

# **DRÄXLMAIER Group Code of Conduct**



# Code of Conduct

## Preamble

We are convinced that long-term success is based on the trust of our customers in our competence, innovation, sustainability, and especially, in our integrity. This trust has been reflected in the reputation of our company for decades. It decisively depends on all employees being committed to the values and objectives of the company, and acting according to these in their respective areas of responsibility.

We expect all employees of the DRÄXLMAIER Group to comply with currently applicable legal regulations and corporate guidelines, to live our corporate values and respect the culture of individual countries. In particular, all managers are called on to lead and act as a role model. We are unconditionally committed to lawful and responsible conduct.

The **Code of Conduct** is based on our vision and our corporate values. This provides an insight into the corporate culture of the DRÄXLMAIER Group and is binding for all managers and employees. It contains the essential aspects of our policies and pretend the desired conduct of employees and external interest groups, e.g. suppliers, customers, applicants and important NGOs (non-governmental organizations). Further information can be found in the respective policies.

## Content

### People

#### [Social Policy](#)

The fundamental values of social responsibility, such as an open-minded approach to the world and tolerance of all peoples, cultures and religions are a matter of course for us.

We are convinced that the success of the DRÄXLMAIER Group is based equally on the social responsibility of our company and our employees. All employees of the DRÄXLMAIER Group are treated according to these principles – we guarantee this! All employees act according to these principles – we expect this!

The social values which we live on a daily basis have been anchored into our global Social Policy.

#### [Leadership Policy](#)

Our managers act as a role model through integrity, commitment and passion corresponding to our corporate values. Managers assume responsibility in terms of corporate objectives and decision-making for the long-term; hence they secure the sustainable success and independence of the DRÄXLMAIER Group.

They promote individual initiative and a result orientation; enabling employees in their teams to develop within the company. The specific conduct expected of our managers has been anchored into our Leadership Policy.

#### [Corporate Behavior Policy](#)

The values of the DRÄXLMAIER Group sets the framework for our corporate culture and the desired behavior of employees.

At all times, our employees play a key role in shaping our internal culture. They characterize the external perception and represent the DRÄXLMAIER Group. The way in which employees live our corporate culture and values, and the specific behavior which is expected of them has been anchored in our global Corporate Behavior Policy.

#### [Policy for Corruption/Bribery/Extortion](#)

We expect all employees to refrain from corrupt or comparable illegal behavior and not to tolerate it in their areas of responsibility. This means that benefits or contributions should not be offered or granted to employees by public authorities and business partners for the purpose of getting them to carry out illegal or unfair action.

We expect all the employees to make their business decisions in the interests of the corporation and focus their action on the same. Personal reasons, personal relationships or personal advantages may not influence decisions and actions that focus on the corporate interests.

#### [EHS-Policy: Health and Safety](#)

We comply with applicable laws and standards on occupational health and safety. We act responsibly in accordance with our own rules, which often go beyond the legal requirements. In doing so, we adhere to the latest state of the art.

# Code of Conduct

## Environment

### [EHS-Policy: Environment](#)

We expect our employees to handle the available resources and raw materials with care. We are actively looking for savings potential to reduce waste. We comply with legal environmental requirements.

### [EHS-Policy: Energy](#)

We are committed to taking measures that improve energy efficiency and reduce energy consumption. We expect all employees to support the implementation of energy-saving measures. We comply with the relevant laws and regulations.

## Economy

### [Policy for Fair Competition](#)

We expect all our employees to adhere to the rules of competition in their areas of responsibility. Anti-trust agreements with competitors, for example on prices or other conditions, are forbidden. If an employee is approached with the aim of participating in anti-trust agreements, the employee is required to inform his supervisor and the legal department of this without delay.

We are committed to fair competition. Unfair practices are not permitted. Suppliers are assigned according to objective, transparent criteria. Obviously arbitrary reasons may not play a part in the selection.

### [Quality Policy](#)

We are a competent partner to the automobile industry, understand the demands of the market and implement them for our OEMs throughout the processes. In times of increasing digitalization, we create innovative ideas and implement them for our customers in a timely manner. We consistently adhere to our global standards and continue to develop our excellent processes in every areas of the organization. By recognizing the need for differentiation and keeping an eye on the market, we increase the satisfaction of our customers and thus also our corporate success. Moreover, we require our partners and suppliers to adhere to the quality standards of our customers.

### [Risk Policy](#)

The corporate goals of the DRÄXLMAIER Group are subject to internal and external influences which undergo changes over time. These changes lead to deviations from the planned, future-oriented strategic and operative goal values. A risk is defined as an undesirable, negative deviation from a goal, while an opportunity is defined as a positive deviation. Risk management describes the process of identifying, assessing and communicating risks, followed by coordinated and economical use of resources to minimize the likelihood and impact of unwanted events and to maximize opportunities.

### [Corporate Security Policy](#)

The primary purpose of Corporate Security is to protect the company and its employees from threats. The concept of protecting the company is based on the protection of individuals, information, products and values. Furthermore, Corporate Security is an integral part of emergency and crisis management within the organization and prepares the company for these scenarios in the best possible way.

Together with the employees at regional and site level, Central Corporate Security in Vilsbiburg makes sure that these comprehensive tasks can be implemented consistently throughout the world. The activities of Corporate Security are based on the values of responsibility, trust and confidentiality. We are convinced that in our role as a reliable partner, these values will enable us to protect the safety of our employees and the company's economic success.

# Code of Conduct

## Data / Information

### [Data Protection Policy](#)

We not only set high standards as a global supplier in the premium automotive segment, but also in complying with the various international data protection laws. In this context, it is important for us to ensure a uniform and globally valid standard in handling personal data.

### [Information Security Policy](#)

Responsible handling of company information as well as information from customers, partners and employees is an integral part of our actions. We protect all information appropriately considering its value and maintain the Information Security goals Confidentiality, Integrity and Availability. Specifically, we are protecting the intellectual property of the DRÄXLMAIER Group as well as that of our customers against unauthorized access, thus respecting the values of our clients. We ensure delivery capabilities by securing our IT-Systems against outage, attacks and misuse. Innovation & Information Security go hand in hand at the DRÄXLMAIER Group.

## Handling suspected cases and contacts

Compliance with legal regulations, policies and guidelines has the utmost priority, and this likewise applies to the observance of standards voluntarily set by us. Violations to these rules seriously damage the reputation of the DRÄXLMAIER Group. Therefore, we reserve the right to initiate labor law-related sanctions in cases of intentional non-compliance with applicable laws and guidelines. Should a potential violation be discovered within our company environment, then this can be reported via our regional Compliance Officer or external ombudsman. Over and above confidentiality, they can assure absolute anonymity towards the company at the request of the information provider. As a result, every employee can express their concerns anonymously: [help@draexlmaier.com](mailto:help@draexlmaier.com)

\*) For reasons of better readability, no distinction has been made between male, female and diverse language forms. All person designations apply to all genders.

**Version:** January 2021