



CODE OF CONDUCT

of

PANKL RACING SYSTEMS AG

for Suppliers

This Code of Conduct defines ethical principles and general requirements which Pankl Racing Systems AG expects from its suppliers of goods and services with regards to their responsibility to fellow human beings and the environment. Pankl Racing Systems AG itself acts in accordance with this Code of Conduct and hence requires also its suppliers to be bound by these standards.

Pankl Racing Systems AG hereby reserves the right to amend this Code of Conduct if needed. The most current and valid version of the Code of Conduct will be available on the Pankl homepage under <https://www.pankl.com/de/downloads/agb/>.

The Supplier hereby declares:

1. Acting in a responsible and legal manner

To comply with the relevant laws of respective applicable legislation, especially antitrust, taxation and export control regulations and

To record business transactions correctly and comprehensively.

2. Corruption and bribery

To comply with the respective national regulations to combat corruption and the international guidelines and recommendations (e.g. UN convention to fight corruption, OECD guidelines for multinational companies). The supplier shall not tolerate any type of corruption or bribery. The supplier shall not engage in any type of corruption or bribery in any way including the involvement in the provision of any illegal financial incentives to government officials to influence their decisions.

3. Respect for the basic rights of employees

To promote the fair and equal treatment of all employees regardless of their colour, race, nationality, social origin, handicaps or disabilities, sexual orientation, political or religious beliefs, gender or age;

To respect dignity, privacy and rights of any person;

To refrain from employing any person or from forcing any person to work against his or her will;

To not tolerate unacceptable treatment of employees such as psychological pressure, sexual or personal harassment or discrimination;

To not tolerate behaviour (including gestures, language and physical contacts) which is sexually harassing, threatening, coercive, abusive or exploitative;

To assure fair remuneration and to ensure that the national legal minimum wage is met;

To comply with the national legal requirements for maximum working times;

To comply with the national legal requirements for working hours, overtime and resting times;

To accept employees' freedom of association as far as legally permissible and

To not favour or discriminate members of employee associations or trade unions.

4. Prohibition of child labour

To comply with the rules of the United Nations regarding human rights and rights of children, the regulations of the convention defining the minimum age for employment (Convention 138 of the International Labour Organisation) and the regulations of the convention prohibiting child labour and defining immediate measures to end the worst forms of child labour (Convention 182 of the International Labour Organisation).

To not employ any person who has not yet reached the age of 15 years and to comply with the restrictions regarding the employment of persons who have not yet reached the age of 18 years. According to the Convention 138 of the International Labour Organisation countries which are classified as developing countries may reduce the minimum age for employment to 14 years.

5. Protection of health and work safety

To assume responsibility for health and safety of employees and visitors;

To limit risks and to take precautionary measures against accidents and occupational illnesses;

To provide training and education and to ensure that all employees are competent in the area of work safety;

To establish and apply an appropriate work safety management system.

6. Environmental protection

To protect the environment and to comply with any related legal rules and international standards;

To minimise pollution and to continuously improve environmental protection;

To manufacture products in an environmentally responsible manner and not to complete or carry out projects or transactions which may cause sustained damage to the environment and

To establish and apply an appropriate environment management system.

7. Prevention of financing of armed groups or conflicts

To use only raw materials for the manufacturing of products for which excavation, transport, trade, processing or export does not directly or indirectly finance conflicts or human rights violations.

8. Data protection and security

To process personal data in a responsible manner and to ensure an appropriate level of data protection in compliance with EU regulation 2016/679 of the European Parliament and the EU Council to protect natural persons when their personal data is processed. This regulation also deals with free data traffic and provides for the cancellation of guideline 95/46/EU (basic regulation for data protection).

9. Protection of confidential information and resources

To ensure that all business-related data and documents are stored in a safe manner;

To keep confidential matters private and to not use any information which one is not authorised to have access to and

To conclude appropriate confidentiality and non-disclosure agreements with suppliers and service providers to ensure that confidentiality is maintained throughout the whole supply chain and that confidential information of Pankl Racing Systems AG is appropriately protected.

10. Supply chain

To encourage suppliers throughout the whole supply chain to comply with this Code of Conduct in an appropriate manner;

To identify and minimize risks within the supply chain and

To comply with the principles of non-discrimination in the selection and treatment of suppliers.