

# Code of Conduct of the Kistler Group

## Prolog

As a company that operates globally, the Kistler Group undertakes to maintain compliance with national and international laws, ethical principles and values, and to ensure that employees know how they can protect the Kistler Group's reputation as they go about their business activities. The Code of Conduct of the Kistler Group defines the ethical standards that apply throughout the company and defines mandatory rules for correct conduct in everyday business life.

Laws and regulations are highly complex; they change dynamically, and in many cases, they differ from country to country. For this reason, we must also familiarize ourselves with the guidelines and laws in each country where we engage in our activities. In cases where local legislation contradicts the Code of Conduct, the local legislation must be observed. And if the applicable guidelines and business practices in the country concerned are stricter than the regulations in the Code of Conduct of the Kistler Group, the stricter guideline shall always apply.

The Code of Conduct of the Kistler Group is updated regularly by the Group Executive Committee and is integrated into our global corporate culture by means of training activities and active communication. The governing bodies, managers and employees of the Kistler Group undertake to adhere to the rules set out in the Code of Conduct, and to set the best possible example by respecting the values they represent. Disregard of the Code of Conduct may lead to substantial business losses and reputational damage and will also entail personal consequences for the employees concerned. Kistler expects its employees as well as its business partners and suppliers to acknowledge the Kistler Code of Conduct and to adhere to it in their own organizations. We have a zero-tolerance policy in case of breaches of the rules.

## No discrimination

The Kistler Group does not tolerate harassment or discrimination based on nationality, ethnic background, health, age, marital status, religion, skin color, gender or sexual orientation. As a company that operates globally, the Kistler Group fosters intercultural collaboration and diversity, and it views cultural differences among its employees as a strength and a source of experience for the firm. Individual persons are treated equally at all times and in every respect and, in particular, they have the same opportunities for promotion and career development. The Kistler Group attaches great importance to respect for all

employees, and it undertakes to ensure that employees also treat one another with respect.

The Kistler Group maintains professional and cooperative relationships between customers and employees; in this context, personal boundaries must always be respected and protected. All forms of bullying and sexual harassment are strictly condemned and punished. Physical contact, touching or sexist remarks occurring against a person's will must be reported immediately. The dissemination of fake news via any Kistler communication channel or on social media violates the interests of the Kistler Group and is therefore strictly forbidden.

## Conflicts of interest

Conflicts of interest arise when business activities result in unjustified personal advantages that could influence decisions by the employees concerned. In this context, the term 'personal advantages' refers not only to the employees themselves, but also to their closest family members and people closely linked to them if these individuals could benefit from the situation.

Independence and neutrality are the keys to sustainable and successful collaboration with our customers. Each individual employee is responsible for maintaining their own objectivity and for ensuring that external parties find no opportunities to exert pressure. Any situations that might lead to conflicts of interest should therefore be avoided and should be reported immediately.

Kistler maintains a purely professional network for the sole purpose of promoting business; it does not favor private individuals or private associations. Political or religious organizations receive neither financial support nor backing in the form of public statements.

## Fair competition

The Kistler Group and its employees undertake to exhibit legally compliant conduct in fair competition. The relevant laws on the protection and promotion of competition must be obeyed without restrictions. This applies in particular to compliance with national and international antitrust law regulations as well as to other laws and standards that regulate competition. These regulations prohibit the exchange of information and reciprocal agreements that could lead to influence being exerted on prices and conditions, to the promotion of ethically dubious

transactions, or to the impairment of free and open competition.

The Kistler Group sets great store by integrity in the execution of business transactions. Any activities that impose restrictions on competitive ability or which unlawfully promote it are strictly prohibited. The employees of the Kistler Group are obligated to maintain full compliance with the internal regulations and statutory provisions relating to competition in all business processes. Any abuse should be avoided by actively implementing preventive measures.

Employees of the Kistler Group treat all business partners with respect and approach them on an equal footing. Conduct towards business partners always aims to safeguard the interests of the Kistler Group while maintaining a correct and constructive attitude. Customers' requests and wishes are taken seriously to foster long-term collaboration that yields success for both parties.

In respect of competition as in all other areas, we do not breach any regulations, and we always adhere to quality, security and safety standards. We refrain from any market or price-fixing agreements that distort competition. In keeping with these principles, we also select our suppliers with all due care so that they too comply with our conduct guidelines.

## Combating corruption

The Kistler Group conducts its business based on honesty and the quality of the products and services it provides. For this reason, we firmly reject extortion, bribery and any other forms of corruption. The Kistler Group complies with all applicable laws in its commercial transactions with business partners, and in its dealings with authorities and official government representatives or employees.

Authorities are often subject to strict laws. Non-compliance with such laws can lead to disastrous consequences for the Kistler Group and the employees involved in the relevant transactions. Proceedings under civil law substantially damage the reputation of the Kistler Group and may lead to a general prohibition of business activities with the authority concerned. For those reasons, the Kistler Group always endeavors to be familiar with the applicable laws and to adhere to them with the greatest integrity.

## Confidentiality

Information which comes into the possession of the Kistler Group's employees during their business activities must always be utilized conscientiously and only to the extent justified by business reasons.

Compliance with the statutory provisions on data protection and privacy is always required. In particular, the personal data of customers, employees or business partners is treated as confidential, and appropriate measures are implemented to protect such information. In this regard, the employees of the Kistler Group adhere strictly to the fundamental principles of data protection and privacy.

Insofar as possible, data acquisition for business purposes takes place in anonymized form so that it does not fall within the applicable scope of data protection regulations. If personal data must be collected in exceptional cases, the data subjects must be informed of this in advance and the data must only be recorded with their explicit consent. Neither the collected data nor the analyses performed on it are disclosed to unauthorized parties, either within or outside the company.

## Intellectual property, property rights, and data protection

The Kistler Group respects the intellectual property rights of other enterprises and complies strictly with non-disclosure agreements and confidentiality regulations. Third-party copyrights, trademarks or patents must never be infringed. In return, the Kistler Group expects its own intellectual and industrial property rights to be respected by employees and third parties.

The Kistler Group obligates its employees to maintain confidentiality as regards technical know-how that strengthens the Kistler Group's competitive edge. Knowledge is the greatest asset – disregard for business secrets and disclosure of intellectual property may have serious consequences for the company.

The internal guidelines on ICT security and data protection apply to all Kistler employees, and they guarantee secure handling of sensitive know-how within the Kistler Group. Patented technologies, protected software and materials are available solely for business purposes and must be handled with the greatest care. Any abuse or damage must be reported immediately. As the Kistler Group attaches great importance to the right of privacy, it has implemented

the General Data Protection Regulation (GDPR) to protect all personal data.

## **Security of company property, financial responsibility, and disclosure of information**

Theft, damage, carelessness and waste have a direct impact on the success of the Kistler Group. We therefore protect our company's physical assets against theft, damage, loss and abusive use. Any suspected instances of fraud or theft must be reported immediately.

Each Group company is responsible for ensuring that business documentation is recorded and maintained exactly, and that any required communication is correct. The books and records of the Kistler Group are kept in compliance with the applicable laws and generally accepted accounting policies.

Financial and non-financial information and any information relating to the workforce, measures to protect safety at work, environmental practices, business activities, the financial situation, and performance are disclosed in accordance with the applicable provisions and usual industry standards.

## **Sustainability**

The Kistler Group understands sustainability as the harmonious interaction of three aspects: economic, ecological, and social sustainability. The company can only develop its full potential if all the dimensions of sustainability are given due consideration.

One key element of economic sustainability is the business system of the Kistler Group. It guarantees equilibrium among the central corporate factors and functions, and it provides the basis for our financial model and our target-setting process. Key figures tracked by the business system help us to identify changing conditions and challenges at an early stage so we can take the right strategic decisions. In all these ways, the business system of the Kistler Group safeguards the long-term success of the Kistler Group.

From the ecological standpoint, a sustainable approach to the use of resources is an indispensable success factor. As a company that operates globally with production facilities and sales outlets all over the world, the Kistler Group must meet its ecological responsibilities. The Kistler Group plays

an important part in protecting the environment thanks to foresighted corporate management, targeted utilization of resources, and efficient processes.

The Kistler Group makes every effort to meet generally applicable standards and requirements such as the EU Regulation on the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) and other regulations in connection with the EU Directive on the Restriction of the Use of Certain Hazardous Substances (RoHS). The international regulations on preventing imports of raw materials and minerals from conflict regions are also followed strictly. International certifications confirm the Kistler Group's commitment to meeting these requirements and regulations. The Kistler Group also expects its suppliers and end customers to meet these commitments.

As a matter of conviction, the Kistler Group also adheres to globally recognized social guidelines; we support the UN Universal Declaration of Human Rights (UDHR) and related guidelines issued by the OECD (Organization for Economic Co-operation and Development) and the IAO (International Accreditation Organization). For example, we categorically reject child labor, forced labor, and modern slavery – and this also applies to customers or suppliers. Employees' rights to freedom of assembly are recognized within the scope of the legal provisions.

The Kistler Group fosters a healthy and socially balanced working environment. Internal security and occupational safety policies have been established to protect our employees. Implementation of these policies is ensured by means of internal audits and training activities.

The Kistler Group's products are mainly used in contexts where demanding requirements must be met in terms of product quality, mechanical safety and reliability, and optimized process technologies. These requirements can only be met if processes to promote quality are already implemented within the Group and are put into practice by its employees.

## **Foreign trade**

The Kistler Group conducts its business as a trustworthy and reliable economic operator to meet the requirements for simplified procedures in connection with customs, origin of goods, safety and security, and export controls, so as to enable inclusion in integrated global supply chains. All business units of the Kistler Group always comply with national and international laws and regulations to avoid

penalties, the withdrawal of simplified procedures, and any loss of reputation.

The Kistler Group attaches importance to compliance with international export controls and sanctions, and it encourages and expects the same approach from its suppliers and customers.

## **Point of contact for internal and external parties**

This Code of Conduct applies to all full-time and part-time employees of the Kistler Group throughout the world. Breaches of this Code of Conduct must be reported to direct line managers so that appropriate measures can be initiated. If there is reason to assume that direct line managers themselves are involved in the breach (or are aware of it), the senior line manager or the Kistler Head of Compliance must be contacted.

Discriminatory or punitive measures against employees who report breaches of this Code of Conduct in good faith, or who refuse to participate in such a breach, shall not be tolerated.

There are certain situations that are not covered by the Kistler Code of Conduct. If unexpected circumstances arise or in case of questions, you can obtain advice and support.

The Kistler Group also expects its business partners to behave in accordance with the fundamental content of this Code of Conduct.

Complaints of any nature or notifications regarding breaches of the provisions of the Kistler Code of Conduct can be submitted to Kistler's Head of Compliance at any time. The Head of Compliance is also responsible for handling any cases of whistleblowing. All concerns will be treated as strictly confidential, and anonymity will be safeguarded. Contact: [compliance@kistler.com](mailto:compliance@kistler.com).

Employees and externals can also submit information or notifications regarding breaches of the Code of Conduct securely and anonymously via the ["SpeakUP Line"](#) reporting system.