted with assets or company property are responsible for protecting and handling these with care. These include, among others, furniture, machinery and equipment, mobile devices and company cars, as well as intellectual property, such as patents, German utility models, registered designs, brands or business plans and reports. We expect that any damages, unnecessary costs and other disadvantages are avoided, and that company property is not misused.

### **6. Communication**

#### **6.1. Open dialogue**

We maintain an open dialogue with our business partners, our employees and with authorities and our neighbours. Open dialogue is the basis for the greatest possible success of joint efforts.

#### **6.2. Corporate communication**

Public communication and the answering of media inquiries are exclusively carried out by the Board of Directors and the responsible employees of the Public Relations department.

### **6.3. Violations of the corporate policy principles**

Suggestions, deviations or violations of the principles outlined in the corporate policy of the Craemer Group may be submitted to the Compliance Officer Petra Adibelli, Telephone +49 5245 43-129 or e-mail [compliance@craemer.com](mailto:compliance@craemer.com).

Alternatively, every employee has the possibility to inform their immediate supervisor or a member of the Works Council. Complaints can be made confidentially and anonymously. All notifications are reviewed, and measures introduced, where appropriate.

### **7. Statement against slavery and human trafficking (United Kingdom Modern Slavery Act)**

We are absolutely committed to prevent slavery and human trafficking in all our corporate activities and at all our sites as well as along all our supply chains. Our Board of Directors in conjunction with the human resources departments are responsible for the identification and investigation of known or suspected instances of slavery or human trafficking. In addition to standard employment suitability checks, temporary employee induction processes are designed to identify signs of potential worker exploitation. Grievance procedures and processes are referenced and included in our comprehensive employee guide issued to all employees along with all the other company policies and procedures.

The procurement and human resources departments at all our sites are responsible for risk assessing direct suppliers, labour providers and employees respectively. Supervisory personnel are encouraged to have regular conversations with agency workers to understand if they are being treated correctly, and to look out for and act upon any indications of apparent exploitation. Key supervisory personnel, recruiters and management personnel undertake regular trainings designed to assist them in identifying typical signs of worker exploitation and mistreatment and how to record and report any concerns to the Management Team. We promote awareness to all employees, both permanent and temporary, via its established employee engagement system.

Due diligence checks and investigations are undertaken in respect of direct suppliers and external labour suppliers we work with. We only work with suppliers and labour providers who are legitimate, registered business organisations who supply comprehensive service level agreements and/or a written anti-slavery and human trafficking policy statement. We only use specified, reputable employment agencies to source labour and always verify the practices of any new agency we are planning to use before accepting workers from that agency.

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Craemer GmbH

Sebastian P. Brandenburg

Siegbert Geldner

Christoph J. Brandenburg