

# Code of Conduct

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## 1. INTRODUCTION

The Code of Business Ethics of Telerob Gesellschaft für Fernhantierungstechnik mbH applies to the workforce of Telerob Gesellschaft für Fernhantierungstechnik mbH ("Telerob"), its subsidiaries and intermediaries.

For the sake of readability, the gender-neutral plural form (they, them, their) is used below.

### **Lawful and ethical conduct**

Telerob is committed to the high quality of its products and services. Our market success is closely bound up with safeguarding reliability and the fulfillment of customers' requirements. This long-term ambition can only be achieved through responsible and fair business practices.

We are unreservedly committed to lawful behavior that is always in accordance with the applicable regulations and our binding company rules as well as the terms of the employment contract.

Our Code summarizes what we mean by fair business practices, to which we are committed. This requires a high level of integrity in all our dealings with all our key stakeholders, who include employees, customers, suppliers and intermediaries.

### **Our employees have the following responsibility:**

- Avoiding any deliberate participation in acts which are considered unlawful, unethical or otherwise inappropriate.
- Having appropriate, practical basic knowledge of laws, regulations and company policies relating to their area of responsibility.
- Complying with applicable laws and company guidelines, such as this Code.
- Asking their line manager for advice if they have any doubts about their obligations or the application of this Code in a specific situation.
- Reporting potential infringements of laws, our guidelines or our Code.

### **Our managers have the following responsibility:**

- Ensuring that all employees receive this Code and understand the responsibility associated with it.
- Setting an example by their own conduct.
- Supporting employees by being available to answer questions and by taking information about misconduct seriously, for example.
- Creating a working atmosphere that reduces and prevents potential violations of the Code or of relevant laws and promotes open and honest reporting of potential violations without fear of reprisals.

## **2. PERSONAL INTEGRITY**

### **Conflicts of interest**

We avoid activities, actions and commitments that could lead to a conflict between our personal interests and those of Telerob. Conflicts of interest and unauthorized secondary employment can damage the company and have consequences under labor law for the employee.

A conflict of interest can occur if, for example:

- responsibility or decision-making power exists for concluding contracts with a supplier or customer that is managed or represented by a close friend or relative.
- secondary employment is pursued for a supplier or customer.
- other private relationships or interests conflict with those of Telerob.

We inform our line manager immediately about any conflict of interest and leave the decision to them or other colleagues who can decide objectively.

The personnel department should be informed about any secondary business activities, including self-employment, and its approval should be obtained. This does not apply to voluntary work, provided it is compatible with the duties covered by the employee's employment contract.

## **3. RELATIONSHIPS WITH CUSTOMERS, SUPPLIERS AND OTHERS**

### **Gifts, entertainment, hospitality and other business courtesies**

Gifts, hospitality, entertainment and other business courtesies which are either accepted by us or offered by us to others may affect the required independence. Such gratuities may only be offered or accepted if it is usual and customary within the scope of the industry standards, is in keeping with the local, country-specific or other laws and regulations, seems appropriate and does not procure any personal influence. If we are unsure whether a gift meets these conditions, then we raise the matter with our line manager.

We are aware that it may be difficult to identify a situation where personal influence takes place. We must not accept anything if it affects our independence or influences our judgment or could lead us to award or offer contracts in a manner which is not impartial or does not conform to fair competition.

Gifts or invitations may influence the independent judgment of suppliers and customers. Before giving any gift or other business courtesy, we therefore consider whether its acceptance by the other party could limit their ability to make impartial decisions. In such cases the gratuity should not be given.

In the case of dealings with public officials or with businesspersons who are working on government contracts, special care must be taken both nationally and internationally, since the offer of even the smallest gift, modest hospitality, entertainment or other business courtesies to such a person may be considered a bribe.

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## Intermediaries

Our intermediaries, especially advisors and resellers, are the extended arm of Telerob and are carefully selected based on appropriate eligibility criteria. All such intermediaries behave according to the applicable laws and regulations, Telerob guidelines and this Code.

Our intermediaries do not tolerate any form of corruption or bribery and they avoid situations which could lead to corruption risks. Unlawful material or non-material gratuities to public officials or comparable persons are not tolerated by our intermediaries.

Remuneration must not be used to give impermissible advantages to resellers, advisors, customers or other third parties.

## Impermissible gratuities

Payment and acceptance of bribes or kickbacks or other inappropriate payments are prohibited in our business dealings. This prohibition also applies to current or potential customers, suppliers, resellers, advisors or other parties who have, or wish to enter into, any kind of relationship with us.

In dealings with customers, suppliers or other persons and companies, we must not ask for, accept, offer, make or give any payments or other items of value whose purpose or result is to influence good faith business decisions or relationships that impact on Telerob and such persons or companies, or could be interpreted in such a way.

In case of uncertainty about accepting or giving gratuities we ask our line managers.

# 4. DECLARATION OF PRINCIPLES ON RESPECT FOR HUMAN RIGHTS

## Human rights

Based on the UN Guiding Principles on Business and Human Rights, Telerob is committed to respecting human rights. For us, companies have a responsibility to respect the fundamental human rights in their global supply and value chain and to prevent human rights violations, while it is the duty of the state to protect human rights.

In our corporate activities, we observe the following international standards and guidelines:

- the Universal Declaration of Human Rights of the United Nations (UN)
- the Guiding Principles on Business and Human Rights of the United Nations (UNGP)
- the International Labor Organization (ILO) Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration)
- the Conventions and Recommendations of the International Labor Organization (ILO) on labor and social standards
- the United Nations Convention on the Rights of the Child (CNC)
- the United Nations Convention on the Rights of Women (CEDAW)
- the Guidelines of the Organization for Economic Cooperation and Development (OECD) for multinational enterprises and the principles of the United Nations Global Compact (UNGC)

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## 5. PROTECTION OF CONFIDENTIAL INFORMATION AND COMPANY PROPERTY

### Confidential information

The misuse of confidential information and the loss of business secrets can have a negative effect on the company's success. This also applies to all employees. Therefore, Telerob's confidential information must be strictly protected and kept secret and must not be forwarded to third parties.

### Company property

Items of company property must be treated with care and not damaged, misused or lost. Company property must be used sparingly and it may only be used for personal purposes in exceptional cases and with the express consent of the line manager.

## 6. INTERNATIONAL TRADING CONTROLS

Our policy is that all import, export and re-export activities and/or transactions in which Telerob is involved should take place in full compliance with all the applicable import and export control laws, regulations and guidelines.

## 7. POTENTIAL VIOLATIONS OF THE CODE

### Reporting violations of the Code

Each individual is responsible for complying with this Code. Each of us is responsible for making their line manager aware of potential Code violations. Telerob strictly prohibits any form of reprisals or detrimental consequences for employees who report potential violations in good faith.

If we have any questions about this Code or other Telerob guidelines or if we suspect any violation of laws or ethics, then we seek advice from our line managers. If we do not feel comfortable doing this for any reason, then we can speak to the Business Ethics and Compliance Officer.

### Non-compliance with this Code

Non-compliance with this Code can lead to disciplinary measures, which may include a warning, temporary suspension and/or dismissal. In addition, criminal prosecution may follow.

Non-compliance with this Code by an intermediary may lead to termination of the contractual relationship and other legal action.

## 8. BUSINESS ETHICS AND COMPLIANCE COMMITTEE AND BUSINESS ETHICS AND COMPLIANCE OFFICER

Telerob has a Business Ethics and Compliance Committee who is the point of contact for business ethics issues at the company. The Business Ethics and Compliance Committee is responsible for the management of the Code of Conduct and its implementation in all parts of the Telerob company.

The details of the aforementioned contact persons are as follows:

Business Ethics and Compliance Committee:

- Florian Gruener (florian.gruener@telerob.com, Tel. 0711 34102-130)
- Thomas Biehne (Thomas.biehne@telerob.com, Tel. 0711 34102-133)