

# EVVA | CODE OF CONDUCT

Show respect and demonstrate strength in what you say and do.

**This Code of Conduct is binding and you must always comply with its regulations.**

If you are unsure about any contents, you can contact your manager or HR department at any time.

We urge you as employees to also observe the EVVA IT directives and social media directives.  
Available on the Intranet at:

 Unser EVVA > Leitbild, Werte & Richtlinien

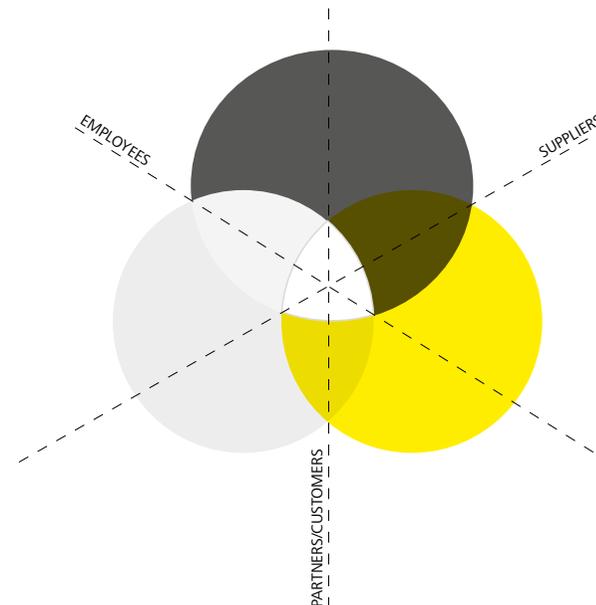


## Why publish a code of conduct?

EVVA operates on an international stage. Intentional or unintentional violations of a country's legislation may result in financial penalties and damage our image. All EVVA employees must always be up to date with regard to legislation and directives applicable within their areas of responsibility. Please contact your supervisor if you are unsure about any issues. Violations of legal stipulations and regulations of this Code of Conduct may result in investigations under criminal or civil law as well as recourse and compensation payments. Use a certain element of common sense when you make decisions.

## Who does it apply to?

The Code of Conduct applies to all EVVA Group employees. This includes all companies in which the EVVA Group directly or indirectly holds a minimum stake of 50% or in which EVVA exerts any other type of influence. EVVA also provides the Code of Conduct to companies in which it holds minor shares and to major business partners as a basis for their decisions.



At EVVA, we want to be role models and act according to our values as a family-run business. The opportunities to react incorrectly are ample and may be motivated by greed, a lack of respect or just negligence. But regardless of what others do – **we remain on the right path.**

This EVVA Code of Conduct is intended to give you as employees, suppliers, partners or customers an impression of what we consider to be the right way to react. It helps all of us to make the right decisions and always be able to look at our reflection in the mirror and see an honest, reliable and fair person looking back at us.

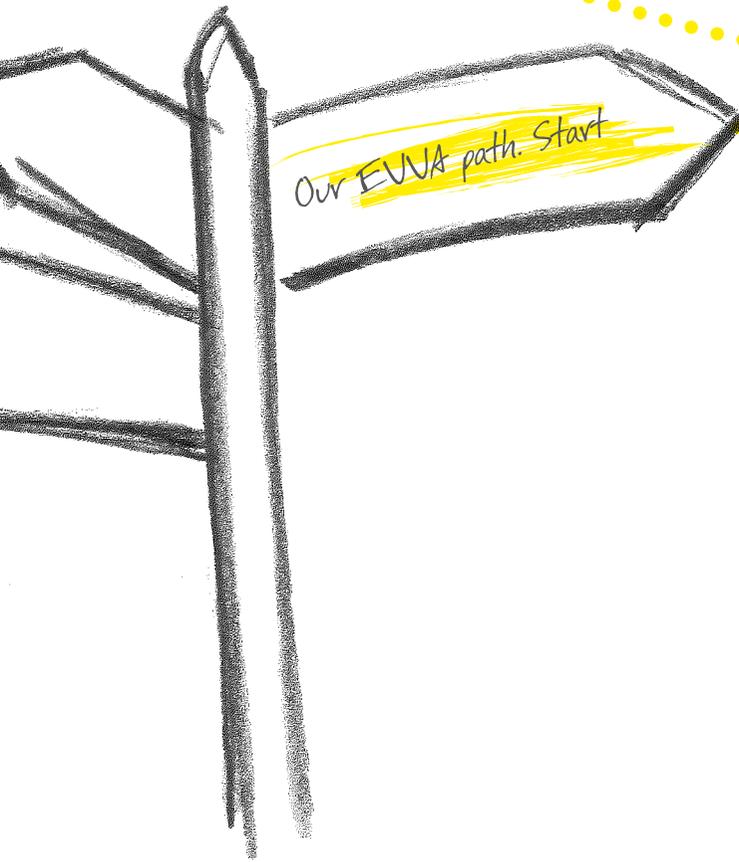
[www.evva.com/csr](http://www.evva.com/csr) – Visit this page to access our mission, values, Code of Conduct and everything else about sustainable relationships at EVVA.

## 1. We communicate professionally.

You as our employees are EVVA's most important brand ambassadors. It must be clear to anyone you talk to that you are proud to represent EVVA. This also applies to contributions on social media platforms. The best way to deal with the issue is to treat others like you would like to be treated yourself: be honest, fair, professional and respect others, even if others do not respond in the same way.

*For example: the meeting starts. One of the participants is giving a rude and irritated impression. You remain polite and calm. You soon realise the person in question had yet another challenging commute to work and needs a few minutes to calm down.*

*For example: you heard a rumour? Do not let rumours irritate you. Actively approach your supervisors or address the issue publicly at an info breakfast session.*



Our EVVA path. Start

## 2. We are discrete.

- › Confidential information must remain within the company. Exclusively provide information to third parties – regardless of verbally or in writing – which has been explicitly approved for publication by your managing director, supervisor or communication officer.
- › Keep all corporate information (documents, drawings, etc.) and copies thereof safe. Does your job involve travelling? Protect said information on devices such as laptops from access by third parties. Our IT guidelines describing how to securely use your hardware and software provide support.
- › You have a strict duty not to disclose confidential company information at any time. This includes questions relating to areas such as research and development, acquisition, strategy or vital investments. Said information is exclusively intended for employees requiring the information on a professional basis. In addition, conclude non-disclosure agreements as part of your service agreements as well as agreements with EVVA Certified Partners. By the way, the strict duty not to disclose confidential company information also continues to apply fully after having terminated any type of agreements.

*For example: someone asks you casually, „you are currently working on this new technology, aren't you? How are you doing?“. Be honest and openly say that you are unfortunately unable to comment on the issue.*

### 3. We remain within legal boundaries.

- › We value our competition, but agreements or arrangements of any kind are an absolute „no go“. EVVA is a synonym for fair competition. Violations of anti-trust legislation may entail heavy fines and considerable compensation payments, in some countries they may even involve prison sentences. Verbal agreements and concerted practices will be punished identically to written agreements.
- › Do not employ unfair business practices or put pressure on intermediaries to retail products at certain prices.
- › Do not disclose confidential information relating to the market we share with competitors, such as prices, sales conditions, costs, production capacities, stocks or similar matters. This also applies to participations in associations or trade fairs.

Please refer to the competition guidelines for further regulations.  
These are available from the Legal Office and HR Development department.

| *For example: You are invited to represent EVVA at an association event.  
| During the break you notice other participants are violating anti-trust  
| regulations. You immediately withdraw from the conversation  
| and inform your supervisor of the issue.*

### 4. We are not corrupt.

- › All employees are strictly prohibited from directly or indirectly offering or accepting benefits if this could bear an impermissible influence on business transactions or merely give the impression that this is the case. It is not permitted to offer or accept money or monetary benefits at any time.
- › Gifts to public officers or government employees which exceed the corresponding maximum permitted, country-specific limits are also prohibited. We urge you to not accept any gifts. This excludes occasional gifts of little value and hospitality within the scope of common business relations only. All other types of gifts must be refused or returned. This will help us to make independent decisions.

| *For example: an external service provider wants to give you  
| valuable holiday vouchers as a gift. You decline with thanks.*

### 5. We act sustainably and with respect.

- › EVVA attaches great importance to respectful behaviour towards others. We respect the opinion of others as well as their dignity, privacy and personal rights.

At EVVA, we do not tolerate any kind of discrimination or abuse, for instance on the basis of nationality, culture, religion, skin colour, sex, political orientation, age or disability (see also the Universal Declaration of Human Rights at [www.un.org/en/documents/udhr](http://www.un.org/en/documents/udhr)). EVVA explicitly condemns slave or child labour.

- › Employees are contracted, promoted and assessed based on performance-related criteria such as the achievement of objectives or professional experience.
- › EVVA has developed directives on occupational safety, healthcare and environmental protection. We urge you to always comply with said directives. All employees can view the documents at

 „Unser EVVA > Arbeitssicherheit“ and  
„Unser EVVA > Nachhaltigkeit“

| *For example: As a family business, we include corporate social  
| responsibility (CSR) in our company policies. EVVA is an indus-  
| try pioneer with regard to sustainability – the keywords are:  
| clean production –  
| setting numerous social measures for employees. All because  
| values must be lived, not just defined.*

## 6. We notify of conflicts of interest.

- › Transparent processes are imperative, particularly in the event of conflicts of interest. Immediately notify your supervisor about conflicts of interest or if you anticipate any conflicts of interest in the future. For instance, this may affect secondary employment or collaborations in management boards or committees outside the company. In each case, you require prior, written approval from EVVA.
- › The following circumstances must also be reported (prior to concluding agreements) if you or one of your family members is affected: economic investments in customers, partners, suppliers, competitors, etc. as well as participation in corporate decisions at EVVA business partners.

| *For example: you would like to take on a second job.*  
| *This requires approval, notify your supervisor in advance.*

## 7. We back our decisions. And admit errors.

Notify your supervisor or your HR department if you notice any violations. EVVA guarantees to treat every issue correctly. However, bear in mind that EVVA expressly reserves the right to take disciplinary action against employees who act with intent or gross negligence or have made false accusations against others.

| *Nobody is perfect. If you observe the Code of Conduct and EVVA Directives, you will always be on the safe side.*  
| *However, we urge you to report any violations that may occur. This is the only way EVVA can avert damage.*



**Tips for the home straight.**  
Dangers or insecurity may be lurking at the side of the EVVA path. Before you act, ask yourself the following question:

- › Do my decisions violate this Code of Conduct or EVVA Directives?
- › Who can I ask for advice?
- › Will my actions harm anyone?
- › Would I act in the same way if others learnt of the consequences?
- › Will I still be able to confidently look at myself in the mirror?