

CODE OF CONDUCT OF NAF¹ NEUNKIRCHENER ACHSENFABRIK AG

Foreword

This Code of Conduct is of central importance for NAF Neunkirchener Achsenfabrik AG. It forms the basis of our actions and provides the context for them, whether within the company or in relation to our external business partners or the general public.

Every employee² of NAF must therefore be familiar with and observe these guidelines and principles. They are especially important for the managers of our company. They must ensure compliance by their employees and themselves be a model of how these rules are observed.

We have always stood for fair competition, personal integrity as well as the quality, sustainability and innovativeness of our products. These values and aspects should be the foundation of our business success in the future.



Erwin Urban, Bernhard Schnabel & Dr. Norbert Knorren,
executive board, Neunkirchen am Brand, 14 July 2022

CODE OF CONDUCT

A. Basic Rules of Conduct (lawful conduct, respect and honesty, responsibility for the reputation of NAF)

Compliance with relevant laws and internal guidelines is a matter of course for us and every employee must adapt to this. This applies in the same way in all countries where we carry on business activities.

We respect the dignity, privacy and intimacy and other personal rights of every individual with whom we come into contact in the course of our business activities. We work together free of discrimination with people of various ethnic origins, religions, cultures, differing ages, regardless of disability, race, sexual identity, world view and gender.

We see ourselves as open and honest business partners and are committed to our social responsibility. We only make promises that we can keep.

Our actions are characterised by principles of sustainability and integrity that are of fundamental importance for us and are reflected in our actions.

We expect our employees to behave honestly and to preserve and further the reputation of NAF.

B. Dealing with employees (non-discriminatory attitude, no harassment, no child labour, no forced labour, compensation and working hours)

It is natural for us to engage employees without discrimination and only if the required work permits exist. Employees are not employed with us against their will or forced to work. We will not tolerate any unacceptable treatment of employees, such as mental cruelty, sexual or personal harassment or discrimination; the same applies to actions or behaviour, including gestures, language or physical contact, that are sexually coercive, threatening, abusive or exploitative. We employ only staff who have reached the legally prescribed minimum age. We ensure fair compensation and adhere to the scope of statutory working hours. We respect the freedom of association of our employees and neither favour nor discriminate against members of employee organisations or trade unions.

C. Dealing with business partners and third parties (no antitrust violations, no corruption)

Fair competition is a prerequisite for free market development and the associated social benefits for society. Consequently, the principle of fairness also applies to competition for market share. We commit ourselves to respect the rules of fair competition. We receive orders based on the quality and price of our innovative products and other services.

We do not tolerate any kind of corruption or bribery.

All employees of NAF, both direct and indirect, are prohibited from demanding, accepting, offering or granting of advantages if business dealings could be influenced in an unacceptable manner.

In dealing with contributions in the form of gifts or entertainment, we are rigorously attentive to avoid any appearance of bad faith or impropriety. We do not tolerate any contributions that reflect doubt on our integrity or that might be construed to influence business decisions.

D. Dealing with information (reporting, confidentiality, data protection)

Open and efficient communication particularly requires objective and truthful reporting. This applies to relationships with investors, employees, customers and business partners as well as to the general public. For us, then, truthful reporting is a matter of course. For confidential information of NAF that is not meant for the general public or third parties, the requirement of confidentiality applies. We expect all our employees or other third parties, in particular business partners, to treat confidential information in accordance with legal requirements or contractual agreements. Conversely, our business partners may also require of us and expect us to protect their confidential information accordingly. We protect data and information that are relevant for safeguarding personal rights and transmit it only in compliance with laws, while taking necessary precautions. We respect the relevant rights of persons concerned to access and, where appropriate, to object to, block and delete data.

E. Environment, Safety and Health

Protecting the environment and conserving natural resources are an important corporate goal for us. Through the commitment of our management and our employees, we wish to make our business environmentally friendly and energy efficient and we expect the same from our business partners. In particular, legal norms and international standards for protecting the environment must be observed. We are committed to environmentally friendly product design. The environmental impact of our business processes is optimally reduced and our energy and environmental performance improves continuously.

The safety and health of our employees in the workplace is a high priority for us. We hold the expectation for both ourselves and our business partners that the working environment will meet the requirements for a health-oriented design. In particular, risks should be curbed and the best possible precautionary measures should be taken to prevent accidents and occupational diseases. In addition, employees should receive training in occupational safety.

An environmental management and occupational safety management system is implemented in company procedures.

F. Monitoring compliance with the Code of Conduct

If violations of this Code of Conduct occur, every employee is required to file a complaint with management, Human Resources or any other person or department designated for this purpose. Reprisals of any kind against complainants will not be tolerated.

The management of NAF actively promotes broad dissemination of this Code of Conduct and supports its implementation with suitable measures and procedures.

¹ NAF refers to the 'NAF Neunkirchener Achsenfabrik AG' or its subsidiaries.