

CabTec Group Code of Conduct

(Version 05 21)

We place particular emphasis on equal opportunities for all employees.
In this Code of Conduct, gender-specific references have been avoided.

1. Adhering to laws and regulations

In our business activities, we strictly observe the laws and regulations of the country in which we are working. Each one of us is personally responsible for familiarising ourselves with legal requirements and restrictions and observing them. In cases of doubt, we will refrain from carrying out an activity or concluding a business transaction.

Environment, health and safety

Acting sustainably is a top priority for us. We consistently observe environmental, health and safety regulations and seek to exceed the applicable standards wherever possible. We use natural resources carefully and are committed to environmentally friendly production. By adhering to health and safety regulations and practices, we ensure that the health, safety and personal integrity of our employees, our customers and their employees as well as the general public are not endangered. During working hours, we do not tolerate any consumption of alcohol. On important business occasions such as customer meals, board meetings and social events, we restrict alcohol consumption to a level that does not jeopardise our employees' safety or ability to work in any way. We do not tolerate the consumption, possession, sale or dissemination of drugs at any time while we are employed by a CabTec Group company.

With regard to smoking, we always adhere to the locally applicable directives of the company that employs us. Moreover, there is an absolute ban on smoking inside the premises of all CabTec companies. On company sites, we only smoke in explicitly designated areas. We always interrupt our recorded working hours by clocking out when taking separate smoking breaks outside any paid break times.

Taxes and fiscal duties

We adhere to the legislation on taxes and duties applicable in the respective country. We pay all legally required and/or contractually agreed social security contributions in a correct and proper manner.

Export control regulations and trading restrictions

We unreservedly observe national and international export control regulations. If we are unsure whether a particular product is subject to controls or whether a country has import/export restrictions, we check for any official authorisation requirements.

Protecting confidential data

We treat confidential information belonging to our employees, group companies, customers, suppliers and other business partners with care (including strategic, technical, financial, product-related and personal data that is transferred electronically, verbally or in writing). We adhere to the provisions of country-specific data protection legislation, including for an unlimited period of time after our involvement with a CabTec Group company has terminated. Moreover, we do not use any potentially exchange-rate-relevant information entrusted to us by third parties for the trading of securities, nor do we pass such insider information on to third parties.

2. Respecting ethical standards

Our business activities are characterised by reliability, credibility and integrity. Dealing fairly, appreciatively and respectfully with each other and observing moral principles is therefore extremely important to us.

Communication

Our word can be relied upon. We value accurate, truthful and transparent communication with our employees, customers, business partners, investors and other stakeholders of the CabTec Group. When exchanging and disclosing information, we take care that it is up-to-date, applicable and clearly worded.

We abide by our obligations and assurances towards our employees, business partners and other stakeholder groups and we do not make any promises that we cannot or do not wish to keep. If a contradiction occurs nevertheless, we advise those affected immediately, openly and without being prompted to do so, and seek a solution that is satisfactory for all those involved.

Equal opportunities

We act honestly and fairly, respect the dignity of all people and protect the personal views and privacy of our fellow humans and colleagues, as well as those of our customer's employees, our competitors and other business partners. We support equal opportunities and do not discriminate against anyone on the basis of gender, skin colour, ethnic origin, nationality, age, sexual orientation, religious affiliation, disability, political views or ideology. We do not tolerate degrading, malicious or intimidating behaviour, discrimination, sexual harassment, threats, verbal or physical violence or any other attacks on people's characters. We do not use roles or hierarchically superior positions for our own personal gain or that of our friends and family.

Child labour and forced labour

In our establishments, we do not tolerate any form of child or forced labour, and we only employ people who are at least 16 years of age. We do not work with partners who condone forced labour or employ children under the age of 16. In the case of business partners in countries that, according to ILO Convention 138, come under the exception for developing countries, we do exceptionally accept a minimum age of 14 years.

The temporary employment of young people aged 13 or over is exempt from this ruling if such a young person voluntarily and with parental consent wishes to have a holiday job for a limited period of time; that is, a maximum of half of their school holidays. In such cases we are responsible for them and ensure that they are able to perform easy, non-hazardous work and that the special regulations regarding working hours and rest periods are observed. We also remunerate such holiday jobs appropriately, in line with the type of work and local practices.

Social media

New information technologies and social platforms create opportunities that should be seized, but also responsibilities that should be fulfilled. We use social platforms responsibly. Consequently, we align our behaviour with the principles of this code of conduct and use these new communication routes to work together with our customers, employees and other interest groups in a respectful manner.

Protecting intellectual property

We handle the tangible and intangible assets owned by the CabTec Group appropriately, responsibly and with care. These assets include furnishings, facilities, machinery, vehicles and buildings, as well as patents, trademarks, copyrights, business and corporate plans, technical drawings and other confidential information. We do not misuse these for personal purposes for our own benefit or the benefit of third parties. We respect the intellectual property rights and tangible assets of competitors and third parties.

3. Obligation to compete fairly

The success of the CabTec Group and its corporate subsidiaries is based on the commitment of all our employees. Our accomplishments and our honest business conduct are of paramount importance.

Corruption and influence

We categorically oppose all forms of active and passive bribery. Irrespective of the amount concerned, we neither accept nor offer sums of money or objects of value. Payments in kind in the form of material gifts or invitations when dealing with authorities or customers, suppliers or other business partners are only permitted if they do not exceed customary limits and are a sign of courtesy or in keeping with country-specific customs, and if it can reasonably be assumed that we will not gain any unauthorised benefit from them or that they will not influence the business transaction.

We refrain from any type of unfair practice and do not use any illegally procured information with which we could influence the decisions of customers, suppliers, competitors or authorities.

Conflicts of interest

Our business decisions and negotiations on behalf of the company focus exclusively on the company's interests and, at a higher level, those of the CabTec Group. They are not motivated by personal interests or relationships. We internally declare potential or actual conflicts of interest that may arise through our personal life overlapping with our roles and responsibilities within the company or through close relationships with customers, suppliers or other contractual partners or their employees. If an individual conflict of interest proves to be unavoidable, we take appropriate action promptly and make this transparent so that the group company and the CabTec Group are not disadvantaged by it.

Donations and sponsorship

As a responsible corporate group, we get involved in social and regional affairs in a variety of different ways at the individual sites of our group companies. This may, within reason, include charitable donations and sponsorship activities. However, we do not make any donations to political parties, political organisations or individuals who hold a political office or who are candidates for such offices.

4. Responsibility for compliance

Each one of us is responsible for becoming acquainted with, understanding and complying with the provisions in this code of conduct. We do not tolerate any infringements of the code of conduct. We are aware of the consequences that improper behaviour will inevitably entail.

Questions about the code

In some circumstances it is easy to tell correct from incorrect or right from wrong, and to act accordingly. But in our day-to-day business, we will also be confronted with situations where the legally correct behaviour or the behaviour that is appropriate from an ethical point of view is not always obvious.

If it is unclear how to act in a particular instance, we should discuss the matter openly so that a broad-based solution can be found and any damage to the company and the CabTec Group can be averted.

In cases of uncertainty or doubt with regard to the correct procedure or how to behave in accordance with these rules, we will clarify the situation with our direct line manager first of all. If they are not the appropriate person to talk to, we will contact the relevant divisional manager or managing director. In any case, there is always the option of contacting the CabTec Group's Compliance Officer directly.

Reporting infringements

If we establish or are made aware that provisions in the code of conduct have been violated, we report this fact immediately to our direct line manager. If we suspect that our line manager themselves is involved in blameworthy conduct or is aware of such conduct, we contact the divisional or site manager responsible. The on-site HR department or the CabTec Group's Compliance Officer (Antikorrupcion@cabtecgroup.com) can also be notified at any time.

All reports will be treated in the strictest confidence. If further investigation of the reported incident is needed, we as the reporting person are obliged to disclose in full all facts that are relevant and known to us. In the investigations we undertake, we will involve as many people and internal or external authorities as necessary, but also as few as possible in all cases.

Sanctions

Seeking to gain an advantage – either for personal reasons or for individual group companies or the CabTec Group as a whole – does not at any time justify illegal or other business practices that contradict our ethical standards. Violations of the code of conduct will be immediately and systematically punished. This applies both to those people who have contravened these rules and also all those who have recognised misdemeanours but did not report them.

We do not tolerate retaliation measures against employees who report contraventions against the code of conduct in good faith, nor do we tolerate the intentional abuse of the reporting system or the untruthful denunciation of other people. These transgressions will also be interpreted as contraventions against the code of conduct, and appropriate sanctions will be applied.

Employees who violate this code of conduct can expect disciplinary measures that may entail dismissal, criminal proceedings and/or claims for damages against the violators.