



PREAMBLE

Our Code of Conduct is intended to be a guideline for the entire company ATX Hardware GmbH West and therefore applies equally to each of us. Specifically, it is addressed to the top management, the executives and all our employees and suppliers. On the one hand, it represents the demand we place on ourselves to live up to the values and principles listed therein, and at the same time it signals to the outside world responsible conduct towards our business partners, customers and employees.

COMMITMENT OF THE COMPANY MANAGEMENT

The company ATX Hardware GmbH West considers it its duty to act economically, socially and environmentally conscious. The company ATX Hardware GmbH West strives to conduct its business competently and on an ethical and moral basis and to compete fairly in all markets in which it operates. This includes compliance with applicable laws and acceptance of anti-trust prohibitions or restrictions on competition. We want to avoid gaining undue advantages over customers, suppliers or competitors.

TEAM SPIRIT, CONSTRUCTIVE COOPERATION

We constantly question existing solutions and develop new ideas for the benefit of our customers. To this end, we encourage constructive teamwork among our employees. Their interests and demands on us are decisive for our work and further development. We are successful in our cooperation due to the diversity of our employees and their commitment to the business areas.

STANDARDS OF COOPERATION

We expect all our employees to act at all times in accordance with the highest professional standards and the guidelines of our company. If employees violate existing guidelines, rules or regulations in the course of their work or through their conduct, they will be subject to disciplinary action.

OPEN COMMUNICATION WITH EMPLOYEES

We do not cover up misconduct. If employees report actual or suspected misconduct in good faith, we will not tolerate intimidation or retaliation against them. We understand „in good faith“ to mean that the employee is convinced that his or her account is true. This applies regardless of whether a subsequent investigation confirms the employee's version or not.

DIALOG WITH COOPERATION PARTNERS

All business information of our partners and their trade secrets are treated sensitively and confidentially as a matter of principle. Necessary documents are properly prepared, stored or, if necessary, destroyed after the end of the cooperation.

CUSTOMER ORIENTATION

We behave fairly and honestly towards our customers and business partners. We record the wishes, needs and expectations of our customers and business partners in order to ensure a target-oriented implementation in products, services or other processes. Our primary goal is to build a long-term and stable relationship with our customers and business partners on the basis of trust.



ACCEPTANCE OF GIFTS, DONATIONS

a) Gifts to our employees

Our employees do not request or accept personal benefits from customers or suppliers that could influence or affect their own behavior with regard to their work for the company. If gifts are offered by third parties, they may only be accepted if they are common practice and can be recognized as a courtesy or favor (promotional gifts bearing the logo of the donating company, such as calendars or pens). In the case of gifts whose value exceeds the customary amount, the Compliance Officer or management must be informed. If this is not possible, these gifts must always be refused.

b) Gifts from our employees

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

c) Donations

As a matter of principle, ATX Hardware GmbH West does not make donations to political parties, to individuals or to organizations whose goals contradict our corporate philosophy or damage our reputation. Donations are always made in a transparent manner.

BRIBERY AND CORRUPTION

We do not tolerate any form of corruption or bribery, regardless of whether this damages our company assets or the assets of third parties. We ensure through control mechanisms that bribery, theft, embezzlement, fraud, tax evasion or money laundering are prevented. Our employees are prohibited from accepting or giving favors of any kind (cash, travel, gifts, etc.) that are linked to an undue advantage (order placement, project award, etc.). Our business partners are also required to avoid conflicts of interest that could pose a risk of corruption.

DATA PROTECTION

We treat all personal data of our customers, business partners and employees with the utmost care. This includes names, addresses, telephone numbers as well as date of birth or information on current health status. Our employees are obliged to take all measures to protect our IT system against both internal and external data theft. This applies in particular to passwords misused in the company and unauthorized downloading of files, in particular of inappropriate material from the Internet.

PROTECTION OF THE ENVIRONMENT

The protection of the environment and the climate are important to us. Our employees are required to treat all natural resources used in our company (e.g. energy, water surfaces) with care. Our employees are expected to act responsibly in the production and distribution of our products and/or our services. To protect our employees, we comply with all laws and regulations relating to health and safety in the workplace. To this end, our managers in particular take measures to create a healthy and hazard-free working environment for our employees.

COMPLIANCE WITH APPLICABLE LAW

We require our managers to familiarize themselves with the laws, regulations and rules relevant to their area of responsibility and to comply with them without exception. Our managers in particular bear a high level of responsibility in complying with the Code of Conduct. The business practices of our business partners and their suppliers must also comply with applicable laws. This applies in particular to import, export and domestic trade in goods, technologies and services, but also to payment and capital transactions. Violations of economic embargoes and trade, import and export control regulations by our business partners must also be ruled out, as must the financing of terrorism.



FAIR COMPETITION

We are committed to fair competition and comply with these laws and rules. We refrain from agreements on prices, conditions and strategies with competitors, suppliers, other companies and traders that hinder fair competition. We do not participate in any anti-competitive boycotts.

PROHIBITION OF DISCRIMINATION

Any form of discrimination is prohibited as a matter of principle. This applies regardless of nationality, ethnicity, age and gender, sexual orientation, marital status, pregnancy or disability, or religion or ideology. Promotions, new hires are always made free of discrimination.

DEALING WITH INTERNAL COMPANY INFORMATION

It is 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 LABOR

We strictly reject child or forced labor without exception and expect the same from our business partners. Children of compulsory school age (younger than 15 years) must not be employed even if the legal requirements of the respective country of our supplier would allow this.

IMPLEMENTATION AND ENFORCEMENT

The company ATX Hardware GmbH West is committed to make the necessary efforts to comply with the principles and values described in this Code of Conduct.

Pürgen, 04.08.2020

Place, Date

gez. Markus Rauch | Robert Schulz

Management