



DIRECTIVE FOR CODE OF CONDUCT AND  
STANDARDS OF BEHAVIOR

# CODE OF CONDUCT

Our Code of Conduct and Guidelines for Action.

PIA Automation Holding GmbH

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Dear Colleagues,

What does integrity mean at PIA? What values should we apply today and in the future to our actions and our dealings within the company, as well as with business partners and customers? PIA Automation Holding GmbH prides itself and its subsidiaries (hereinafter referred to as „PIA“) with this Code of Conduct, a standard of conduct for all employees of PIA as well as business partners and customers.

PIA should be known as an honest and respected company. PIA and all its employees should always strive to be considered competent, reliable and fair by continually behaving in accordance with general social rules, appropriate business practices, adhering to local regulations and protecting the environment. This Code of Conduct is intended to serve as a guide to legally viable and ethical decisions. It enables all employees to always act in accordance with the basic values and expectations of PIA.

Everyone at PIA is encouraged to familiarize himself or herself with this Code and to strictly adhere to it. PIA expects its business partners to respect this Code of Conduct in their business dealings as well, and to refrain from doing business in violation of the law and this Code.

All of us at PIA are responsible for our long-term success and in this sense, the implementation of this Code of Conduct is a key factor. We, the members of the management board of PIA Automation Holding GmbH, carry out our day-to-day activities in accordance with this Code of Conduct and trust that everyone at PIA will follow and respect these rules and regulations every day.

Johannes Linden      Georg Weiler      Thomas Ernst      Shilai Xie



# 01 INTRODUCTION

**B**y aligning ourselves with our core values in all actions, we move towards a common goal and moreover exceeds the expectations of our business partners.

Although this Code of Conduct contains helpful guidelines, it is not intended to address any specific situation. However, in any case, we demand honesty, fairness all with the aim of „doing the right thing.“ Therefore, dishonest, unethical or illegal behavior violates this Code of Conduct, regardless of whether or not this Code of Conduct expressly mentions it. Violations of this Code or other PIA Policies and Regulations may, without prejudice to the principle of proportionality, will lead to consequences of employment relationships and other legal consequences.

PIA has therefore appointed a Chief Compliance Officer responsible for implementing and managing this Code of Conduct and for carrying out the policies it sets forth.

# 02 Our Vision for Business Success

Our entrepreneurial vision at PIA is to be, “The leading automation partner for our customers worldwide.”

Our ambitious goal of setting new standards in the digitized world of automation is achieved in cooperation with our worldwide customers, engaging in open dialogue regarding technology, cost-effectiveness and efficiency as well as a responsible approach to our employees, suppliers and resources. At PIA, we strive for open, trust worthy and honest relationships with our suppliers, customers and business partners. We respect their legitimate interests and never offer promises we cannot keep.

All employees are required to comply with the laws and other regulations of the countries in which they operate, as well as the policies of PIA. In business dealings, we expect our business partners to adhere to these guidelines and to comply with the company’s Code of Conduct. Our sustainability standards are formulated in this Code of Conduct.

# TO BE YOUR LEADING PARTNER IN AUTOMATION. WORLDWIDE.



# 03 Our Responsibility – Socially and Globally

Guidelines, principles or codes alone cannot guarantee compliance with laws or ethical decisions. Each one of us contributes to PIA's own efforts.

## 3.1 Sustainable Environmental and Climate Protection

PIA cares deeply about our environment and always adheres to all relevant legislation and internationally recognized environmental standards. PIA is committed to keeping the consumption of energy, raw materials and other materials as low as possible and avoiding any negative impact in relation to our environment.

## 3.2 Appearance and Communication in Public

PIA respects the right to freedom of expression and the protection of privacy. Everyone at PIA is aware that even in the private sphere anyone can be perceived as a representative of PIA and therefore, behavior in public, especially in the media, can damage the reputation of the company. In the case of private opinions, everyone at PIA should make sure that any respective function or activity is not linked to his/her private statement.

## 3.3 Interaction with Officials

When contacting authorities, ministries or agencies to obtain licenses or other approvals, everyone at PIA must ensure that they are handled appropriately. Interaction with governments and government officials can lead to significant legal risks for PIA and even to the data subject in the event of inappropriate behavior.

In such interactions, it is therefore important not to make payments to a government official (even indirectly through third parties). Further, it is inadmissible to give any indication that such payment may be made for the purpose of improperly influencing their opinions or actions. This also includes the granting of a donation or a charitable or political contribution at the request or proposal of a government official. All interactions with or in connection with government officials or officers conducted by an employee must be consistent with applicable laws, this Code of Conduct, and all applicable PIA policies, such as the Anti-Corruption Policy.

It is therefore always necessary to obtain a prior approval from the Compliance Officer before granting or accepting a potential benefit to or from an official.



# 04 Integrity in Business Dealings

## 4.1 Compliance- law and order

Compliance with laws and regulations is a fundamental principle of PIA's economic responsibility. PIA always observes the applicable legal prohibitions and obligations, even if it involves short-term economic disadvantages or difficulties for the company or individual persons. If national laws have more restrictive regulations than PIA regulations, national law will apply.

## 4.2 Bribery and Corruption

Corruption and antitrust violations threaten the guarantor of success and will not be tolerated (zero tolerance). Kickbacks or cartel agreements are by no means an option for PIA to win an order. PIA refuses doing business and achieving internal goals by breaking the law. With its Compliance Program, PIA has taken far-reaching measures to comply with anti-corruption and anti-trust regulations. Violations are not tolerated and lead to sanctions against the persons involved. Everyone must be aware of the extraordinary risks that corruption or an antitrust case can pose for both PIA and those affected.

PIA therefore never directly or indirectly grants illegal or improper benefits in the course of business dealings. This includes cash payments and other benefits (for example, vouchers / air travel / hotel accommodation / private trips and transfer of company property). This includes when the benefit does not affect a business decision. Any benefit shall be provided in a transparent manner and in accordance with applicable laws and PIA policies, particularly in the context of public officials or employees of public companies, to which even stricter standards apply.

Sales representatives, subcontractors, consultants and other partners are important business associates for PIA. PIA is required to ensure that none of its affiliates commit any illegal activity in connection with PIA. It is of the utmost importance that such partners be carefully and critically selected, reviewed and monitored. Any contractual relationship must be entered into so that there is an appropriate balance between performance and consideration and that there is no appearance of acceptance or granting of an unlawful benefit.

Violations of anti-corruption laws can result in fines and loss of profits that can endanger the existence of PIA. Persons who commit crimes or are responsible for such actions may face consequences including a prison sentence.

## 4.3 Gifts and Invitations

PIA does not give or accept gifts or invitations that suggest an unfair influence. PIA understands that exchanging gifts and mutual invitations or respectful hospitality offers are useful and legitimate for maintaining contacts.

## 4.4 Money Laundering Prevention

PIA complies with its legal obligations to prevent money laundering and does not participate in money laundering activities. Anyone could be called upon to have an unusual financial transaction, which may justify money-laundering suspicion. When in doubt, it is essential to inquire and review the situation with relevant financial, legal or compliance departments.

## 4.5 Behavior in International and Export Business

PIA operates in a large number of markets in several regions and compliance with trade is therefore essential for foreign business. Trade embargo laws and regulations can prohibit companies from doing business in a given country. PIA therefore complies with all relevant export and import laws. This also includes a strict adherence to sanctions, embargoes and other laws and regulations without exception. In particular, contract fulfillment in the military sector in a crisis area is not allowed. PIA monitors these embargoes and sanctions and carries out checks to ensure they are complied with.

## 4.6 Fair Competition

PIA stands for fair and free competition and adheres to all national and international antitrust and competition regulations. In all regions and countries in which PIA operates, PIA will actively and fairly compete to receive customers and orders. This ensures that the interests of PIA and its customers are protected with respect for fair competition.

## 4.7 Conflicts of Interest

The independence of decision-making at PIA and the integrity of its employees are of fundamental importance to the credibility and success of PIA. All employees are obliged to act in the best interest of PIA and not in their own interest or the interest of third parties. A „conflict of interest“ exists when an employee's private interests displace or overlap PIA's interests, or when an employee or close relative personally benefits from a transaction involving a PIA company.

All employees are expected to make business decisions that are in the best interests of PIA and are prohibited from engaging in conflicts of interest. Therefore, the selection of business partners, business start-ups, personnel decisions, bid submissions, approval procedures or comparable business decisions must be made solely on the basis of comprehensible economic criteria or objective criteria and the applicable processes.

Behaviors that may conflict with employees or any agent acting on behalf of the company (e.g. consultants, or collaborators) against PIA's corporate welfare will not be tolerated.

Financial or other interests of business partner companies to PIA that could have a positive effect on the employee concerned

in a business deal must be disclosed in good time in order to rule out any conflict.

Secondary employment can lead to conflicts of interest. In general these arise when relationships or activities of employees outside of a job for PIA affect the independence and objectivity of their decisions. It is therefore important to ensure that any possibility of such influence is avoided. Prior to starting such a secondary activity, the approval of a supervisor and the personnel department must always be obtained. Activities and business relationships that could conflict with commitments to PIA should be rejected.





# 05

## Behavior Towards Employees

### 5.1 Equal treatment and exclusion of discrimination

At PIA, all employees are treated with respect and are under no circumstances harassed or discriminated against. PIA is proud of the diversity of its employees, as these diversities represent a significant contribution to the international success of society.

PIA respects the dignity, freedom and personal rights of all employees. Therefore, the working environment is based on mutual trust and respect. According to PIA values and in accordance with the laws of most countries, no discrimination based on skin color, gender, religion, age, nationality, social or ethnic origin, disability, belief, sexual orientation, pregnancy, political opinion or trade union activity is tolerated. In addition, neither defamatory nor discriminatory behavior is tolerated. Each employee is required to ensure that neither prejudice nor discriminatory conduct in any form exists or may be present.

The UN conventions and ILO conventions on working conditions will be respected. PIA does not support child labor and provides adequate compensation.

Employees are hired, paid for and promoted solely on the basis of their qualifications and suitability for the intended position, and never according to special treatment or partiality. Every leader is committed to promoting and developing the individual knowledge and skills of each employee in the team.

All employees have the right to a work environment without harassment. Harassment is a behavior that has the goal or effect of making the work environment intimidating, hostile or threatening. There are many forms of harassment. These include physical actions and verbal or written statements. Everyone at PIA is therefore required to ensure that there is no workplace stress or harassment.

Employees are not obliged to travel for business in regions where they are exposed to specific risks. Forced and compulsory labor is inadmissible.

Achieving business goals is achieved through open communication, a cooperative management style and a clear appreciation for all employees as well as underscoring their importance as long-term partners in PIA's success. Communication with and between employees is encouraged and supported by internal company information and participation rights. Employees can speak openly with the company management about the working conditions, without fearing unfair disadvantages.

Every employee should feel responsible for and purposefully working to improve the reputation of PIA. Always striving to do everything reasonable to avoid harm to the company.

### 5.2 Cooperation with employee representatives

Within PIA a trusting and close cooperation with the employee representatives is an important component. Reciprocal, trusting and cooperative cooperation requires an open and constructive dialogue between employee representatives and management, which is characterized by mutual respect.



### 5.3 Health and safety at work

A safe working environment for all employees and environmental awareness are top priorities at PIA.

Health, safety at work and environmental protection are integral parts of PIA's business activities. PIA maintains a system of continuous improvement in the area of health, occupational safety and the environment in strict compliance with all national laws and relevant international conventions to ensure sustainability.

All employees should therefore ensure that health and safety measures are followed at all times, that the relevant regulations

and work instructions are observed and that necessary protective equipment is used. All employees take their own health and safety into consideration as well as those of their colleagues and behave accordingly. They follow the safety rules and prevent dangerous situations with the aim of eliminating accidents.

PIA has zero tolerance for violence or threats in the workplace as part of a commitment to health and safety at work. In order to keep the workplace free from violence and intimidation, weapons and other dangerous objects that are not necessary for work are prohibited on the premises of PIA. The management of the respective PIA COMPANY must authorize any exceptions under local law or



regulations in advance.

During working hours, employees should not be under the influence of drugs, alcohol, or other substances that affect their ability to work. PIA expects its business partners to behave in accordance with these principles.

# 06 Handling Information

## 6.1 Proper documentation and reporting

PIA maintains open and honest communication with its shareholders, customers and employees, business partners, the public and all authorities. This is based on adherence to orderly and legitimate accounting, internal documentation and reporting.

Proper, complete and accurate bookkeeping is fundamentally important to business operations. This is the only way PIA can comply with legal requirements and operate safely in society. All business transactions, documents, numerical values and other information must be processed, stored and recorded in accordance with legal regulations and internal guidelines. PIA will submit accurate, truthful and complete payment requests or applications for permits that comply with applicable legal and contractual requirements.

Therefore, business transactions must always be duly presented, in particular compliance with legal and internal quality regulations, the recording and checking of incidents and product complaints, the return of products, stock, consumption of vendor parts etc. PIA's business records and documents must be suitable for all business transactions at all times.

It is of the utmost importance that documents are always complete, correct and readable. Incomplete or incorrect documentation conflicts with PIA's internal policies (accounting policies) and any applicable laws.

Any violations can have serious consequences for PIA and its employees.

## 6.2 Confidential Company Information / Inside Information

PIA pays particular attention to the general rules for dealing with business and trade secrets and takes the necessary steps to protect confidential information and business records from the access and insight of uninvolved colleagues and other third parties in an appropriate manner. In addition, every employee ensures confidentiality by complying with legal and contractual requirements.

PIA respects the intellectual property of others. If the intellectual property of a third party is reproduced without permission or used improperly, then high fines may be imposed against each and every person involved. In addition, PIA is responsible for treating any confidential information imposed by customers, suppliers and other business partners in the same manner as their own confidential information.

## 6.3 Privacy and Information Security

The protection of personal data, in particular of employees, customers and suppliers, is particularly important for PIA. No personal data may be collected or processed without legal admissibility or consent of the data subject.

A worldwide electronic exchange of information is a crucial prerequisite for the business success of PIA and enables productivi-



ty. The electronic exchange of information is in turn associated with risks to information security and privacy therefore; it is the task of each employee to protect information from third-party access and to treat this information confidentially within PIA („need-to-know“ principle).

## 6.4 Protection of Company Property

Each employee is responsible and legally obliged to protect the business, the property and the assets of PIA. PIA sells its products and services on a responsible prior costing basis, which aims for commercial success.

Property, plant and equipment such as assets, raw materials, products and manufacturing facilities are essential to PIA's day-to-day business. Everyone is therefore required to treat the assets, drawings and sketches made available to them, customer records, hardware, software, office equipment, raw materials, products and production facilities carefully. In terms of long-term success, the protection of accumulated knowledge, the know-how of the resources and intellectual property rights are essential, because these constitute the largest part of our competitive advantage.

All employees share responsibility for ensuring that the nature and extent of business travel is always proportionate to the purpose of the trip and is planned and carried out with due regard to time and cost aspects.

## 6.5 Social Media

PIA values the global importance of social media (e.g., Facebook, Twitter, and YouTube) and engages itself on various channels with the digital public. Therefore, PIA welcomes the fact that every employee, as an important part of the company, helps to shape a positive image of the company and its diversi-

ty through responsible expression towards PIA in public.

At the same time, we call for caution when dealing with social media. Due to the broad spectrum of opinions and information expressed on the Internet, the protection of PIAs reputation needs to be ensured. For this purpose, employees should not appear in the use of social media, especially on behalf of PIA, make no false statements about their activities, make no objectively unreasonable assessments of corporate matters or use any IT equipment contrary to PIA guidelines. PIA centrally manages the content of official corporate pages in social media.

## 6.6 Copyrights, patents and trademarks

Intellectual property is an important part of the economic success of PIA as well as our business partners' and customers. Every employee is expected to protect intellectual property, including all patents, trademarks and trade secrets. Everyone at PIA is committed to respecting the intellectual property of others. The unauthorized duplication or misuse of another's intellectual property may be subject to substantial fines and criminal sanctions.

# 07 Compliance Officer and Hotlines

Branch	Chief Compliance Officer	Compliance Hotline
PIAH	Sebastian Beller	Hotline: +49 9771 6352 4229 Available: every Friday 11-12:00
PIANES	Martin Maier	Hotline: +49 9771 6352 4316 Available: every Friday 11-12:00
PIAAMB	Dominik Graml	Hotline: +49 9621 608 2190 Available: every Friday 11-12:00
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PIA Automation is your strong partner for the design and implementation of sophisticated assembly automation systems in the mobility, commercial and consumer goods, medical technology and pharmaceutical sectors.

At its locations in Germany, Austria, Croatia, China, Canada and the US, PIA Automation offers a mature range of products and solutions for assembly and automation systems as well as reliable worldwide service.



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WE AUTOMATE  
YOUR WORLD