

## **Code of Conduct**

### **1. Preamble**

This Code of Conduct defines the principles and requirements of the companies within the esw GROUP, Eichsfelder Schraubenwerk GmbH, ESW Bohemia k.s. and ESW Autolog GmbH, in terms of their responsibility for mankind and the environment. The esw GROUP and its employees are committed to complying with the applicable national and international statutory regulations. In addition to the provisions of anti-trust and competition law, these also include foreign trade regulations, the regulations on responsible corporate management, the rules on the prevention of bribery, illegal money transfers and corruption as well as the relevant employment and environmental-law regulations.

The ethical guidelines are based primarily on the principles of the UN Global Compact, the ILO Conventions, the United Nations Universal Declaration of Human Rights, the UN Conventions on the Rights of the Child and on the Elimination of all Forms of Discrimination against Women as well as on the OECD Guidelines for Multinational Enterprises.

### **2. Customer and supplier relationship**

Each employee of the esw GROUP is obliged to comply with the rules of fair competition, and to refrain from all measures aimed at inadmissible restriction of competition and which violate the statutory rulings. This includes above all agreements on prices and/or capacities with competitors, agreements on refraining from competition, the submission of sham offers, the allocation of customers, territories, production programmes, or agreements on terms and conditions of sale based on other segmentation criteria.

When purchasing inventories, materials, services or other performances from third parties, attention must be paid to ensuring that the procurement process is based exclusively on quality, performance and costs. The requesting of any form of gift from suppliers and service providers for the personal gain of the employee is prohibited. The acceptance of monetary gifts is forbidden. Exceptions apply only in the case of generally customary occasional and/or promotional gifts up to a value of 50 euros. Other privileges, in particular invitations to events of a non-business nature, services, small presents, commission payments or other favours, also apply as gifts in kind.

Compliance with this generally applicable Code of Conduct should be ensured along the entire supply chain. The principles of non-discrimination when selecting suppliers and in dealings with suppliers must be observed at all times.

### 3. Employees

The success of the esw GROUP is based to a decisive extent on the qualification and motivation of its employees. The achievement of employee satisfaction through qualification for advancement and adaptation, information, involvement, performance-related remuneration as well as safe and health-compatible working conditions are substantial aspects of the corporate policy. Every employee is entitled to fair, polite and respectful treatment by superiors, staff and colleagues.

The esw GROUP is particularly aware of its responsibility for the health and safety of its employees. Employees receive regular expert instruction and training on industrial-safety issues. Within the framework of industrial safety, corresponding risks are examined and minimised through suitable measures; in addition, the best possible precautionary measures are taken against accidents at work and occupational illnesses.

The principle of equal treatment of employees at the place of work applies without restriction. No employee must be harassed, discriminated against or disadvantaged without objective reason on the grounds of gender, nationality, religion, disability, age or sexual orientation.

The esw GROUP respects the dignity, private sphere and personal rights of each individual, and complies with the prohibition of discrimination as per the principles of the German General Act of Equal Treatment (AGG).

### 4. Compliance

This Code of Conduct must be made accessible to all employees of the esw GROUP. Every employee of the esw GROUP must know and comply with this Code of Conduct. Superiors must ensure this and must also be aware of their function as role models.



esw Group  
Manfred Leitold  
Chief Executive Officer  
Board of Directors