

Code of Conduct of AKB Antriebstechnik GmbH

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Preamble

AKB Antriebstechnik GmbH ("AKB") is committed to integrity and responsible, lawful conduct. This Code of Conduct sets binding principles for all employees and leaders. It draws on industry best-practice codes and the applicable legal framework in Germany and the EU. It complements internal policies and is a binding minimum standard for daily behavior.

Scope and Responsibility

This Code applies to all AKB employees, corporate bodies and representatives and—where contractually agreed—to temporary staff and third parties acting on AKB's behalf. Leaders have a special duty to act as role models, communicate this Code, and foster an environment where questions and reports can be raised without fear of retaliation.

1. Compliance with Laws, Standards and Internal Rules

We comply with all applicable laws, regulations and internal policies. This includes, in particular, data protection (GDPR/BDSG), equal treatment (AGG), occupational health & safety (ArbSchG/ArbZG), competition & antitrust (GWB/Arts. 101, 102 TFEU), anti-corruption (Sections 299, 331 et seq. German Criminal Code), export controls & sanctions (AWG/AWV/EU Dual-Use Regulation), product safety (ProdSG), and—where applicable—supply chain due diligence (LkSG) and the Whistleblower Protection Act (HinSchG).

2. Human Rights, Fair Work & Inclusion

We respect internationally recognized human rights and labor standards (e.g., prohibition of child and forced labor, freedom of association, decent working conditions). We promote diversity, equal opportunity and a respectful, harassment-free workplace under the AGG. Minimum wage and fair pay are ensured.

3. Occupational Health & Safety

Safety first. We meet our obligations under occupational health & safety and working time law, perform risk assessments and take preventive measures. Hazards and near misses are reported.

4. Data Protection & Information Security

Personal data is processed lawfully and kept confidential (legal basis, purpose limitation, data minimization, storage limitation, integrity and confidentiality). Trade secrets and confidential information are protected under the Trade Secrets Act. Security incidents are reported promptly to IT/IS and the privacy contact.

5. Conflicts of Interest

Private interests must not influence business decisions. Secondary employment, shareholdings, related persons and other potential conflicts must be disclosed and, if necessary, approved in writing.

6. Anti-Corruption, Gifts & Hospitality

Bribery and improper advantages are prohibited. Gifts and hospitality must be of low value, appropriate and transparent. Higher values require prior management approval. Sponsorships and donations are compliant and without expectation of return.

7. Competition & Antitrust

Agreements on prices, market/customer allocation, quotas, or exchanges of competitively sensitive information are prohibited. Be cautious at association or industry meetings and keep adequate records. Consult Legal/Compliance early.

8. Foreign Trade, Export Controls & Sanctions

We screen export restrictions, classifications, end-use and sanctions lists. Technology transfers and services may require licenses. We observe documentation and retention duties.

9. Anti-Money Laundering & Payments

We do not tolerate money laundering or terrorist financing. Payments are traceable; never to unknown third parties; no sham transactions or bypassing of controls. Where legally obliged, internal AML safeguards are implemented.

10. Product Quality & Safety

We comply with all applicable product safety requirements, including CE marking, risk assessment, recall and notification duties. Quality, safety and reliability guide all development, manufacturing and service processes.

11. Environment, Energy & Sustainability

We comply with environmental, waste and water laws and strive for efficient use of resources. We minimize emissions, noise and waste, handle substances safely and dispose of them properly.

12. Responsible Use of AI & Digital Tools

We use digital tools—including AI—responsibly. High-risk uses require enhanced safeguards (e.g., risk assessment, data quality, transparency, human oversight) in line with the EU AI Act. We respect IP and licenses; confidential information is not entered into insecure systems.

13. Company Assets & IT Use

Company resources, devices, software licenses and time are used sparingly, lawfully and primarily for business purposes. Unauthorized private use, bypassing IT security or using unapproved software is prohibited.

14. Public Communications & Social Media

Statements to media, on social networks or to authorities are made only by authorized functions. Employees label private opinions and never disclose confidential information.

15. Cooperation with Employee Representation

We respect rights of employee representatives and cooperate as partners.

16. Whistleblowing & Non-Retaliation

Reports of legal or policy violations can be submitted internally (e.g., via compliance@akb-drives.com, datenschutz@akb-drives.com) or externally to competent authorities. Acknowledgment within 14 days; feedback within 3 months. Whistleblowers are protected against retaliation; reports are kept confidential.

17. Enforcement, Training & Sanctions

This Code is binding. Violations may result in disciplinary, civil or criminal consequences. AKB provides regular guidance.

Annex A – Company-Specific Information (to be completed by AKB)

Annex A – Company-Specific Information (to be completed by AKB)

- Roles/contacts (Compliance, HR, Data Protection, Export Control)
- Gift/hospitality thresholds (e.g., approval-free up to 50 €; approval required above)
- Reporting channels (email, phone, web portal, mailing address) and process description
- Cross-references to internal policies (IT use, data protection, H&S, travel, donations/sponsorships, export control)

Annex B – Compliance Mapping (Excerpt)

Topic	Legal references (examples)
Data protection	GDPR (EU 2016/679), BDSG
Equal treatment	AGG
Occupational H&S	ArbSchG, ArbZG
Competition/Antitrust	GWB; Arts. 101/102 TFEU
Anti-corruption	German Criminal Code Sections 299, 331–335

Export controls/Sanctions

AWG, AWV; EU Reg. 2021/821

AML

GwG (where applicable)

Product safety

ProdSG

Environmental law

BImSchG, KrWG, WHG

Human rights/Supply chain

LkSG

Whistleblower protection

HinSchG; Directive (EU) 2019/1937

Digital ethics/AI

EU AI Act (EU 2024/1689)