

## Code of Conduct of Sievering Nutzfahrzeuge GmbH

Dieselstraße 19 – 59609 Anröchte - Germany

### Preamble


We, the Sievering company, are one of the leading manufacturers of tank semi-trailers for the West African transport market. Our reliability and high quality standards have enabled us to develop a good reputation in the respective markets, operate sustainable business, and to thus gain our customers' trust. Our reputation is very important for sustaining our company's success. It is for that reason that absolute integrity along with ethically and legally correct conduct are essential in our entire organisation. Our Code of Conduct is intended to be a guideline for the entire company and it therefore applies to all of us equally. On the one hand, it represents the demands we place upon ourselves to live up to the values and principles it describes, and at the same time it signals how we are to act responsibly towards our business partners, customers, and our employees.

### Commitment of the company management

We believe we have a duty to act in an economically, socially and environmentally responsible manner and strive to conduct our business competently and on an ethical and moral basis and to compete fairly in all markets in which we operate. This includes compliance with applicable laws and the acceptance of bans on cartels and other attempts to restrict competition. We want to avoid creating undue advantages over customers, suppliers, or competitors.

### Implementation and enforcement

We are committed to making the necessary efforts to live up to the principles and values described in this Code of Conduct.

A handwritten signature in dark ink, appearing to read "H. Sievering".

Heinrich Sievering

Anröchte, 04/01/2021

## **Team spirit and constructive collaboration**

We continually question existing solutions and develop new ideas for the benefit of our customers. To that end, we encourage constructive collaboration among our employees. Your interests and your demands on us are crucial for our work and further development. Our collaboration finds success due to the diversity of our employees and their commitment to the business divisions.

## **Standards of collaboration**

We expect all of our employees to always act in accordance with the highest professional standards and with our company's guidelines. If employees violate existing guidelines, rules, or regulations in the course of their work or through their conduct, they will have to face disciplinary measures.

## **Open communication with employees**

We do not cover up misconduct. If our employees report actual or suspected misconduct in good faith, we will not tolerate any attempts at intimidation or reprisals against those people. We understand "in good faith" to mean that our employees are convinced that their statements are true. This applies regardless of whether a later investigation confirms the employees' version or not.

## **Dialogue with cooperation partners**

As a matter of principle, all business information belonging to our partners and their trade secrets are to be treated sensitively and confidentially. Required documents are properly prepared, stored or, if necessary, destroyed once the collaboration has ended.

## **Customer focus**

Our conduct with customers and business partners is fair and honest. We identify the wishes, needs, and expectations of our customers and business partners in order to then ensure that they are precisely fulfilled by our products, services, and other processes. Our ultimate goal is to build long-term and stable relationships with our customers and business partners on the basis of trust.

### Acceptance of gifts, donations

#### a) Gifts to our employees

Our employees do not demand or accept any personal advantages from customers or suppliers that could influence their own actions and their own work for the company.

If gifts are offered by third parties, they may only be accepted if they are common practice and can be recognised as a small courtesy (promotional gifts with the logo of the issuing company, such as a calendar or ballpoint pen).

The compliance officer or management must be informed of gifts with a value that exceeds the usual amount. If that is not possible, these gifts are to be rejected as a matter of principle.

#### b) Gifts from our employees

Gifts on our part may also only be offered to the extent it is customary for the business relationship and in a materially appropriate scope. The recipient must not be able to associate the gift with any obligation that would influence his or her business decisions.

#### c) Donations

As a matter of principle, we do not donate to political parties, individuals or organisations whose goals contradict our corporate philosophy or damage our reputation. Donations are always made transparently.

### Bribery and corruption

We do not tolerate any form of corruption or bribery, whether or not it damages our company's assets or the assets of third parties. We use control mechanisms to ensure that bribery, theft, embezzlement, fraud, tax evasion, and money laundering are prevented.

The company is strongly committed to complying with all laws relating to the prevention, detection and reporting of money laundering activities and conducts business only with customers and business partners who are engaged in legitimate business activities and using legitimate financial resources.

Our employees are prohibited from accepting or giving favours of any kind (cash, travel, gifts, etc.) that are linked to an undue advantage (placing an order, project award, etc.).

Our business partners are also urged to avoid conflicts of interest that pose a risk of corruption.

### **Conflicts of interest**

All employees must avoid situations where their personal or financial interests conflict with those of the company. In particular, it is prohibited to invest in the companies of competitors, suppliers or customers or to enter into business relationships with them in private if this may lead to a conflict of interest. Such a conflict is present whenever the nature and extent of an investment is likely to influence actions taken in the course of the company's activities in any way.

### **Data protection**

We treat all personal data of our customers, business partners, and employees with the greatest care. This includes their names, addresses, telephone numbers, date of birth, and current health information. Our employees are obliged to take all measures to secure the data that are suitable to protect our IT system from both internal and external data theft. This applies in particular to the misuse of passwords in the company as well as the unauthorised downloading of files, in particular inappropriate material from the internet.

### **Protecting the environment**

Protecting the environment and the climate is very important to us. Our employees are required to treat all natural resources that are used in our company (e.g., energy and water) with care. Our employees are expected to conduct themselves responsibly with respect to the production and sale of our products and/or our services. To protect our employees, we comply with all laws and regulations that affect health and safety in the workplace. To that end, our managers in particular take measures to create a healthy and risk-free work environment for our employees.

### **Compliance with applicable laws**

We require our managers to familiarise themselves with the laws, regulations and rules relevant to their area of responsibility, to comply with them without exception and to regularly inform all other employees of the company regarding them. Our managers in particular bear a great responsibility in fulfilling the Code of Conduct and must set a good example.

Our business activities, as well as those of our business partners and their suppliers, must comply with applicable laws. This applies in particular to laws regulating import, export, and domestic trade in goods, technologies, or services, but also to payment and capital transactions.

We and our contractual partners must refrain from any violation of economic embargoes along with trade, import and export control regulations, and from financing terrorism.

## **Fair competition**

We are committed to fair competition and abide by the relevant laws and regulations. We refrain from making agreements on prices, conditions, and strategies with competitors, suppliers, other companies, or dealers that could impede fair competition. We do not participate in any boycotts intended to restrict competition.

## **Discrimination ban**

Any form of discrimination is prohibited in principle, whether it is based on nationality, ethnicity, age, gender, sexual orientation, marital status, pregnancy, disability, religion, or belief. Promotions and new hires are always free of discrimination.

## **Dealing with internal company matters**

It is very important to us that the products manufactured, the work equipment used, and the company's intellectual property are handled carefully and responsibly.

## **Protection against child or forced labour**

We strictly reject child or forced labour without exception and expect the same from our business partners. School-age children (younger than 15 years) may not be employed even if permitted under the laws of the lands where our suppliers operate.

## **Information and training**

Every single employee is responsible for compliance with our Code of Conduct. In order to raise awareness of our policies and ensure compliance, our employees are regularly trained on relevant topics related to this Code of Conduct. This may be ensured via classroom training or by using e-learning methods.