

## Code of Conduct

PLATH Signal Products GmbH & Co. KG



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# 1 Foreword by the Management of PLATH Signal Products GmbH & Co. KG

The confidence of customers and stakeholders in our group of companies and in their products and solutions is our greatest asset. If we act with integrity and with honesty, we strengthen society's trust in us. This is how we protect the PLATH group of companies, its employees and our environment.

This includes knowing and complying with the applicable legal requirements and internal rules. The principles of conduct set out in this Code of Conduct form the basis of our actions.

In this Code of Conduct, we describe the standards with which we want to act in the future. These principles of conduct are binding for the entire PLATH group of companies and thus for each and every one of us. In addition, we have developed values that give us ethical orientation in cooperation and decision-making.

The PLATH Corporation GmbH being the shareholder of all participations in the PLATH group of companies - the PLATH Signal Products GmbH & Co. KG being an integral part - and thus sets the values and the responsibility placed in us.

## 2 Central values at PLATH Signal Products GmbH & Co. KG

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<b>Respect</b>	We show respect and understanding towards one another
<b>Empowerment</b>	We lay the foundations for our employees to contribute to our success in the best possible way
<b>Integrity</b>	We act and communicate in an ethical manner
<b>Empathy</b>	We look at a situation from the position of others
<b>Ever better</b>	We strive for continuous improvement
<b>Partnership</b>	We demonstrate clarity towards others
<b>Joy/Passion</b>	We identify with our tasks and teams

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<b>Innovation</b>	We are curious and creative, we embrace change and we are open to new input and approaches
<b>Cohesiveness</b>	We like working in teams, appreciate co-creation and enjoy networking

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We all share the responsibility for sustainable corporate success and equally for following up these words with the right actions. In doing so, we protect the reputation of PLATH Signal Products GmbH & Co. KG and the entire PLATH group of companies respectively as a reliable business partner, fair competitor and attractive employer.



*Dr. Ronald M. Meixner*

## 3 Our responsibility as a member of society

### 3.1 Human rights

#### Background

Human dignity is inviolable. Respecting them is a task for each of us.

#### Our principle

We respect, protect and promote the applicable regulations for the protection of human and children's rights (hereinafter referred to as human rights) worldwide as fundamental and universally applicable guidelines.

We reject any use of child, forced and compulsory labour, as well as any form of modern slavery and human trafficking. This applies not only to the cooperation within our company, but of course also to the behaviour of and towards business partners.

#### My contribution

As an employee, I also contribute to the observance of human rights. I observe human rights as a fundamental guideline and am alert to human rights violations that occur in my environment. If I have indications of human rights violations in my environment, I strive to ensure that these violations are prevented or stopped. If necessary, I will inform my superior.

### 3.2 Equal opportunities and equal treatment

#### Classification

Equal opportunities and equal treatment are important cornerstones for fair, unprejudiced and open interaction. The PLATH group of companies promotes respectful and cooperative inter-action, diversity and tolerance.

#### Our principle

We offer equal opportunities for all. We do not discriminate against anyone and do not tolerate discrimination on the basis of ethnic or national affiliation, gender, religion, ideology, age, disability, sexual orientation, skin colour, political views, social origin or other legally protected characteristics. We

live diversity and create an environment that promotes the individuality of each person in the interest of the company. The selection, recruitment, remuneration and promotion of our employees is always based on their qualifications and skills.

### **My contribution**

I respect the principles of equal opportunities and equal treatment and encourage the people around me to behave in the same way. If I notice violations of the principles of equal opportunities and equal treatment (e.g. through discrimination, harassment and bullying), I point out the misconduct to the person concerned. If I cannot directly influence what is happening, I report the incident to the HR department.

## **3.3 Dealing with public officials and government representatives**

### **Classification**

Special legal conditions often apply when dealing with public officials or elected representatives, governments, authorities and other public institutions. Even individual violations can have serious consequences and permanently exclude the PLATH group of companies from being awarded public contracts.

### **Our principle**

Our contacts with public officials and mandate holders are strictly guided by law and the relevant internal regulations to avoid conflicts of interest and corruption.

### **My contribution**

I am aware that particularly strict rules apply when dealing with representatives of public clients and I inform myself about them.

In our dealings with representatives of governments and authorities, we refrain from any actions that could unlawfully influence their decisions.

## 3.4 Regional social commitment

### Classification

Each company of the PLATH group of companies is also an active part of a regional environment through its location and its employees and participates in the infrastructure.

### Our principle

The PLATH group of companies makes a social contribution to regional charitable projects at the respective locations of our companies. These measures must always be appropriate, transparent and in line with applicable law.

Each measure shall be approved and documented by the management.

### My contribution

I approach the management with an idea for a regional social commitment.

## 3.5 Communication

### Classification

The PLATH group of companies attaches great importance to clear and transparent communication towards employees and business partners. Each of our employees has the responsibility to follow the internal regulations when communicating in order to ensure a uniform and consistent appearance of our company and the entire group of companies.

### Our principle

To maintain the trust of customers and other interested stakeholders, we pay attention to consistent and clear communication. We coordinate planned communication and marketing measures with the relevant specialist department before they are approved and implemented.

### My contribution

At trade fairs and in contact with customers and partners, I pay attention to coordinated communication in the sense of "One Voice". In case of doubt, I clarify the respective position with the communications team before corresponding events and appointments. I do not make any statements on behalf of my company to members of the press and always refer enquiries to the communications department.



I inform myself about the right behaviour in social networks in my company's social media guidelines and act accordingly.

## 3.6 Environmental protection and sustainability

### Classification

As a business enterprise, we bear responsibility for the environmental compatibility and sustainability of our products, sites and services.

### Our principle

We rely on environmentally friendly, advanced and efficient technologies and implement them where possible throughout the entire life cycle of our products. Already during development and production, we pay attention to the careful use of natural resources, a continuous reduction of environmental impact and compliance with environmental protection laws and regulations.

### My contribution

Within the scope of my activities, I take into account the concerns of environmental protection and use resources and energy appropriately and sparingly. I ensure that my activities have the least possible negative impact on the environment and that they comply with environmental laws and regulations.

## 4 Our responsibility as a business partner

### 4.1 Conflicts of interest

#### Classification

A potential conflict of interest exists when the private interests of one of our employees collide or may collide with the interests of the PLATH group of companies. Such a conflict of interest may arise, for example, from secondary activities. If an employee puts his or her personal interests ahead of those of the company, this can be detrimental to the company.

## Our principle

We respect the personal interests and private lives of our colleagues. However, we attach importance to avoiding conflicts between private and business interests or even the appearance thereof. We make our decisions on the basis of factual criteria and do not allow ourselves to be influenced by personal interests and relationships.

## My contribution

I already avoid the appearance of a conflict of interest and disclose any apparent or actual conflict of interest that may arise openly to my supervisor without delay. Together we look for a solution that does not harm the interests of the company.

## 4.2 Gifts, hospitality and invitations

### Classification

Benefits in the form of gifts, hospitality and invitations are widespread in business relationships. Provided that these benefits remain within reasonable limits and do not violate legal regulations, they are not objectionable. However, if such benefits exceed this scope and are used to influence third parties, this may be punishable.

### Our principle

We follow the legal and employment contract regulations and also take into account the principles of our business partners.

### My contribution

I review my conduct in this context to determine whether conflicts of interest exist or may arise. I inform my superior immediately of any gratuity offered to me. When in doubt, I do not accept gifts.

## 4.3 Fair competition

### Classification

Fair and free competition is protected by the applicable competition and antitrust laws. Compliance with these laws ensures that there are no distortions of competition in the market - for the benefit of all market

participants. In particular, unfair business acts as well as agreements and concert-ed practices between competitors which have the purpose or effect of preventing or restricting free competition are prohibited.

### **Our principle**

We conduct business exclusively according to the principle of performance and on the basis of the market economy and free, unhindered competition. We like to measure ourselves against our competitors and always comply with the law and ethical principles.

### **My contribution**

In any contact with competitors, I take care to ensure that no information is given that could allow conclusions to be drawn about current or future business behaviour. In conversations or other contact with competitors, I avoid topics that could be of particular importance for competition among each other.

## **4.4 Prevention of bribery, granting of advantages and acceptance of benefits**

### **Classification**

Bribery, granting and accepting advantages are serious problems in commercial transactions. They lead to decisions based on irrelevant reasons, prevent progress and innovation, distort competition and harm society. Bribery, the granting of advantages and the acceptance of benefits are prohibited. They may result in fines for the PLATH group of companies or one of the associated companies as well as criminal sanctions for affected employees.

### **Our principle**

We fight bribery, the granting of advantages and the acceptance of benefits. We grant benefits to business partners, customers or other external third parties only within the legally permissible framework conditions and specified requirements.

### **My contribution**

I never bribe others and never allow myself to be bribed. I inform myself on my own responsibility about the regulations published by the employer before I give or receive gifts, extend or accept invitations and hospitality. In case of doubt, I consult my manager.

## 4.5 Procurement/ Purchasing

### Classification

The PLATH group of companies is contractually linked to a large number of suppliers and service providers in its business activities.

### Our principle

We carefully select suppliers and service providers according to objective criteria.

### My contribution

I do not unilaterally favour a supplier or service provider without objective reason and avoid any conflict of interest. As a matter of principle, I do not buy any products or services without having informed myself in advance about the market and alternative providers. In doing so, I observe the applicable procurement principles and involve the responsible purchasing department early on in the purchasing process.

## 4.6 Export control

### Classification

Cross-border economic transactions are subject to prohibitions, restrictions, authorisation reservations or other monitoring measures within the framework of export control.

### Our principle

We ensure compliance with all regulations governing the import and export of goods, services and information.

### My contribution

In the case of decisions on the export, transfer brokering and technical support of products, systems and services, I examine without exception whether this decision is subject to any export control restrictions that may need to be observed. In cases of doubt, I seek advice from the Legal Counsel of PLATH Corporation GmbH.

## 4.7 Money laundering prevention

### Classification

Almost all countries in the world have laws against money laundering. Money laundering occurs when funds or other assets originating directly or indirectly from criminal offences are brought into the legal economic cycle and their origin is thus concealed. Criminal liability and liability for money laundering does not require the perpetrator to be aware that the funds or assets involved originate from a criminal offence. Even a careless failure to recognise the origin and thus an unintentional participation in money laundering is punishable and can lead to liability for all those involved.

### Our principle

We carefully verify the identity of customers, business partners and other third parties with whom we wish to do business. It is our declared aim to only maintain business relationships with reputable partners whose business activities are in accordance with legal regulations and whose funds and other assets received by us are of legitimate origin.

### My contribution

I do not take any measures that may violate domestic or foreign money laundering regulations. I am attentive and follow up on suspicious behaviour by customers, business partners and other third parties. If there are indications that could justify such a suspicion, I immediately contact one of the contact persons mentioned in chapter 6. I comply with all applicable regulations in my area of responsibility and participate in the anti-money laundering processes established in our company.

## 5 Our responsibility in the workplace

### 5.1 Occupational health and safety

#### Classification

Occupational health and safety is an important prerequisite for healthy, motivated and creative employees as well as for the competitiveness of the corporate group.

## **Our principle**

The occupational health and safety of our employees is a top priority for us. The working conditions of the employees are designed to meet their needs and are subject to a continuous improvement process. We regard compliance with legal requirements as the minimum standard.

## **My contribution**

I am jointly responsible for my occupational health and safety and regularly review my behaviour in this regard. If I have special requirements for my individual health protection, I contact my supervisor.

# **5.2 Data protection**

## **Classification**

Special legal regulations exist for the handling of personal data to protect privacy and can vary locally. In principle, the collection, storage, processing and other use of personal data require the consent of the data subject, a contractual provision or another legal basis.

## **Our principle**

We protect the personal data of employees, former employees, customers, suppliers and other data subjects. We collect, gather, process, use and store personal data only in accordance with current legal requirements.

## **My contribution**

I take into account that the collection, storage, processing and other use of personal data may only take place with the consent of the person concerned, with a contractual regulation or other legal basis. I secure all components of information processing in such a way that the confidentiality and integrity of the information worth protecting is guaranteed and unauthorised internal and external use is prevented. In case of doubt, I contact my supervisor or the office responsible for data protection.

## 5.3 Confidentiality and security of information

### Classification

We recognise that in the course of our employment within the PLATH group of companies we have access to confidential and or proprietary information belonging to customers, potential customers and business partners. This information can be of various kinds.

### Our principle

Regardless of how such information is created, communicated or stored, we are all responsible for ensuring its confidentiality, availability and integrity. Confidential and proprietary information may not be used for personal use, reproduced or unlawfully possessed. Confidential information may only be passed on within the authorised circle of persons. It must also never be discussed outside the organisation or made available to outside persons without the ex-press permission of the line manager. In this respect, we only permit the storage of information on encrypted portable data carriers to the extent necessary for business purposes in individual cases. Furthermore, employees may not copy, retain, access, share or otherwise deal with such information after termination of employment. All tangible information carriers on which confidential or proprietary information is stored must be returned in full before the end of employment.

### My contribution

I handle all company information with care and never pass it on without authorisation. I observe the principle of "need to know".

## 5.4 IT security

### Classification

Electronic data processing (EDP) is part of everyday work in the PLATH group of companies but it harbours a multitude of risks. This includes, in particular, the impairment of data pro-cessing by malware (viruses), the loss of data due to program errors or the misuse of data (e.g. by hackers).

### Our principle

We pay attention to IT and EDP security and adhere to the applicable regulations.

## **My contribution**

I familiarise myself with the applicable IT security regulations and adhere to the specifications made therein. I am aware that unencrypted data exchange (e.g. by e-mail or USB stick) is not a secure means of communication. I inform the IT security officer of any suspected cases of unauthorised data leakage.

## **5.5 Dealing with company assets & company property**

### **Classification**

The tangible and intangible assets and property of the companies of the PLATH group of companies serve to support our employees in achieving the business objectives of the company and may only be used within the framework of the company regulations.

### **Our principle**

We respect the tangible and intangible assets and property of the company and do not use them for non-business purposes.

### **My contribution**

I comply with company regulations and treat company assets and property with care and consideration.

## **6 Support/Contact person**

If required, the following departments in the company can offer you support in dealing with the Code of Conduct:

- Human Resources
- Safety Officer
- IT Security
- Data Protection Officer
- Legal Counsel
- The respective management



## 7 Self-test to help you decide

If I am unsure in an individual case whether my conduct is in line with the principles of our Code of Conduct, I should ask myself the following questions:

If I have consistently answered "yes" to questions 1-7, my behaviour is most likely in line with our principles. If I have any questions or doubts, please contact the contact points mentioned in section 6.

1. Have I taken into account all relevant concerns in my decision and weighed them up correctly? (subject test)
2. Do I have the feeling that my decision is within the framework of the legal and internal requirements? (legality test)
3. Would my supervisor support my decision? (supervisor test)
4. Am I advocating that the same decision be made in all similar cases throughout the company? (generalisation test)
5. Do I still think my decisions are right when my company has to support them in public? (public test)
6. Would I accept my own decision as an affected person (affected person test)?
7. Would my family approve of my decision (second opinion)?