



CODE OF CONDUCT – HOW WE WORK



Robert und 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 initialized a new development stage.

We put the operational responsibility for a healthy growth of our international enterprise into the hands of an experienced management team. With them we coordinate all vital strategic decisions while still carrying responsibility as a family. Thus we give the next generation the opportunity to take over the company with joy and to keep developing it with enthusiasm.

Our values characterize future rules:

What is valid for our family shall be valid for the company. Honesty, fairness and loyalty define how we interact in each of our company locations. We make sure that interaction between all employees is based on respect and mindfulness.

Pollmann International is considered a champion in process innovation with great expertise in mechanical and electro-mechanical components. This distinction gives us a lasting attractiveness both as a client 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 stay in a close connection to the company. We wish the management team all the best in developing Pollmann as a brand.

With kind regards

Markus Pollmann

Robert Pollmann

WE, POLLMANN

We are an internationally active family business in the automotive industry with over 125 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 create better solutions. We are connected to our customers in a cooperative alliance for mutual success.



CAPABLE

The best partner for components in metal-plastic composites.



COMPREHENSIVE

Full-service provider for process innovation solutions.



PERFECT

We combine quality with flexibility and supplier reliability.



COLLECTIVE

Process innovation relies on trustful business partnerships.



MOTIVATED

Identification and passion is based on the joy of creation.



SUSTAINABLE

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



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 be able to comply with the code, we make sure we understand it.

This Code of Conduct applies to all Pollmann employees and representatives who act in the name of Pollmann. Every one of us is responsible for knowing and complying with the values and standards defined in this code and for raising questions if we are uncertain about any company policy. If we are concerned whether the standards are being met or are aware of violations of the code, we contact senior management or human resources for advice on how to apply this code.



01

CORPORATE CULTURE AND LEADERSHIP BY EXAMPLE

We live our values. Managerial staff acts as a role model.

Pollmann is a family owned business with an international reach. The success of its business is dependent on the trust, honesty, respect, fairness, loyalty and confidence we earn from our employees, customers and other stakeholders. We gain credibility by keeping to these commitments, and by displaying the necessary honesty, integrity and quality required in order to reach the Company's goals. 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: Their assets as well as their professional accounting and record-keeping processes. We create, administer and dispose of company documents—as part of our normal course of business—in compliance with all internal policies and guidelines, as well as all regulatory and legal requirements.

In the event of legal action or governmental investigation, please consult senior management before destroying any document regardless of the format (paper, file, electronic) in which it is saved or stored. Pollmann does not tolerate any kind of fraud and, if necessary, will work with investigating parties or officials.

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. Further, 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 unsure of whether a planned action is permitted by law or by a Pollmann policy, all employees must seek the advice from the resource expert. 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, safe work environment.

Pollmann is dedicated and committed to maintaining a safe and healthy environment. We stay in compliance with applicable laws, regulations and quality criteria on safety and related work practices. Every employee is personally 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. Any safety, security, health or environmental issue should be reported to senior management without undue delay.



05 INTELLECTUAL PROPERTY

We protect and respect the company's property. This includes 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 the property of Pollmann.

Any suspected incident of fraud, vandalism or theft should be immediately reported to senior management for investigation. Further, both while employed by the company and after the employment with the company ends for any reason, 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 COMPETITION

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. We ask senior management for advice if questions arise.

Many countries regulate international trade. These trade laws and regulations apply to all import, export, and re-export of goods, software, technology, and international financial transactions. In all jurisdictions where the company operates, it will follow all import and export laws. Because of the complexity of international trade law, all employees must contact senior management with any questions.



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 nonpublic information entrusted to us by our customers and business partners is highly important to Pollmann's business success.

Confidential and proprietary information includes such things as pricing, financial data, customer information, processes, marketing plans, research and development, product design, etc. We do not disclose confidential company and nonpublic information without a valid business purpose and proper authorization. All employees, regardless of position, have an obligation to preserve and protect confidential company and nonpublic information both while employed and after employment ends for any reason.

09 MEDIA INQUIRIES

We only give information to the media in accordance with the executive management.

Pollmann is a well-respected company in our community. From time to time, employees may be approached by journalists and other members of the media. In order to ensure that we speak with one voice and provide accurate information about the Company, all media inquiries shall be directed to executive management. No one may issue a press release without first consulting with the executive management.

10 FALSIFYING INFORMATION

We stay truthful when giving information, whether verbal or in writing.

Employees must never 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 and should immediately be disclosed in full to senior management.



11 USE OF COMPANY PROPERTY

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

Generally, Pollmann does not allow the use of company equipment such as computers, printers and other devices for an outside business or any personal activity. In order to protect the interests of the Pollmann network and its employees, Pollmann reserves 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 at the workplace is not accepted 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, please notify senior management 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.



14 GIFTS, BUSINESS GRATUITIES AND BRIBERY

We do not accept or offer payments in order to gain advantages. If in doubt, we ask our superiors 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 senior management 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 executive management.

15 CONFLICT OF INTEREST

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

Pollmann employees must avoid any relationship or activity that might harm, or appear to harm, their ability to make objective and fair decisions when performing their jobs. A conflict of interest exists when an employee's private interests in any way interfere or appear to conflict with the legitimate interests of the company. We expect our employees to remain neutral in all circumstances and to make sure their judgement is not influenced by personal or family interests. Employees are not allowed to take for themselves—directly or indirectly—business opportunities that rightfully belong to the company using company property, information or the employee's position for personal gain, and/or competing directly or indirectly with the company. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review and advice from senior management.

16 MONEY LAUNDERING

We don't do business with criminal organizations. If we suspect money laundering, we report to the management.

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

17

REPORTING VIOLATIONS OR SUSPECTED VIOLATIONS

We report violations against laws or this codex to the management or human resources department.

Every employee has an obligation to report violations of this code, of unethical or illegal behaviors or violations of laws, regulations or policies. We encourage all of our employees to adhere to and comply with this code of conduct. We encourage to communicate any violations or unethical behavior to senior management. If senior management is unresponsive or if there is reason to believe that reporting to such individuals is inappropriate in particular cases, then the employee is required to contact executive management, or the human resources department (compliances@pollmann.cn).

INFORMATION, RESOURCES AND RESPONSIBILITIES

HERBERT AUER

CEO Pollmann International

EWALD MIKSCHKE

CEO Pollmann China

Reviews and decides on any deviation of this Code of Conduct.

LYNN WU

Human Resources Manager Pollmann China

Monitors, advises and supports management with decision surrounding this Code of Conduct.

compliances@pollmann.cn

● **POLLMANN MECHATRONICS (KUNSHAN) CO., LTD.**

No. 508-8, Hengguanjing Road

Zhangpu Town, Kunshan 215321, P.R.China

Phone: +86 512 5700-3688 / office@pollmann.cn

www.pollmann.at

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