

# Company Code-of-Conduct

Code of Conduct of Battery-Kutter GmbH & Co. KG



In this Company Code of Conduct, the generic masculine is used for reasons of better readability. All personal designations apply equally to female, male and other gender identities.

Dear **#teamkutter**,

Battery-Kutter, that's us: Employees in our various roles, united by our mission statement.

Our values are based on the following commitments:

- We are enablers
- We take responsibility
- We are enthusiastic about progress
- We strive for professionalism
- We are a family
- As a team we are exceptional **#teamkutter**

This creates the basis for our ambitious mission:

## **With our customised and innovative solutions, we accompany our customers into a future of mobile energy.**

At Battery-Kutter, we have always had a common understanding of behaving ethically in our day-to-day business and complying with existing laws.

Cooperation - also on an international level - is becoming increasingly demanding. Our mission statement, our values together with our Company Code of Conduct, the Battery-Kutter Code of Conduct, form the basis for pursuing our ambitious goals in the coming years. Our Code of Conduct clarifies the requirements for responsible behaviour in our day-to-day work, is integrated into our structure and provides us with orientation.

### **OUR VISION & MISSION**

Our values | Leadership principles | Employee handbook

### **OUR BEHAVIOUR**

Company Code-of-Conduct: Battery-Kutter Code of Conduct

### **OUR REGULATIONS**

Guidelines | Instructions | Safety regulations

All contents of the Company Code of Conduct are of equal importance. By adhering to our Code of Conduct, we all support the successful further development of Battery-Kutter. Each and every one of us, all together! The team leaders are required to ensure implementation in all areas with their teams.

If you have any questions or suggestions regarding our Code of Conduct, please contact your team leader, the HR department or, of course, us.



Hendrik Kutter



Kai Kutter



Julia von Kap-herr

## **LEGAL – Compliance with law and order**

We are obliged to comply with the legal regulations that apply to us. The same applies to BK's internal regulations.

We do not participate in transactions that are clearly aimed at circumventing or violating legal regulations.

All team leaders ensure that the Code of Conduct and internal regulations are publicised in their areas of responsibility.

## **WERTSCHÄTZEND – We are a family**

We cultivate a caring, appreciative and respectful approach.

We consider unequal treatment of people based on skin colour, origin, religion, sexual orientation, age or gender to be discrimination and do not tolerate it. Bullying, deliberately defamatory behaviour and sexual harassment will not be tolerated in any form.

## **LOYAL – Information and data protection**

Our information and data are valuable assets that must be protected. We maintain absolute confidentiality regarding our company and business secrets. Confidential data and information may not be passed on online or offline without authorisation. We agree publications and public contributions in advance with the team leaders. We take full account of data protection, including in terms of the GDPR, when handling the personal data of our customers, employees and business partners.

## **RELIABLE – Protection of property and assets**

We actively contribute to the protection of company property and assets. We explicitly refer to tangible and intangible assets, such as work equipment and trademark rights. We are responsible for the protection and proper use of company property and other company assets. As a matter of principle, we only use work equipment and other company property for operational purposes. Our assets must be protected against loss, theft, damage or misuse.

## **HONEST – Private interests, corruption**

We separate private and company interests in a reasonable manner. If there is a possibility of a conflict of interest, we talk to our team leaders or the management. Business transactions with companies in which we ourselves or family members are involved or in which we hold a decisive position require prior authorisation.

We are resolutely opposed to bribery and corruption. We expect the same from our business partners.

We regard both our own bribery and the bribery of business partners as criminal offences. We are particularly sensitive when dealing with public officials, for example from authorities or public institutions.

We pay attention to transparency in our donations and sponsoring activities.

## **ENTHUSIASTIC – Customer, product**

We always have our customers and customer satisfaction in mind as ‘enablers’. Our products and services are developed, produced and distributed in accordance with our strict quality management system. We prove this with our ISO 9001 and ISO 14001 certifications. We guarantee the safety of our products and services and provide our customers with the relevant information.

## **FAIR I. – Cartel agreements**

We handle our market position responsibly and ensure that we do not violate antitrust law. We do not participate in cartel agreements with other market participants.

## **FAIR II. – Employees in our supply chain**

We advocate fair and sustainable labour conditions in our supply chain and prevent modern slavery wherever we can. We also demand the same attitude from those with whom we conduct business (see *Business Partner Code of Conduct for Suppliers, UK Modern Slavery Act, Statement on Human Rights Declaration*)

## **FAIR III. – Embargoes and sanctions lists**

We always carry out the legally required checks against the applicable sanctions lists. Trade or other business relationships with natural or legal persons, groups or organisations that are listed in the current sanctions lists of the EU and/or the USA are strictly prohibited.

## **SUSTAINABLE – Environmental protection and safety**

We do not see sustainability as a trend, but as an essential element of our business activities. We take environmental, social, safety and governance aspects into account across our entire value chain. We act in an environmentally and resource-conscious manner at our workplaces. We are committed to the principles of the circular economy.

We are developing measures to continuously reduce the impact of our business processes on the climate and environment.

For us, occupational health and safety is an obligatory task for every individual. Supervisors play an important role in instructing and setting an example. We plan and operate our systems in strict compliance with safety regulations.

Child labour and forced labour are prohibited, are rejected by us without exception and are actively avoided.

When it comes to conflict minerals, we rely on international standards and initiatives. We expect our suppliers whose products contain conflict minerals and extended conflict minerals (taking CMRT and EMRT criteria into account) to also fulfil their due diligence obligations.

We voluntarily commit ourselves to the *ten principles of the United Nations Global Compact*.

## **AGAINST THE RULES – Dealing with infringements**

We adhere to legal requirements, this Code of Conduct and our Battery-Kutter internal regulations without exception.

Employees who violate the Code of Conduct, applicable laws, regulations or internal guidelines must expect labour law sanctions, claims for damages or other legal action in a timely manner, depending on the type of violation, following a review by the HR department.

If you discover any misconduct, you are required to report the incident to your superiors or the reporting system by name or, of course, anonymously, in accordance with the official announcement of the Battery-Kutter whistleblower reporting system (according to the German Whistleblower Protection Act *HinSchG*).

If you discover any misconduct, you are required to report the incident to your superiors or – either by name or anonymously – to the Battery-Kutter whistleblowing reporting system in accordance with the German Whistleblower Protection Act, *HinSchG*.

([Digital whistleblowing reporting system](http://www.battery-kutter.de/main/de/hinweisgebersystem): [www.battery-kutter.de/main/de/hinweisgebersystem](http://www.battery-kutter.de/main/de/hinweisgebersystem))