

CODE OF CONDUCT

by VETTER

JOB · ENVIRONMENT ·
ANTI-CORRUPTION ·
HUMAN RIGHTS

01. INTRODUCTION

The management of the VETTER Company supports the strategic approach of the Global Compact of the United Nations for sustainable business practices and thus the general principles in the fields of human rights, labour, environment, and anti-corruption. VETTER expects its employees to align their conduct with the principles of VETTER's

guiding vision as well as the ethical and legal standards when performing their day-to-day business.



NORBERT HAMMES
Chairman of the Management Board of VETTER Holding AG




MARC RIESER
Managing Director of VETTER Krantechnik GmbH




OLIVER BREIDER
Managing Director of VETTER Kranservice GmbH




02. COMPLIANCE WITH LAWS AND REGULATIONS

VETTER employees undertake to fully comply with all applicable national and international acts. Among other things, this includes acts and regulations relating to competition, export control, taxation, safety, anti-bribery, illegal payments and corruption, employees' rights, environmental protection as well as acknowledgement and protection of com-

pany assets, in particular including but not limited to business secrets, copyrights, and other types of intellectual property.

03. INTELLECTUAL PROPERTY RIGHTS AND CONFIDENTIALITY

VETTER employees respect and protect intellectual property rights and business secrets of VETTER as well as customers and suppliers (third parties) to which they may have access in the course of the business relationship or which become known to them in another way in the course of the business relationship.

Moreover, the VETTER employees protect confidential information of third parties from unauthorised access and unauthorised use and use this information exclusively in the scope of the cooperation.

04. HUMAN RIGHTS

VETTER ensures that all employees are treated in a fair and just way and that all employees have a contract of employment. The working time is in accordance with local law and shall be complied with. The remuneration to be paid to the employees complies with the applicable wage laws.

VETTER ensures that neither child nor forced labour is used. According to the Convention 138 of the International Labour Organization, VETTER never employs any children under the age of 15.

VETTER does not accept any discrimination of employees due to race, religion, skin colour, gender, age, marital status, national origin, sexual orientation, nationality, or disability (if the employee is qualified for the fulfilment of the essential functions of the workplace with or without appropriate adaptation) or another illegal

basis in the provision, employment, procurement, or promotion of personnel or another condition of employment. VETTER ensures that all employees are given the same opportunities and treatment on the basis of their performance.

VETTER does neither accept any sexual harassment at the workplace nor any other discriminating harassment, threat, intimidation, or mobbing at the workplace.

05. ENVIRONMENT

VETTER acts environmentally conscious striving to avoid and/or reduce emissions and waste of any kind in its course of business. VETTER monitors, controls, and minimises the environmental impacts of its operations and treats waste water, emissions, and solid waste produced in the course of business in accordance with the regulations.

VETTER complies with all applicable environmental provisions and acts on chemicals.

06. OCCUPATIONAL HEALTH AND SAFETY

VETTER ensures that all employees are provided with a safe work environment. To this end, potential safety hazards are identified by means of risk assessment of the workplaces and largely minimised by preventive maintenance and safe working methods. Moreover, emergency situations and events are established to minimise their effects by implementing emergency plans and procedures. The

consumption of drugs, alcohol, and substances having an intoxicating or a mind-altering effect is strictly forbidden at the workplace.

07. DATA PROTECTION

The correct treatment of personal data (individual information on personal and factual circumstances of a specific or determinable natural person) is of utmost importance in the highly engineered age. These data can be stored and duplicated without any limits. This is why employees shall comply with relevant laws and corporate regulations relating to personal data of employees as well as external em-

ployees. Personal data of natural persons shall only be collected, processed, and used in accordance with the legal regulations and corporate requirements. In case of doubt, the data protection officer of the company shall be consulted.

08. CORRUPTION

VETTER employees ensure that the business practices are free from corruption of any kind, including blackmailing and bribing. They shall not offer any presents or entertainment to any office-holders, except as allowed by applicable law.

VETTER employees shall not offer any presents, entertainment or payment of expenses to customers exceeding the reasonable and usual standards of hospitality or intending to influence a business decision or seeming to influence a business decision. VETTER determines limits for the value of presents and entertainment deemed to be reasonable in general. Cash or the like such as gift cards must not be offered.

This also applies to VETTER employees accepting corresponding presents from suppliers. The acceptance of money or

other non-cash benefits from third parties, such as loans, commissions, etc., is forbidden.

Travel and accommodation expenses incurred by the employees are compensated by the employer in the scope of the applicable travel expenses guidelines. If possible, flights and hotels shall be booked via the employer before the start of the trip. Deviations from the above (e.g. higher hotel costs, take-over by third parties in the scope of a major event, etc.) are possible upon consultation with the direct superior, only.

09. CONFLICTS OF INTEREST

Conflicts of interest always occur if personal interests of oneself or those of related persons or friends are affected when taking a business decision. If a conflict of interest is suspected, the superior is to be notified.

10. ENFORCEMENT AND CONTROL

VETTER continuously checks the compliance with this Code of Conduct and the applicable laws and regulations. The management of the VETTER Company disapproves any violation of law by its employees and punishes this violation in the scope of applicable law and labour legis-

lation. Violations of the Code of Conduct can be reported to the respective superior or the human resources department.



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