

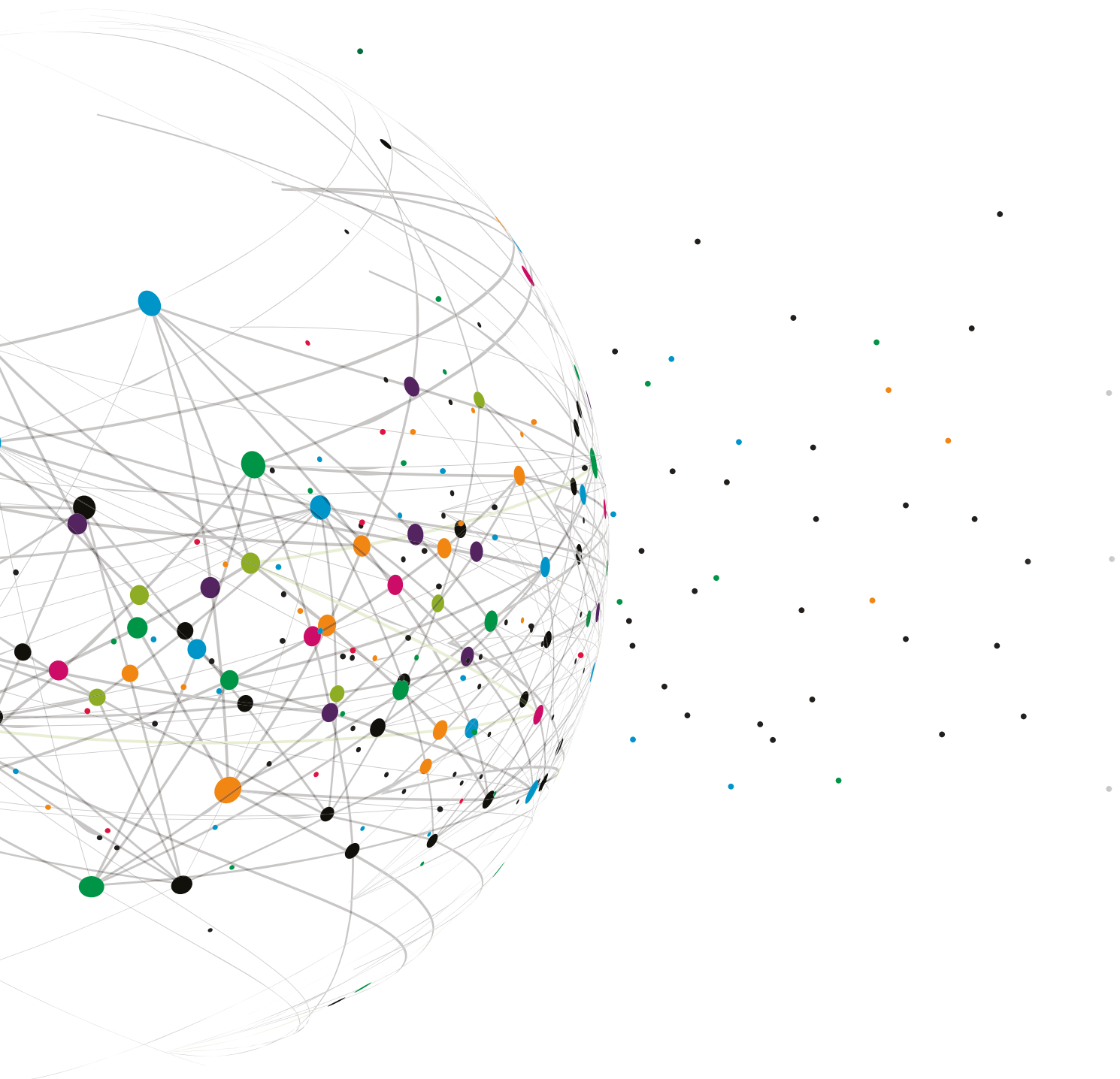
CUSTOMER VALUE THROUGH INNOVATION



# Code of Conduct

## Secure Connections





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# 1 Introduction

Dear reader,

*There is a norm we live and work by at NORMA Group: to build 'secure' connections for every day of our working lives.*

As a leader in Joining Technology, secure connections are the bedrock of everything we do. This fires our commitment for building and maintaining integrity, reliability, and transparency in our business practices. We are determined to drive positive change and make a relevant impact through the way we conduct our business and build relationships with each other, as much as with every other person and business we come in contact with. This is what Compliance at NORMA Group is all about – because secure connections are the fundamentals of our business.

The reputation and integrity of NORMA Group SE and its direct and indirect subsidiaries ("NORMA Group") is a valuable asset that is vital to NORMA Group's success.

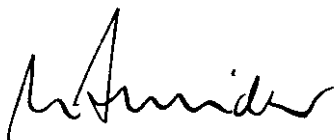
Breaches of law or unethical behavior can destroy this reputation and cause great disadvantages for all of us. You and every other director, officer, manager and employee of NORMA Group are responsible for our name and our integrity.

In every instance we expect you to act honestly, fairly and with a view towards "doing the right thing". Illegal, unethical or dishonest behavior is strictly forbidden and will be investigated and have consequences for involved persons.

With this Code of Conduct we provide a guideline for you to help understand the red line between ethical and unethical behavior. It is designed to help you make the right decisions but, obviously, cannot cover every situation you might have to deal with in your daily business.

We expect that all our employees conduct themselves in a manner consistent with our values and commitment to ethical conduct. In case of questions regarding this Code of Conduct or if you have suspicions of violations of this Code of Conduct, please contact your superior, a more senior manager or NORMA Group's Compliance organization.

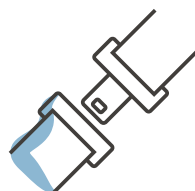
Maintal, June 2020



Dr. Michael Schneider,  
Chairman of the Management Board/CEO



Jan Löffler  
Chief Compliance Officer



**Compliance**  
Secure Connection

## 2 What "COMPLIANCE" is about



**"COMPLIANCE"** is to act in accordance with laws, external regulations as well as internal regulations and guidelines.

Simply spoken:  
COMPLIANCE is **"correct behavior"**.

Being a NORMA Group employee, you are expected at all times to conduct NORMA Group business in accordance with all applicable national, regional, local and foreign laws, and applicable NORMA Group policies. NORMA Group condemns all acts that violate any applicable law, rule or regulation, even when such action appears to be in NORMA Group's best interest and is motivated by your best intentions. In most cases, simply doing the right thing will avoid any violations of law. However, some legal concepts and areas of regulation are a challenge

for all of us. If you are uncertain of whether or not a particular action or transaction violates applicable laws, rules or regulations, please do not hesitate to contact NORMA Group's Compliance organization.

This Code of Conduct will provide you with an overview of the most important topics in the area of "Compliance". It also provides guidelines that help you assess critical situations and choose "correct" behavior.





## 3 Raising Concerns and reporting Impropriety

NORMA Group encourages you to openly discuss Compliance issues. Often, asking a question is the best way to determine whether an action is proper and to ensure that we comply with applicable laws. Any question concerning this Code of Conduct, our guidelines and policies can be addressed to NORMA Group's Compliance organization.

If you become aware of, or reasonably suspect that there will be or has been a violation of any laws, rules, NORMA Group's policy or this Code of Conduct, we expect you to take action. In this case, please consult your immediate supervisor. He or she is responsible for taking necessary steps to resolve the issue. In case your immediate supervisor does not take the necessary measures or in case he or she may be involved in the alleged misconduct, please contact a more senior manager or a member of the Compliance organization. (The contact details of all members of the Compliance organization can be found on the intranet (Our Company/ Compliance), or the following E-Mail contact:



[compliance@normagroup.com](mailto:compliance@normagroup.com).

If you wish to stay anonymous, you, any other NORMA Group employee, as well as any third party can report any kind of actual or alleged misconduct relating to NORMA Group using our Whistleblower System. The Whistleblower System is a web-based reporting platform backed by the latest security technology. Only selected members of the Compliance organization have access to incoming notifications.



<https://www.bkms-system.net/normagroup>

The Whistleblower System can also be used for Compliance-related questions. However, we encourage our staff to directly and openly contact a member of the Compliance organization in this regard.

Since internal reports are often vital to detect misbehavior and to take the necessary steps, a notification made in good faith shall never cause any disadvantages for the reporting person.

Every whistleblower-report will be taken seriously and followed-up by our Compliance organization who will provide for an answer to the whistleblower within a period of three months maximum.



# 4 Personal Integrity



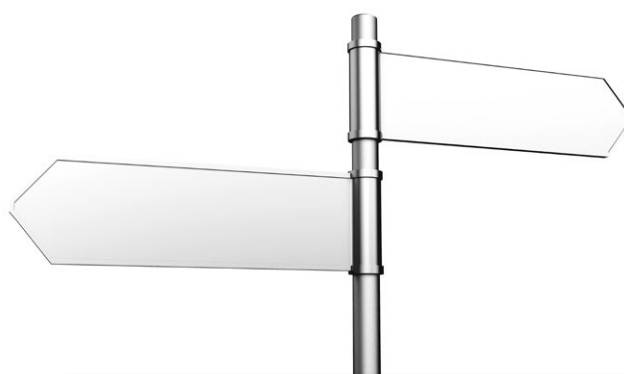
## 4.1. CONFLICTS OF INTEREST

Regarding work-related aspects, you are expected to put the interests of NORMA Group ahead of your personal interests or those of any other person or company. You must avoid Conflicts of Interest.

### What is a Conflict of Interest?

A business decision affecting NORMA Group that you (also) take because of personal interests and which you would not have taken in this form if you were not biased by personal interests. In a nutshell, the risk of a Conflict of Interest always arises, if you make business for NORMA Group with companies (partly) owned by you, family members, friends or other persons close to you.

In such situations, there will always be the suspicion that you are not acting in the interest of NORMA Group. In your own interest you should even avoid the risk that someone could believe you have a Conflict of Interest. If, however, a Conflict of Interest, due to specific circumstances, cannot be avoided, you are obliged to report this to the Compliance organization before entering a business relationship and request written approval.



### Examples of Conflicts of Interest include:

- Having outside employment or business or civic affiliations or ventures (including board memberships) that interfere with your ability to perform your duties for NORMA Group in an objective, effective and timely manner.
- Having a direct or indirect financial interest in a customer, vendor or supplier.
- Engaging in personal investment or business ventures that compromise or give the appearance of compromising your ability to make decisions in the best interests of NORMA Group.



## 4.2. INSIDER TRADING

NORMA Group SE and some of the companies we do business with are publicly traded companies. This puts you in a position to potentially obtain so-called “insider information”.

### What is Insider-Trading?

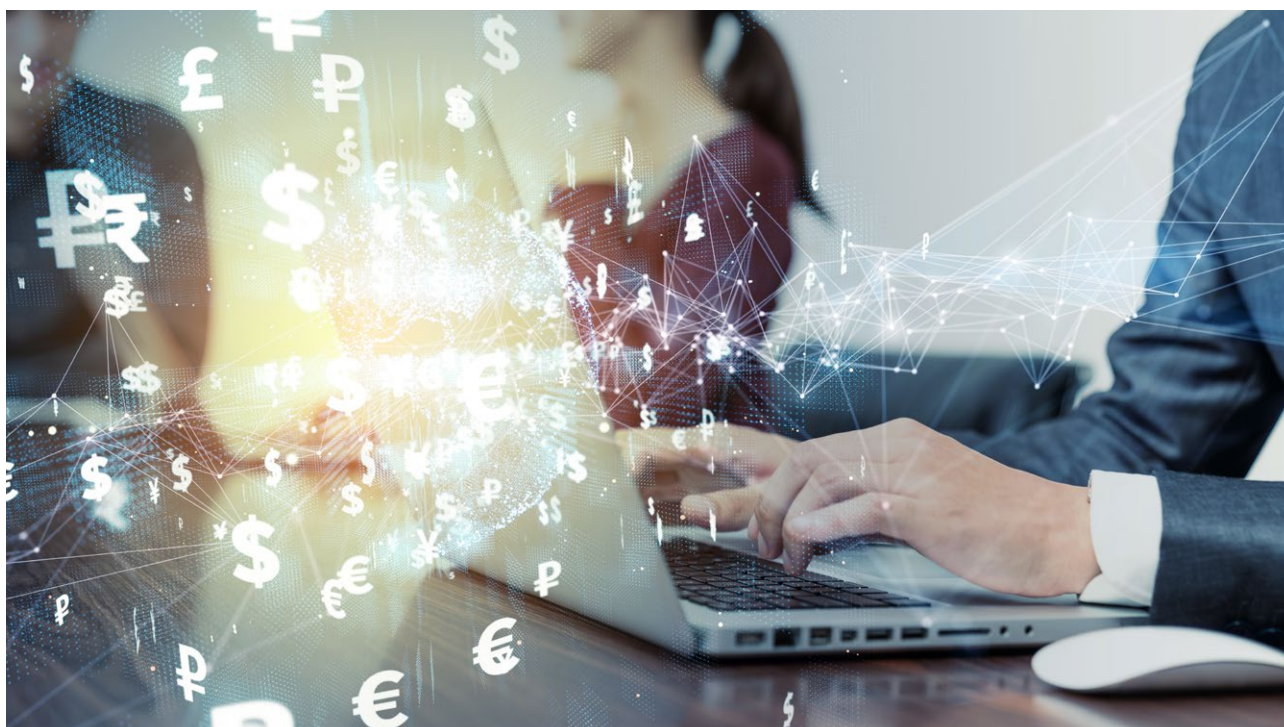
Insider Trading means to make an investment based on non-public information that was illegally obtained to have an illegal advantage towards the market.

Regardless of whether you are listed in an insider list or not, you must refrain from using or disclosing/communicating any non-public information you have learned about NORMA Group SE or any other publicly traded company for purposes of making investment decisions.

### Non-public information includes, but is not limited to:

- development of new products or services;
- unannounced mergers and acquisitions;
- advance notice of changes in senior management;
- non-public financial results; and
- pending or threatened litigation.

The consequences of violating insider trading laws can be severe. In the event that you may have inadvertently disclosed insider information or have questions about whether your actions or the actions of another person may violate the Code of Conduct or insider trading laws, please contact the Compliance organization or Legal Dept.



# 5 Corporate Integrity

## 5.1. ANTI-CORRUPTION LAW COMPLIANCE

One of the biggest risks in international business relationships is corruption. If employees of companies engage in corruption, this does not only result in penalties for the involved persons but also for the companies they represent. Very high fines, bans from markets or reputational damage are just some of the possible consequences.



### What is Corruption?

#### Corruption, in the broadest sense, means

- giving a personal advantage to public officials or to representatives/employees of a company
- influencing these persons with regard to their duties towards their employer/ authority in favor of the giving person

NORMA Group does not tolerate corruption or bribery in any form. All applicable anti-corruption laws must be followed. Anywhere in the world you are expected never to engage in any kind of corrupt conduct.

### Never let your actions be driven by the goal to

- improperly obtain or retain business,
- to gain influence,
- favorable treatment or
- any other advantage

### for NORMA Group or another party.

You are furthermore expected never to request, never to agree to receive, and never to accept any such improper advantage for you personally or for another person or entity.

The best way to avoid corruption is to always act transparently and to use a common sense approach. However, to facilitate decision-making in this regard, NORMA Group's Anti-Corruption Policy<sup>1</sup> identifies the prohibited conduct and defines clearly which advantages to be given or received are subject to mandatory pre-approval.

### Special Risk: Public Officials

Anti-Corruption laws around the globe are especially strict when it comes to giving/promising personal advantages to public officials. In this regard, may the public official be a customer or an authority involved in your business (e.g.) for a permit, allowance, etc., the granting of personal advantages, even if they are very small, are strictly prohibited without prior approval by NORMA Group's Compliance organization.

<sup>1</sup> NORMA Group's Anti-Corruption Policy can be accessed under: <https://www.normagroup.com/Compliance>  
It is also available on the intranet pages of NORMA Group (Our Company/Compliance)

## 5.2. ANTI-MONEY LAUNDERING

NORMA Group is committed to complying with all applicable anti-money laundering laws, rules and regulations.



### What is Money Laundering?

In the broadest sense, money laundering means to use illegally “earned” money in a separate business to disguise its origin and to transfer it into legitimate assets. “Dirty” money is thus to be “laundered clean” again to return it to the regular financial and economic cycle.

Money laundering results in high fines and other severe consequences – both for the company and the people involved, e.g. high fines and long prison sentences.

Be alert, in particular, to the following circumstances:

- Cash payments
- Country where a business partner is located deviates from country where its bank is located
- Unreasonable splitting of transactions
- A business partner uses multiple bank accounts or suddenly changes its bank accounts without reasonable explanation

Therefore, in case you recognize any suspicious facts, you are obliged to immediately consult with NORMA Group Compliance or NORMA Group’s Treasury Dept.





### 5.3. CUSTOMER & SUPPLIER RELATIONS, AGENTS & CONSULTANTS

Our success depends upon deep and trusting relationships with our customers and suppliers. When dealing with customers and suppliers, you must act ethically, fairly, courteously, competently and timely.

#### In furtherance of these objectives:

- You must act in a professional and courteous manner at all times and avoid misleading customers and suppliers.
- You must never willingly or incomprehensively give false statements towards customers, authorities or other third parties about technical specifications of NORMA Group's products or give misleading statements regarding their quality.
- You must only make claims about our services that you know to be true or have adequate information to support.
- You must not misuse or disclose confidential or proprietary customer or supplier information.
- You must truthfully represent the nature and quality of our services, prices, contractual terms and other information.
- When dealing with suppliers, vendors or customers, you must ensure full Compliance with our Anti-Corruption Policy.<sup>2</sup>

From time to time, our business may require us to hire agents, consultants, or other third parties for rendering services regarding the sale of NORMA Group products and receiving salaries, provisions, rewards, finders' fees or similar consideration from NORMA Group ("Third Party Representative").

If such Third Party violates the law, this might create liability risks for NORMA Group. This does in particular apply to any case of corruption. Therefore, NORMA Group carefully chooses Third Party Representatives after analyzing potential Compliance-Risks and monitors Third Parties Representatives already employed. Please refer to our Anti-Corruption Policy<sup>3</sup> for more details.

<sup>2</sup> NORMA Group's Anti-Corruption Policy can be accessed under:  
<https://www.normagroup.com/Compliance>

It is also available on the intranet pages of NORMA Group (Our Company/Compliance).

<sup>3</sup> Please refer to footnote <sup>2</sup>

## 5.4. ACCURATE BOOKS, RECORDS AND PUBLIC DISCLOSURES

The effective operation of NORMA Group's business, and the integrity of NORMA Group's public disclosures, is dependent on accurate business records. You must prepare and maintain all company records accurately and honestly. You must maintain all paper and electronic records in accordance with applicable laws on data retention and NORMA Group's policies on records management, including applicable retention periods.

No false or misleading entries must be made in any books, records or accounts of NORMA Group and no NORMA Group funds must be used for any purpose other than as described in the documents supporting the disbursement.

NORMA Group personnel engaged in the preparation of these filings, submissions and communications must endeavor to ensure that NORMA Group's filings, submissions, and communications accurately and fairly

reflect NORMA Group's transactions and provide full, fair, timely, accurate and understandable disclosure.

If you are responsible for any aspect of our internal accounting controls and financial and tax reporting systems, you must be vigilant in recording entries accurately and honestly and in a manner consistent with all legal requirements. If you are uncertain about proper recording of company transactions or accounting or tax matters, you should consult with a manager.

You must not take any action to fraudulently influence, coerce, manipulate or mislead any auditor engaged in the performance of an audit of NORMA Group financial statements. Complaints or concerns regarding accounting, internal accounting controls or auditing matters should be reported as indicated in section 3 of this Code of Conduct.

## 5.5. COOPERATION WITH INVESTIGATIONS AND GOVERNMENT REPORTING

If you are notified by any member of the Compliance organization or Legal Counsel of NORMA Group that you have electronic or paper records that are relevant to anticipated or pending litigation, investigation inquiry, formal proceeding or audit, you must follow the guidelines for retaining documents set forth in that notice. Do not destroy any records contained in the notice.

You must follow all requests made by NORMA Group management or the government for information or records related to any investigation or government report. Do not conceal, alter, falsify or destroy any records management or the government requests, as this could lead to criminal prosecution for you and NORMA Group.

If you believe documents are being concealed, altered, falsified or destroyed, you should immediately report this in accordance with section 3 above.



## 5.6. EMBARGO LAWS, TRADE SANCTIONS, EXPORT CONTROL



NORMA Group's international operations can trigger issues under applicable trade sanctions and trade embargo laws. Trade embargo laws and regulations generally prohibit companies located in a particular country from doing business in another specific country. On the other hand, sometimes a country makes it illegal for companies operating within their jurisdiction to

recognize embargoes put in place by another country. You must act in accordance with all applicable laws, rules and regulations relating to embargo laws and trade sanctions. NORMA Group monitors these embargoes and sanctions and implements controls to make sure we follow them.

## 5.7. FAIR COMPETITION & FAIR DEALING

NORMA Group's mission is to maintain its status as a global market and technology leader in Engineered Joining Technology solutions through ethical and legal conduct, and not resort to anti-competitive behavior. Although we recognize the importance of identifying NORMA Group's strengths and our competitors' weaknesses, you may not seek a competitive advantage for NORMA

Group through fraud, concealment, misrepresentation of material facts, or illegal means. NORMA Group also does not condone theft of trade secrets and you must avoid unauthorized use of any patented, copyrighted, privileged or confidential information.



## 5.8. ANTITRUST

NORMA Groups strictly prohibits any behavior that could give reason to suspect violations of applicable antitrust law.



### What is a Violation of antitrust law?

Any communication with competitors or customers that aims at restricting competition and is in disfavor of the free market principle.

**This includes but is not limited to any attempts of competitors**

- to secretly agree on pricing, purchasing conditions or
- to split any markets, regions or customers or to boycott third parties.

Even arrangements with resellers that aim at providing for maximum or minimum prices are illegal. The consequences of violating antitrust laws are severe, both for individuals as for corporations. Even the appearance of anti-competitive behavior must be avoided. To avoid participating in prohibited anti-competitive behavior, always act as transparent as possible when it comes to competitors and contact your superior or a member of the Compliance organization when you have the feeling that any behavior related to NORMA Group could restrict competition.

**To give you an idea on possible antitrust related matters, please read the following examples of prohibited behavior carefully and refrain from:**

- communication about sensitive information with competitors, for example prices, output, capacities, sales, bids, profits, profit margins, costs, methods of distribution or any other parameter that determines or influences NORMA Group's competitive behavior;
- informal discussions and unwritten agreements in relation to behavior that could have an impact on competition;
- communication with competitors to:
  - raise, lower or stabilize prices or other terms and conditions of sale;
  - influence the award of a tender;
  - boycott or refuse to deal with certain customers or suppliers;
  - reduce output of services;
  - allocate clients, services, market, production programs or geographic territories;
  - coordinate on employees' wages and benefits, except as permitted by specific labor laws;
  - submit offers when not intending to obtain a contract.
- influencing the resale prices charged by our customer or set a minimum resale price;
- providing our services at predatory or below-cost pricing;
- entering into exclusive arrangements that deny a competitor access to an excessive proportion of the market.

## 5.9. INFORMATION SECURITY & DATA PROTECTION

Being confronted with the global phenomenon of ever-increasing collection, storage, transfer, and use of data through modern technology (e-mail, internet, mobile phones, social networks, etc.) and the consequent increased risk of data loss or misuse, NORMA Group is committed to protecting confidentiality, integrity and availability of information and to protecting the privacy of employees, customers and business partners.

### What is Information Security?

Information Security's primary focus is the balanced protection of confidentiality, integrity and availability of information.

Information Security encompasses not only the security of the IT systems and the data processed with them, but also the security of information that is not processed electronically.

Measures undertaken to ensure confidentiality are designed to prevent sensitive information from reaching the wrong people. Access must be restricted to those authorized to view the data in question (e.g. via data encryption, user IDs and passwords). Measures undertaken to ensure integrity are designed to prevent data from unauthorized changes or removals (e.g. via file permissions and user access controls). Availability ensures access to information when needed.

We expect you not to make any transcripts or copies of information for other than operational purposes and not to access information that is unrelated to your own activities. Do not save/store information in insecure locations (e.g. public clouds).

Confidentiality of postal correspondence and telecommunications must be maintained at all times. Therefore, also pay particular attention to IT aspects of confidentiality such as data security and protect your computer from unauthorized access by necessary appropriate measures (e.g. changes of password). Please consult the ICT policies and contact NORMA Group's ICT Risk & Security Manager in case of any question.

NORMA Group treats personal data of employees, customers, suppliers and other affected individuals confidentially and protects their personal data at all times.

NORMA Group only collects and processes personal data, if NORMA Group is required to do so by law or if necessary for business or employment purposes. NORMA Group thereby ensures to only process personal data in accordance with the applicable data protection regulations and to adhere to the rights of all affected individuals.

### What is Data Protection?

The aim of Data Protection is to secure the fundamental right to informational self-determination of the individual. It protects personal data against misuse.

### What is Personal Data?

Personal data is data that can be assigned to a specific person. This includes, but is not limited to,

- Name,
- Address,
- Telephone number,
- E-mail address,
- and information that can be linked to a specific person by linking it to other data sources (e.g. IP address, customer number).

For more details, please consult NORMA Group's Data Protection policies or contact NORMA Group's Data Protection Office:



[dataprotection@normagroup.com](mailto:dataprotection@normagroup.com)

## 5.10. ENVIRONMENTAL PROTECTION

*NORMA Group complies with all applicable environmental laws, standards and requirements and takes a proactive and long-term view on environmental matters to prevent pollution and continuously improve environmental performance.*

Environmental protection and product safety is of great importance, not only for NORMA Group's reputation but also for our customer's safety and future generations. NORMA Group is conscious of the great importance of environmental protection in developing

and manufacturing its products. We support national and international efforts to ensure the health of the environment. It is everyone's responsibility to take care that environmental laws are properly observed and resources are used efficiently.



# 6 Employment & Human Rights

## 6.1. HUMAN RIGHTS

Aware of its social responsibility NORMA Group is committed to ensure that all people working for NORMA Group or on its supply chain are treated fairly, equitably and in consistency with fundamental human rights. We respect and promote the principles of the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. We strongly condemn forced labour, child labour and all practices in which people are exploited or exposed to dangerous conditions.

NORMA Group does not tolerate any form of forced or compulsory labour at any of its subsidiaries or suppliers in any form. Any person employed or engaged by our suppliers must have voluntarily chosen to do so. Any type of slave or forced, bonded or prison labour is prohibited. Employees must not be in any way restricted in their personal freedom of movement.

We comply strictly with laws regulating the minimum age for employment and other employment conditions. The minimum age for employment at NORMA Group corresponds to the ILO Conventions No. 138 and No. 182 and/or the age prescribed under local law if this is higher.



## 6.2. HEALTH & SAFETY

It is the policy of NORMA Group to comply with all applicable environmental health and safety laws and regulations. NORMA Group is committed to creating and maintaining a safe working environment and preventing workplace injuries. You are responsible for recognizing hazards, taking steps to correct them, making certain that safe working conditions exist and that safe operating practices are observed. If you observe an unsafe condition, you should warn others, if possible, and immediately report the condition to your manager or local workplace safety contact.

## 6.3. FAIR EMPLOYMENT PRACTICES

NORMA Group is committed to complying with all laws relating to freedom of association, working time, wages and hours, as well as laws prohibiting forced, compulsory and child labour, and employment discrimination.

Any person employed or engaged by NORMA Group or their suppliers is entitled to form or join an employee organization (or union) of their choice with the aim of conducting collective bargaining and defending their interests.

All persons employed or engaged by NORMA Group or their suppliers must be treated equally. We do not tolerate discrimination with regard to sex, religion, age, race, social background, caste, nationality, ethnic and national origin, membership in an employee organization, disability, sexual or political orientation or any other personal characteristic.

NORMA Group condemns and will not directly or indirectly support harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, nor the threat of any such treatment.



# 7 NORMA Group Assets

## 7.1. PROTECTION AND PROPER USE OF NORMA GROUP ASSETS

*NORMA Group property and assets may only be used for legitimate NORMA Group-related business purposes. You are responsible for ensuring that NORMA Group's property is not misused, wasted or damaged.*

Unless authorized to do so, you are also prohibited from using or taking NORMA Group property for your personal benefit or gain.

You may not provide third parties with any NORMA Group property, unless you are authorized to do so in a legitimate business transaction.

**NORMA Group property includes, but is not limited to:**

- Work equipment (i.e. laptops, internet, email, mobile phones), including approved personal use authorized in accordance with applicable NORMA Group policies.
- Office supplies, materials and services.

## 7.2. CONFIDENTIAL AND PROPRIETARY INFORMATION

*Confidential and proprietary information is one of a company's most valuable assets.*

Without prejudice to any obligation contained in your employment contract or any other document, you may not disclose NORMA Group's confidential and proprietary information without authorization.

Similarly, you may not disclose the confidential information of NORMA Group's customers, vendors or suppliers without authorization.

These obligations apply whether or not the information is specifically designated as "Confidential" or "Restricted", and extend beyond your employment with NORMA Group.

**Examples of confidential or proprietary information include inter alia**

- non-public sales, pricing and marketing strategies;
- accounting information and non-public financial data, customer lists and contacts;
- non-public information regarding NORMA Group's products, processes, practices, methods, designs, developments, production manufacturing or services;
- development or experimental work in progress;
- trade secrets of customers and NORMA Group;
- possible acquisitions and divestitures; and
- non-public information relating to customer agreements.

### 7.3. SOCIAL MEDIA

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Social media forms an important part of today's business and is becoming more and more important. Social media include social networks (e.g., Twitter, Facebook, LinkedIn), blogs, wikis and video streaming websites (e.g. Youtube). NORMA Group manages the contents of the official company pages on social media in a centralized manner. Therefore, do not create any NORMA Group pages on any social media platform.

Keep in mind that postings, both personal and professional, may ultimately be connected to NORMA Group, even if your affiliation with NORMA Group is not disclosed.

Have a healthy distrust especially when it comes to business-related topics in social networks or other public portals.

**Therefore, when you are active on social media, you must**

- be honest, accurate and respectful;
- be open about your affiliation with NORMA Group if it is relevant to the issue;
- make it explicitly clear that your opinions are personal and may not represent the position of NORMA Group.

**Please also consult NORMA Group's Social Media Guidelines.**

### 7.4. COPYRIGHTS, PATENTS, AND TRADEMARKS

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Intellectual property forms an important part of our economic success and the success of our business partners and customers. You are expected to protect our intellectual property, including any patents, trademarks, trade secrets, technical and scientific knowledge, and expertise developed in the course of our business. You are required to respect the intellectual property of others. Unauthorized duplication or misappropriation of another's intellectual property may subject you and NORMA Group to significant fines and criminal penalties.



# 8 Contact

If you have any questions regarding this Code of Conduct or Compliance, please contact NORMA Group Compliance or any member of the Compliance organization.

## Chief Compliance Officer

Jan Löffler

Edisonstr. 4

63477 Maintal

Germany

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## Group Compliance Officer

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The contact details of all members of NORMA Group's Compliance organization can be found on the intranet (Our Company/Compliance).

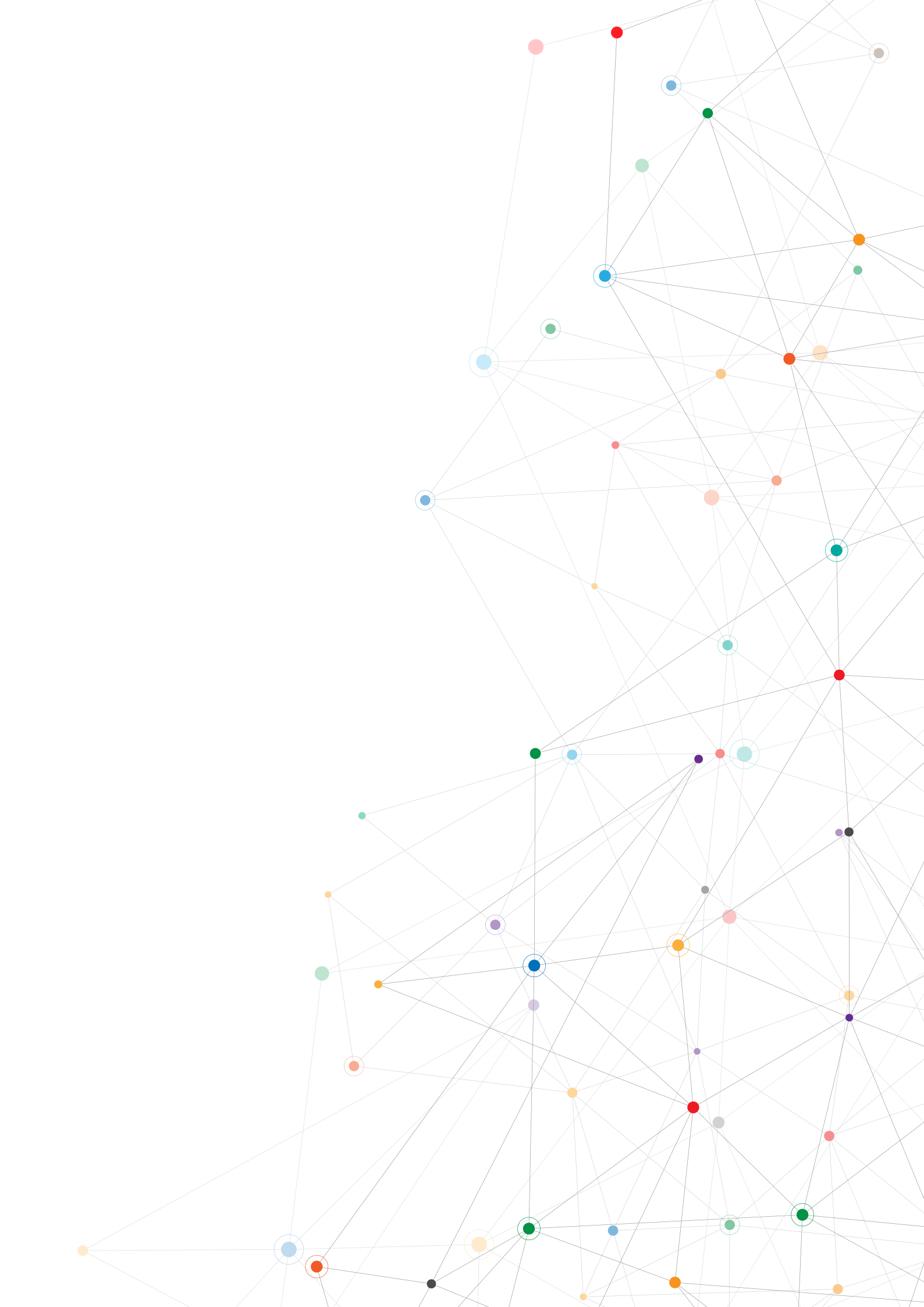


# 9 Review

This Code of Conduct is subject to regular review by NORMA Group Compliance and can be amended due to changes in applicable law or in NORMA Group's business. It is therefore necessary to make sure that you rely on the up-to-date version which can be accessed under:

<https://www.normagroup.com/Compliance>







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