

EHG Code of Conduct

OUR RESPONSIBILITY.

Acting with integrity in the world.



Contents

Foreword	4
I HOW WE DO BUSINESS. WITH ECONOMIC FORESIGHT.	5
1 Donations. How we deal with them.	
2 Conflicts of interest. How we solve them.	
3 Free competition. How we make it fair.	
4 Transparent financial reporting. How we ensure it.	
5 International trade controls. How we support them.	
6 Bans on money laundering and terrorist financing. How we respect them.	
7 Purchasing and suppliers. How we deal with each other in a trusting manner.	
8 Insider information. How we handle it sensitively.	
II HOW WE FULFILL OUR SOCIAL RESPONSIBILITY. WITH RESPECT AND HUMANITY.	8
1 Equal treatment and mutual appreciation, AGG (General Equal Treatment Act), equal treatment of the severely disabled, inclusion of people with disabilities. Our values.	
2 Occupational health and safety management. Our responsibility.	
3 Human rights and fair working conditions. Our benchmark.	
4 Co-determination within the company. Our claim.	
5 Donations and sponsoring. Our rules.	
III HOW WE SEE OUR ECOLOGICAL RESPONSIBILITY. WITH REGARD TO THE ENVIRONMENT AND SOCIETY.	11
1 Environmental protection. Our actions are decisive.	
2 Sustainability in the value chain. Our actions have consequences.	

IV HOW WE IMPLEMENT INDIVIDUAL PROTECTION. WITH SPECIAL ATTENTION TO DATA SECURITY. 13

- 1 Data protection and data security. What is important to us.
- 2 Protection of the company. What benefit we get from it.
- 3 Dealing with corporate property. How resources are conserved.
- 4 Dealing with social media. Where the boundaries are.
- 5 Public relations. How we want to be seen.
- 6 Dealing with authorities. Why cooperation is indispensable.

V HOW WE SUPPORT EACH OTHER AT ALL TIMES. WITH RESPONSIBILITY AND EMPATHY. 16

- 1 Procedure for reporting violations – Speak!
- 2 Contact for Compliance

FOREWORD



Executive Board (from top to bottom)
Martin Brandt, Jan de Haas, Jan Francke, Stefan Junker

We, the Erwin Hymer Group (EHG)¹, are a company with a long tradition, grown from an unparalleled pioneering spirit, great inventiveness, and high integrity. We are characterized by our down-to-earthness, determination, and a great sense of responsibility for company employees², customers, business partners, the public, and the environment.

Everyone in the Erwin Hymer Group has a responsibility to uphold the reputation of the Group and avert any damage to it. This responsibility is based on our basic ethical values and our actions, which are characterized by the principle of sustainability. We respect human rights, the interests of our company employees and their representatives, protect the environment, promote fair competition, and take consistent action to combat corruption. Our membership in the United Nations Global Compact is an expression of this claim.

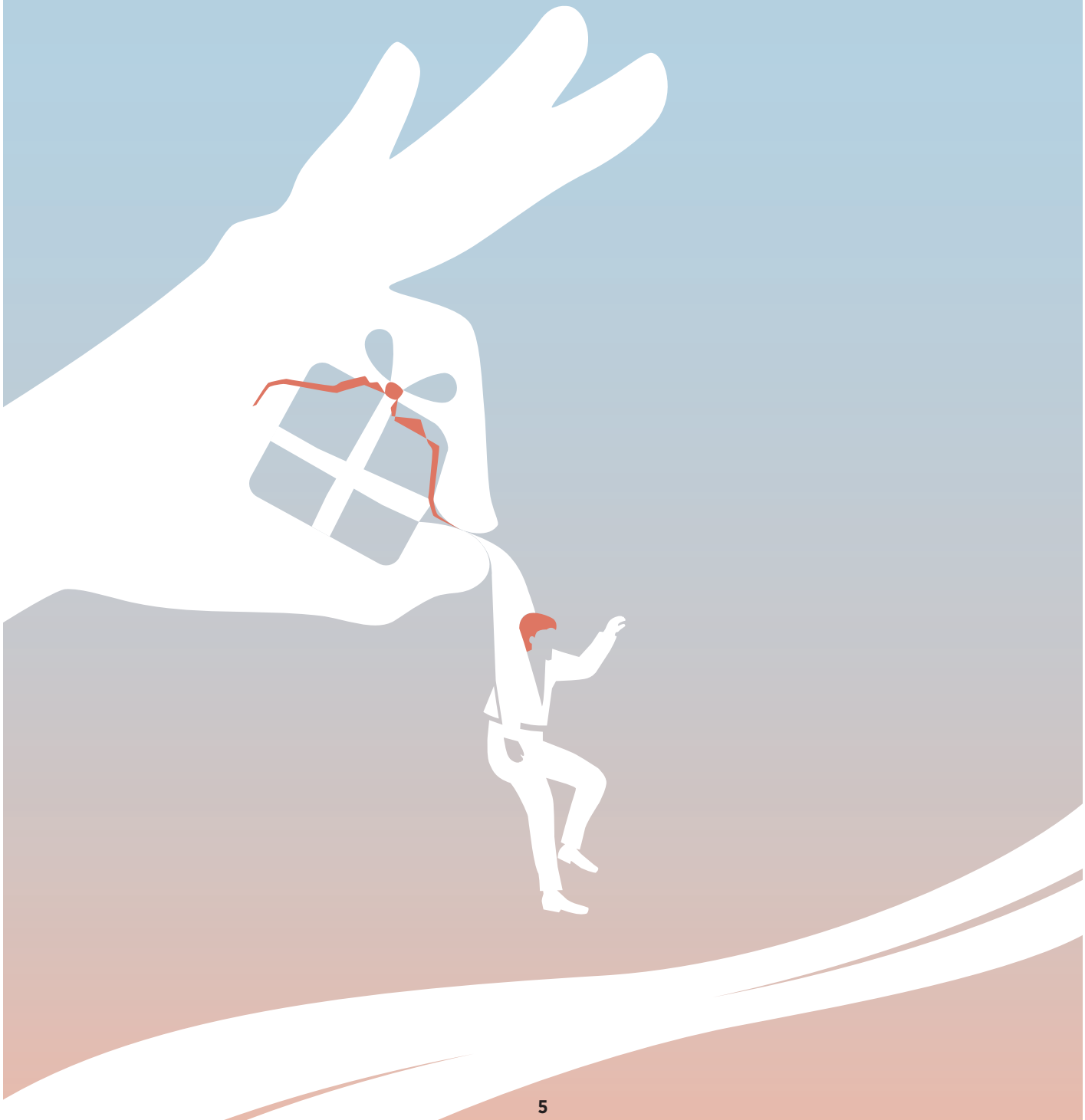
It goes without saying that the Executive Board, management, executives, and employees must act in accordance with the rules. This is our conviction and expected of all members of the company in equal measure.

We do not tolerate violations of legal regulations or internal rules, as they lead to considerable disadvantages for the company, such as fines and claims for damages. This is compounded by a loss of public confidence in our brands, products, and services. Deliberate and intentional misconduct will be sanctioned within the framework of legal provisions.

To meet our high standards, we are all jointly responsible for acting with integrity in accordance with the law and our internal guidelines. All regulations contained in this Code of Conduct are binding for us as members of the EHG.

We promote a culture of open communication in which errors and indications of violations can also be addressed and reported openly and without personal disadvantage, so that the Erwin Hymer Group is always in a position to improve and achieve its common global goals.

I HOW WE DO BUSINESS.
With economic foresight.



1 Donations.

HOW WE DEAL WITH THEM.

For us, integrity in business transactions has the highest priority. In order to maintain this standard and to prevent corruption, a gift, entertainment, an invitation to an event or other benefit, including from third parties, may only be accepted if and to the extent ethically and legally permissible, thus excluding any undue influence on business decisions. This also applies to gifts from us to third parties, especially public officials and business partners.

2 Conflicts of interest.

HOW WE SOLVE THEM.

In our view, business relationships and decisions must be free of personal interests and family ties. Moreover, only factual criteria may be taken into account when making personnel decisions or entering into business relationships with third parties. We therefore expect our Executive Board members, managing directors, managers, and employees to always keep the company's well-being in mind when making professional decisions and to place this principle before private concerns. By disclosing any or actual conflicts of interest and acting transparently, we prevent any disadvantages for our Group.

3 Free competition.

HOW WE MAKE IT FAIR.

We observe the applicable requirements of consumer protection as well as antitrust and competition law without any ifs and buts. We are committed to global trade and competition by fair means. Actions that conflict with fair competition and violate laws are contrary to our values and will not be tolerated.

4 Transparent financial reporting.

HOW WE ENSURE IT.

The financial reporting of EHG is always based on the respective local and current accounting standards worldwide and reflects the actual financial, asset, and earnings position of EHG. It goes without saying that we prepare all reports conscientiously and provide the responsible authorities with correct data. In the event of any uncertainties, we are always available to answer questions and deal with them in a solution-oriented manner.

5 International trade controls. HOW WE SUPPORT THEM.

We maintain worldwide business relations. Strict adherence to relevant trade controls and the applicable regulations on import and export control as well as German and international foreign trade regulations is a matter of course for EHG. In doing so, the rights of the employees and the European regulations on data protection must also be taken into full consideration.

6 Bans on money laundering and terrorist financing. HOW WE RESPECT THEM.

As an internationally operating company, EHG observes national, European and international regulations to combat money laundering and the financing of terrorism and ensures that infringements are excluded through awareness-raising and training. Should anyone in our company become aware that a payment is being either misused or passed on to third parties not involved in the transaction, they will report this and EHG will report the matter to the relevant authorities.

7 Purchasing and suppliers. HOW WE DEAL WITH EACH OTHER IN A TRUSTING MANNER.

The purchasing department of EHG and all persons and sub-departments authorized by it are responsible for the professional procurement of goods and services at the best possible conditions and for the benefit of EHG. In doing so, they always act in accordance with internal company guidelines and with the locally applicable law and legislation of the country in which EHG operates. The purchasing department is always to be involved in all purchasing activities and is directly responsible for avoiding disadvantages for EHG.

8 Insider information. HOW WE HANDLE IT SENSITIVELY.

As part of a listed company, it is essential for us to protect the confidence of investors in the functioning of the capital market and the ability of EHG to act. Therefore, we adhere to the given rules for handling transactions and insider information as well as to the prohibition of recommendations or insider trading and also to the obligations of confidentiality.

II HOW WE FULFILL OUR
SOCIAL RESPONSIBILITY.
With respect and humanity.



1 Equal treatment and mutual appreciation, AGG (General Equal Treatment Act), equal treatment of the severely disabled, inclusion of people with disabilities.

OUR VALUES.

We treat each other with respect. We talk to each other, not about each other. Discrimination and harassment, particularly on the basis of gender, age, origin, religion, sexual orientation, or existing impairments, are not tolerated, nor is bullying. Instead, appreciation, tolerance, mutual understanding, and openness characterize our behavior in everyday business life. This includes in particular the inclusion and fair treatment of people with disabilities.

2 Occupational health and safety management.

OUR RESPONSIBILITY.

EHG takes its responsibility for the health and safety of its employees very seriously. The development and improvement of the health and safety compatibility of workplaces and the working environment are always given a high degree of attention.

EHG attaches particular importance to compliance with all national and European labor laws as well as to the continuous promotion of the professional and social competence of its employees.

3 Human rights and fair working conditions.

OUR BENCHMARK.

We reject all forms of exploitation, slavery, and human trafficking and expect the same from our business partners. We also expect our business partners to be willing to protect women and children and to reject exploitation through forced labor. We will not purchase goods that have been produced as a result of slavery, human trafficking, or forced labor in any form.

4 Co-determination in the company. OUR CLAIM.

Within the framework of co-determination at operational level, which is determined by law and statute, great importance is attached to the Group Works Council and the locally responsible works councils of the EHG companies and, taking into account the special agreement, the SE Works Council. Cooperation and observance of co-determination are part of our corporate culture and firmly anchored in our codex.

5 Donations and sponsoring. OUR RULES.

We are aware of our social responsibility with regard to donations and sponsoring. We only promote others in accordance with our values, our goals, and our responsibility for sustainability. Any support provided is transparent and in accordance with our donation and sponsoring guidelines.

III HOW WE SEE OUR
ECOLOGICAL RESPONSIBILITY.
With regard to the environment
and society.



1 Environmental protection.

OUR ACTIONS ARE DECISIVE.

We underline our responsibility and commitment to society, nature, and the environment. We therefore act in accordance with this social and ecological responsibility and commit ourselves as members of EHG to pursuing sustainable business practices, using resources sparingly and economically, avoiding waste and emissions as far as possible, and keeping the working environment clean. This approach is applied not only at our sites, but also to our products, thus securing the future of our company and the health of our employees in the long term.

2 Sustainability in the value chain.

OUR ACTIONS HAVE CONSEQUENCES.

We comply with the applicable regulations on safety and the harmlessness of the processes and the materials we use for production as well as those we market. This also applies to the purchasing of any products containing conflict minerals. We also assume our responsibility by obliging our suppliers to act with the same care in their supply chain.

IV HOW WE IMPLEMENT INDIVIDUAL PROTECTION.

With special attention
to data security.



1 Data protection and data security. WHAT IS IMPORTANT TO US.

EHG emphasizes the special importance of data security and the protection of personal data in dealing with customers, suppliers, and other business partners, but also with company employees, as stipulated in the applicable laws as well as the guidelines and agreements applicable within the company.

Each individual is responsible within the scope of his or her duties for ensuring the high level of protection established by law and regulation. The data protection regulations are strictly adhered to and the rights of the persons whose data are collected, used, and processed are fully taken into account.

2 Protection of the company. WHAT BENEFIT WE ALL GET FROM IT.

As a highly innovative company, we live by being at least one vehicle length and idea ahead of our competitors worldwide. Therefore we handle our company and business secrets very carefully. They may not be disclosed and must be protected by all of us as company employees. The same applies to the property rights of third parties (e.g. copyright or trademark rights).

Recognizable confidential information must also be protected and marked "confidential" and may not be disclosed either to third parties or the public. This also applies to contributions in social networks. Here, the principle "less is more" applies.

3 Dealing with corporate property. HOW RESOURCES ARE CONSERVED.

We handle company property (e.g. vehicles, tools, drawings, office materials) and other company assets with care and use them only for business purposes. Company property may not be removed from the company premises without authorization.

In addition, we always act according to the principle of economy and avoid waste in our daily work. This corresponds in equal measure to our demand for sustainability and the responsible use of materials and raw materials.

4 Dealing with social media. WHERE THE BOUNDARIES ARE.

Communication via so-called social media and services or posting on public portals has become part of everyday life. It is therefore all the more important to pay attention to which information is disclosed. If sensitive data are passed on or unethical information is communicated, this can have far-reaching consequences for our company and the individual. Therefore, sensitive handling of media and services as well as public portals is advisable. Personal views are to be expressly marked as such.

5 Public relations. HOW WE WANT TO BE SEEN.

We are all responsible for the safe handling of company information. Therefore, external information and communication in the media within the framework of EHG's public relations work is carried out exclusively by the responsible Corporate Communications department of EHG and the respective brands. Requests from the media are immediately forwarded to the responsible communications department.

6 Dealing with authorities. WHY COOPERATION IS INDISPENSABLE.

EHG maintains a cooperative and flawless relationship with all authorities.

The information required for this purpose is provided by the responsible departments of EHG in a complete, open, correct, timely, and comprehensible manner. Non-compliant behavior slows down processes and damages the company on many levels.

V HOW WE SUPPORT
EACH OTHER AT ALL TIMES.

With responsibility
and empathy.

1 Procedure for reporting violations – Speak up!

Non-compliant behavior such as violations of legal requirements, laws, and our internal guidelines can lead to fines, penalties, economic damage, and a severe loss of reputation for our company.

We therefore promote and support an open corporate and communication culture and assist our employees in reporting any indications of violations or suspected violations of applicable laws, internal regulations, and guidelines.

For this purpose, a notification procedure is provided in which all company employees, business partners, and third parties can also make anonymous reports. We undertake not only to protect the interests of the whistle-blower and to treat the incoming information confidentially, but also to guarantee that the whistle-blower will not suffer any disadvantages from the report.

Denunciations will not be tolerated. Deliberately false or unjustified accusations and allegations will be sanctioned.

contact details:

<https://www.bkms-system.com/ehg-compliance-speakup>



Internally, comments can be sent to:

EHG Group Compliance Office
compliance@erwinhymergroup.com

The ombudsman of the EHG can be contacted at:

Ombudsmann-EHG@rae13.de

Details are available in the EHG Whistleblower Policy.

2 Contact for Compliance

The first person to contact should always be your manager. If you have any questions or comments, you can also contact the following offices:

You can contact the EHG Group Compliance Officer at:

compliance@erwinhymergroup.com

Erwin Hymer Group
Holzstr. 19
88339 Bad Waldsee
Germany

The contact details of your local compliance officer(s) are available in JUST (Corporate Compliance).