

# Code of Conduct

## Foreword

This Code of Conduct establishes guidelines for the moral, ethical and lawful behaviour of all OTT-JAKOB employees, including executives, in their interactions with our stakeholders (in particular customers, suppliers, employees, colleagues and other business partners). The applicable laws in Germany and abroad, EU directives and recognised international agreements must be observed and complied with in all business decisions and actions. In line with our responsible and sustainable corporate governance, OTT-JAKOB expects its partners throughout the value chain to comply with this Code of Conduct.

### 1. Human rights

Within our company, compliance with internationally recognised human rights is respected and promoted. This naturally includes preventing any involvement of the company in human trafficking or modern slavery.

### 2. Child and forced labour

The regulations of the United Nations on human rights and children's rights are observed. In particular, the Convention on the minimum age for admission to employment and the Convention concerning the prohibition and immediate action for the elimination of the worst forms of child labour should be used as a benchmark and observed. If a national regulation concerning child labour prescribes stricter standards, these must be given priority. The rights of young employees must be respected and special protective regulations must be observed. Any form of forced labour is strictly forbidden.

### 3. Discrimination

Employees must be treated with respect and dignity. OTT-JAKOB employees are called upon to oppose any form of discrimination within the framework of the applicable rights and laws. This refers in particular to discrimination against employees on the basis of gender, race, disability, ethnic or cultural origin, religion or ideology, age or sexual identity. In addition, sexual harassment and inappropriate treatment in the workplace are strictly prohibited.

### 4. Occupational safety

Health and safety and the avoidance of harmful influences must be guaranteed. Strict compliance with occupational health and safety regulations is the mandatory duty of each individual. All employees are responsible for constantly improving occupational safety and their level of training.

### 5. Product safety

We conduct risk analyses, implement appropriate preventive measures and utilise operational procedures, leveraging our extensive expertise in the application areas of our clamping technology components. This approach allows us to enhance safety during their use. Our development team is committed to adhering to the general product safety guidelines in the respective markets.

**6. Corruption, bribery, extortion**

Corruption, extortion and bribery in any form are neither practised nor tolerated by us. When dealing with business partners and government institutions, the interests of the company and the private interests of employees on both sides are strictly separated. Decisions and actions are carried out without any irrelevant considerations or personal interests. In particular, any personal benefit offered or accepted in exchange for preferential treatment within the scope of business transactions must not be solicited, offered, demanded, promised, granted or endorsed if it is intended to improperly influence a business relationship or poses a risk of compromising the professional independence of the business partner.

**7. Money laundering, export controls**

OTT-JAKOB supports the global measures to combat money laundering, as we attach great importance to ensuring that economic success is achieved in compliance with the applicable laws. As an international company, we observe all relevant economic sanctions and comply with all local and international trade regulations and export and import control laws.

**8. Data protection, intellectual property, fair competition**

We take the protection of the personal data of our employees, customers, business partners and applicants very seriously. When processing data, we comply with the statutory data protection regulations.

Each of our employees is obligated to maintain confidentiality regarding any confidential information, operational or business secrets that become known to them, regardless of how the information was obtained. We are committed to absolute confidentiality regarding our company and business data. Internal company data may neither be used to further the company's own interests nor made accessible to third parties. This commitment applies equally to sensitive information and intellectual property that we receive from our customers, suppliers or business partners.

We act in accordance with national and international competition and antitrust laws and do not participate in price or bid rigging or market sharing.

**9. Conflicts of interest**

OTT-JAKOB strives for a sustainable, professional relationship with its business partners based on economic principles. Any mixing of personal and business interests between OTT-JAKOB employees and its customers, suppliers or other parties involved in business processes that could impact the employees' work behaviour or OTT-JAKOB's legitimate interests may lead to conflicts of interest and is prohibited.

**10. Ecological responsibility**

A responsible approach to the environment and the careful use of resources are integral parts of our daily operations. Each employee bears the responsibility to treat natural resources with care and to contribute to protecting the environment and climate through their individual behaviour. This is in the interest of us all. For us, the legal framework is the starting point for further measures, such as extensive training, appropriate organisational structures and environmentally friendly and energy-efficient construction and equipment. We promote environmental awareness and strive to continuously reduce our ecological footprint.

**11. Conflict mineral, REACH, RoHS**

In our business conduct, we advocate for the peaceful and sustainable use of global resources. We do not directly import "conflict minerals", nor do we currently have any indications that minerals originating from conflict regions are present in our products. We ensure compliance with REACH, RoHS and other relevant regulations with regard to our products.

**12. Supply chain**

We also expect our business partners to comply with the principles set out in this Code of Conduct.

**13. Reporting concerns**

In order to protect our employees, business partners, the environment and wider society, it is imperative that any deviation from the aforementioned principles of behaviour be reported immediately. All stakeholders can use the following reporting channel for this purpose: [HinweisSchG@ott-jakob.de](mailto:HinweisSchG@ott-jakob.de)

All incoming reports dealing with compliance matters are processed immediately. OTT-JAKOB will not tolerate any form of discrimination against whistleblowers who submit reports in good faith. All whistleblowers will receive feedback on each report they submit. After careful review, appropriate measures to remedy the deviation will be taken as quickly as possible in each justified case.

OTT-JAKOB Spanntechnik GmbH  
Lengenwang, June 24<sup>th</sup> 2024