



**CODE OF CONDUCT** 



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As a service enterprise, we are highly dependent on trust. To avoid any misunderstandings - which are often arise accidentally - concerning our business practices and ethical principles, it is essential to have clear rules of conduct and behaviour for all personnel of August Storm GmbH & Co. KG.

For reasons of transparency, therefore, we now present this Code of Conduct, which details and summarizes our understanding of good business conduct and practice and is binding on the enterprise and its employees. At the same time, it constitutes a statement of our understanding of value management.

This Code of Conduct is intended to serve as an aid to all personnel on how to conduct themselves correctly towards their colleagues, supervisors and managers, the customers, and not least also the public.

The enterprise is committed to these clear principles!

Bernard Storm

Karl-Heinz Lammers



## **INTRODUCTION**

The STORM – Group is committed to consistently conducting its business in accordance with these corporate principles.

In order to fulfil the long-term interests of the STORM – Group, its companies strive to meet the highest legal and ethical requirements in all their business practices. Therefore, every employee is expected to act with responsibility, integrity and honesty

act with responsibility, integrity and nonesty and to comply with this Code of Conduct, based on the underlying principles and valid laws.

This Code of Conduct applies equally to all personnel of the STORM – Group, whether male or female.

### **COMPLIANCE WITH LAWS**

All business and other activities of the STORM – Group must be conducted in strict compliance with all valid laws and in keeping with the principles of social engagement in each country in which the activities concerned are taking place.

All employees are expected to comply with the laws and regulations that apply to the business activities, their sphere of activities and duties and the social engagement of the companies.





# MUTUAL RESPECT AND PROHIBITION OF DISCRIMINATION

The STORM – Group supports and respects the protection of human rights as defined in the United Nations' "General Declaration of Human Rights". No employee may violate these fundamental human rights through his or her actions.

The STORM – Group supports the general rights of the employees as defined in valid legal regulations. Accordingly, the companies also respect the freedom of association within the scope of those regulations. Should these rights be restricted by laws which are in force at any time, the companies will strive to enable the employees to present their views through alternative channels. The companies of the STORM - Group reject forced or compulsory labour and child labour in any form whatsoever.

The STORM – Group rejects discrimination of any kind on grounds of a person's race, ethnic origin or nationality, skin colour, sex, marital status, sexual orientation, religious belief, disability, age or political conviction within the scope of the law or any other legally protected characteristics.

We promote equality of opportunity. Employees are chosen and treated exclusively on the basis of their abilities and performance.

We reject any form of discrimination, harassment or mobbing by our employees. All management personnel must set an example by their behaviour.





#### **OPENNESS**

The STORM – Group promotes openness and transparency as well as continuous dialogue with its customers and other business partners, employees, authorities, communities and the media. This openness and transparency may, however, be restricted in some cases on grounds of competition law or in special cases by the management.

The STORM – Group attaches importance to honest and careful communication, and all statements and utterances of employees must be in keeping with this principle.



#### **WORKPLACE SAFETY**

The STORM – Group has set itself the aim, through the application of high standards in the field of occupational health and safety, of providing safe workplaces for its employees, contractors and other persons operating on its behalf at its various sites. It is our striving to ensure the safety of our products and services through development processes on the highest level.

Each employee is responsible for compliance with the safety rules and regulations and the use of such personal protective equipment as may be needed and for reporting all deficits in relation to safety regulations or safety measures.







#### **ENVIRONMENTAL PROTECTION**

Our aim is to develop and provide advanced services and solutions which are environmentally friendly and fulfil essential requirements such as low emissions and high efficiency.

We therefore strive to ensure sustainable developments through the careful selection of raw materials, processes, products, disposal methods and emissions reduction, thereby making use of the latest technological advances. All employees must comply with the regulations and guidelines relating to environmental protection.

## **CONFLICTS OF INTEREST**

The STORM — Group expects absolute loyalty of its employees. The employees must avoid situations in which their personal interests could conflict with those of the STORM — Group. That means, for example, that employees may not accept any gifts or invitations, so as not to be compromised in any way in their freedom to take decisions in compliance with this Code of Conduct. The only exception to this are occasional gifts or invitations of minor value, provided that acceptance of them would not give rise to any conflict of interests.







#### **COMBATING CORRUPTION**

No employee may, whether directly or indirectly, promise, offer, pay, request or accept bribes of any kind, including cash, subsidies, benefits or other items with money's worth of any kind. Payments or perquisites of this kind may be seen as bribery.

As a consequence, they would be in breach of valid laws and internationally recognized principles for combating corruption and bribery.

# COMPETITION AND FAIR TRADING

Competition laws have the purpose of protecting consumers and businesses against unfair trading practices. Every employee must comply with these laws. Acts such as the participation in cartels, misuse of a leading position on the market or the exchange of pricing data or other business information between competitors are prohibited. When participating in events at which competitors or potential competitors may also be present, our employees must be aware of unfair trading issues.

#### **COMBATING FRAUD**

We reject fraudulent conduct or acts of any kind, such as embezzlement, misappropriation of funds, defraudment or theft.

Violations of this kind will result in the immediate dismissal of the employee concerned and may also be made the subject of criminal prosecution.





# INNOVATION AND PROTECTION OF CONFIDENTIAL INFORMATION; DATA PRIVACY

All employees have a duty to use data and information which come to their knowledge in the course of their professional duties within the permitted scope only, and acknowledge this duty by signing the Data Protection Declaration.

The STORM – Group encourages and supports the development of innovations by its employees in all areas of its business. Intellectual property is among the most valuable assets.

The patents, trademarks, brands, copyright, business secrets and other confidential information of the STORM – Group must be protected.



# COOPERATION WITH AUTHORITIES AND THE COMMUNITY

We cooperate constructively with authorities and supervisory authorities at local, national and international level.

Wherever possible, we strive to contribute towards satisfying the needs of the community.





#### **IMPLEMENTATION**

The STORM – Group is committed to actively promoting the application of this Code of Conduct and communicates its content to the employees. We monitor the internal application of this Code of Conduct.

Suppliers and business partners are important links in the overall value-creation chain of the products and services of our companies. We expect them to perform their business activities in compliance with the same high legal and ethical standards and business practices as we expect of ourselves. The companies of the STORM — Group encourage the application of this Code of Conduct by monitoring the actions of their suppliers and business partners.

Questions relating to the interpretation of or compliance with this Code of Conduct should be addressed to the management or advisory board of the respective STORM — Group companies.

All management personnel have a duty to ensure compliance with this Code of Conduct in their sphere of responsibility.

### **REPORT OF VIOLATIONS**

Any employee of the STORM – Group who acquires knowledge of a possible breach of this Code of Conduct must contact his/her supervisor, line manager or company management, provided that it is none of the latter who are involved in the alleged breach. In this case, the advisory board must be informed.

We will handle all such matters which are reported to us with discretion. Provided employees are acting in good faith and to the best of their knowledge and belief in reporting a breach, we give our assurance that they will suffer no negative consequences.

The STORM – Group will not accept any infringements of the law by its employees. A breach of this code may result in the issue of a warning, notice of dismissal and also claims for compensation. Breaches of a criminal nature may also result in criminal prosecution.

Technology and Service for engines and prime movers





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