



**ARNTZ OPTIBELT GROUP**  
**CODE OF CONDUCT**



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## PREAMBLE

Dear Colleagues,

The following Code of Conduct summarises the essential values and principles of the Arntz Optibelt Group, which we are all called upon to follow, and gives us guidance on conducting ourselves ethically in the course of our global business operations. This Code of Conduct applies to all companies within the Arntz Optibelt Group and their employees (male/female/diverse) around the globe: **one Group – one Code of Conduct for all.**

It provides us with a proven framework within which we can arrive at our business decisions. By following it, we ensure that everyone is treated fairly and with respect. The Arntz Optibelt Group is convinced that long-term success is only possible through sustainable and responsible actions. Basic cornerstones of our Code of Conduct encompass integrity, sustainability and responsibility towards people and the environment. In our day-to-day dealings with each other and our business partners and the public, we are called to consistently align our behaviour with the Code of Conduct. We all have a part to play when it comes to forging a more sustainable and successful future for the Arntz Optibelt Group. We are counting on your contribution and would like to thank you for your support.

Your Management

  
Reinhold Mühlbeyer

  
Konrad Ummen



## **BASIS**

Our top priority is to comply with the laws and regulations of all the countries we operate in. All employees (male/female/diverse) are obliged to be familiar with the basic legislation, regulations and the company's own internal rules and guidelines that are relevant to their area of responsibility. The following regulations are to be regarded as minimum requirements; if local legislation imposes higher requirements, these must be complied with, of course, as a matter of priority.

As a participant in the UN Global Compact Act, we observe international standards and conventions in our business activities, including the ten principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.

Employees (male/female/diverse) who are unsure of how to assess a specific situation are encouraged to seek support and advice from supervisors, the HR department or the legal department at any time.



## **HUMAN RIGHTS AND LABOUR LAW FOR EMPLOYEES (MALE/FEMALE/DIVERSE)**

The Arntz Optibelt Group supports the objectives of the UN General Assembly's "Universal Declaration of Human Rights" and pledges to respect and protect them. We recognise the core labour standards of the ILO as binding principles for the protection of the interests of each individual employee (male/female/diverse).

### **PROHIBITION OF FORCED LABOUR AND HUMAN TRAFFICKING**

The Arntz Optibelt Group does not tolerate any form of forced or compulsory labour. It is prohibited to engage in practices such as human trafficking and slavery, as well as to purchase materials or services from companies that use such methods. Forced labour encompasses all forms of debt bondage, the use of corporal punishment, detention or the threat of violence as a means of discipline as well as surveillance measures such as withholding identification documents and work permits.

We also respect the principle of freely chosen employment. Workers are free to leave and terminate their employment relationship.

### **PROHIBITION OF CHILD LABOUR AND PROTECTION OF YOUNG EMPLOYEES (MALE/FEMALE/DIVERSE)**

The Arntz Optibelt Group pledges in compliance with applicable national legislation to employ only persons (male/female/diverse) who have reached the minimum age required for undertaking work and to not tolerate child labour. Where young workers (male/female/diverse) are employed within the framework of national legislation, it will be ensured that the type of activity they do does not adversely affect their safety, health, development and morale and that their working hours do not interfere with their participation in vocational training programmes.

### **FREEDOM OF ASSOCIATION**

The Arntz Optibelt Group respects the right of workers to freedom of association, to join trade unions, to appeal to labour representatives and to join works councils. Workers' representatives are granted free access to workers. Furthermore, the right to collective bargaining to regulate working conditions and the right to strike are afforded in line with the legal provisions. Even where there is disagreement, the aim will always be to maintain a trusting and constructive working relationship that will benefit the company and the workers (male/female/diverse). Workers can communicate openly with management without fear of discrimination, harassment or reprisals and are able to put forward ideas and concerns about working conditions and management practices.



## **EQUAL OPPORTUNITIES AND PROHIBITION OF DISCRIMINATION AND HARASSMENT**

The management of the Arntz Optibelt Group hereby reaffirms its commitment to respecting the principles of equal opportunities and does not tolerate any discrimination of their employees (male/female/diverse). No one shall suffer discrimination on account of characteristics such as gender, origin, religion, age, sexual orientation, mental or physical limitations, trade union membership or any other characteristics protected by local law. The aforesaid applies in particular to the recruitment of employees (male/female/diverse), their further training, promotion and remuneration. The personal dignity, privacy and personal rights of each individual must be respected. Employees (male/female/diverse) shall not be subjected to physical, sexual, psychological or verbal harassment or other abuse.

All employees (male/female/diverse) are expected to interact with each other on the basis of mutual respect. There is no place in our company for bullying of any kind. Furthermore, the Arntz Optibelt Group promotes diversity within the company as well as an inclusive, prejudice-free corporate culture. In addition, we support the professional development and individual advancement of our employees (male/female/diverse) within the framework of operational and personal possibilities.

## **OCCUPATIONAL HEALTH AND SAFETY**

The protection and promotion of the health of employees (male/female/diverse) belong to the fundamental values of the Arntz Optibelt Group and are firmly anchored in its corporate policy. The Arntz Optibelt Group complies with all labour and safety regulations and requirements for all of its locations worldwide, and guarantees occupational health and safety within the framework of the relevant national provisions. Processes are in place to continuously identify, assess, prevent and control potential hazards to the health and safety of employees (male/female/diverse). Measures are also taken to prevent potential accidents, injuries and illnesses of employees (male/female/diverse) that are related to or may occur during the course of work.

Access to company premises is regulated. Before entry, visitors are made aware of the need to comply with the rules and also, in particular, with occupational health and safety regulations.

## **ALCOHOL AND DRUGS**

It is a fundamental principle for us that no employee (male/female/diverse) shall be under the influence of drugs, alcohol or other substances which could impair the safe and effective performance of the employee's duties during the course of his/her/their work, including on the way to and from work. Please note that the aforementioned substances may also include appropriately prescribed medication.

**PAY**

Employees' (male/female/diverse) pay is based on the applicable laws and regulations as well as binding collective agreements. Pay shall be disbursed punctually, recurrently and in full in legal tender. The basis for calculating employees' pay shall be continuously communicated or announced to the employee (male/female/diverse) in the form of a pay slip or a comparable document.

**WORKING HOURS**

All employees (male/female/diverse) shall comply with applicable laws with regard to regular working hours and overtime, including breaks, rest periods and holiday periods. For the Arntz Optibelt Group, compliance with ILO core labour standards is a matter of course.

**RESPONSIBLE HANDLING OF COMPANY PROPERTY**

Work equipment such as furniture, licences, technical devices and machines must be handled with care and used exclusively to fulfil the company's objectives.

**APPROPRIATE COMPORIMENT IN PUBLIC**

Public statements, particularly ones made to the media, may only be delivered by persons who are authorised to do so. Employees (male/female/diverse) are expected to always refer enquiries to Corporate Communications. The right to freedom of expression applies to statements made by employees (male/female/diverse) in public. A respectful tone should be maintained at all times.



## ENVIRONMENT AND SUSTAINABILITY

The Arntz Optibelt Group takes a responsible approach to the environment as a matter of course. Our goal is to develop environmentally friendly and resource-saving products. In pursuing this aim, we consider the entire life cycle of our products and are committed to restricting the impact on people and the environment resulting from the development, production, storage, transport, distribution and use of our products to what is absolutely necessary. Tasks undertaken in the course of everyday business must be performed by employees (male/female/diverse) in a sustainable way and with due consideration to their impact on natural resources. In particular, the applicable laws on soil protection, emissions, waste water, hazardous substances, packaging and waste disposal must be complied with. All permits required must be obtained and kept up to date. Furthermore, measurable goals aimed at minimising environmental impacts must be set, reviewed and documented, and their implementation and success must be communicated regularly and systematically.

### ECONOMICAL USE OF RESOURCES AND LOW EMISSIONS

Inefficient use of resources must be avoided. Improved resource efficiency can be achieved by adapting production and maintenance processes, by using alternative materials, by making savings through reducing consumption, or by means of recycling. We should strive to use renewable energies. Environmental indicators such as total energy consumption and our CO<sub>2</sub> emissions, in particular, are to be recorded and continuously monitored to track our own development.

### RESPONSIBLE WASTE DISPOSAL

When it comes to dealing with waste, the principle to be followed is "avoidance before recycling before disposal". When developing, manufacturing and subsequently recycling products and undertaking other activities, consideration must be given to waste avoidance, and to the reuse, recycling and disposal of residual waste, chemicals and waste water in an environmentally friendly way.

### RESPONSIBILITY FOR PLASTIC PACKAGING

The Arntz Optibelt Group is committed to using environmentally friendly packaging. The aim is to avoid packaging wherever possible or to improve the environmental impact of any packaging used. Packaging is considered to be environmentally friendly if it is reusable and uses as little material as possible, and if it is recyclable or consists of secondary raw materials or alternative materials.

### HAZARDOUS SUBSTANCES AND CHEMICAL SAFETY

The Arntz Optibelt Group attaches particular importance to ensuring its products comply with, meet or exceed the legal regulations, directives and standards – including but not limited to the RoHS Directive and the REACH Regulation in their latest versions.

## CONFLICT MINERALS

A significant focus is placed on the issue of so-called conflict minerals and critical materials in general, where the entire supply chain is key to greater responsibility and care.

The Arntz Optibelt Group has set the mission, for itself and its suppliers, that all products are free from conflict minerals and that legal requirements – in particular EU regulations and the Dodd-Frank Wall Street Reform and Consumer Protection Act – are complied with. The Arntz Optibelt Group establishes due diligence processes to promote responsible supply chains for minerals from conflict areas and high risk areas.



## **FAIR MARKET CONDUCT AND ETHICS**

### **COMPLIANCE WITH COMMERCIAL LAW, COMPETITION AND ANTITRUST LAW**

The Arntz Optibelt Group operates in compliance with the globally applicable legal and regulatory requirements in the areas of customs, export, import and economic sanctions. We take suitable measures to ensure, among other things, that transactions with third parties do not violate applicable economic embargoes and/or sanctions lists.

Furthermore, we obtain and award contracts on the basis of fair competition. Accordingly, we select our business partners based on the criteria of quality, sustainability, suitability of their performance and price. It is prohibited, in accordance with applicable antitrust laws, to enter into agreements with another competitor, supplier or customer which pursue the objective of the prevention, restriction or distortion of competition.

### **PROPER ACCOUNTING AND FINANCIAL REPORTING**

All business transactions must be properly accounted for, in a traceable manner, in our books and records. Fictitious transactions or sub-ledgers are prohibited. Financial reporting shall be accurate and complete.

### **AVOIDANCE OF CONFLICTS OF INTEREST**

We expect our employees (male/female/diverse) to reach decisions based on objective considerations and not to be guided by personal interests. Any situation where there could be a conflict of interest, or what appears to be a conflict of interest, between their interests and the interests of the Arntz Optibelt Group should be avoided. As soon as an employee (male/female/diverse) becomes aware of any potential conflict of interest, they are required to inform their superior immediately. In the interests of avoiding conflicts of interest, employees (male/female/diverse) must not hold significant shares in the companies of suppliers, customers or competitors.

### **COMBATTING CORRUPTION AND PREVENTING MONEY LAUNDERING**

The Arntz Optibelt Group will not practise or tolerate corruption, extortion, misappropriation or bribery in any form or at any time. Applicable laws on the prevention of money laundering are complied with. The principle that guides our actions is a fair, honest and transparent business policy. No employee (male/female/diverse) will offer, procure or accept a bribe, kickback or other improper advantage to business partners or their employees (male/female/diverse), public officials or other third parties in business activities of any kind. This applies even if local laws permit such procedures.

### **POLICY REGARDING INVITATIONS AND GIFTS**

Accepting or granting benefits such as gifts, invitations or other advantages is only permissible if they are of a purely symbolic nature, are transparent, correspond to customary practices at business level and if any possible inappropriate influence on an official decision can be reliably ruled out. We stand for a reasonable and measured approach to benefits. Decisions by our business partners to not accept invitations and gifts ("zero gift policy") are to be respected.

# INFORMATION SECURITY POLICY

## CONFIDENTIAL INFORMATION

Confidential information about the Arntz Optibelt Group is treated with care and will not be disclosed to unauthorised third parties or to the public without express permission. Confidential information may include manufacturing formulas and processes, prices, sales and profits, corporate strategies, contract information, supplier lists, personnel files and other non-public information. The obligation to protect confidential information continues to apply even beyond the date of termination of employment. The foregoing applies equally to information disclosed to us by customers, suppliers and other business partners. A confidentiality agreement must be concluded with all external persons or companies before they receive confidential information.

## DATA PROTECTION AND IT SECURITY

It is in the economic interest of the Arntz Optibelt Group to protect internal company data, confidential information pertaining to our partners, and company-specific knowledge according to the state of the art, and to comply with the applicable data protection laws, including the EU general data protection regulation. Personal data must not be processed without a legitimate business purpose or without consent. This includes, but is not limited to, the recording, collection or storage of personal data. The Arntz Optibelt Group also requires all business partners to comply with the obligation to protect data and data security and to maintain confidentiality.

For the Arntz Optibelt Group, information security is an extremely important quality feature of data processing. All essential strategic and operative business processes in the corporate Group are supported decisively by information technology (IT) and ensure our success. IT security comprises all technical and organisational measures which aim to protect systems from cyber attacks and other threats. The confidentiality, integrity, authenticity and availability of sensitive data, in any form, pertaining to our customers, interested parties, business partners, employees (male/female/diverse) and the corporate Group itself must be adequately guaranteed.

## PROTECTION OF INTELLECTUAL PROPERTY

Intellectual property rights must be respected; the transfer of technology and know-how must take place in such a way that the intellectual property rights of the Arntz Optibelt Group as well as all customer information are protected. It is the fundamental objective of the Arntz Optibelt Group to identify infringements of our intellectual property rights and to take action against the perpetrator in order to immediately remove counterfeits from the market, curb the production and transnational distribution of potential counterfeits and take all necessary steps to ensure that, as far as possible, only original products from us are on the market.



## SUPPLY CHAIN TRANSPARENCY, SUPPLIER SELECTION AND MONITORING

The Arntz Optibelt Group attaches great importance to continuous transparency of its supply chains. Our objective is to verify the origin of all the raw materials we use right back to their source. Our supplier selection procedure includes carrying out a supplier self-disclosure, certificate tracking, supplier evaluation and/or risk tracking together with an action plan. The risk management process also includes on-site inspections and audits.



## REPORTING OF BREACHES OF THE CODE OF CONDUCT

Every employee (male/female/diverse) is called upon to report any possible suspicions and violations of this Code of Conduct. The aim of this is to limit the consequences of any such violations and to prevent similar misconduct in future. Any such hints can be submitted by e-mail or telephone, or by using the anonymous whistleblower system. The following link will take you to the Arntz Optibelt Group 's protected online reporting channel: [www.bkms-system.com/optibelt](http://www.bkms-system.com/optibelt). You can also contact your supervisor, the HR department or the legal department. Every report will be treated confidentially and thoroughly investigated.



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