

Anti - Corruption Policy of VORWERK & SOHN GmbH & Co. KG Group – in detail

Vorwerk & Sohn GmbH & Co. KG

Vorwerk Autotec GmbH & Co. KG

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Content

Preface of the Chief Executive Officer.....	3
The goal of the Vorwerk & Sohn Group - a "Compliance Culture"	4
I. General	5
1. Target	5
2. Scope of Validity	5
3. Responsibility	5
II. Prohibition of bribery, corruptibility and corruption	5
1. Definition.....	5
2. Corruption endangered fields of action	6
2.1 Dealing with public officials.....	6
2.2. Dealing with business partners	6
2.3 Dealing with sales representatives and consultants	8
2.4 Procurement process	9
2.5 Donations and Sponsoring	9
3. Consequences for employees and company.....	9
III. Corruption Prevention.....	10
1. Responsibility and Control.....	10
2. Four-eyes principle.....	11
3. Behavior in case of suspected corruption	11
4. Raising Awareness and Training	11
5. Changes	12

Preface of the Chief Executive Officer

Bribery is a crime. Companies face harsh penalties and disciplinary measures are taken against executives and employees involved in violations. The Vorwerk & Sohn Group takes a clear stance on bribery and corruption. Offering, paying, approving, soliciting or accepting bribes are prohibited practices for the Vorwerk & Sohn Group.

The success of the Vorwerk & Sohn Group is based on the reputation of the company, which has built up over many years as an honest and reliable business partner. Many of our investments and business relationships outlast the work of individuals and governments and are even more enduring than many a political system. Transactions not according to applicable law would do far more harm than good to the long-term business goals of the Vorwerk & Sohn Group and the company's reputation.

Please read this policy carefully. If you are acting on behalf of the Vorwerk & Sohn Group, you should follow the principles and procedures set out in this document in all countries in their meaning and wording.

Dr. Jürgen Möller

The goal of the Vorwerk & Sohn Group - a "Compliance Culture"

This policy is intended to help you as an employee to contribute to the long-term goals of the Vorwerk & Sohn Group.

Its purpose, among others, is to ensure our employees and as necessary our business partners know and comply with the laws and regulations governing bribery and other forms of corruption.

In addition, we pursue an even more comprehensive and fundamental goal, the understanding and recognition of the corporate culture of the Vorwerk & Sohn Group. This means that our employees - regardless of the accuracy of legal interpretations in different countries - are always committed to the highest ethical standards. Our goal is not only to set a regulatory framework to ensure regulatory compliance, but also to create and maintain a corporate culture based on legal and ethical behavior for the Vorwerk & Sohn Group.

Individual responsibility

Our corporate philosophy includes entrusting individual employees of the Vorwerk & Sohn Group with the responsibility for establishing business relationships and developing business activities. However, this responsibility also means that your conduct will affect the Vorwerk & Sohn Group and its reputation, and that in all your activities for the Company, you must comply with the principles contained in this Policy.

Report concerns

If you have concerns, that a conduct or proposed course of action may be inadmissible and / or violate any laws or regulations that apply to bribery or other corruption, you must communicate these concerns to your superior or the management of the company.

No disadvantages

Employees are not to be feared of being inferior, penalized or otherwise subject to disciplinary action if they report a suspected violation of these policies or refuse to pay bribes, even if the Vorwerk & Sohn Group could avoid doing business because of the employee's refusal.

I. General

1. Target

This Anti-Corruption Policy aims to raise employee awareness of corruption risks while providing guidance and assistance in preventing and combating corruption, including in connection with the granting or accepting of invitations or gifts in business processes.

2. Scope of Validity

This policy applies to every business transaction, to all business partners, authorities and third parties as well as to all intra-group transactions. The rules and measures outlined in this Policy apply to both passive corruption (eg corruption) and active corruption (eg bribery).

Furthermore, the Directive applies to all bodies, employees, temporary workers and consultants regardless of the level of management or function in the company. In the following, all these persons are summarized under the name "Employees".

Within the meaning of this guideline, companies in the Vorwerk & Sohn Group are all companies in which the Vorwerk & Sohn Group directly or indirectly holds more than 50% of the shares or holds the entrepreneurial leadership.

The Vorwerk & Sohn Group will systematically prosecute and adequately punish violations of this policy.

3. Responsibility

Responsibility for compliance with this guideline is borne by the group management or the management of the respective Vorwerk & Sohn Group company / site.

II. Prohibition of bribery, corruptibility and corruption

1. Definition

Corruption in general means offering, promising or accepting incentives, perks, preferences or other benefits from the position of trust that are designed to influence fair, objective and proper business or regulatory decisions.

Corruption is not a trivial offense, but is a criminal offense. Criminal offenses associated with corrupt behavior can include fraud, infidelity, competition restrictive agreements in tenders or money laundering.

Not only the acceptance or granting of financial benefits, but also their offering or solicitation is illegal. Financial benefits consist of any form of direct or indirect payments. Other benefits may be tangible or intangible benefits, such as: Gifts, entertainment, entertainment, benefits, discounts, entertainment, loan, moratorium, or any item of financial value, including services, transportation, miscellaneous conveniences or meals (irrespective of whether these are in kind, through purchase of tickets, payment provided in advance or refund of the issue), rewards, off-market discounts or donations. Since corrupt

behavior is not always clearly and unequivocally identifiable in daily business life, all employees should be given an orientation framework and appropriate assistance in the following.

2. Corruption endangered fields of action

2.1 Dealing with public officials

Officers are civil servants, judges, persons in public service (ministers, notaries, etc.) or persons who perform public administrative tasks in a public authority (eg social insurance institutions).

Since laws are more stringent when dealing with public officials, donations should generally be avoided. However, in order to be able to rule out corrupt behavior in dealing with public officials in case of doubt, the following principles should be adhered to:

- Payments to office-holders may only be paid in the form of low-grade attentions, which are legally unobjectionable and customary and customary (eg, depending on the occasion, a customary giveaway or bouquet of flowers).
- In the case of invitations to public officials, care should be taken to ensure that this is standard hospitality for the occasion.
- For invitations to events, the officer should always be invited as a representative of his authority or in accordance with his or her mandate.

Most public institutions have their own laws and regulations governing the acceptance of benefits and invitations. Therefore, it is not uncommon that the acceptance of donations or invitations is denied.

If there are any doubts or questions regarding the handling of public officials, management should be contacted.

2.2. Dealing with business partners

For the purposes of this Guideline, business partners are understood to mean all persons or companies as well as their managers, employees or agents with whom the Vorwerk & Sohn Group maintains or will have business relations.

In business life, maintaining relationships with business partners, as well as cultivating contacts, is common practice. Gifts and gratuities are in every culture and social form to the usual social courtesies. However, gifts, entertainment, hospitality or gratuities of any kind can also be misused as a means of bribery.

Often the transition from benefits and favors to corruption is fluent.

The Vorwerk & Sohn Group rejects consistently corruption and other unfair business practices. This means that no employee of the Vorwerk & Sohn Group may offer, promise, demand or accept incentives, benefits, preferences or other benefits in connection with its business activities that aim to influence fair or objective and appropriate decisions or merely appearances of which awaken.

The following principles must be observed:

- Gratuities may not be a consideration and must comply with the principle of voluntariness.
- Donations may never be made in the form of cash or cash equivalents (discounts, vouchers, loans, etc.).
- Gratuities must be of normal commercial value and commensurate with the recipient's normal standard of living (for example, an invitation to a business meal on the occasion of a deal in a "reasonable" restaurant - "normal" deal ☐ "normal" restaurant; ☐ "upscale" restaurant).
- Donations and invitations may not be made in unusual regularity.
- Each donation is transparent and should not be in the nature of secrecy (for example, if I feel uncomfortable telling my supervisor of the gift or invitation).
- A representative of the inviting company should always be present for invitations to events.
- Gifts, gratuities or invitations may only be made or accepted if this does not affect any business decisions or if this impression could arise.
- Donations of any kind are neither to be accepted nor awarded immediately before business decisions
- In the case of hospitality, it must be ensured that these correspond to a business nature and do not exceed the social standard.

This means that in particular the following donations are prohibited:

- gifts of money at any value,
- other gifts, in particular non-cash benefits from suppliers or business partners for private use,
- loans,
- individual discounts on goods and services, but not general staff rebates, which are granted regardless of the function,
- advertising premiums
- free or discounted services,

- Incentive travel (eg short breaks at the expense of suppliers or other business partners, such as a sailing weekend),
- financing of business trips to suppliers or business partners by these suppliers or business partners,
- shopping vouchers

As a general rule, gifts, invitations, benefits or other benefits are permitted as long as they conform to the above principles, are socially accepted, of reasonable value and do not give the impression of compensation. This also includes services that serve the fulfillment of employment contract tasks, eg. B. business-related trade fair visits.

Every employee must review the principles beforehand before any benefits are granted or accepted. If there are any doubts or questions concerning the handling of benefits or benefits of any kind, the respective supervisor or the management must be contacted.

2.3 Dealing with sales representatives and consultants

Business cooperation with sales representatives or consultants is quite common in practice.

Fees for agents and consultants are often suspected of concealing a corrupt grant. It should be noted that the Vorwerk & Sohn Group is basically also responsible for the corrupt behavior of a consultant or sales representative.

To ensure that the interest of the Vorwerk & Sohn Group is maintained in the best possible way and that it does not even appear that the behavior is corrupt, the following principles must be observed by all employees:

- The value of remuneration for advisers, agents and intermediaries must be in adequate ratio with the value of the service provided and personal qualifications, as well as customary in the market.
- Remuneration to be used to influence business partners or third parties is unlawful and strictly prohibited.
- The use and selection of consultants, agents or intermediaries will be decided on the basis of a transparent procedure.
- Payments must not be made in cash.
- Representatives and consultants working on behalf of the Vorwerk & Sohn Group must strictly adhere to national laws.
- The length of service of consultants is limited and subject to regular review.

In summary, all of the above criteria should be observed by each employee when dealing with agents or consultants. In addition, every adviser or sales representative should be made aware of these principles of conduct of the Vorwerk & Sohn Group and orient their own behavior to the standards of the Vorwerk & Sohn Group in terms of ethics and integrity.

2.4 Procurement process

Contractors, suppliers and business partners must be commissioned through a fair, formal procedure.

Employees must ensure that all activities and transactions are duly authorized, properly recorded and executed in accordance with the Vorwerk & Sohn Group guidelines and applicable anticorruption laws.

Employees should make all procurement and award decisions based on the best value approach, taking into account the factors price, quality, performance, competence, compliance and suitability (including sustainability criteria).

Employees must pay particular attention to the risks associated with potential procurement and contractors. Should employees have concerns as to whether the involvement of a third party could violate the principles of this Anti-Corruption Policy, these concerns must be reported to the supervisor or management.

2.5 Donations and Sponsoring

Vorwerk & Sohn Group supports charitable projects to get involved in society and to give something positive to the society in which we operate. The commitment of the Vorwerk & Sohn Group in the form of donations in kind, donations or sponsoring activities serves education, science, culture, arts, social affairs, sports and other social activities. Donations are exclusively unselfishly. Demanding donations or sponsoring activities for a consideration is prohibited to the Vorwerk & Sohn Group.

All donation and sponsoring activities of the Vorwerk & Sohn Group are based on the principle of transparency, voluntariness and legal acceptability. Donations and sponsoring activities are decided solely by the management of the individual Group companies. After a positive decision, all money transfers and monetary benefits are documented. Payments are expressly made only cashless.

3. Consequences for employees and company

All employees are obliged to adhere to the Vorwerk & Sohn Group's anti-corruption policy. Each of us is expected to be familiar with the Code of Conduct, our corporate policies and guidelines, and that they apply to our day-to-day work. Especially in dubious situations, it is

particularly important for your own protection and for the protection of the company, that every decision as well as our actions are in accordance with law, legislation, rules of procedure, guidelines and our code of conduct.

This anti-corruption guideline is binding for all and sets out a framework for action that should protect all employees of the Vorwerk & Sohn Group from becoming involved in corruption. Legal violations can have serious legal consequences for the Vorwerk & Sohn Group (eg civil and criminal proceedings, heavy fines, loss of revenue and reputation) and also for the individual employee.

Since the laws have changed in recent years in this area and are extremely complex, unlawful behavior is not always clear and unequivocal to recognize. In addition, the prosecution of corrupt behavior has become increasingly intensified. For this reason, every employee of the Vorwerk & Sohn Group is urged to avoid already the impression of corruption and to comply with this directive conscientiously.

The Vorwerk & Sohn Group will systematically prosecute and adequately punish violations of this policy. In doing so, the HR department integrates the respective responsible works council (within the framework of legal and / or industrial constitutional regulations) into the proceedings.

III. Corruption Prevention

1. Responsibility and Control

Top management and managers of the Vorwerk & Sohn Group are exemplary in the implementation and adherence to this guideline. The managers are obliged to consistently and autonomously address corrupt behavior in their respective area. Leaders have a special role to play in this regard and they are responsible for ensuring that all employees in their area of responsibility are familiar with and strictly comply with this Directive and the Code of Conduct.

All employees of the Vorwerk & Sohn Group must correctly record and provide proof of travel, hospitality, invitations, gifts and other expenses or benefits spent or received on behalf of the Vorwerk & Sohn Group. The employees are obliged to send these records and evidence to the responsible accounting departments in a timely manner.

In addition to managers, all employees have a duty to point out serious deficiency, as well as faulty organizational structures or the suspicion of a legal offense. The notification should be made immediately to the respective manager or top management. No employee has to fear disadvantages by such notification, as this is treated confidentially at all times. The Vorwerk & Sohn Group attaches great importance to the protection of whistleblowers. Therefore, no behavior that is directed against the whistleblower is tolerated.

Raising awareness among all employees and the willingness to openly address the issue of corruption and to discuss the risks of corruption are an elementary component of corruption prevention.

2. Four-eyes principle

The Vorwerk & Sohn Group is characterized by fair and reliable contact with customers and business partners. To protect every employee and the Vorwerk & Sohn Group, business decisions, gratuities of all kinds, the establishment of business relationships as well as critical activities have to follow the principle of transparency and the double control principle.

Every action and decision must be made in a transparent, factual and objective manner. At the Vorwerk & Sohn Group, the four-eye principle must always be applied in all legally relevant business processes. The four-eyes principle takes place in mutual responsibility and represents a control for the own protection and for the protection of the colleagues dar. If the four-eyes-principle exceptionally not to be kept, then other corruption preventive measures must be taken, which are complete, clear and understandable must be documented.

Corrupt behavior destroys trust in colleagues and business partners and contradicts the Code of Conduct of the Vorwerk & Sohn Group. All principles of this policy serve as a support and assistance to maneuver successfully in daily business life. Nevertheless, if support is needed in dubious decision-making situations, there is always the possibility of addressing the respective supervisor or the management.

3. Behavior in case of suspected corruption

All employees are obliged to adhere to the Vorwerk & Sohn Group's anti-corruption policy. Especially in dubious situations, it is particularly important for your own and for the protection of the company, that every decision is made in accordance with law, law, rules of procedure, guidelines and our code of conduct.

All employees have an obligation to point out violations or suspicions of a violation of the law in connection with the "Code of Conduct" of this Anti-Corruption Policy. This should not create a culture of distrust. However, to protect the whole company, it is necessary to report serious violations in order to take necessary action.

4. Raising Awareness and Training

Each employee receives a copy of this Anti-Corruption Policy when entering the service and documents receipt by signing. Managers must ensure awareness through preventive measures and joint exchanges on potential weaknesses. Once a year, managers have to sensitize the respective employees and temporary employees to the anti-corruption guideline. This regular awareness must be documented.

5. Changes

date	version	changes
2021-01-01	2.0	<ul style="list-style-type: none">• location Vorwerk Autotec, Vorwerk Drivetec Serbien added