pollmann INTERNATIONAL

"It's not the rules that make a company grow – it's the people who bring them to life."

CODE OF CONDUCT – HOW WE WORK

Robert and Markus Pollmann

VALUES FOR OUR FUTURE

We, Robert and Markus Pollmann, would like to pass on a stable company to the 5th generation. This is why we have introduced a new development phase.

We put the operational responsibility for a healthy growth of our international enterprise into the hands of an experienced management team. Together we coordinate all vital strategic decisions, while continuing to carry responsibility as a family. In this way, we give the next generation the opportunity to take over and develop the company with pleasure and enthusiasm.

Our values characterize future rules:

What is valid for our family shall be valid for the company. Trust, respect and responsibility define how we interact at all locations. We make sure that our interactions continue to be based on mindfulness.

Pollmann International is considered a champion in process innovation with great expertise in mechanical and electromechanical components. This distinction gives us a lasting attractiveness both for clients and as an employer.

Economic independence is the foundation for entrepreneurial freedom. We want to secure this freedom through stable development of the company's success, because long-term liquidity is the best insurance against economic crises.

More important than a growth in size or number of locations is a growth in quality. We want to offer all employees a safe, fulfilling workplace. In order to reach this goal, we must ensure long-term success for each of our locations.

We, the Pollmann family, will remain closely connected with the company. We wish the management team all the best in developing Pollmann as a brand.

Kind regards,

Markus Pollmann

Robert Pollmann

WE ARE POLLMANN

We are an internationally active family business in the automotive industry with over 135 years of innovation experience. Our structure is big enough to stay close to our customers around the world. At the same time we are agile enough to quickly find great solutions. We are connected to our customers in a cooperative alliance for mutual success.

01. CAPABLE

The best partner for components in metal-plastic composites.

02. COMPREHENSIVE

Full-service provider for process innovation solutions.

03. PERFECT

We combine quality with flexibility and supplier reliability.

04. COLLECTIVE

Process innovation relies on trustful business partnerships.

05. MOTIVATED

Identification and passion are based on the joy of creation.

06. SUSTAINABLE

Investments are not just expenses, they are key to success.

07. GLOBAL

Karlstein/Austria is our R&D center. Our locations take us close to the customer.

SUSTAINABLE DEVELOPMENT
BUSINESS ACTIVITY
INFORMATION AND SECURITY
BEHAVIOR IN THE WORKPLACE
COMPLIANCE

SCOPE AND APPLICATION OF THIS CODE

In order to comply with the Code, we must ensure that we understand it.

This Code of Conduct applies to all Pollmann employees and representatives who act in the name of Pollmann. Each of us is responsible for knowing and adhering to the values and standards defined in this Code and for asking questions if we are unsure about a company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we contact the Compliance Office or Human Resources for advice.

01 CORPORATE CULTURE AND LEADERSHIP BY EXAMPLE

We live by our values. Management staff act as role models.

Pollmann is a family-owned business with an international reach. The success of its business depends on the trust, honesty, respect, fairness, loyalty and confidence earned from employees, customers and other stakeholders.
We gain credibility by adhering to these values. We achieve our company's goals through honesty, integrity and quality. Pollmann is an equal-opportunity employer and is committed to providing a workplace that is free from any form of discrimination or harassing behavior, including but not limited to comments, behaviors or actions based on national origin, gender, age, disability, religion, race or any other grounds prohibited by law.
All employees have the responsibility for demonstrating, through their actions, the importance of this Code. Managers are responsible for clear and direct communication of behavioral expectations, and for promptly addressing ethical questions or concerns raised by employees. Leadership by example happens at every level so that employees can be held accountable at every level; this strengthens the team.

02 COMPANY ASSETS AND FINANCIAL INTEGRITY

When creating, administering and processing documents we act professionally and responsibly.

The fundamentals for the company's success are its assets as well as its professional accounting and record-keeping processes. We create, administer and dispose of company documents in compliance with all internal policies and guidelines as well as all regulatory and legal requirements.
In the event of legal proceedings or official investigations, please consult the management before destroying any document, regardless of the format in which it is stored (paper or electronic). Pollmann does not tolerate any kind of fraud and will cooperate with investigating parties or officials if necessary.

03 LEGAL COMPLIANCE

We are all responsible for knowing and following the rules.

Pollmann's commitment to integrity begins with respecting and complying with all applicable laws, rules and regulations in every country where we do business. All employees, representatives of Pollmann and all who act in the name of Pollmann must have an understanding of the company's internal policies as well as the laws, rules and regulations that apply to each specific role.
If we are not sure whether a planned action is permitted by law or by a Pollmann policy, we need to seek the advice of the relevant experts. All employees are responsible for preventing violations of law and for speaking up if they see possible violations. Lack of knowledge of the rule, law or regulation is no excuse.

04 SAFETY, HEALTH AND ENVIRONMENTAL PROTECTION

We all contribute to a healthy and safe work environment.

Pollmann is dedicated and committed to maintaining a safe and healthy environment. We comply with applicable laws, regulations and quality criteria on safety and related work practices. Every employee is responsible for safety, security, health and environmental protection at the workplace to the fullest extent required by their duties and to the best of their knowledge, ability and experience. We report any safety, security, health or environmental issues to the relevant internal representative. If this person does not resolve the problem, we contact our direct supervisor. As a last resort, we contact the Compliance Office.

05 INTELLECTUAL PROPERTY

We protect and respect the company's property, including intellectual property like copyrights, trademarks and patents.

The protection of the company's intellectual property is secured by lawful intellectual property rights. Employees must protect the company's physical assets and ensure their efficient use. The company's intellectual property rights exist in numerous forms of data and media, for example on the internet, in e-mail systems, as images or written documents, in products, trademark names and in technical processes, irrespective of whether they are recorded on paper or electronically. Generally, the product of every employee's work and the associated intellectual property rights, such as copyrights, trademark rights and patent rights, are Pollmann's property.
Any suspected incident of fraud, vandalism or theft should be immediately reported to the Compliance Office for investigation. Furthermore, the unauthorized use or disclosure of the company's intellectual property may result in disciplinary action, and/or cause the company to pursue civil or criminal penalties against current or former employees.

06 COMPETITON

We act as fair competitors on the market. Our success is based on quality.

Pollmann is dedicated to ethical, fair and dynamic competition. Our competitive position is based solely on our business success factors, in particular our innovative products and services, quality, reliability and fairness. We will make independent pricing and marketing decisions. We will not offer or ask for improper payments or gratuities in connection with the purchase of goods or services from Pollmann or for the sale of its products or services.
Whether from past or present employees of our competitors, we will not acquire or seek to acquire by any improper means competitors' trade secrets or other proprietary or confidential information.
No employee should take unfair advantage of any customer, supplier, vendor or other employee through manipulation, misrepresentation of material facts, or any other intentionally unfair business practice. In short, all employees must comply with all laws that deal with fair competition and anti-competitive business practices.

07 INTERNATIONAL TRADE

We follow all international trade laws. If we have questions, we contact the Compliance Office.

Many countries regulate international trade. These trade laws and regulations apply to import, export, and re-export of goods, software, technology, and international financial transactions. The company follows all import and export laws in the jurisdictions where it operates. Because of the complexity of international trade law, in case of questions, employees turn to the Compliance Office.

08 CONFIDENTIAL AND PROPRIETARY INFORMATION

We do not give confidential or non-public information to outsiders.

The company is committed to safeguarding information from unauthorized access, disclosure, modification or destruction. The protection of confidential company information and non-public information entrusted to us by our customers and business partners is highly important to Pollmann's business success.
Confidential and proprietary information includes pricing, financial data, customer information, processes, marketing plans, research and development, product design, etc. We do not disclose confidential company and non-public information without a valid business purpose and proper authorization. All employees, regardless of their position, must preserve and protect confidential information both while employed and after employment ends for any reason.

09 MEDIA INQUIRIES

We only pass on information to the media after consultation with the management.

Pollmann is a well-respected company in our community. From time to time, journalists and other members of media may approch our employees. In order to ensure that we speak with one voice and provide accurate information about the company, all media inquiries shall be directed to the management. Nobody is allowed to issue a press release without first consulting the executive management.

10 FALSIFYING INFORMATION

We remain truthful when providing information, whether verbally or in writing.

Employees must not falsify information, whether verbal or written. This regulation includes, but is not limited to, omitting or falsifying information on an employment application, resume, time card or any other company document or record. Mistakes should never be covered up. They must be reported immediately and in full to the Compliance Office.

11 USE OF COMPANY PROPERTY

We use computers, phones, printers and all other devices provided by the company for authorized professional purposes only.

In general, Pollmann does not allow the use of company equipment such as computers, printers and other devices for an outside business or any personal activity. To protect the interests of the Pollmann network and its employees, Pollmann has the right to monitor or review all data and information contained on an employee's company-issued electronic device. There should be no expectation of privacy when using electronic devices provided by the company. Pollmann does not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive.
Unauthorized use of any company equipment may result in disciplinary action, up to and including, termination of employment, and cause the company to pursue civil or criminal penalties depending on the jurisdiction.

12 HARASSMENT

Harassment in the workplace is not acceptable and must be reported immediately.

The company does not tolerate any form of harassment, including sexual harassment. The company investigates, promptly and thoroughly, all allegations of harassment. If any employee is a victim of harassment or observes harassment, they should inform the Compliance Office immediately so that the company may start an investigation. The company does not accept retaliation against any employee who reports discrimination or harassment.

13 SUBSTANCE ABUSE

We do not use alcohol or other drugs in the workplace.

The company is committed to maintaining a drug-free workplace. Being under the influence of, unlawfully using, selling and/or consuming prescription drugs, controlled substances and/or alcohol on the company's premises is strictly prohibited and grounds for termination of employment.

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14 GIFTS, BUSINESS GRATUITIES AND BRIBERY

We do not accept or offer payments in order to gain advantages. If in doubt, we ask the Compliance Office for advice.

The company encourages the use of good judgment, discretion and moderation when giving or accepting gifts or business gratuities. The exchange of reasonable gifts and invitations are common practice and generally accepted. However, they may never be used to influence any business decision. They must not be reasonably perceived as setting up unfair business practices that would violate any law, regulation or policy of Pollmann or its customers. No gifts or gratuities must ever be offered or accepted that would cause embarrassment or reflect negatively on Pollmann's reputation.
Employees must seek review and advice from the Compliance Office regarding any gifts or proposed gifts (given or received) that could be perceived as either inappropriate or excessive. All transactions must be properly and correctly recorded. Never give a payment to any government official to speed up a matter or action. Do not make contributions on the company's behalf without prior approval from the Compliance Office.

15 CONFLICT OF INTEREST

We make objective and fair decisions and act in solidarity with the company's interests.

Pollmann employees must avoid any relationship or activity that might harm their ability to make objective and fair decisions when performing their jobs.
We speak of conflict of interest when an employee's private interests interfere or appear to conflict with the legitimate interests of the company. Employees have to remain neutral in all circumstances and make sure their judgment is not influenced by personal or family interests. They are prohibited from directly or indirectly accepting business opportunities for themselves that rightfully belong to the company. Employees may not use company property, information or their position in the company for personal advantages or to compete directly or indirectly with the company.
Any activity or relationship that could lead to a conflict of interest must be discussed with the Compliance Office for review or advice.

16 MONEY LAUNDERING

We do not do business with criminal organizations. If we suspect money laundering, we report this to the Compliance Office.

The company only does business with reputable organizations whose business is legal and whose funds come from legal sources. Many countries have laws that prohibit accepting money from criminal activities. Any employee who becomes suspicious or has questions about money laundering must discuss concerns with the Compliance Office before continuing business activities.

17 REPORTING VIOLATIONS OR SUSPECTED VIOLATIONS

We report violations against laws or this Code of Conduct to superiors or to the Compliance Office.

Employees must report violations of this Code of Conduct, of the Code on Human Rights and Working Conditions and unethical or illegal behavior as well as violation of laws, regulations and guidelines. We encourage our employees to adhere to this Code of Conduct and communicate any violations or unethical behavior to their superiors. If their superiors do not respond or reporting to them is not appropriate in the specific case, please contact the Compliance Office.

Contact the Compliance Office via:
https://pollmann.integrity.complylog.com

INFORMATION, RESOURCES AND RESPONSIBILITIES

HELMUT RÖSSL-GROBBAUER
Director People & Culture Pollmann International
Compliance Officer

KATHARINA AMMER
Director Legal Pollmann International
Compliance Officer

Responsible for reviews and decisions in the event of deviations from this Code of Conduct.

Compliance Office:
https://pollmann.integrity.complylog.com

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This Code applies equally to all locations.

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