Compliance Policy

of Reinhard Kissler Energiemontagen GmbH & Co. KG

November 2020

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Foreword

Dear employees,

For many decades, Reinhard Kissler Energiemontagen GmbH & Co. KG has been offering its customers and business partners the highest level of reliability and professional competence as a regional partner in the Rhine-Main region in the electrical industry. An essential part of our success is the consistent observance and adherence to social and legal principles of conduct. In order to protect our employees and for the successful further development of our company, we will therefore continue to adhere to this basic attitude in the future.

The relevant aspects are described in this compliance guideline. They regulate the self-evident and yet are also an everyday reminder to respect and follow the law in business operations.

In order to meet this requirement, even against the backdrop of an increasingly complex regulatory environment, this compliance guideline, together with the rules of conduct based on it, is intended to provide not only legal but also ethical orientation. The compliance guideline, which is also supported by our works council, contains the basic and binding rules for our conduct within Reinhard Kissler Energiemontagen GmbH & Co. KG as well as towards our business partners and involved third parties.

Ludwigshafen in November 2020





Dipl.-Vw. C. Amon
Managing Director

R. Ludwig
Managing Director

1. Definitions and scope

a) Compliance means adhering to laws, regulations, codes and internal guidelines as well as monitoring them.

b) The compliance guideline is aimed at all employees of Reinhard Kissler Energiemontagen GmbH & Co. KG, including managers and board members.

2. Duty to provide information and personal responsibility

a) The Compliance Directive and the associated conduct requirements are not intended to shift responsibility for the actions and omissions of employees to the level of a compliance organization with regard to the legality and consistency of their actions. Reinhard Kissler Energiemontagen GmbH & Co. KG is built on a strong corporate culture in which reliability, personal responsibility and integrity of employees are of great importance.

b) It is therefore the responsibility of each employee to find out about the laws, regulations, codes and internal guidelines applicable to his or her area of responsibility. In cases of doubt, advice should be sought from the Compliance Office, the Legal Department or the relevant specialist department.

3. Basic behavioral requirements

Every employee is obliged to:

- comply with the laws, regulations, codes and internal policies applicable in his/her area of responsibility;
- to be fair, respectful and trustworthy in all activities and business relationships;
- to respect and promote the reputation of Reinhard Kissler Energiemontagen GmbH & Co. KG;
- avoid conflicts of interest between business and private matters;
- not to obtain any unlawful advantage for yourself or others.

4. Equal treatment

Discrimination on the grounds of race, ethnic origin, gender, religion, ideology, disability, age or sexual identity is strictly prohibited. This applies in particular to dealing with colleagues, employees and business partners as well as when hiring, promoting or dismissing employees.

5. Sexism and sexual harassment in the workplace

TheFederal Agency for Civic EducationdescribesSexismas "the**personal and social discrimination**of people because of their gender. This can be directed against all genders, but it mainly affects women." Sexism in everyday life as well as in professional life often manifests itself in jokes, derogatory sayings and terms, in physical assaults, in unfair working conditions and traditional norms and thought patterns for the distribution of roles between the sexes.
Sexual harassment is described in Section 2 (1) nos. 1 to 4 of the General Equality Act (AGG) as unwanted, sexually determined behaviour. This includes unwanted sexual acts and requests for them, sexually determined physical touching, remarks of sexual content as well as unwanted showing and visible display of pornographic images.

Sexism and sexual harassment at the workplace in the form described above, Reinhard Kissler Energiemontagen GmbH & Co. KG and was prosecuted if he became aware of it. This applies in particular to the promise of professional advantages in the event of sexual accommodation and the

threat of professional disadvantages in the event of refusal.

6. Prohibition of bribery and corruption

a) Corruption – bribery, bribery, the granting and taking of advantages – is strictly prohibited in all forms.

b) This also applies to preliminary stages of acts of corruption. Any appearance of a conflict of interest in the granting or acceptance of benefits must be avoided. The "Code of Conduct on Benefits" (Section 6) applicable in this context must be strictly observed.

7. Gifts and entertainment

Basic rules for gifts and entertainment:

1. Employees must treat all forms of gifts and entertainment with caution, especially with regard to risks of bribery, corruption and conflicts of interest.

2. Employees must therefore pay attention to and ensure that they only grant or accept gifts and entertainment that:

   - Comply with all external and internal legal requirements and guidelines that must be observed by the grantor and the recipient; this must be carefully examined in particular if the recipient is a public official or family member of a public official.

   - Pursue a legitimate business purpose; In particular, the purpose must not be to influence a decision of the recipient.

   - are appropriate to the situation, comply with the boundaries of good taste and are delivered or take place in a place appropriate for business purposes and are granted without obligation, i.e. without creating an expectation that a business favor will be done in return.

3. In general, for gifts with a total value of more than €35,--, the approval of the supervisor must be obtained in advance of the donation or acceptance. This also applies to invitations to events of any kind or dinner invitations. The acceptance or donation or distribution of monetary benefits in a business context is generally prohibited.

4. If the employee is unsure about how to deal with the basic rules for gifts and entertainment listed above, he or she is requested to consult his or her supervisor and/or the responsible Compliance Officer.

8. Avoidance of conflicts of interest

The private interests of the employees and the interests of Reinhard Kissler Energiemontagen GmbH & Co. KG must be strictly separated from each other. Even when awarding contracts, the appearance of a conflict of interest must be avoided.

In particular, the following are not permitted:

- the awarding of contracts to related parties (e.g. spouses, partners, relatives and private business partners);

- the awarding of contracts to companies in which related parties work in a significant position;

- the award of contracts to companies in which related parties have a 10% or more shareholding;

- Secondary activities for competing companies;
- Secondary activities for business partners.

Exceptions can only be approved by the management, the shareholders' meeting or the compliance office. Employees who want to participate directly or indirectly with 10% or more in a competitor company or are already involved must report this to the Compliance Office. The Compliance Office checks whether there is a conflict of interest.

9. Anti-Money Laundering

a) Money laundering is the process of funneling funds from illicit sources into legitimate financial channels or diverting legitimate funds for illicit purposes.

b) Reinhard Kissler Energiemontagen GmbH & Co. KG consistently follows the principle of "know your customer" in order to prevent involvement in money laundering activities. The employees of Reinhard Kissler Energiemontagen GmbH & Co. KG are required to establish the identity of the respective business partner. Suspicions that indicate money laundering must be reported immediately to the Head of Accounting and the Compliance Office.

10. Cooperation with customers and suppliers

Reinhard Kissler Energiemontagen GmbH & Co. KG expects its executive bodies, employees, suppliers, customers and business partners to:

- compliance with all applicable laws;
- the refrain from corruption;
- respect for human and fundamental rights;
- compliance with child labour laws;
- compliance with the legal provisions of international trade, in particular compliance with import and export bans such as embargo provisions;
- the protection of the health and safety of all employees;
- compliance with relevant national laws and international standards on occupational safety, environmental protection and data protection;
- that these above points are also implemented and adhered to in the company's own production and supply chain.

11. Occupational safety and environmental protection

a) In order to ensure the safety and health of all employees and business partners, all employees must observe and comply with the applicable laws, standards and regulations on occupational safety at their respective workplaces.

b) Every employee is jointly responsible for environmental protection at his or her workplace and must observe and comply with laws, standards and regulations on environmental protection.

12. Data protection

a) As a modern company, the use of regularly up-to-date communication and information technology is a matter of course for Reinhard Kissler Energiemontagen GmbH & Co. KG and an indispensable part of a promising business operation.

b) Our employees are obliged to handle personal data sensitively in all business processes. The applicable legal regulations on data protection must be complied with. This applies to employee data as well as to that of customers, business partners or third parties.

c) Data processing may only be carried out with the consent of the person concerned or if there is a permissible legal reason. It is always important to collect and process data sparingly. A regular necessity check is essential.

d) The other requirements of the company's internal data protection officer must always be observed.

13. Protection of the company and its assets

a) Each supervisor must develop and maintain a structure in his or her respective area that prevents the misuse and waste of company assets.

b) The company's assets may not be used for private purposes.

c) The purchase and sale of company assets must be transparent, comprehensible and at market conditions. Private interests must not influence decisions.

14. Behaviour towards competitors

a) Reinhard Kissler Energiemontagen GmbH & Co. KG is committed to free competition. Reinhard Kissler Energiemontagen GmbH & Co. KG behaves fairly and fairly at all times in competition. Compliance with the applicable antitrust and competition laws, national, European and international, is a matter of course.

b) Reinhard Kissler Energiemontagen GmbH & Co. KG requires its employees in particular to observe the following behavioral requirements:

- No information will be passed on, received or exchanged with competitors that would allow conclusions to be drawn about current or future market behaviour.
- Business policy and prices are determined independently and never formally or informally, directly or indirectly, agreed with competitors, competitors or other independent parties.
- Orders, clients and territories are never divided between Reinhard Kissler Energiemontagen GmbH & Co. KG and competitors, competitors or other independent parties.
- No unfair commercial practices are used or unfair commercial practices are carried out.
- Participation in associations and events is only for permitted purposes. Any comparison with competitors or the exchange of information is in accordance with the relevant laws.
- Contacts with competitors must be kept to the absolute minimum.

15. Protection of intellectual property

We respect the intellectual property of third parties, such as trademark rights, design patents and patents, as well as copyrights.

16. Compliance violations and their consequences

a) For **employees**, violations of these compliance guidelines can result in:

- Warning
- Termination
- Claims for damages by third parties or by the company itself
- Fines/penalties
- Imprisonment

b) For **Reinhard Kissler Energiemontagen GmbH & Co. KG itself,** compliance violations can have the following consequences:

- Claims for damages by third parties
- Costly court cases
- Fines and disgorgement of profits
- Loss of image

17. Contact person and compliance officer

If you have **any questions**, talk to your supervisor, department head or external compliance officer.

If you believe that internal clarification might be impracticable, you can also contact our compliance officer directly.

The compliance officer is an external management consultant with many years of experience in this topic who is bound to secrecy, and who will handle your concerns discreetly and, if desired, anonymously.

If you find a **violation** of these compliance violations, you are required to report it.

Contact details of the Compliance Officer:

DvH Consult
Consulting



Dietloff von Hagke

compliance@kissler.de