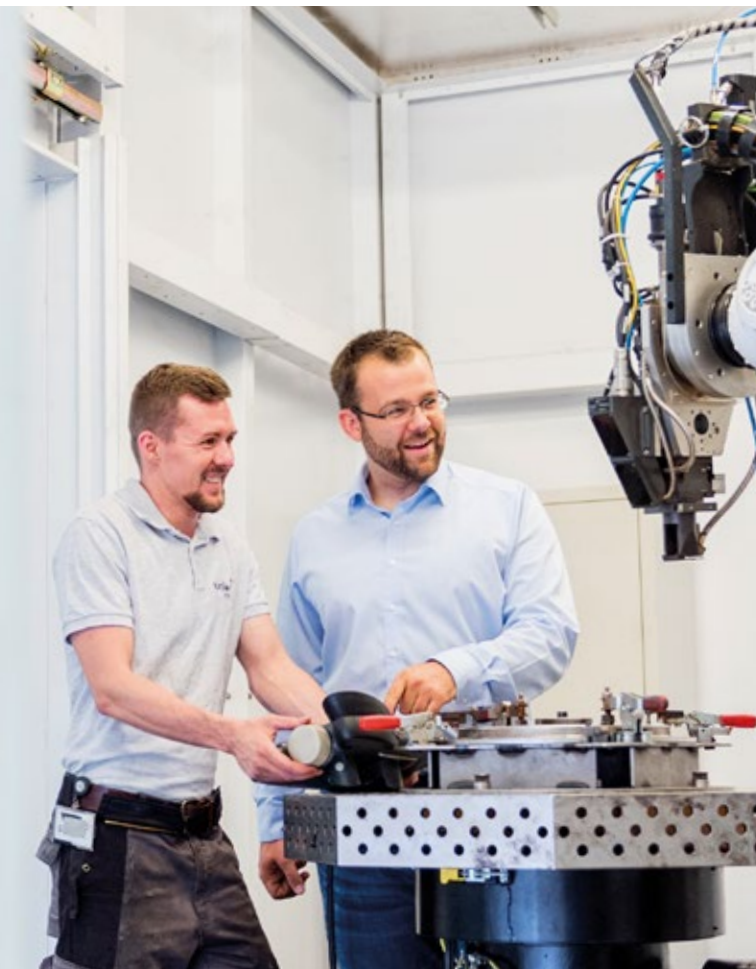


punker 



CODE OF CONDUCT

## ► Dear employees,



our mission statement describes the values we share and how we want to work together - today and in the future. It gives us a clear goal that we must achieve in order to secure our corporate success in the long term. Based on the central idea „WE MOVE THE BEST“ we can only achieve this goal together. Values such as personal responsibility, openness and transparency as well as ethically correct conduct that conforms to the law at all times play an important role in this.

Our most important basic rules and principles are summarized in this Code of Conduct. They provide a frame of reference and apply to all of us without exception. This means that we not only place high demands on ourselves, but also make a promise to the outside world that we will always behave responsibly in our dealings with each other and with business partners and the public.

Together we bear the responsibility for ensuring that our company is perceived positively by the public. Any violation of the following basic rules and principles can cause enormous damage to all of us. We therefore ask you, dear employees, to read this Code of Conduct carefully and observe it in your daily work for our company.

DR. HENNING BÄHREN  
CHIEF EXECUTIVE OFFICER

JUNE 2020

## ► Preamble

Employees of the punker Group have jointly developed a mission statement that describes what our company stands for today and in the future.

### **This is punker - this is us.**

Full of energy, always conjointly and with a common focus, we want to move forward - as doers, experts, helpers or forward thinkers. But always as a team, with an idea and a clear promise:

### **Moving better.**

Being one, doing the right thing together and acting with conviction - this will be successful if everyone has the same goal. So it is important to formulate this goal, to pursue it collectively and to set off together. Each in their own way, all with the same direction. That is how we improve things and inspire people. To make it better. Together is always better.

### **OUR VISION:**

#### **We move the best.**

Why: we move the best? The best do certain things very well. They often demand a lot - e.g. knowledge, quality and safety. We have been good at this for decades and, through our services and the high standards of our work, we act at eye level with the best. punker is therefore part of many solutions worldwide and always right in the middle of it. This is how we move the best.

#### **We live shared values.**

We act in the interest of punker. Openness and mutual appreciation characterize our cooperation. We build on strong values: confident, likeable, inspiring, conjointly, forward and worldwide.

#### **We act sustainably**

punker assumes responsibility for society and is committed to the principles of the United Nations Global Compact (UNGC).

The UNGC is the world's largest and most important initiative for responsible corporate governance. Based on 10 universal principles, it pursues the vision of an inclusive and sustainable global economy for the benefit of all people, communities and markets, now and in the future.

### **In detail this means for us,**

1. we respect the internationally proclaimed human rights and promote their observance within our sphere of influence.
2. we make sure that we do not complicit in human rights abuses.
3. we uphold the freedom of association and the effective recognition of the right to collective bargaining.
4. we eliminate all forms of forced or compulsory labor.
5. we work for the effective abolition of child labor.
6. we eliminate any discrimination in respect of employment and occupation.
7. we take a precautionary approach to environmental challenges.
8. we undertake initiatives to promote greater environmental responsibility.
9. we encourage the development and diffusion of environmentally friendly technologies.
10. we work against corruption in all its forms, including extortion and bribery.

The implementation of these principles is clearly formulated at punker, if necessary by means of concrete rules and regulations for individual situations and facts in the professional environment. These are binding and apply without restriction to all employees of the punker Group. Violations are punished within the framework of the company and legal regulations.

## ► **Conduct towards and among employees**



### **Equal treatment and non-discrimination**

A culture of equal opportunities, mutual trust and respect is very important to us. We promote equal opportunities and prevent discrimination both in the recruitment of employees and in the promotion or granting of training and further education. We treat all employees equally, regardless of gender, age, skin color, culture, ethnic origin, sexual identity, disability, religious affiliation or ideology.

### **Human and labor rights**

We respect internationally recognized human rights and support their observance. We strictly reject all forms of forced and child labor.

### **Cooperation with employee representatives**

For the corporate management, close and trustful collaboration with employee representatives is a key component and proven cornerstone of corporate policy. The basis of mutual trust and cooperative collaboration is an open and constructive dialog characterized by mutual respect.

## Occupational safety and health protection

The safety and health of our employees is a corporate objective of equal importance to the quality of our products and economic success.

Occupational safety and health protection are therefore an integral part of all operational processes and are included in the technical, economic and social considerations from the very beginning - even in the planning phase.

We all promote health and safety in our working environment and comply with the relevant regulations. Every manager is obliged to instruct and support his or her employees in the exercise of this responsibility.



## ► **Societal Conduct**

### **Sustainable environmental and climate protection**

Sustainable environmental and climate protection as well as resource efficiency are important corporate goals for us. Both in the development of new products and services and in the operation of production plants, we ensure that all effects on the environment and climate are kept as low as possible and that our products contribute to our customers' environmental and climate protection efforts. All employees bear equal responsibility for treating natural resources with care and contributing to the protection of the environment and climate through their individual behavior.

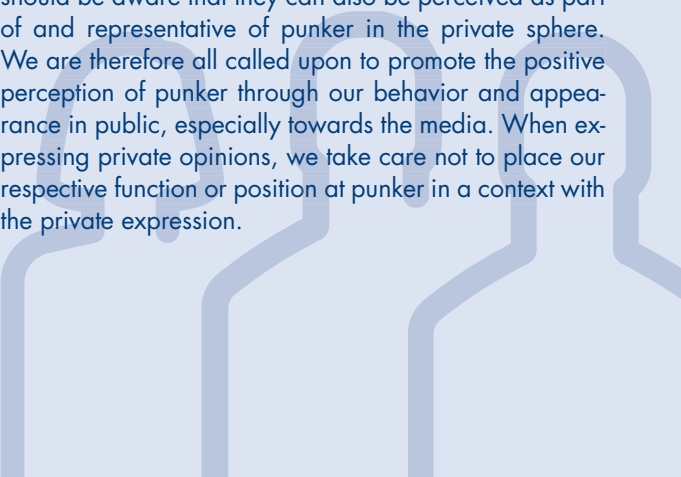
### **Donations**

We see ourselves as an active member of society and are therefore involved in various ways. We make donations and other forms of social commitment solely in the interests of the company.

However, we do not make any financial contributions, in particular donations and sponsoring measures, to political parties at home and abroad, party-affiliated or similar organisations, individual holders of public office or candidates for political office.

### **Public appearance and communication**

We respect the right to freedom of expression and the protection of personal rights and privacy. All employees should be aware that they can also be perceived as part of and representative of punker in the private sphere. We are therefore all called upon to promote the positive perception of punker through our behavior and appearance in public, especially towards the media. When expressing private opinions, we take care not to place our respective function or position at punker in a context with the private expression.



## ► **Dealing with the company's resources**

### **Protection of corporate property**

We use company property and resources properly and carefully and protect them from loss, theft or misuse. The intellectual property of punker represents a competitive advantage and thus a property worth protecting, which we defend against any unauthorized access by third parties.

We use the company's tangible and intangible property exclusively for business purposes and not for personal use, unless explicitly permitted.

We treat property provided or surrendered by third parties, e.g. customers or suppliers, in the same way.

### **Proportionality of business travel**

Together with their superiors, our employees bear responsibility for ensuring that the type and scope of business travel is always in proportion to the purpose of the trip and that it is planned and carried out economically, taking into account time and cost aspects.





## ► **Conduct in the business environment**

### **Compliance with law and order**

For us, compliance with laws and regulations is an essential basic principle of economically responsible action. We observe the applicable legal prohibitions and obligations at all times, even if they are associated with short-term economic disadvantages or difficulties for the company or individual persons. If national laws are more restrictive than those applicable to punker, national law takes precedence.

### **Avoidance of conflicts of interest**

At punker, business decisions are made exclusively in the best interests of the company. Conflicts of interest with private interests or other economic or other activities, including those of relatives or other related persons or organizations, are avoided from the outset. If they occur nevertheless, they must be resolved in compliance with the law and the applicable guidelines. A prerequisite for this is the transparent disclosure of the conflict.

### **Fair competition**

Legal conformity and compliance are the benchmark for our competitive actions:

punker stands for technological competence, innovative strength, customer orientation and motivated, responsibly acting employees. This is the basis of our high reputation and the sustained economic success of punker in global competition. Corruption and cartel violations threaten these guarantees of success and are not tolerated (zero tolerance). Bribes or cartel agreements are no means for us to obtain an order. We would rather forego a business and the achievement of internal goals than violate laws.

Management and all employees must be aware of the extraordinary risks that a corruption or antitrust case can pose for punker, but also for them personally. All employees are therefore called upon to play an active role in implementing and complying with the punker Code of Conduct within their area of responsibility.

## Money Laundering Prevention

punker complies with its legal obligations to prevent money laundering and does not participate in money laundering activities.

All employees are requested to have unusual financial transactions, in particular those involving cash, which may give rise to suspicion of money laundering, investigated by the responsible financial team in case of doubt or reported via the whistleblower system.



## ► Handling of information

### Confidential company information

We take the necessary steps to protect confidential information and business documents from access by non-participating employees and other third parties in an appropriate manner.

### Data protection and information security

The protection of personal data, especially of employees, customers and suppliers, is of particular importance to punker.

No personal data may be collected or processed without legal admissibility or consent of the person affected.



## ► **Implementation and contact persons**

punker actively promotes the communication of the guidelines and agreements on which the Code of Conduct is based, ensures that they are implemented and ensures that no employee is disadvantaged by compliance with the guidelines or agreements.

Our managers have a special function as role models and their actions are particularly measured by the Code of Conduct. They are the first point of contact for questions regarding the understanding of the regulations and ensure that all employees are familiar with and understand the Code of Conduct. Within the scope of their management duties, they prevent unacceptable behavior or take appropriate measures to prevent violations of rules in their area of responsibility.

Trusting and good cooperation between employees and managers is reflected in honest and open information and mutual support.

Information on possible violations of laws or guidelines in the areas of antitrust law and corruption that affect persons and companies of the punker Group can also be reported via the punker whistleblower system. The relevant contact details are available through punker's corporate information channels. Confidential treatment is guaranteed.

Your contact person around the topic  
**Code of Conduct** at punker is

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