

CODE OF CONDUCT

Our values. Our actions.

A circular diagram with a grey border containing five white text elements: 'HUMAN RIGHTS', 'JOB', 'ENVIRONMENT', 'ANTI-CORRUPTION', and 'ANTI-CORRUPTION'. The text is arranged in a circle with small dots separating the words.

HUMAN RIGHTS · JOB · ENVIRONMENT · ANTI-CORRUPTION · ANTI-CORRUPTION



OLIVER WEIRICH

VETTER Holding AG
Management Board



MARC RIESER

VETTER Krantechnik GmbH
Managing Director (CEO)



OLIVER BREIDER

VETTER Kranservice GmbH
Managing Director



We comply with this set of rules

The Code of Conduct sets out the VETTER principles and standards of behaviour that apply to the company and all its employees. Based on the corporate values and the social and legal framework conditions, the Code ensures that VETTER always behaves in a legally correct, ethical and socially responsible manner.



01. INTRODUCTION

The management of the VETTER Company supports the strategic approach of the Global Compact of the United Nations for sustainable business practices, the core labor standards of the International Labor Organization (ILO) and thus the general principles in the fields of human rights, labour, environment, and anti-corruption. VETTER expects its employees to align their con-

duct with the principles of VETTER's guiding vision as well as the ethical and legal standards when performing their day-to-day business.

02. COMPLIANCE WITH LAWS AND REGULATIONS

VETTER employees undertake to fully comply with all applicable national and international acts. Among other things, this includes acts and regulations relating to competition, export control, taxation, safety, anti-bribery, illegal payments and corruption, employees' rights, environmental protection as well as acknowledgement and protec-

tion of company assets, in particular including but not limited to business secrets, copyrights, and other types of intellectual property.

03. INTELLECTUAL PROPERTY RIGHTS AND CONFIDENTIALITY

VETTER employees respect and protect intellectual property rights and business secrets of VETTER as well as customers and suppliers (third parties) to which they may have access in the course of the business relationship or which become known to them in another way in the course of the business relationship. Moreover, the VETTER employees protect confidential information of third parties from unauthorised access and unauthorised use and use this information exclusively in the scope of the cooperation.

04. HUMAN RIGHTS

VETTER respects and supports the observance of internationally recognized human rights and respects the personal dignity, privacy and personal rights of each individual. The right to freedom of opinion and expression is protected.

VETTER ensures that all employees are treated in a fair and just way and that all employees have a contract of employment. The working time is in accordance with local law and shall be complied with. The remuneration to be paid to the employees complies with the applicable wage laws and collective agreements.

VETTER ensures that neither child nor forced labour is used. According to the Convention 138 of the International Labour Organization, VETTER never employs any children under the age of 15.

VETTER does neither accept any sexual harassment at the workplace nor any other discriminating harassment, threat, intimidation, or mobbing at the workplace.

VETTER does not accept any discrimination of employees due to race, religion, skin colour, gender, age, marital status, national origin, sexual orientation, nationality, or disability (if the employee is qualified for the fulfilment of the essential functions of the workplace with or without appropriate adaptation) or another illegal basis in the provision, employment, procurement, or promotion of personnel or another condition of employment. VETTER ensures that all employees are given the same opportunities and treatment on the basis of their performance.

VETTER respects the right of employees to freedom of association and assembly.

05. OCCUPATIONAL HEALTH AND SAFETY

VETTER ensures that all employees are provided with a safe work environment. To this end, potential safety hazards are identified by means of risk assessment of the workplaces and largely minimised by preventive maintenance and safe working methods. VETTER ensures suitable workplace design, implements safety regulations and provides suitable personal protective equipment. Moreover, emergency situations and events are established to minimise their

effects by implementing emergency plans and procedures. The consumption of drugs, alcohol, and substances having an intoxicating or a mindaltering effect is strictly forbidden at the workplace.

06. ENVIRONMENT

VETTER acts environmentally conscious striving to avoid and/or reduce emissions and waste of any kind in its course of business. VETTER monitors, controls, and minimises the environmental impacts of its operations and treats waste water, emissions, and solid waste produced in the course of business in ac-

cordance with the regulations. VETTER complies with all applicable environmental provisions and acts on chemicals.

07. CONFLICT MATERIALS

VETTER takes the necessary care to avoid the use of conflict materials in its products in order to prevent human

rights violations, corruption and the financing of armed groups or similar.

08. CORRUPTION

VETTER employees ensure that the business practices are free from corruption of any kind, including black-mailing and bribing. They shall not offer any presents or entertainment to any office-holders, except as allowed by applicable law.

VETTER employees shall not offer any presents, entertainment or payment of expenses to customers exceeding the reasonable and usual standards of hospitality or intending to influence a business decision or seeming to influence a business decision. VETTER determines limits for the value of presents and entertainment deemed to be reasonable in general. Cash or the like such as gift cards must not be offered.

This also applies to VETTER employees accepting corresponding presents from suppliers. The acceptance of money or other non-cash benefits from third parties, such as loans, commissions, etc., is forbidden.

Travel and accommodation expenses incurred by the employees are compensated by the employer in the scope of the applicable travel expenses guidelines. If possible, flights and hotels shall be booked via the employer before the start of the trip. Deviations from the above (e.g. higher hotel costs, take-over by third parties in the scope of a major event, etc.) are possible upon consultation with the direct superior, only.

09. CONFLICTS OF INTEREST

Conflicts of interest always occur if personal interests of oneself or those of related persons or friends are affected when taking a business decision. If

a conflict of interest is suspected, the superior is to be notified.

10. FAIR COMPETITION

VETTER acts in accordance with national and international competition and antitrust law and does not participate

in price fixing, market sharing or customer, market or supply agreements.

11. PREVENTION OF MONEY LAUNDERING

Money laundering refers to the process of smuggling illegally obtained money or illegally acquired assets into the legal financial and economic cycle. VETTER complies with its legal obligation to prevent money laundering and

does not participate in transactions that serve to conceal or integrate criminal or illegally acquired assets.

12. DATA PROTECTION

VETTER processes, stores and protects personal data in compliance with legal regulations. For example, personal data is collected confidentially, only for lawful, previously defined purposes and in a transparent manner. VETTER processes personal data only if it is protected against loss, alteration and unauthorized use or disclosure by appropriate

technical and organizational measures. In case of doubt, the data protection officer of the company shall be consulted.

13. INTERNATIONAL TRADE

VETTER undertakes to comply with all national and international trade sanctions and embargoes as well as all legal standards required for export control - in particular licensing requi-

rements and export bans - in the context of the shipment and export of the products.

14. SUPPLY CHAIN

VETTER expects its suppliers to comply with the principles of the Code of Conduct for Suppliers. Suppliers are also requested to enforce the contents of the Code of Conduct in their supply chains. VETTER reserves the right to review the application of the Code of Conduct by its suppliers systematically and on an ad hoc basis. This may take the form of questionnaires, assessments or audits.

15. ENFORCEMENT AND CONTROL

VETTER continuously checks the compliance with this Code of Conduct and the applicable laws and regulations. The management of the VETTER Company disapproves any violation of law by its employees and punishes this violation in the scope of applicable law and labour legislation. Violations of the Code of Conduct can be reported to the respective superior or the human resources department.

16. INDICATIONS OF VIOLATIONS

VETTER offers its employees access to a protected mechanism to report possible violations of the principles of this Code of Conduct in confidence.



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