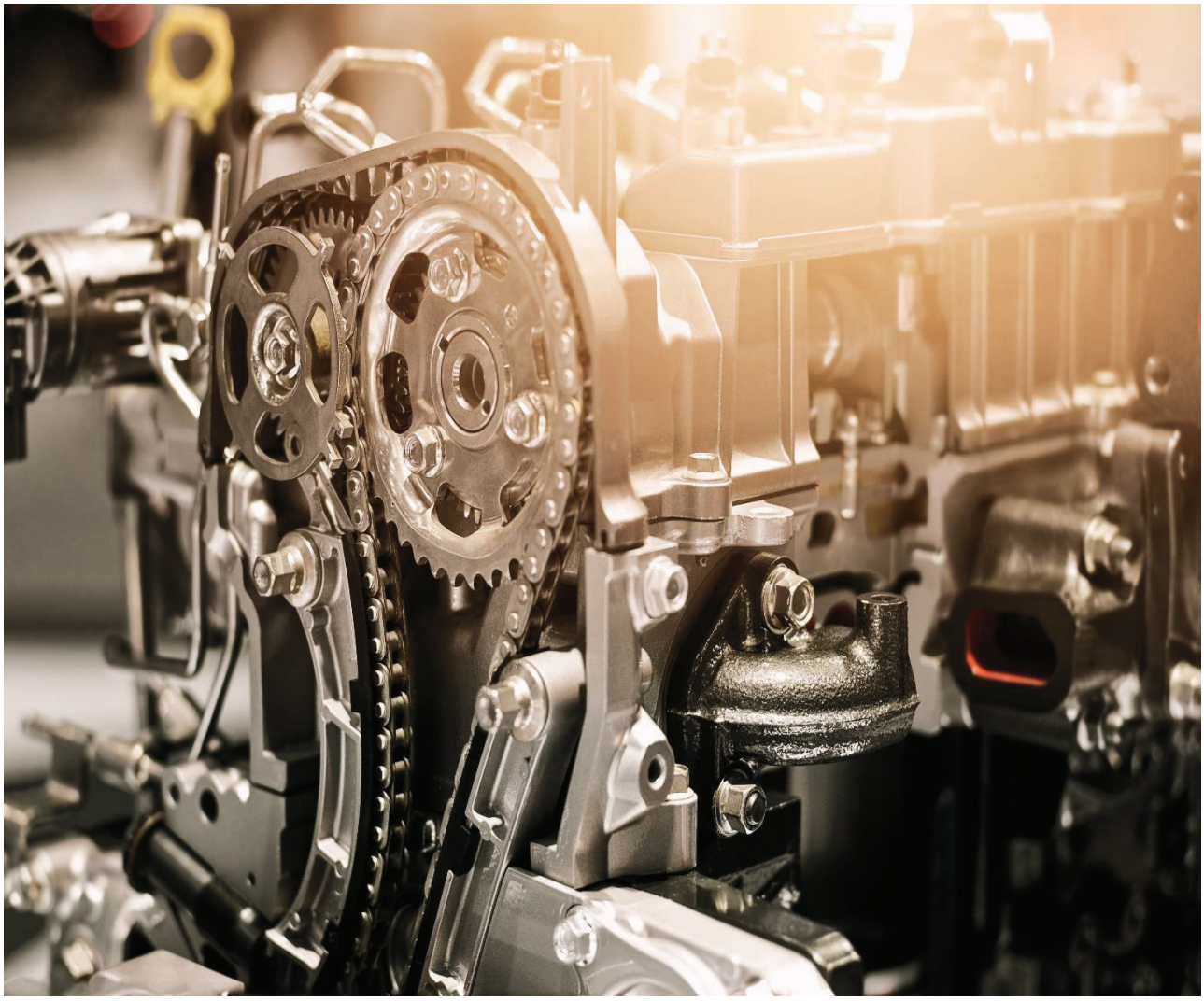
CATENSYS
chain drive systems

Code of Conduct



CATENSYS Germany GmbH
Nägelsbachstr. 33, 91052 Erlangen
T +49 9131 9166134 Email: info@catensys.com
Geschäftsführer: Mark Haberkorn, Axel von Bauer
Amtsgericht Fürth, Handelsregister-Nr. HRB 19186
Bankverbindung: Commerzbank AG München,
IBAN DE79 7004 0041 0271 7726 00, BIC COBADEFFXXX

Code of Conduct

Contents

1	Preamble	3
2	Conduct Towards Business Partners and Third Parties	4
2.1	Integrity	4
2.2	Conflict of Interest	4
2.3	Fair Competition	4
2.4	Anti-Corruption	5
2.5	Anti Money Laundering	5
2.6	Suppliers and Other Commercial Third Parties	5
3	Compliance with Laws, Regulations and Internal Company Rules, Standards, Instructions	6
3.1	International Trade Restrictions	6
4	Interactions with Employees	7
4.1	Employee Development	7
4.2	Respect for Human Rights and Fair Working Conditions	7
4.3	Rejection of Forced and Child Labor	8
5	Dealing with Information and Resources	9
5.1	Privacy and Cyber Security	9
5.2	Use of Company Property	9
5.3	Protection of Confidential Information	9
5.4	Third Party Information	10
6	Responsible Documentation and Reporting	10
7	Environment, Safety and Health	11
7.1	Safety and Health Protection	11
7.2	Environmental Protection	11
8	Code of Conduct Violation Reporting, Protected Disclosure and Whistleblower System	12

1 Preamble

We revised our Catensys Code of Conduct in 2023. With the new edition, we describe the framework of our Catensys values more clearly and understandably.

It is based on our common "Vision and Mission," our four corporate values of trust, integrity, respect and cooperation, as well as the sustainability of our actions.

We have earned an excellent reputation with our customers and suppliers through decades of excellent work, innovative technologies and first-class quality. This is a valuable asset that we want to secure and expand.

The Catensys Code of Conduct is an integral part of our global corporate culture. It applies throughout our organization. It supports our actions in accordance with laws, regulations and internal guidelines. This gives each of us more clarity, security and freedom of action in our own behavior.

This Code of Conduct defines what we stand for and how we conduct our business. We expect all employees[1] to follow the Code.

Thank you for your support.





Mark Haberkorn
CEO Catensys Group

Axel von Bauer
CFO Catensys Group

[1] As far as only the male designation is used below for the sake of simplicity, this applies to all genders.



2 Conduct Towards Business Partners and Third Parties

2.1 Integrity

Our business relationships are governed by integrity and we comply with all applicable anti-bribery laws and regulations. We strive to build positive and collaborative relationships with customers, suppliers and stakeholders. Entertainment and small gifts can strengthen relationships, but we will not use them to improperly influence business relationships or decisions.

2.2 Conflict of Interest

Catensys expects loyalty and integrity from all employees. This means that all employees act exclusively in the interests of Catensys as part of their employment in the company. The private interests and personal considerations of each employee should not influence judgment when acting in the best interests of Catensys.

Therefore, any activity or situation that could lead to a conflict between personal interests and the business interests of Catensys should be avoided. If there is a potential conflict of interest, this is to be reported by the employee to the respective supervisor or the HR department.

2.3 Fair Competition

Catensys strives to compete in a fair and compliant manner and to achieve its own business success based on existing technical knowledge, own products and competitive prices. This means that Catensys will present the products in a clear, honest and direct manner and will not use unfair methods of competition.

2.4 Anti-Corruption

We reject and do not tolerate any form of corruption, bribery, theft, embezzlement, extortion or illegal payments. We do not offer, give, solicit, or accept bribes, illegal payments, kickbacks, inducements, lavish gifts, hospitality and invitations to events, favors, or any other benefit or gratuity of value for the realization of business opportunities with or related to Catensys' business activities.

Violations of anti-corruption laws can result in void contracts, criminal penalties and fines. Any involvement in corruption harms Catensys.

We take personal responsibility for all our actions and behavior and always act to the best of our knowledge and belief in all matters affecting Catensys.

We expect that our business partners (e.g., customers, suppliers, representatives and consultants) also observe the relevant legal provisions. Catensys will only do business with partners who engage in ethical business practices and do not expose the company to criminal or other liability or damage the company's reputation. Catensys stands for fair and undistorted competition.

Catensys and its employees observe and follow the antitrust regulations of the markets in which Catensys operates. Almost every country has laws and regulations that prohibit relationships or agreements between customers, competitors or suppliers that could distort competition.

Benefits are only permitted if given or received in accordance with the Anti-Corruption Policy. This means that the grant must be appropriate and transparent. In addition, offering an advantage in any form for the purpose of influencing anyone in the public or private sector is prohibited. The same applies to the acceptance of benefits of any kind or the offering of such benefits (such as gifts, invitations or benefits).

2.5 Anti Money Laundering

Catensys is subject to certain obligations under national anti-money laundering laws that may apply internationally. Therefore, all Catensys business units must review questionable or dubious transactions and payments and monitor their business relationships. Money laundering is the conversion of profits from criminal activity, such as tax evasion, into what appear to be legitimate assets.

2.6 Suppliers and Other Commercial Third Parties

Catensys applies the same high standards of integrity to suppliers and business partners as it does to itself. Catensys expects suppliers and business partners to comply with the obligations set out in the Catensys Code of Conduct for third parties.

3 Compliance with Laws, Regulations and Internal Company Rules, Standards, Instructions

Catensys complies with all applicable laws and regulations of the countries in which we operate as a company. In addition, all internal company rules, principles and instructions are followed. Compliance with applicable laws and regulations is mandatory. Because such laws and regulations may vary from country to country, it is not possible to list them specifically in this Code of Conduct.

3.1 International Trade Restrictions

Catensys is a global company involved in international trade every day. It is essential when engaging in international trade transactions that you comply with all applicable laws and company requirements, including trade compliance policies that apply to the following topics:

a) Import and Export Controls

National and international laws regulate the import, export or domestic trade of goods, technology, services and the handling of certain products. Catensys must implement appropriate procedures to ensure that transactions with third parties do not violate economic embargoes, trade regulations, regulations on import and export controls or regulations on the prevention of terrorist financing. Requirements may vary based on local laws and apply to transfers between Catensys affiliates as well as transfers between Catensys and external parties.

b) Trade Sanctions

It is to be ensured that the trade restrictions imposed by various governments on countries, territories, entities and individuals are observed. Catensys is committed to complying with all applicable export and import laws, including but not limited to sanctions, embargoes and other laws, regulations, governmental orders or directives.



4 Interactions with Employees

4.1 Employee Development

It is Catensys policy that skills, qualifications and other work and business criteria form the basis of all employment related decisions (including hiring, promotion, termination, compensation and benefits, and access to training and development). Catensys is an employer that offers equal opportunities.

Catensys is proud of the diversity that employees around the world bring to our company. Diversity such as gender, culture or religion is used together as different perspectives for innovation and performance.

4.2 Respect for Human Rights and Fair Working Conditions

As a company and as an employee, Catensys bears responsibility for respecting human rights and fair working conditions. Catensys wants to actively contribute to their implementation by treating employees, future potential employees, suppliers, customers and everyone else with whom Catensys does business with fairness and respect. The internationally recognized standards of the International Labor Organization (ILO), among others, guide our actions. This includes at least:

a) All employees have the right to freedom of association and the representation of their interests by elected representatives.

b) Catensys expects the work environment to be free from inappropriate behavior. Physical or verbal harassment or mistreatment in any form is unacceptable.

c) Catensys undertakes, together with its employees, to create a working environment that is free of any discrimination based on gender, age, race, skin color, social or ethnic origin, nationality, sexual orientation, religious or political beliefs or other legally protected characteristics.

d) Catensys is committed to protecting the rights of minorities and ensuring equal treatment for women. In accordance with the United Nations' "Women's Empowerment Principles," we want to promote the empowerment of women to fully participate in economic life in all countries and business areas in which we operate.

e) Catensys recognizes the employee's right to appropriate and market-based remuneration and adheres to the legally guaranteed minimum wages in the respective labor markets. The applicable labor law regulations (e.g., in relation to working hours and social benefits) in the countries are followed.

f) Catensys expects that inappropriate behavior can be addressed actively and constructively and that conflicts are attempted to be resolved together. If individual employees feel that inappropriate behavior is taking place, they must speak to their manager or the local Human Resources department.

4.3 Rejection of Forced and Child Labor

Any form of forced labor and child labor is rejected within the company. Catensys condemns any form of exploitation and discrimination and strictly adheres to legal requirements.

5 Dealing with Information and Resources

5.1 Privacy and Cyber Security

Catensys complies with all applicable laws and regulations, as well as Catensys' privacy and cybersecurity rules, policies and guidelines.

Failure to comply with cyber security and protection measures can result in serious consequences such as loss of data, disclosure of confidential information and trade secrets, theft or misuse of personal data. Employees should contact the Catensys Data Protection and Cyber Security Officer or their local Human Resources department if they have any questions about data protection.

5.2 Use of Company Property

Employees treat Catensys company property with reasonable care and responsibility. Unless otherwise specified in local Catensys rules, Catensys corporate property is for use within the scope of its business activity.

Catensys corporate property includes property, such as products manufactured by Catensys, production and office equipment, tools, systems and vehicles as well as intangible assets such as e.g., know-how and intellectual property rights.

The resources provided, including company information, information technology systems and property, plant and equipment, must be used appropriately for business purposes. Employees are expected to promptly report any theft or damage to company assets to the company. When participating in the conclusion of contracts for Catensys, the applicable company processes must be observed.

5.3 Protection of Confidential Information

Protecting confidential business information and secrets (“Confidential Information”) is essential to safeguarding Catensys' interests and success. Employees are responsible for ensuring that all confidential information obtained during their own business activities is treated as strictly confidential, not misused and not disclosed to colleagues or third parties.

This may be information owned or related to Catensys or other organizations or individuals.

Examples of Catensys Confidential Information:

Research and development information, product design details, manufacturing methods, non-public financial results, business plans and strategies, potential licensing and acquisition agreements, and legal notices and advice.

5.4 Third Party Information

The intellectual property rights and confidential information of third parties must be respected.

Confidential information of third parties shall not be obtained in an inappropriate manner (including from persons bound by confidentiality obligations, such as consultants, suppliers or current or former employees of the third party).

Material from external parties may not be used in a way that is inconsistent with the rules of intellectual property rights, including copyright.

Employees understand that if confidential information is misused or disclosed, they may be subject to disciplinary action, up to and including termination, even if the individual does not personally benefit from such disclosure.

If the employee leaves Catensys, he will not disclose or use Confidential Information, but will promptly return property of that nature, including but not limited to confidential information, to Catensys.

6 Responsible Documentation and Reporting

Catensys is committed to maintaining books and records that accurately and completely reflect its financial condition and business operations. The integrity of books and records is essential to successful and effective business management.

Because Catensys operates globally, corporate transactions must be reflected in its corporate books and records in a timely, accurate, complete and understandable manner.

These documents must comply with applicable external legal and accounting requirements, as well as internal Catensys policies, regardless of where the transactions take place.



7 Environment, Safety and Health

7.1 Safety and Health Protection

Safety and health protection form an integral part of Catensys' responsibility and business activities. The company is obliged to take measures for safety (e.g., safe production machines, fire protection) and health protection (e.g., ergonomic workplaces), to follow the relevant regulations and work instructions and to ensure that the protective equipment required by law is used.

Catensys is committed to developing and manufacturing safe products.

7.2 Environmental Protection

Environmental protection is an integral part of Catensys corporate policy. Economy and environment are not mutually exclusive for Catensys. They form the basis of sustainable value creation at Catensys.

Catensys endeavors to conserve resources by continuously adapting the production, quality and performance of its own products with regard to their environmental compatibility and by reducing the consumption of energy, water and raw materials and supplies. With the processes and products, Catensys makes a significant contribution to the sustainable use of resources, environmental protection and climate protection.

All managers and employees are obliged to comply with work, safety and environmental protection standards. If you have any questions or comments on these topics, you should contact your supervisor or, if applicable, local ESH managers or the local Human Resources departments.



8 Code of Conduct Violation Reporting, Protected Disclosure and Whistleblower System

Catensys encourages all employees to report concerns or violations in good faith, with confidence and without fear of retaliation.

Catensys will not tolerate retaliation, discrimination, or disciplinary action against anyone who, in good faith, reports a reasonable concern about an attempted, actual, or suspected misconduct or violation of any provision of the Catensys Code of Conduct.

For questions related to the Code of Conduct or addressing misconduct, employees can contact a person in their immediate work environment (e.g., manager or Human Resources).

Reports of serious violations of the Catensys Code of Conduct can be submitted at any time via the Catensys compliance whistleblower system. The system is available in multiple languages and allows confidential and specially encrypted secure communication with our investigative team.

Contact information for the compliance whistleblower system:

Link: https://catensys.com/compliance/

Catensys takes all reports seriously and will at all times protect the identity of those who choose to remain anonymous. Catensys deals with all reports.

* * *