

# CODE OF CONDUCT



# Code of Conduct

## Power Service Solutions GmbH

### 1. INTRODUCTION

We are committed to conducting all business relationships with business partners, employees and the public in an ethical and professional manner. This goal can only be achieved if we comply with applicable laws in every country in which the company operates (including rules and regulations), company policies and, in particular, our Code of Conduct. Compliance with this code serves as protection against sanctions, helps to maintain the trust of our business partners and other stakeholders in our company and strengthens our corporate value and growth.

We therefore expect our employees and third parties, who work on our behalf, without exception to comply not only with company internal rules but also with all applicable laws, to avoid any conflict of interest, protect the company's assets and to take into consideration the customs, traditions and social values of all the countries and culture areas in which we do business.

Misconduct, including unauthorized alternative solutions or workarounds, is never in the interest of our company.

This Code of Conduct applies to all employees and members of the Management Board of Power Service Solutions GmbH (PSS), as well as to persons working in subsidiaries or on behalf of the company. Its rules help to properly and appropriately address ethical and legal issues that we encounter in our day-to-day business, strategic considerations and decision-making processes.

This code is not intended to be a complete list of all the laws or ethical principles with which employees are expected to comply. They are required to follow not only the letter but the spirit of its principles. From time to time additional or revised guidelines may be issued which are applicable to the company as a whole or to selected groups of employees.

Our employees are encouraged to discuss questions related to the Code of Conduct or company policies with their supervisor and / or consult the Compliance Office. The same applies with regard to the question of whether conduct is in line with the Code of Conduct, company policies or applicable laws (including rules and regulations).

Our employees are obliged to participate in Compliance trainings of the company

## **2. DIVISION AND DEPARTMENT HEADS (MANAGER)**

Division and Department Heads (Managers) are obliged to regularly participate in trainings on ethical behavior and the prevention of corruption and to set a good example in the area of Compliance.

Reports of suspected violations of the Code of Conduct or company policies must be followed up immediately and carefully evaluated; the Compliance Office coordinates all internal measures and investigations in consultation with Management Board.

Questions from employees about the Code of Conduct or company policies must be answered with care.

## **3. RISK ASSESSMENT**

Managers are obliged, particularly within their area of responsibility, to carry out regular risk assessments with regard to Compliance risks, to document them and to report the results to the Compliance Office, so that any necessary measures can be taken.

When working for / with a new business partner (customers, suppliers, consortium partners, joint venture partners, consultants and other third parties, etc.), in a new market or at a new location, Compliance risks must always be assessed in advance. The Compliance Office should be contacted and involved in the risk assessment in accordance with internal specifications and policies (e.g. Policy Business Partner Check).

## **4. REPORTING A BRIBERY ATTEMPT**

Any form of bribery or corruption is strictly prohibited, both in Germany and abroad. This also expressly applies to so-called facilitation payments to public officials / authorities and constitutes a gross breach of duty. If you have any questions, please consult the *Anti-Corruption* Guideline and / or contact the Compliance Office.

If an employee is asked for a bribe or facilitation payment, is offered a bribe or receives a suspicious request, the Compliance Office must be informed immediately. It will investigate the incident and decide on the necessary measures. If the Compliance Office does not deal with the matter promptly, Management Board should be informed.

## **5. DEALING WITH PUBLIC OFFICIALS, CIVIL SERVANTS AND POLITICAL PARTIES**

We strongly advise against giving gifts, hospitality, entertainment and reimbursement of expenses to public officials and government employees, as well as employees of publicly owned companies. Our employees should refrain from doing so until approval has been obtained from the Compliance Office. Respective pre-approvals can be requested using the "*Entertainment, Hospitality and Gift Authorization Form*" (appendix to the Anti-Corruption Guideline).

The company does not directly or indirectly support political campaigns, parties, political foundations or associations, that raise funds for political campaigns, foundations or parties. Nor does it make any donations or contributions to parties, political foundations or associations. The company's resources (including working time) must not be used for political campaigns or parties.

## **6. BUSINESS PARTNERS – CUSTOMERS, SUPPLIERS, SERVICE PROVIDERS AND THIRD PARTIES**

Dealing with (potential) business partners (customers, suppliers, consortium partners, joint venture partners, consultants and other third parties, etc.) requires a carefully documented assessment of whether they can be classified as qualified and reputable. The supplier or service provider must also comply with our values in ethical terms.

Business relationships with customers, suppliers and third parties must always be based on a written contract. Our *Supplier Code of Conduct* defines the requirements for our suppliers and service providers with regard to the relevant social and environmental aspects, such as human rights, working conditions, environmental protection and business integrity - also along their own supply chains. The supplier's or service provider's agreement to our *Supplier Code of Conduct* and alignment with the principles of the *United Nations Global Compact* is a binding prerequisite for our business relationships and compliance with it must be checked regularly.

Before commissioning a supplier or service provider, establishing a joint venture or consortium or awarding / accepting contracts, the required internal specifications and policies must be observed, in cooperation with the Compliance Office. Required audit procedures must be documented.

## **7. GIFTS, HOSPITALITY AND ENTERTAINMENT**

Gifts, hospitality and entertainment to third parties exceeding EUR 50 per participant require the prior approval of the applicant's superior and the Compliance Office. This does not apply to gifts, hospitality and entertainment to representatives and employees of PSS Group companies. Respective approvals can be requested using the "*Entertainment, Hospitality and Gift Authorization Form*" (appendix to the Anti-Corruption Guideline).

## **8. DONATIONS AND SPONSORING**

The company can make donations to charitable organizations.

It can also provide financial or technical support as a sponsor in the following areas: social, environmental, education, science, health, sports, art and culture.

It should be noted that sponsoring:

- must be transparent, i.e. the recipient and the exact purpose of use must be known and the use of the funds must be monitored;
- does not flow to political parties, foundations or associations;
- does not flow to any organization or institution that does not pursue a generally recognized and accepted goal;
- does not flow to a private individual.

Donations and sponsoring services can be requested from the Compliance Office and require approval from the Management Board or in accordance with the applicable *authorization matrix*.

## **9. FAIR COMPETITION**

The company is in favor of fair competition. This promotes innovation and high product quality for the benefit of business partners and consumers.

In many countries, the mutual exchange and even the unilateral transmission or receipt of competition-relevant information between competitors, whether directly or indirectly, is prohibited. Meetings and cooperation with competitors are only possible if there is a justifiable business reason that is not itself anti-competitive. These principles also apply to memberships within associations.

All employees are obliged to adhere strictly to anti-trust and competition law and the corresponding internal guidelines. For example, approvals for contacts with competitors must be applied for and documented using the form *“Request for Approval for Contact or Other Interaction with a Competitor”* (annex to the Anti-Trust Policy).

## **10. DEALING WITH FELLOW EMPLOYEES**

The company maintains a working environment that provides appropriate remuneration, as well as training and opportunities for personal development.

PSS shall create a favorable employee relations environment supported by Human Resources Department, in which the involvement of all employees is encouraged.

The company will not tolerate discrimination, bullying or harassment. It is committed to equal opportunities and equal treatment at work and acts in compliance with the local applicable legislation.

PSS is also committed to provide a safe and healthy working environment and to ensure insofar as is reasonable, the health, safety and welfare of all employees. It has health & safety regulations in place, which all employees are expected to comply with.

A *Whistleblowing Policy* that is designed to encourage the reporting of non-compliance whilst protecting the reporting individual is in place.

## **11. SOCIAL COMMITMENT**

The company appreciates the private involvement of employees in associations, political parties and other social, political or cultural institutions if these pursue generally recognized and legally permissible objectives and if the involvement does not jeopardize the obligations set out in the employment contract. Under no circumstances may such involvement be detrimental to the company's reputation. Employees must not refer to PSS or their position in the company when expressing their opinions publicly.

## **12. PROTECTION OF ASSETS & INTELLECTUAL PROPERTY**

All employees are jointly responsible for the protection of PSS's tangible and intangible assets. Tangible assets include all objects like buildings, property, products, vehicles, IT equipment, inventories, records and documents. Intangible assets include know-how, industrial property rights, technologies, business secrets and other pieces of information which are valuable and important to the company and must therefore be protected.

PSS employees are required to comply with laws, rules and regulations in Germany and in every country in which the company operates, protecting intellectual property.

All employees are obliged to maintain silence about internal affairs of the company unless the competent bodies have expressly released them for the public.

### **13. INFORMATION SECURITY**

It is the duty of every employee to protect business secrets and information (both from the company and from business partners) from access by unauthorized third parties and to also treat this information confidentially within the company ("need-to-know" principle). This must be done within the frameworks of the *IT Security Policy* and *our Information Management Guidelines*.

Technical risks from file attachments in emails include encryption trojans or the installation of malware on employee computers. In addition, there are attempts of fraud through forged invoices or fictitious approvals for internal payment transactions. All employees must therefore counteract these risks by handling the content and file attachments in emails with great care.

### **14. SOCIAL MEDIA**

When using social media privately, our employees are required not to appear on behalf of the company, not to make any untrue statements about their activities, not to make any objectively incomprehensible assessments of company matters and not to use any IT equipment of the company for this purpose. Further information is available in the *Social Media Policy* and on the intranet.

### **15. INSIDER INFORMATION AND CONFLICTS OF INTEREST**

Employees are not permitted to take personal advantage for themselves or others by using internal company knowledge. The same applies to the unauthorized disclosure of such insider knowledge.

The interests of our company always take precedence over private interests. (Potential) conflicts of interest must be reported immediately to the Compliance Office / Human Resources Department using the appropriate "*Conflict of Interest Declaration Form*".

### **16. COMMUNICATION**

PSS is committed to provide open and honest communication with its employees and with the public, including its customers, suppliers and other business partners.

### **17. OCCUPATIONAL HEALTH AND SAFETY (OHS) AND ENVIRONMENTAL PROTECTION**

Safety in the workplace and healthy working conditions, both in the office and on construction sites, are a top priority for PSS. All employees are obliged to adhere strictly to applicable laws and internal regulations, as well as to take part in appropriate inductions and trainings.

They are also required to protect and conserve the environment and to minimize their impact on it. This also includes the economical use of resources.

## 18. CORPORATE RESPONSIBILITY

PSS takes corporate and social responsibility, as well as sustainability seriously and is committed to contribute to the total and economic wellbeing of the society and those communities in which it operates. The company encourages its employees to participate in corporate responsibility and community projects and initiatives.

## 19. REPORTING

The company supports its employees who report violations of external (legal) regulations, the Code of Conduct or company policies in good faith, even if the report turns out to be unfounded. Reports can be made through various channels, such as directly to the Compliance Office, and also anonymously. The company will not tolerate any retaliation against employees who reported a violation in good faith. Further information is available in the *Whistleblowing Policy*, on the intranet and on our website.

## 20. SANCTIONS AND QUESTIONS

Violations of the Code of Conduct will result in disciplinary action up to and including dismissal. In addition, violation of an underlying (criminal) law (such as bribery) may result in (criminal) conviction, fines, imprisonment and severe damage to PSS's ability to do business. For questions related to this Code of Conduct or regarding the company's policies and procedures, employees and third parties should contact the Compliance Office.

### **Impressum:**

Power Service Solutions GmbH  
Schifferstraße 80  
47059 Duisburg  
Germany

Compliance  
Tel.: +49 203 8038 1492  
Fax: +49 203 8038 611492  
E-Mail: [compliance\\_PSS@power-service.com](mailto:compliance_PSS@power-service.com)

June 2025