



Ritter Starkstromtechnik GmbH & Co. KG
44225 Dortmund

Code of Conduct

1. PRINCIPLES

1.1 Compliance with laws

We comply with the law and the laws of the countries in which we do business. This has always been a matter of course for our company, irrespective of the resulting economic disadvantages. We expect the same from our business partners. In case of doubt, we refrain from achieving a goal, as opposed to breaking the law. If national laws or other relevant regulations differ from the rules of the Code of Conduct and the relevant international guidelines or additional requirements, the stricter rules will apply.

1.2 Compliance is the responsibility of every single employee

Each employee is personally responsible for complying with the law in his or her area of responsibility. With his appearance, actions and behaviour, he contributes significantly to the reputation of RITTER STARKSTROMTECHNIK. Managers are role models for all employees. They live the claim of this Code of Conduct credibly and ensure that employees know and obey the Code of Conduct.

1.3 Reporting of violations

Each employee is required to report violations of the law or violations of the Code of Conduct or other relevant policies. Basically, the way to the respective supervisor should always be sought. Should this not be appropriate in individual cases due to special circumstances, each employee is entitled to report to the next higher level.



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In any case, if there has been an offense, there is an obligation to report the matter to one of the listed bodies. Of course, legal disclosure obligations are to be obeyed. No employee may be disadvantaged by the good faith report. When investigating reported facts, we act in strict confidence. Information about the reporter's data will only be disclosed if he / she agree or if this is necessary for the clarification of a fact for compelling reasons.

1.4 Responsibility

Violations of the Code of Conduct can have serious consequences for both individuals and RITTER STARKSTROMTECHNIK. Therefore every employee has to expect consequences. In addition to labour law consequences of breaches of duty, this also includes the assertion of claims for damages and the refund of a criminal complaint.

2. CONFLICTS OF INTEREST AND ADVANCE

A conflict of interest always exists when business decisions are influenced by private interests. In order to avoid this in the beginning, every employee is obliged to separate private and business interests and to make decisions in an unbiased way in the interests of the company.

2.1 Business partners and competitors

Private business relationships with business partners or competitors must not be entered into if these results in a conflict of interest for a professional purpose. Employees may not enter into any business relationship with a business partner to whom they can exercise significant influence, directly or indirectly.



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2.2 Private benefits from business relationships

Any use of work for private gain is prohibited. In this sense, no benefits arising out of a business relationship or the establishment of a business relationship may be accepted.

2.3 Food invitations and gifts

Food invitations may only be accepted as part of the usual hospitality and must not be construed as inappropriate influence.

The acceptance of gifts is prohibited. Exceptions to this rule are only possible for gifts of low value, where a rejection based on local customs would be socially inadequate and could not influence the gift recipient in his operational decisions. The acceptance of cash and cash equivalents (such as vouchers, securities) is in any case inadmissible. Usual value thresholds for accepting gifts and invitations are set from country to country.

2.4 Disclosure of Conflicts of Interest

Potential conflicts of interest must be disclosed by the employee to his supervisor and clarified in consultation with the supervisor. In the interest of the employee, such agreements must be documented.

3. BRIBES

Bribery is under no circumstances tolerated by RITTER STARKSTROMTECHNIK. Any relationship between RITTER STARKSTROMTECHNIK and civil servants, businesses and individuals must be such as to avoid corruption. Therefore, we waive any form of offer or grant of benefits that could be construed as an attempt to influence.



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3.1 Business Partner

Against this background, business partners are not offered, promised or granted free benefits by RITTER STARKSTROMTECHNIK. Exceptions to this principle are only donations (see below under "4th donations and sponsorship") and the circumvention of such agreements by third parties (e.g. consultants, brokers or agents) is of course also inadmissible.

3.2 Public officials

In particular in relation to public officials is to pay attention to utmost restraint. The term "public official" must be interpreted broadly and, irrespective of the definition of the respective national legal system, always includes civil servants and employees of public authorities, public bodies, state enterprises and international organizations, as well as deputies and candidates, representatives and employees of political parties.

4. DONATE AND SPONSORING

Donations made by RITTER STARKSTROMTECHNIK are always made transparently as a social commitment and on a voluntary basis, without the expectation of a return. In order to ensure transparency, the purpose of the donation, the recipient and the donation receipt are documented.

4.1 Donations to political organizations

RITTER STARKSTROMTECHNIK makes no direct or indirect donations to political organizations, political parties or individual politicians.



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4.2 Sponsorship

In contrast to donations, the sponsoring offers a return service, for example in the form of communication or marketing activities for RITTER STARKSTROMTECHNIK.

All sponsorship activities must be based on written contracts and must be proportionate to the sponsorship services. Sponsorship must by no means be used to circumvent the provisions governing donations.

5. FAIR COMPETITION

We are committed to fair competition as a precondition of the social market economy and we adhere to the laws for the protection of competition. All employees are required to comply with the rules of fair competition. Examples of inadmissible practices that we do not tolerate are unlawful exchange of information, price fixing and market sharing with competitors or suppliers. Spying, theft and other illegal methods of gathering information about competitors or their business activities are expressly rejected.

Our high level of our own claim to correct conduct towards suppliers and business partners is also expressed by regulations of our binding CR principles.

6. CUSTOMER ORIENTATION

6.1 Quality of product and performance

Our aim is to provide our customers with optimum performance at all times in accordance with the requirements of the current state of technology. For this purpose, our quality management and our employee qualification form an integral part of our business. Our product safety and quality standards ensure this claim.



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6.2 Positive treatment of customer inquiries

We always strive to respond positively to inquiries from our customers. For our customers, we always find a suitable, satisfactory solution.

7. EMPLOYEE WILL AND HUMAN RIGHTS

We are committed to fair working conditions. It goes without saying that RITTER STARKSTROMTECHNIK upholds workers' rights.

7.1 Employee protection

The health and safety of our employees is one of our highest assets. Therefore, we create safe working conditions and integrate occupational safety and health into our operations. It is equally important for all employees to comply with our safety regulations without reservation and to point out any possible instances of maladministration without delay or to stop them in their own area of responsibility. Every leader is required to assist their employees in the exercise of this responsibility.

7.2 Right to organize and collective bargaining

We respect the right of workers to set up company organizations in accordance with applicable national law, to join in-company organizations and to conduct collective bargaining.



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7.3 Equal Treatment

Based on the United Nations Charter and the European Convention for the Protection of Human Rights and Fundamental Freedoms, human rights are seen as fundamental values to be respected and respected by all employees.

We reject any form of unlawful discrimination and unfair treatment. Such practices are unlawful and contrary to our Code of Conduct.

8. BUSINESS AND BUSINESS SECRETS

Business and trade secrets must be treated absolutely confidentially. Sensitive information of any kind may not be used for the pursuit of its own interests or made accessible to third parties. The secure custody of corporate information is among others to ensure at any time by technical means.

This confidentiality applies equally to information that we receive from business partners. Conversely, we also contractually bind our suppliers and other business partners to secrecy.

9. DATA PROTECTION

The protection of data of our employees, customers and business partners is very important to us. Therefore we collect, store or process data only when required for specified, explicit and legal purposes.

We support the security of data and processing by appropriate technical and organizational measures. Every employee has to observe the data protection rules that are relevant for their field of activity with the necessary care.

10. COMPANY PROPERTY

For all employees, the principle applies that the ownership of our company must be handled with care. We handle equipment and facilities sparingly, carefully and according to their purpose. Company property may not be privately used in an inadmissible way.