

# Guideline on Business Ethics

MEYER Drehtechnik GmbH

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## **1. Dealing with business partners and third parties**

Ethics is a discipline that deals with human behaviour. We understand this to mean complying with all applicable laws, rules and regulations, and we expect the same from each of our employees. Our business partners – such as customers, suppliers, consultants and other business partners, as well as third parties – are also required to comply with these standards.

In addition to the high quality that characterises our products, integrity represents a fundamental requirement and we see it as a prerequisite for an effective working relationship rooted in trust. It is, therefore, particularly important to us to always make business decisions on the basis of objective criteria – such as quality, reliability and competitiveness, while taking into account the principles of good corporate governance.

### **1.1 Compliance with antitrust & competition law rules**

With our high-quality products, innovative solutions and reliability, we compete both openly and fairly on global markets. We do not, in any way, engage in illegal and/or criminal practices – such as bid rigging – which exclude, distort or restrict competition.

### **1.2 Money laundering**

We ensure that all applicable legal provisions against money laundering, i.e. the channelling of illegally generated money or illegally acquired assets into the legal financial and economic cycle, are complied with.

### **1.3 Export controls and economic sanctions**

We comply with all applicable import and export monitoring laws, sanctions and embargoes that impose restrictions on the export of goods to certain destinations, along with prohibitions on transactions involving certain restricted countries, regions, organisations and individuals.

## **2. Conflicts of interest & bribery/corruption**

Every one of our employees avoids situations in which their personal or financial interests conflict with those of the company. In particular, they are prohibited from acquiring shares in companies classified as competitors, customers or suppliers, or entering into business relationships with them in a private context if this creates a conflict of interest.

Such a conflict shall always be deemed to exist if the type and scope of an investment is suitable for influencing actions in the performance of our company's activities in any way. Our employees shall unequivocally distance themselves from requesting, accepting and receiving unjustified or unlawful advantages that could influence business decisions or transactions.

In similar fashion, none of our employees shall offer, garner (or attempt to garner) unauthorised benefits vis-a-vis business partners, their employees or other third parties in business activities of any kind, or enter into agreements in this regard.

## **3. Transparent handling and protection of information**

### **3.1 Financial responsibility**

We document all significant business transactions in a traceable and timely manner. Internal and external reports (e.g. financial accounts, quality reports, time records, expense reports or other submissions) must be correct and complete, in order that the recipient can form an accurate picture. In doing so, we shall adhere to the presentation of facts and maintain a factual style of expression. Hasty conclusions should be avoided. Documents deemed necessary for ongoing or anticipated internal enquiries or official investigations must not be destroyed, removed or altered.

Financial records must be kept in accordance with applicable law and generally recognised standards

The company's financial statements are prepared in accordance with generally accepted accounting principles (financial responsibility).

We shall also comply with prevailing retention periods for documents (original or electronic) under commercial, tax and specialised law where necessary and structure the relevant documents in a comprehensible manner.



## **3.2 Data protection**

### **3.2.1 Personal data and the private sphere**

We use the personal data of our employees and contractual partners exclusively for the purposes for which they have been made available to us, and we treat them confidentially.

Any processing of personal data (e.g. address, salary information or photos) of employees, customers and business partners (e.g. collection, storage, collection, use, provision) by us or our authorised representatives shall be realised in accordance with the applicable legal requirements on data protection.

### **3.2.2 Protection of confidential business information**

Non-personal data resulting from a business relationship is used and protected by us in an appropriate manner.

Data deemed worthy of protection is properly collected, processed, secured and deleted. Under no circumstances shall confidential content be published without authorisation, forwarded to third parties or made available in any other form.

If available, individually concluded, non-disclosure agreements shall apply with our business partners. Otherwise, statutory regulations shall apply.

## **3.3 Preservation of identity and protection against retaliation**

It is of particular importance to us to protect the identity of employees, business partners or other third parties who report known or suspected misconduct or offences. This means that protection against forms of retaliation enjoys top priority.

The reporting of violations (or suspected violations) may, under no circumstances, result in negative or suppressive measures for the whistleblower. We, therefore, prohibit any direct or indirect action (or form or retaliation) against any person who, in good faith, reports an actual or suspected violation and/or participates in an investigation. However, reports must always be submitted truthfully.

Reports can be submitted to our management team, to our whistleblower protection officer in accordance with the Whistleblower Protection Act (in the event of conflicts of interest or other ethical standards) or to the data protection officer (in the event of data protection violations).

### **3.4 Patents and trade secrets**

We constantly strive to fulfil one particular goal: to never disappoint our customers from all branches of industry with high-quality products. This goal does not tolerate standing still or entertaining mediocrity, but demands constant further development.

No employee or business partner may, therefore, disclose new findings, confidential information or business secrets to third parties in any form. This shall also apply after the termination of the employment or business relationship.

### **3.5 Disclosure of information**


Information pertaining to the business activities, structure, financial situation and performance of MEYER Drehtechnik GmbH shall be published in accordance with applicable regulations and standard industry practice. The falsification of records and the misrepresentation of conditions and procedures within the procurement chain shall not be tolerated.

## **4. Intellectual property**

Any documents or information relating to the intellectual property of MEYER Drehtechnik GmbH may not be passed on to third parties or used for any purpose whatsoever, unless this serves the fulfilment of the contract with MEYER Drehtechnik GmbH.

We shall also respect the intellectual property of our customers and business partners, and shall not use or publish it without authorisation. This shall apply, in particular, to intellectual property that is protected by patents, copyrights or trademarks.

  
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Marienberg, 23.10.2024

Place, date