

Fairness and Integrity.

# THE STABILUS CODE OF CONDUCT



# Foreword

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## Dear Colleagues,

We at Stabilus want to safeguard the sustainable success of our company – and not just with technological excellence, innovative power and outstanding quality alone! In addition, the way we treat each other, how we present ourselves in business dealings and how committed we are to community needs is also intended to make a positive contribution to fair, honest and sustainable actions in business and society.

It is the foundation of all of our actions that we conduct business only in full compliance with the respective legal requirements and in agreement with our company values. We have updated our corporate guideline and drawn up a new Code of Conduct which is a compilation of a set of rules that translates legal requirements and our ethical values into general conduct guidelines and is intended to help us act lawfully and responsibly in our daily work. It replaces the Company Guidelines of February 2015.

Our Code of Conduct is binding for all activities of the Stabilus Group, both in our internal collaboration as well as in our work with business partners, government institutions and the general public.

Anyone who violates the Code of Conduct acts disloyally, harms the reputation of Stabilus and may cause considerable economic damage to Stabilus. We trust that you will monitor compliance in your work environment and openly address any violations. Based on their personnel and leadership responsibilities, each Stabilus manager also has a special role model function where the implementation of conduct guidelines in daily business is concerned.

Of course we are already applying many of the rules of the Code of Conduct on a daily basis. But there might be areas that could be improved. Let us tackle those topics together.

Together, we are responsible for integrity and law-abiding behavior within the Stabilus Group. In order to meet the various local and global requirements, the Stabilus Group has created a Compliance Organization that will assist you in organizing business processes such that they are in compliance with laws and regulations as well as the Code of Conduct, and to make decisions that are in agreement with these requirements. You can contact the Chief Compliance Officer at any time for advice and support.

Best regards,  
Your Management Team

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# BEHAVIOR WHEN CONDUCTING BUSINESS



**STABILUS**

# A. Behavior when Conducting Business

## 1. Fair Competition

We want to set ourselves apart from our competitors through innovation, excellent quality and customer-oriented service, and, together with our customers, develop optimized product applications. Consequently, business transactions that violate the principles of fair competition are not acceptable.

Our Code of Conduct is based on legal regulations that apply in almost all countries worldwide and that are intended to protect competition from anticompetitive practices. Violations of these legal requirements will result in high fines and claims for damages under civil law as well as criminal sentences for companies and employees.

### What guidelines must be followed in dealings with competitors?

- ▶ We do not enter into agreements with competitors or potential competitors with the intent of restricting competition, limiting business with suppliers, dividing up customers, markets, regions or production, or agreements to boycott a market participant.
- ▶ We do not enter into agreements or share information with competitors or potential competitors regarding pricing, production volumes or capacities, quotes, profit margins, costs, technologies, product innovations or other topics that might determine or influence competitive behavior.



Any disclosure of information to third parties for the purpose of market studies, benchmarking or similar must be agreed with the Legal Department ahead of time.

Contracts with competitors, such as joint ventures, purchasing or distribution cooperations, purchasing contracts or marketing agreements must be agreed with the Legal Department ahead of time.

### What guidelines must be followed in dealings with customers and suppliers?

- ▶ We do not enter into anti-competitive agreements that violate the cartel prohibition, in particular
  - Agreements with customers that would restrict them in setting their resale prices or their own sales and delivery terms with regard to their own customers;
  - Exclusivity agreements, such as most-favored-party clauses, sole distribution rights or exclusive purchase obligations that are not in compliance with applicable legal conditions.
- ▶ In markets where Stabilus holds a leading market position, we take care that our conduct cannot be construed as an abuse of a dominant market position that would constitute an unfair restraint of competition. The following situations in particular could be critical:
  - Different treatment of customers without good cause;
  - Sales prices that could be considered dumping prices in order to drive competitors from the market;
  - Purchasing prices or other purchasing terms that seem inappropriate in comparison with other markets;
  - Discount or bonus systems that could isolate a customer against the competition;
  - Tie-in deals for additional deliverables or services that have no objective reason.



An evaluation of whether an agreement with a customer or supplier is permissible under anti-trust law often requires thorough examination. Likewise, the evaluation of a market-dominating position is often complex and is determined according to different criteria in the respective legal systems, with market share as a percentage being only one evaluation criterion of many. Thus, in cases where Stabilus has a leading market position or for agreements with customers or suppliers that do not conform to the Stabilus standard contract, we ask that you consult with the Legal Department to avoid violating anti-trust regulations.

# A. Behavior when Conducting Business

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## 2. Anti-Corruption

Stabilus always observes the rules of fair competition. This also includes that Stabilus competes for business on the basis of its products' quality, professional customer services and price and not by giving undue advantages to others. We expect the same from our business partners.

Only long-term and trust-based business relationships will sustainably secure Stabilus' success. Please remember that you are representing Stabilus when dealing with our business partners.

When doing business, formal courtesy in business relationships may sometimes include exchanging small gifts or extending invitations. However, using gifts, invitations or other favors to influence or reward decisions might constitute a punishable act.

### Guidelines of conduct for accepting gifts, invitations or other favors

- ▶ Stabilus employees may not use their position to request, accept or obtain the promise of personal favors for themselves, a third party or a family member.
- ▶ Gifts, invitations or other favors must be moderate as well as an expression of normal business courtesy, conform to local customs and may not be detrimental to Stabilus' image or the employee's integrity. Favors that do not conform to the above rules must be declined or, where this is not possible, the Compliance Officer must be notified, who will then decide how to proceed.
- ▶ Permissible are, for example:
  - Promotional gifts, tokens or other favors of minor value, and
  - Invitations to a business luncheon or dinner, provided the extent and frequency of these meals is appropriate to avoid them being construed as improper.

- ▶ Conferences, seminars or workshops organized by business partners without any additional entertainment element are usually no problem and, as a rule, permitted.
- ▶ Favors that do not meet the above mentioned criteria must be declined. Where this is not possible, the Compliance Officer must be notified, who will then decide how to proceed.

### Guidelines for granting advantages, gifts or other favors

- ▶ Stabilus employees may not offer or grant a personal advantage to a business partner's employee or agent for the purpose of obtaining preferential treatment in case of decisions, e.g., to be awarded orders. If a business partner's employee or agent requests such favors, this must be reported to the Compliance Officer responsible.
- ▶ No employee may offer or grant a personal advantage to a third party as an intermediary (e.g., a representative or sales or project consultant) to obtain an improper advantage in the decision-making process of another company.
- ▶ Advantages that are offered or granted must be moderate and an expression of normal business courtesy and conform to local customs.
- ▶ With the exception of a usual and reasonable dinner in the ordinary course of business, no favors may be offered or granted a (potential) customer or other business partner (or a related person) during ongoing or upcoming negotiations.

# A. Behavior when Conducting Business

## What is always prohibited?

- › Favors that violate legal regulations;
- › Favors that are sexual or immoral in nature;
- › Favors that are offered in order to influence or accomplish the outcome of a specific decision or that could be construed as such;
- › Favors that could be interpreted as appreciation of or a reward for a decision made.
- › Financial favors, such as cash, checks, loans, debt cancellation, gift certificates regardless of their amount;
- › Personal discounts or price reductions that are not granted in general;
- › Favors in the form of transferring the use of facilities, material or systems;
- › Promises of future orders or employment;

## When is special permission required?

- › An invitation to a business event that also includes an entertainment element may only be accepted with the permission of the supervisor.
- › Invitations to events where the business context takes a backseat may only be accepted in exceptional cases and with prior permission by local senior management or the Board of Stabilus S.A. provided that the invitation is extended to the local seniors management. Giving approval is determined by whether participation in the event is in the company's business interest or whether the overall circumstances could be construed as undue exertion of influence.



In actuality, it is not always clear what is permitted and what is not. If you are not sure, please consult with your supervisor or the Compliance Officer responsible.

## Special Rules for Public Officials

The influencing of officials and public servants through personal favors is almost worldwide punishable pursuant to local anti-corruption laws and is often vigorously prosecuted. The laws are based on a very broad understanding of who is considered a public official or public servant.

## Who is a Public Official?

This includes not only civil servants, employees and representatives of government agencies, but also employees (and their family members) of national and international organizations that are owned or controlled by a government as well as members and officials of a political party.

## What guidelines must be observed?

- › No Stabilus employee may offer or grant a domestic or foreign official or public servant any favor to said official or a third party for an official act, not even as so-called "facilitation payments" to speed up routine administrative matters.
- › Employees responsible for awarding orders to third parties and who represent Stabilus (such as sales representatives, sales and project consultants, distributors and similar individuals) will thus have to ensure that
  - the representatives contractually agree to follow the Stabilus Code of Conduct for business partners, and
  - the agreed-upon and paid compensation constitutes appropriate and justified consideration for properly performed and documented services.



In light of the high risks associated with a violation of country-specific anti-corruption laws, neither invitations nor gifts may be offered or granted to an Official or Public Servant, regardless of any official act, unless the Compliance Officer explicitly grants prior approval.

# A. Behavior when Conducting Business

## 3. Donations and Sponsoring

For Stabilus, social responsibility means commitment to community causes at our global sites, in particular for projects in the areas of science, education, and culture, as well as for social and humanitarian causes:

### What guidelines of conduct must be observed?

- › Donations and sponsoring must not be construed as exertion of influence by Stabilus, or detrimental to the reputation of Stabilus or its employees.
- › For the engagement in projects and donations and sponsoring agreements, the location-specific budgets that have been approved by the Board of Stabilus S.A. shall apply.
- › Donations to individuals, especially to candidate for or an incumbent of a political office, to political parties or party-affiliated organizations, as well as for-profit organizations are not permitted for Stabilus Companies.
- › Each donation must be clearly and discernibly documented and signed by at least one managing director of the respective Stabilus Company.
- › Sponsoring of projects, events, or similar must have a clear relationship to company goals and yield a measurable advantage for Stabilus.
- › Sponsoring agreements must be in writing. Performance and consideration must be clearly discernible and proportionate.



Special restrictions and procedural rules apply to donations or sponsoring agreements with public entities, and they must absolutely be complied with. In these cases, the corresponding Compliance Officer must be consulted in advance.

## 4. Export Controls, Customs Regulations and International Sanctions

For Stabilus as an internationally active company, export and import are part of its daily operations. This is why it is essential for Stabilus to handle all cross-border activities in compliance with national and international regulations to ensure professional processes.

If sanctions, trade control regulations, customs regulations or restrictions on trade with internationally blocked individuals or organizations are violated, this can result in steep fines for Stabilus and cause major damage to the entire Group's reputation. It also bears the risk that Stabilus might be blocked, leading to a loss in orders for Stabilus.

### What guidelines of conduct must be observed?

- › All group companies of the Stabilus Group are obliged to designate individuals responsible for export control and customs, and to take organizational measures to ensure compliance with all regulations that apply to cross-border activities.

## 5. Deciding on Business Partners

Stabilus examines all proposals from business partners fairly and without prejudice. The entire order awarding and processing procedure shall follow only objective criteria and must be transparent and reproducible. Biased preferential treatment or discrimination of business partners is not permissible.

Stabilus expects its business partners to pursue their business activity in a manner compatible with the principles of the Stabilus Code of Conduct. Any violation of these principles will not be tolerated and may result in the termination of the business relationship.



# A. Behavior when Conducting Business

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## 6. Money Laundering

Stabilus takes measures to ensure that funds received originate from legitimate sources only, and payment for goods and services is made directly to contract partners only.

### **What guidelines of conduct must be observed?**

- › In addition to the diligent selection of business partners, each Group Company shall implement adequate processes to limit cash payments beyond the national threshold amounts set forth in anti-corruption laws, prevent dubious incoming payments, and guarantee the identity of payment recipients.
- › Each employee is obligated to notify senior management of the Group Company or the CFO of Stabilus S.A. immediately if there is reason to suspect that payments are from illegal sources, or other doubts about the legitimacy of payments.

## 7. Book-keeping and Documentation

Any books and records of business transactions shall be prepared and archived correctly and transparently in accordance with legal provisions as well as internal requirements, and shall reflect the transactions of the Stabilus Group completely, accurately, and be entered in the correct period.

# Conduct within the Organization



**STABILUS**

# B. Conduct within the Organization

## 1. Leadership Culture

Stabilus' sustainable success depends particularly on innovative, reliable and motivated employees.

In line with the guidelines for successful leadership ("Leadership Profile"), Stabilus leaders are expected to create this space for self-empowered and creative employees to act, build intercultural teams and act with entrepreneurial responsibility for Stabilus to achieve the set strategic goals.

## 2. Conduct towards Colleagues

Our company culture is based on trust, mutual reliability, honesty, fairness and respect.

We expect all employees to live these shared values in dealing with each other in order to maintain a work culture of mutual support that allows everyone to fulfill their responsibilities, achieve their goals and to contribute thus to Stabilus' sustainable success.

## 3. Avoiding Conflicts of Interest

It is every employee's responsibility to be loyal to Stabilus and to make business decisions in the best interest of Stabilus, without regard to potential personal advantages.

Conflicts between personal and company interests must be avoided at all times. .

### What are potential conflict situations?

- Business dealings between Stabilus Companies and
  1. Members of company management, employees or related persons (spouse, partner, close relatives and friends)
  2. Customers, suppliers or other business partners
    - in which members of Stabilus management, Stabilus employees or persons related to them hold shares, either directly or indirectly;
    - in which members of Stabilus management, Stabilus employees or persons related to them hold an office;
- direct or indirect interests in competitors;
- side jobs by members of management or Stabilus employees;
- private orders awarded to companies that are business partners of Stabilus;
- employment of or awarding orders to related persons.

It is not Stabilus' policy to strictly prohibit the collaboration with individuals related to employees or with customers, suppliers or other business partners in which members of Stabilus management, Stabilus employees or persons related to them hold a direct or indirect interest.

However, it must be ensured that there is no actual or perceived exertion of influence or preferential treatment involved in such collaboration.

Conflicts of interest are not always clear-cut, so if you have a question, or if a situation raises any doubt, you should promptly consult with your Compliance Officer.



## B. Conduct within the Organization

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### What guidelines of conduct must be observed?

- › If employees or managers have the opportunity to influence the business dealings with customers, suppliers and other business partners, in which they or related persons hold a direct or indirect interest, or in which they themselves or a related person hold an office, this shall be reported to HR in order to avoid conflicts of interest.
- › Stabilus management and Stabilus employees are prohibited from holding a direct or indirect interest in a Stabilus competitor. This does not apply to interests in stock exchange-listed companies.
- › During their employment, employees must not participate in activities that are in direct competition with Stabilus, or support a company that is a direct or indirect competitor of Stabilus. Upon termination of employment, employees must not use or disclose to a third party confidential (business, technical or other) Stabilus information and know-how.
- › If a related person of an employee or management member is employed by a competitor or otherwise works for a competitor, this shall be reported to HR in order to avoid conflicts of interest.
- › Any side jobs must be reported to HR. Depending on country-specific laws or labor agreements, these side jobs may also require prior approval by Stabilus.
- › Stabilus employees must not have private orders performed by companies that said employees deal with as part of their employment with Stabilus, if any personal advantage therefrom could be derived or if it could be construed as such.
- › Employees must not hire or otherwise contract on behalf of Stabilus with persons closely related to them without prior written approval of the senior management of the respective Stabilus Company. If local management wishes to award contracts to persons personally related to them, this will require the prior written approval of the Board of Stabilus S.A.

In their free time, employees are free to volunteer for charitable organizations, social services or political parties, as long as these activities do not interfere with their duties toward Stabilus.

## 4. Protection of Stabilus Assets

All employees are obliged to treat Stabilus assets responsibly and carefully, and to protect them from loss, theft and from access and misuse by third parties.

Besides tangible assets such as buildings, machines, tools, computers, office equipment and cash, these assets also include software, patents and know-how.

In case of legal violations such as fraud, theft and embezzlement criminal prosecution will be initiated by Stabilus.



### What guidelines of conduct must be observed?

- › Stabilus assets are available for work purposes and, as a rule, must not be used for personal purposes. This also applies for IT-supported communication systems (email system, Internet access, Intranet) provided by Stabilus. Exemptions from this, for example the use of company cars or cell phones, are governed solely by Company Guidelines.
- › Assets must not be removed from the premises of the respective Stabilus Company without a business reason.
- › Emails received on or sent from a company computer that constitute business documents shall be retained in accordance with local laws and regulations.

# Confidentiality and Communications



**STABILUS**

# C. Confidentiality and Communications

## 1. Protecting Business Secrets

Our business secrets, in particular our inventions and know-how, are of strategic significance for Stabilus' long-term success and must consequently be treated strictly confidential and protected from unauthorized access by third parties.

### What guidelines of conduct must be observed?

- ▶ Confidential information of Stabilus may only be disclosed to a third party, such as a customer or cooperation partner, when and to the extent this is required in Stabilus' business interest. In this case, disclosure shall only be made after prior written approval from the general management of the respective group company and with the necessary protective measures.
- ▶ Confidential information and know-how of third parties, such as customers and suppliers, that was made available to Stabilus shall be treated with the same confidentiality as Stabilus' own trade secrets and may only be disclosed to a third party with the written approval of the party affected.
- ▶ Confidential information of third parties that Stabilus employees have gained knowledge of may not be used to pursue Stabilus business without ensuring that Stabilus holds the corresponding rights (e.g., licenses).
- ▶ The personal use of information obtained in the course of business is prohibited.
- ▶ The confidentiality duty shall survive the termination of the employment relationship.



The Stabilus Legal Department must be consulted for contractual confidentiality agreements that differ from Stabilus' standard contracts.

## 2. Protection of Personal Data

Stabilus is committed to treat personal data with strict confidentiality and diligence, as not to infringe on the right to privacy of employees, customers and business partners.

### What guidelines of conduct must be observed?

- ▶ Personal data, i.e., data associated with an individual, such as name, address, telephone number, birthday or salary, may only be collected, stored, processed and transmitted in accordance with the country-specific laws.
- ▶ Each Stabilus Company shall take the required regulatory, organizational and technical precautions to comply with the relevant legislation and ensure strictest confidentiality.

## 3. IT and Information Security

In its operational business, Stabilus relies on the use of electronic data processing systems and the worldwide exchange of electronic data.

The use of IT systems and electronic data exchange carry the risk that third parties may gain unauthorized access to data and cause damage to Stabilus by using, changing or destroying this data or by abusing personal data and violating the privacy of individuals affected.

### What guidelines of conduct must be observed?

- ▶ For the IT systems in use, the IT Security Officer shall take and continuously update suitable security measures, such as authorization concepts, password defaults, protective software and technical precautions.

# C. Confidentiality and Communications

## 4. Prohibition of Insider Trading

Since Stabilus S.A. is listed on the stock exchange, Stabilus employees must follow the rules for securities trading, in particular

- ▶ the prohibition of disclosing or giving access to insider information to third parties (“third parties” also includes partners, family members or friends, as well as Stabilus employees who do not gain insider information in the course of business)
- ▶ the prohibition to buy or sell securities on the basis of insider information or recommend buying or selling to others.

### What is insider information?

Insider information is any information, whether true or false, that is non-public but apt to significantly affect the price of Stabilus shares if it were to become public.

### Examples

Major mergers or acquisitions, unexpected financial results, new customers, new products, problems related to products, promising research results, legal disputes.



A violation of the insider trading prohibition may result in criminal prosecution by public authorities.

## 5. Appropriate Internal and External Communication

Stabilus fosters open and truthful communication. False or misleading statements can harm Stabilus’ credibility considerably. This is why all employees are expected to carefully examine information before distributing it, and especially with regard to email, consider which type of communication is appropriate.

Communication with media is handled by Global Communications (Stabilus’ central communications department), or by management of the respective Group Company.

The Group Companies are responsible for designing their own communication measures, but communication topics relevant to the company and image, such as market and financial topics as well as crisis communication must always be coordinated with Global Communications. Consequently, corresponding inquiries from media representatives should always be answered in coordination with Global Communications.

Communication with analysts and investors shall be exclusively through Investor Relations in coordination with the Management Board of Stabilus S.A. Inquiries from analysts or investors must always be forwarded to the Investor Relations department or the Management Board of Stabilus S.A.

# EMPLOYEES AND SOCIETY



**STABILUS**



# D. Employees and Society

## 1. Protection of Human Rights

Stabilus respects and supports the protection of human rights in accordance with the United Nations Universal Declaration of Human Rights, both within the company and with business partners, and in the company's presence in the general public sphere. .

## 2. Compliance with Laws

For Stabilus, legal compliance is the fundamental cornerstone of all actions and applies to all activities without exception.

## 3. Compliance with Social Standards

### Fair working conditions

Group-wide, Stabilus respects the principles of the International Labour Organisation ("ILO") regarding the basic principles and rights at work:

Stabilus does not condone any type of forced labor or child labor. The gainful employment of minors under the age of 15 or of school-age according to country law is prohibited.

Stabilus respects the right to form an employee union and to join it, as well as employees' right to collective bargaining agreements as provided by applicable law. Stabilus promotes trust-based, fair and constructive collaboration with employee representatives.

Stabilus pays the same compensation to female and male employees for equivalent work. Wages and salaries as well as fringe benefits correspond to or exceed the respective national minimum norms.

If there are no minimum norms, fair compensation will be paid, taking into consideration industry-specific and locally customary income standards.

The country-specific legal provisions shall apply to work hours. Any guidelines beyond this from the International Labour Organisation will be followed.

### Non-Discrimination and Equal Opportunity

Stabilus conducts its business in a manner that acknowledges the right of all individuals to be treated with dignity and respect and to work in an environment that is free of harassment, physical or verbal abuse, threat and intimidation.

Discrimination due to gender, ethnic origin, religion, age, disability, citizenship, sexual orientation, social origin or other reasons that are prohibited by law will not be tolerated.

Stabilus provides equal opportunities to all its employees. Hiring, compensation and promotions are based on performance, qualification, personality and aptitude.

Any employee who feels discriminated against or harassed may contact the HR department or the Compliance Officer responsible. An employee who complains in good faith may not be disciplined or put at a disadvantage.



# D. Employees and Society

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## 4. Health and Occupational Safety

Organizational health management and occupational safety are integral components of the Group strategy.

Stabilus is committed to providing its employees and third parties working for or with Stabilus a safe and healthy work environment worldwide, and strives to continuously improve the work environment and avoid hazards.

In addition, Stabilus invests in comprehensive measures to promote health, supporting all employees to take ownership of their health. All employees are encouraged to participate in the corporate health management program.

### What guidelines of conduct must be observed?

- › Management of each Stabilus company shall take the necessary regulatory, organizational and technical precautions to ensure compliance with applicable laws. This includes a regular hazard analysis to identify and assess the risks in the work environment.
- › Each supervisor is responsible for the protection of his/her employees and shall instruct, coach and supervise them accordingly.
- › Each individual is responsible for ensuring a safe work environment. This is why all safety rules must be strictly followed, so that nobody endangers themselves or others.
- › Any violation of safety provisions, every accident and every near-accident must be reported to the supervisor or the Safety Officer responsible.
- › Anyone who notices safety issues should address them with a supervisor or the Safety Officer and is strongly encouraged to submit improvement ideas.

## 5. Environmental Protection and Efficient Use of Resources

It is Stabilus' goal not only to optimize the entire value-added chain under economic aspects and beyond compliance with legal requirements, but also to make it environmentally compatible and use resources efficiently. This is why we continually assess the environmental and resource relevance at each production site, in order to develop reasonable measures for reducing environmental impact and resource consumption.

We also expect our business partners to abide by all legal regulations for protecting the environment and for using resources efficiently, and we take these criteria into consideration in our evaluation of suppliers and service providers.

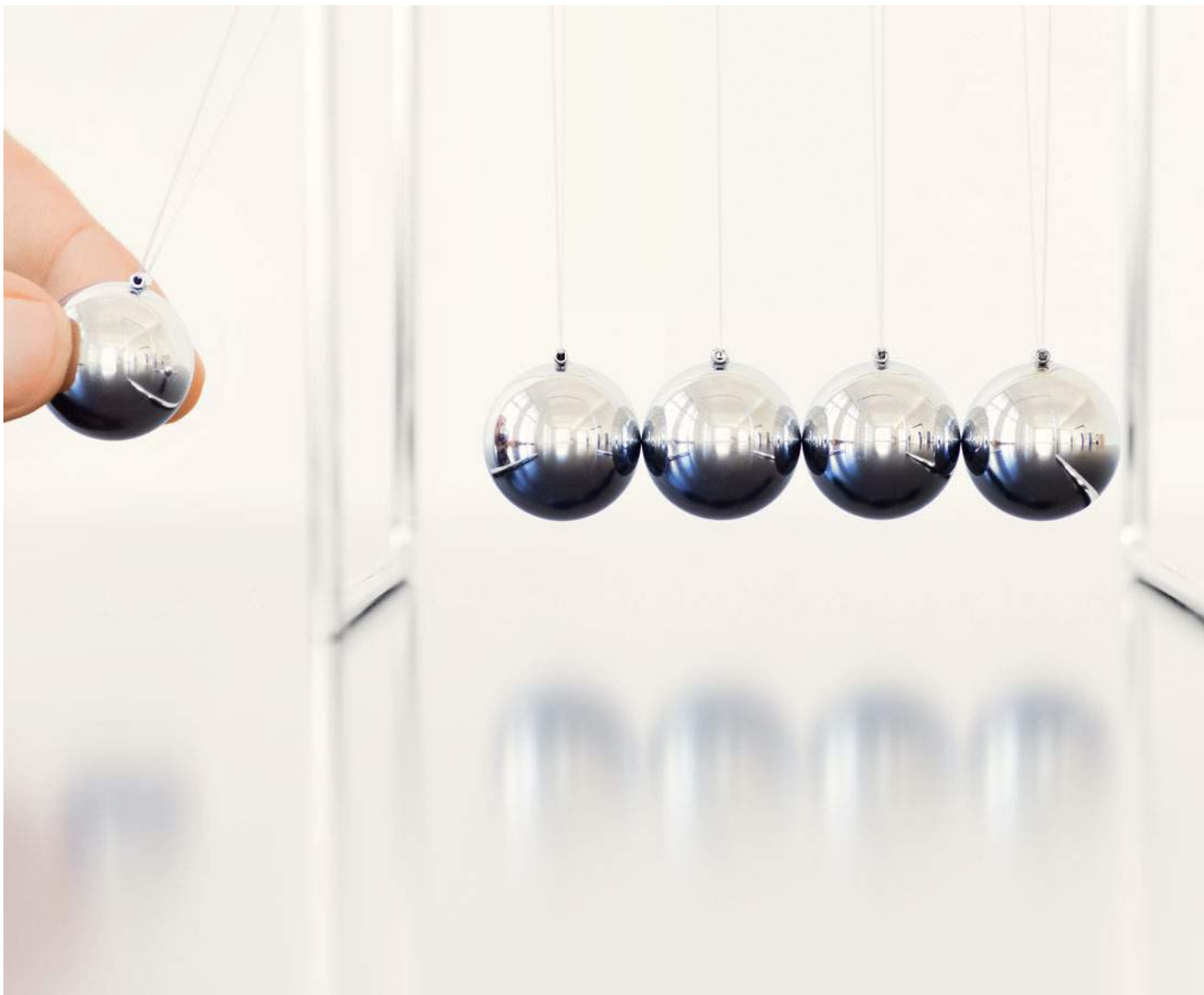
## 6. Product Safety and Quality

One of the cornerstones of our success is that our products meet the highest quality and safety requirements. This is why we have implemented a Group-wide quality management system for the continuous improvement of work flows in the design, development, production, and marketing of our products; we also keep a close eye on the products brought to market regarding their safety and potential effects on health and environment.

New products are only marketed when it is sure that they - when used as intended or anticipated - do not endanger the safety and health of humans and have no avoidable negative effect on the environment.

All employees who are in charge of the development, marketing or sale of products shall make sure that these requirements are strictly adhered to. Deliberate or negligent disregard of these requirements will not be tolerated.

# Implementation of the Code of Conduct



**STABILUS**

# E. Implementation of the Code of Conduct

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## 1. Group-wide Compliance Organization

The guidelines summarized in the Code of Conduct are the foundation of the sustainable development of the Stabilus Group, which is aligned both with economic as well as ecological and social goals. The guidelines are used to control business risks and commit Stabilus to act responsibly towards society.

Consequently, Stabilus expects strict adherence to this Code of Conduct as well as the special compliance guidelines that will be issued to examine very important topics in more detail. To assist its employees, Stabilus has launched a Compliance Organization in order to ensure that business risks associated with operative processes are identified early on and controlled with suitable measures. The Group-wide Compliance Organization is led by a Corporate Compliance Officer and subordinated local Compliance Officers who are responsible for implementing and continuously improving the Compliance Management System.

The rules of this Code of Conduct constitute a minimum standard. Where stricter legal regulations, internal Procedural Instructions or other requirements are stipulated, they shall not be restricted by the Code of Conduct but continue to apply.

In the event of contradictions between the rules of the Code of Conduct and mandatory country-specific legal provisions, the mandatory local laws and regulations shall take precedence. However, the management of the respective Stabilus Company should inform the Corporate Compliance Officer of this.

## 2. Employee and Management Responsibility

The responsibility for complying with the Code of Conduct, as well as integrity and law-abiding conduct lies with every single employee.

Corporate management takes legal violations as well as violations of the Code of Conduct and of other internal company rules very seriously and sanctions them accordingly.

Each manager is expected to be a role model for integrity and law-abiding conduct in their daily business and to ensure the compliance with legal provisions in their areas of responsibility and with the Code of Conduct through employee training and organizational measures.

# E. Implementation of the Code of Conduct

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## 3. Questions and Notifications

All employees are expected to seek the advice and support of supervisors, technical departments responsible or employee representatives if the employees are in doubt about the legality of their actions or if there are indications of dubious activity in the work environment.

In addition, employees have the option of consulting the Head of Global HR, the Corporate Compliance Officer or local Compliance Officers regarding the topics of "Compliance" or "proper conduct", or if violations of the Code of Conduct or laws are suspected.

There is another option of reporting violations of the Code of Conduct or laws in an anonymized format using an electronic reporting system that can be accessed through the Stabilus Internet page.

Any employee who exercises the right to report violations of the Code of Conduct or laws need not fear repercussions, provided the employee acts in good faith and has, based on actual indications, come to the conclusion that such a violation has or might have occurred. To the extent necessary, Stabilus will take measures to protect the reporting employee.

To the extent that it is legally permissible, Stabilus will treat the identity of employees who report such violations or help resolve violation cases confidentially.

### Any Questions?



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