



Code of Ethics



Document change history

Revision N°	Revision date	Change description
01	April 30, 2019	Completely revised new edition in coherence with transition to BOS
02	November 11, 2019	Updated: layout. Added: Data protection
03	February 25, 2020	Updated: Clarified compliance procedures



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Foreword

This Code of Business Conduct and Ethics covers a wide range of business practices and procedures. It does not cover every issue that may arise, but it sets out basic principles to guide all employees of Reutter / ITIB Group. All Reutter / ITIB Group employees must conduct themselves accordingly and seek to avoid even the appearance of improper behavior. The Code should also be provided to and followed by the Reutter / ITIB Group's agents and representatives, including suppliers and consultants.

If a law conflicts with a policy in this Code, the law comes first. If you have any questions about these conflicts, you should ask Reutter / ITIB Group top management how to handle the situation.

Those employees who violate the standards in this Code will be subject to disciplinary action, up to and including termination of employment.

IMPORTANT NOTE:

If you are in a situation which you believe may violate or lead to a violation of this Code, follow the whistle-blowing guidelines described in Section 14 of this Code



1. Compliance with Laws, Rules and Regulations

Obeying the law, both in letter and in spirit, is the foundation on which Reutter / ITIB Group ethical standards are built. All employees must respect and obey the laws of the cities, states and countries in which they operate. Although not all employees are expected to know the details of these laws, it is important to know enough to determine when to seek advice from top management or other appropriate personnel.

2. Conflict of interest

A "conflict of interest" exists when a person's private interest interferes, or appears to interfere, in any way with the interests of Reutter / ITIB Group. A conflict situation can arise, when an employee takes actions or has interests that may make it difficult to perform his or her company work objectively and effectively. Conflicts of interest may also arise when an employee, or members of his or her family, receives improper personal benefits as a result of his or her position in the company.

It is almost always a conflict of interest for a company employee to work simultaneously for a competitor, customer or supplier. Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with top management. Any employee, who becomes aware of a conflict or potential conflict should bring it to the attention of top management.



3. Insider trading

Reutter / ITIB Group employees who have access to confidential information are not permitted to use or share that information for stock trading purposes or for any other purpose except the conduct of our business. All non-public information about Reutter / ITIB Group should be considered confidential information. To use non-public information for personal financial benefit or to "tip" others who might make an investment decision on the basis of this information is not only unethical but also illegal.

4. Corporate Opportunities

Reutter / ITIB Group employees are prohibited from taking for themselves personally opportunities that are discovered through the use of corporate property, information or position without the consent of the top management. No employee may use corporate property, information, or position for improper personal gain, and no employee may compete with Reutter / ITIB Group directly or indirectly. Employees owe a duty to Reutter / ITIB Group to advance its legitimate interests when the opportunity to do so arises.



5. Discrimination and Harassment

Reutter / ITIB Group believes diversity in our workforce is an asset that enhances creativity, innovation and growth. The employees' different cultures, sexual orientations, backgrounds and experiences allow issues to be seen from varied perspectives, thereby enriching the decision-making process. All personnel decisions, including, but not limited to, those relating to recruitment, hiring, training, promotion, compensation and benefits, shall be based solely upon an employee's or applicant's qualifications, skills, performance and abilities and without regard to any condition or characteristic protected by applicable law. Reutter / ITIB Group will not tolerate harassment – whether it is sexual or non-sexual in nature – of its employees by anyone, including any supervisor, co-worker, employee or non-employee, vendor, client, or customer.

6. Health, Safety, Environment & Sustainability

Reutter / ITIB Group strives to provide each employee with a safe and healthy work environment. Each employee has responsibility for maintaining a safe and healthy workplace for all employees by following safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions. The use of alcohol and drugs in the workplace is prohibited, as well as working under influence of alcohol or drugs.

7. Integrity, Accuracy and Reliability of Books, Records and Controls

Reutter / ITIB Group's financial books and business records are filled with the highest degree of accuracy, completeness and integrity. Reutter / ITIB Group relies on its financial books and business records to make smart, timely business decisions. Reutter / ITIB Group also recognizes that its managers rely on books and records to get an accurate picture of Reutter / ITIB Group's condition.

All employees generate records as part of their regular tasks, like filling expense reports, drafting contracts and proposals or sending e-mails. It's crucial that these documents accurately reflect the situation, and that no information is left out

8. Protection of and Proper Use of Company's Assets

All employees are responsible for the proper use of our assets. Reutter / ITIB Group three types of assets:

- a.) physical assets, such as materials, supplies, software, inventory, equipment, computers, internet access and technologies;
- b.) information assets, such as confidential and proprietary business information and intellectual property (including our valuable brands);
- c.) resource assets, such as capital and company time during the work day.

Employees must take all reasonable steps to protect Reutter / ITIB Group's assets from theft, destruction or other loss and to ensure that assets are not wasted, misused, or diverted.



9. Competition

Reutter / ITIB Group's public communications – like our products – reflect Reutter / ITIB Group's commitment to integrity and transparency. Reutter / ITIB Group markets, advertises, and labels its parts with this in mind, striving for accuracy, transparency and openness with its customers. Reutter / ITIB Group never tries to mislead customers with incorrect or incomplete information about own products or anyone else's.

To maintain accuracy and consistency in all public communications, only designated Reutter / ITIB Group spokespersons are permitted to make public statements about Reutter / ITIB Group .

10. Child and forced labour

Reutter / ITIB Group complies with national and international legislation and regulations governing child labour. In any case, it will not employ children under the age of 16, and complies with the provisions of the ILO (International Labour Organization) regarding the health, safety and morality of young people aged between 15 and 18. Reutter / ITIB Group ensures that its suppliers and partners adopt the same provisions.

Reutter / ITIB Group promotes freedom of choice in employment and does not support any form of forced and compulsory labour.



11. Fair Dealing

Exchanging gifts, entertainment and other forms of hospitality is a common way to build business relationships. Reutter / ITIB Group employees are prohibited from accepting or receiving gifts of value from any business partner. However, items that are insignificant, small, incidental, and have no market value, such as logoed promotional items (e.g., pens or paper provided at meetings; product samples; publications; etc.) are reasonably permitted. It is also strictly prohibited to solicit gifts or services for themselves or others, including family members, or friends.

Consistent with Reutter / ITIB Group practice of not accepting gifts, employees are generally prohibited from giving gifts of any value to a business partner. Business Entertainment is a situation where representatives from both companies (recipient and provider) attend a meal, performance, or other event and is not considered to be a prohibited gift provided that it complies with the provider's and recipient's policies.



12. Zero Tolerance for Bribery and Corruption

Reutter / ITIB Group has a zero tolerance anti-corruption policy and employees must never offer, give or accept bribes to get business done. It is strictly prohibited to directly or indirectly giving, offering, promising, or authorizing anything of value – no matter how small – to any government official or agency (including a national or local government official or employee, a political candidate, or an official or employee of a government-owned or controlled entity) or any other individual to corruptly secure a business advantage, influence business or governmental decision making in connection with any of our activities, or otherwise induce the recipient to abuse his or her power or official position.

This prohibition must be interpreted broadly and applies to anyone acting on Reutter / ITIB Group behalf, including suppliers, distributors, contractors, consultants and agents. In many countries, facilitating payments offered in exchange for expedited services are legal. Nonetheless, such payments often appear unethical and Reutter / ITIB Group does not permit them. Reutter / ITIB Group is a globally acting company and its reputation matters.

Every employee and every partner of interest has the right and the duty to report violations of the law, this Code, or other Reutter / ITIB Group policies to Reutter / ITIB Group top management





13. Data protection

On a daily basis we receive and provide data from customers and suppliers as per GDPR (General Data Protection Regulation) EU 2016/679. We are also responsible for our employees personnel and even private information.

Our commitment is to treat and protect all data as required by GDPR (General Data Protection Regulation) EU 2016/679.

In case of any question contact our data security officer under datenschutz@reutter-group.com



14. Compliance Procedures

Reutter / ITIB Group works to ensure prompt and consistent action against violations of this Code. However, in some situations it is difficult to know if a violation has occurred. Since in this document it is not possible, to anticipate every situation that will arise, it is important that Reutter / ITIB Group has a way to approach a new question or problem. These are the steps to keep in mind:

Make sure you have all the facts.

In order to reach the right solutions, we must be as fully informed as possible.

Ask yourself:

What specifically am I being asked to do? Does it seem unethical or improper?

This will enable you to focus on the specific question you are faced with, and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.

Clarify your responsibility and role.

In most situations, there is shared responsibility. Are your colleagues informed? It may help to get others involved and discuss the problem.



14. Compliance Procedures (-continued)

Discuss the problem with top management.

This is the basic guidance for all situations. In many cases, top management will be more knowledgeable about the question, and will appreciate being brought into the decision-making process. Remember that it is your top managers responsibility to help solve problems.

Seek help from Company resources.

In the rare case where it may not be appropriate to discuss an issue with your top manager, or where you do not feel comfortable approaching your top manager with your question, discuss it with your Human Resources manager.

You may report ethical violations in confidence and without fear of retaliation.

If your situation requires that your identity be kept secret, your anonymity will be protected. JOST Automotive GmbH does not permit retaliation of any kind against employees for good faith reports of ethical violations.

Always ask first, act later:

If you are unsure of what to do in any situation, seek guidance before you act.

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