

BÜTER Group Code of Conduct

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1. Aim and scope

The BÜTER Group is highly regarded by its customers and suppliers as a premium manufacturer of innovative cylinders and lifting technology solutions. This reputation is not only based on the quality of products and services, but also on values-orientated and morally, legally and ethically unimpeachable conduct by companies and employees.

Our Code of Conduct lays down binding and obligatory principles in this regard. In conjunction with the environmental principles and values which the BÜTER Group embodies, the Code of Conduct provides the foundation for responsible behaviour in the commercial and social environments – and of course vis-à-vis employees at all sites.

We demand compliance with the Code of Conduct by all BÜTER Group managers and employees and conduct the checks necessary for this. Anyone who behaves unlawfully or who violates our ethical principles – or even tolerates such behaviour – must expect immediate, serious consequences.

The Code of Conduct represents the general principles that apply to relationships between BÜTER Group companies and their employees and which are a guide to daily conduct. It expressly does not claim to portray all situations and activities and to back them with specific rules. It does not establish third party rights.

We also expect our business partners to behave in accordance with the principles set out below.

2. Compliance organisation

Responsibility for implementing the Code of Conduct lies in the hands of the respective operational companies' executive managements. If necessary, the principles will be adapted and updated according to the changing framework conditions.

3. Principles for behaviour in the commercial and legal environments

3.1 Compliance with laws and regulations

There must be compliance with the applicable legal regulations at all BÜTER Group locations, without exception. Furthermore, when compiling these principles, the BÜTER Group is guided by generally accepted international standards, namely the UN Convention on Human Rights, the United Nations Convention against Corruption and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work.

We expect our managers to set an example in complying with the regulations and to take action against any non-compliant behaviour.

3.2 Ensuring fair competition

The BÜTER Group wants to win its customers over through performance, quality, ability to innovate and service and to build and develop long-term relationships as a result. We expose our products and services to fair, open competition in Germany and abroad. On principle, we do not create advantages for ourselves by violating the respective applicable market and competition rules. In detail this means:

We ensure that we comply with all **principles of competition and monopoly law** and do not conclude agreements that contravene these. These include price, delivery and tendering agreements, as well as division of territories, customers or product ranges. It is immaterial whether the agreements are reached formally or informally, in writing or verbally. Agreements with customers and suppliers that might contradict cartel law are not tolerated either.

The BÜTER Group does not tolerate **corruption**: bribery, the granting of advantages and venality in any form are strictly prohibited, regardless of whether advantages have been offered, promised or granted. This applies to our relations with officials and politicians, business partners' representatives and employees and customers and their dependents. In connection with this, payments for services and deliveries received are only made directly to the respective contracting party, in cashless form.

Commercial incentives such as volume discounts or performance-based commission must only be granted or accepted to the customary commercial extent – such as within the scope of ethically and legally inoffensive tiered discounts in framework agreements. Such a procedure is to be documented in writing.

Donations to business partners or other third parties to promote business relationships – such as invitations to events, hospitality or gifts in kind – are permitted to the customary commercial extent and having regard to the legal regulations only. They must not be intended to influence business decisions unethically in favour of the BÜTER Group or by circumventing legal regulations due to their value or other aspects. Donations must be transparent, traceable and for a specific purpose, whilst sponsorship requires a commensurate counter-performance.

Conversely, **donations from business partners** or other third parties may be accepted only if they comply with the general customary business conventions. Donations which exceed these bounds and would be suitable to influence decisions in the BÜTER Group's favour must not be requested or accepted. All managers and employees are prohibited from obtaining advantages for themselves by exploiting their role or position in the company.

The BÜTER Group only applies objective financial criteria when **selecting business partners** and ensures a fair, objective and documented selection process. Any preference or discrimination is prohibited. We expect that our business partners will also be guided by the regulations in this Code of Conduct or by comparable principles. Consultancy and service agreements must only be concluded with qualified partners. The commissions and compensation paid must be proportionate to the work performed.

3.3 Confidentiality and data protection

The BÜTER Group rigorously adheres to the respective applicable data protection provisions. It treats any information concerning the commercial activities of the operating companies and their business partners as confidential. Access to this information is strictly limited to those people who require it in order to perform their duties. All employees involved must ensure that the information does not fall into the possession of unauthorised third parties both during their employment contracts and afterwards. Management shall take all measures necessary to secure confidential information against unauthorised access.

3.4 Foreign trade and payments

The BÜTER Group observes all relevant foreign trade and customs regulations for its international business and delivery contracts. The same shall apply to regulations in the field of trade controls, embargoes and terrorism control. All employees involved are obliged to comply with these regulations. We only work with trustworthy business partners and observe the applicable money-laundering regulations.

3.5 Advertising and marketing

We comply with legal regulations on unfair competition and undertake to provide truthful communications regarding our technologies, procedures and product properties that are not misleading. In this context we also abide rigorously by the prohibition on comparative advertising and treat our competitors with respect.

4 Principles for behaviour towards employees

4.1 Non-discriminatory working environment

In unreserved recognition of internationally accepted human rights, the BÜTER Group undertakes to guarantee all employees equality of opportunity in the workplace and to refrain from any

discrimination. All managers are constrained to prohibit any unequal treatment of employees on the basis of gender, race, skin colour, disability, origin, religion or sexual orientation. Our coexistence is marked by mutual respect and trust.

4.2 Health and safety at work

The protection of employees' health and safety at work is of paramount importance to the BÜTER Group. We guarantee a very high standard of safety in the workplace through continuous improvement of our working procedures and rigorous accident prevention measures. Employees are made aware of potential hazards through continuing education and training. The safety officers on site continuously review the situation and, together with managers and the workforce, devise even better prevention strategies. The health protection measures relate to appropriate workplace design and medical services.

4.3 Working conditions and remuneration

We comply with the applicable working time and holiday regulations in accordance with collective bargaining agreements. At the same time, we acknowledge the right to an appropriate remuneration, including the regulations on social payments. The BÜTER Group rejects any form of forced and child labour and also requires this of its suppliers and business partners.

4.4 Qualification

We offer further education and training measures and qualifications suited to needs in order to qualify employees for new production processes, market and customer requirements or digitalised processes.

4.5 Avoidance of conflicts of interest

We ensure continuous avoidance of conflicts of interest and loyalty at executive, management and employee levels. Through this we ensure that daily business is not influenced by personal interests. Any type of conflict of interests must be notified immediately. This also extends to the family environment. Significant shareholdings in business partners or competitors by employees or their dependents will not be tolerated. Management' consent is required for secondary occupations.

4.6 Protection of employee-related data

Personal data is only collected within the scope of statutory provisions and limited to the respective necessary purpose. The BÜTER Group shall ensure that unauthorised parties do not gain access to internal company information. Employees are obliged to maintain the security of information and message systems used during working time.

5 Environmental and societal principles

Our products and production processes are geared to protecting nature and the environment, whilst simultaneously focussing on a high level of cost-effectiveness for our customers. The BÜTER Group's products make a significant contribution to climate protection by supporting climate-related megatrends such as lightweight construction, automated production, electric mobility and environmentally friendly disposal. Our products are geared to maximum freedom from wear and to consistency.

The production processes are low emission and energy saving. Ambitious targets have been set for key environmental objectives such as the consumption of electricity and energy resources.

The BÜTER Group regularly establishes relevant statutory and other binding obligations. The requirements of operational processes accruing from the environmental management system, supplier management and logistics are monitored by means of regular audits and management reviews. The sites for the development and manufacture of hydraulic and pneumatic cylinders are ISO 14001:2015-certified.

6 Implementation of the Code of Conduct

The Code of Conduct is the yardstick for ethically responsible and legally compliant conduct by all BÜTER Group employees. Managers are obliged to inform employees for whom they are responsible of the content and aims of this Code of Conduct and to help them to follow these. Compliance with the policies is to be reviewed regularly by a manager in the course of employee reviews. Any indication of violations of laws and regulations must be followed up immediately.

All BÜTER Group employees are encouraged to orient their actions according to the Code of Conduct's rules and, in so doing, contribute to mutual long-term success and the company's reputation. Any questions about this can be directed to the manager responsible for you at any time.