



# **Code of Conduct**

for all member companies of Oeltechnik Group

effective 01. November 2022





Dear employees:

As a globally active group of companies, the Oeltechnik Group undertakes to conduct its business in an ethical, legally sound, politically correct as well as environmentally, and socially compatible manner. Seemingly minor carelessness or neglect can substantially damage the reputation of our group, cause significant damage or even endanger the existence of the companies. In a time of great change, we want to set a standard of exemplary corporate management and at the same time make a visible contribution to the energy transition, the transformation of industries and a sustainable world through the broad range of our competencies.

This Code of Conduct for Employees ("Code of Conduct") describes the most important principles and rules of conduct in the execution of our global business. This Code of Conduct is binding for all companies in our group of companies.

Through our behavior, we strengthen our working environment in a special way by giving particular weight to the values of integrity, respect, fairness, and responsibility. We therefore expect our employees at all positions or hierarchical levels in all organizations to apply the rules agreed upon herewith in an exemplary manner.

Your earnest and continuous effort is highly appreciated.

Dr. Christoph Lütge

CEO

Jochen Reich

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Norbert fairez

CFO





# How do we conduct our business transactions?

# Our employees comply with laws and regulations

The employees of Oeltechnik Group comply with local, national, and international laws, regulations, directives, etc., that apply to our business as well as internal rules and regulations belonging to this Code of Conduct.

# Our employees safeguard the integrity and reputation of Oeltechnik Group

In their work and every action in business transactions, all employees take care to maintain and strengthen the trust of our business partners and the public in our company. The long-term well-being of the group of companies is at the heart of everything we do, and we put personal interests aside. Conflict situations between corporate and personal interests are avoided.

#### Employee satisfaction and good working conditions are top priorities

The satisfaction of the employees is a central concern within Oeltechnik Group, as only this can lead to satisfied customers. Our company therefore offers employees flexible or part-time working models and ensures a collegial relationship at work.

#### Health and Safety of all employees are special focus

Oeltechnik Group and its employees ensure compliance with all applicable regulations for health and safety at work and in the execution of activities outside the company. The health of our employees is maintained, and we comply with applicable safety standards. Drug use or alcohol abuse during working hours are prohibited. Appearing at the workplace under the influence of drugs or alcohol is also prohibited.

#### Zero-tolerance for discrimination at Oeltechnik Group

Oeltechnik Group does not tolerate any kind of discrimination based on gender, age, religion, ethnicity, nationality, sexual orientation, marital status, political opinion, state of health or other personal characteristics. Harassment or bullying is prohibited and will be prosecuted by the company under employment law if it is reported. Oeltechnik Group encourages its employees to observe these principles when using social media and thereby strengthen the orientation of our company in accordance with this Code of Conduct.





#### **Oeltechnik Group respects human rights**

Our company respects internationally recognized human rights. The Oeltechnik Group also requires this from its suppliers in the corresponding Supplier Code of Conduct.

## Benefits or bribery will not be tolerated

Employees may under no circumstances, regardless of the amount, make or accept cash gifts. This also applies to gifts in kind that exceed a reasonable framework and country-specific customs.

#### Oeltechnik Group adheres to the rules of fair competition

Our company is in fair competition with its competitors and does not participate in price agreements, cartels or other activities that distort competition. Our employees do not engage in illegal transactions or agreements. All employees comply with all laws and regulations in the field of antitrust law. In case of doubt, our company provides the employees with external experts for clarification.

#### Oeltechnik Group protects its material and intellectual property and trade secrets

Trade and business secrets may not be passed on to third parties by employees at any time without authorization. Our company protects its intellectual property in any form, whether as technical or commercial knowledge, drawings, specifications, customer information, or other information. Documents must be protected against loss or access by unauthorized persons.

#### Oeltechnik Group protects the environment and is committed to sustainable action

Oeltechnik Group acts in an environmentally conscious manner and uses energy and natural resources in a careful and considerate manner. Our company continuously improves its products and services and ensures a careful and compliant procurement of raw materials. We strive for sustainable entrepreneurship through a balanced relationship between economic, ecological, and social aspects. We respect the Sustainable Development Goals published by the United Nations and actively contribute to them with our products and services as well as our corporate governance.





# **OELTECHNIK GROUP EXPECTS ALL EMPLOYEES COMPLYING WITH THIS CODE OF CONDUCT**

# **Compliance and Verification**

Oeltechnik Group expects all employees to adhere to this Code of Conduct and regularly trains all employees. This Code of Conduct is part of the employment contracts and violations of this are prosecuted under employment law.

Employees who discover a violation of this Code of Conduct or other ethical guidelines and principles are encouraged to report them internally to their supervisor, human resources or as a last resort to our whistleblower office.

The whistleblower office can be reached in the following ways:

by mail at Dr. Till M. Achenbach, Freiherr-vom-Stein-Allee 31 a, 99425 Weimar,

by phone at +49 1749 732391, or

by e-mail at Hinweisgeberstelle OET OSG TT@kanzlei-achenbach.com.

Upon request, incoming information will be treated anonymously and will in no way be to the detriment of the reporting employee.