



# **Excellence in Safety and Environment**

*Doing the right thing*

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# Foreword by the Management Board

*“A binding Code of Conduct for us all”*

*We can be proud  
of our reputation.  
It is our joint  
responsibility to  
do justice to it.*

Dr. Michael Davies – CEO and Dr. Philip Bosse – CTO



*Dear Colleagues,*

Since 1954 we have stood for safety, environmental protection, reliability and progress. Since 1954 we have been setting standards and delivering for our clients.



***Anyone who knows us knows that we do not rest on our laurels. Successes are just the beginning for us, so that we can continually improve our services and processes.***

It is our commitment to excellence that drives us forward every day and allows us to grow. We have long since become one of the best providers in the world.

We have gained a reputation over the decades that we can be proud of. It is also this positive reputation that we have a special obligation to live up to.

We have therefore developed a guideline in the form of this code of conduct in order to help us to act responsibly and ethically at all times – both internally and externally.

The code of conduct supports workable co-operation and creates the basis for longterm, responsible growth. It is part of our DNA. Whatever position we may hold in the company, it is a binding code of conduct for us all.

We therefore ask you to study our values and standards closely and to bring them to life in your daily work. Make these values the basis of all your decisions and actions. If each one of us is a role model to his or her colleagues in adhering to the code of conduct, then this will create further values: even greater identification with our company, strong customer loyalty and a positive public perception.

Let us together choose a path into the future where safety, reliability, progress and social as well as ecological responsibility are an integral part of our success.

Please contact the CSR-Team at [CSR@protego.com](mailto:CSR@protego.com) should you have any questions in this regard.

Dr. Michael Davies – CEO

Dr. Philip Bosse – CTO

# The Code of Conduct provides Security and Orientation

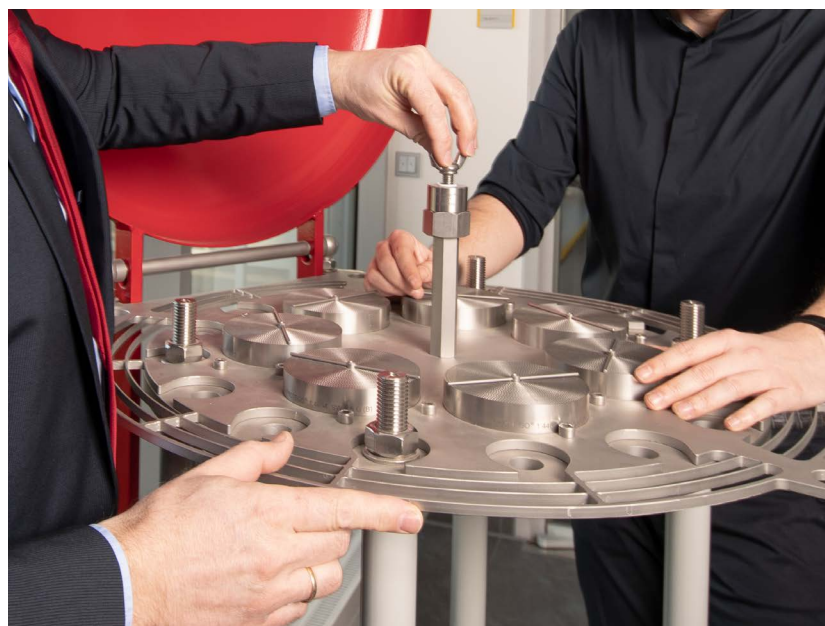
*Progress, safety and reliability form the foundation of our work. Worldwide, we take social and environmental concerns into account within the framework of applicable laws and our internal guidelines.*

We would like work to be meaningful and for our employees to feel connected to what they do. This is the only way we can generate products, services and processes that meet our high standards.

Our values have a special role to play in this. They set the direction. They determine how we interact with one another, our customers and our suppliers. They influence our research and the products that we develop.

The code of conduct provides a framework for our values and defines our guidelines. This binding framework gives us security and helps us to make the right decisions and achieve our goals more quickly. The guideline provides orientation for all the employees of the PROTEGO® Group. It ensures that we are perceived universally as what we are: a company that lives out safety, reliability and progress and that takes national and international social and environmental standards into account.

SECURITY AND ORIENTATION





# Guidelines for us and for our Actions

*Continuity and customer orientation, identification and growth are very important to us. We create an atmosphere that harmonises corporate success, people and the environment so that everyone can make their own contribution. The guidelines help us to achieve this.*

These guidelines are the guiding principles of our self-perception and our actions. They determine both cooperation within the company and the way we present ourselves to others. The guidelines are binding for all employees within the PROTEGO® Group.





## ***Company***

- We are a medium-sized, independent family company and wish to remain so.
- We guarantee continuity in the development of the company, which is expressed in our particular dedication to our headquarters and production facility in Braunschweig.
- We generate sufficient earnings and appropriate returns.
- We use our financial resources efficiently.
- This allows us to secure financial independence and the expansion of the company.
- We operate globally as a company and continue to expand our facilities.
- We concentrate on the essentials and set priorities.



## ***Customers***

- We are a customer-oriented company because they customers dictate our success.
- We meet their expectations and contribute to solving their problems.
- We differentiate ourselves from our competitors and offer additional value from our expertise.
- We strive to continue being the preferred partner to satisfied customers in the future.



## ***Environment***

- We maintain fair conduct and reliability in all our business relationships.
- We conduct our business to have minimal impact on the environment.
- We are committed to civil issues beyond applicable legal requirements.
- We follow a code of conduct that aligns all our actions, without exception, with a legal and ethical framework in accordance with local laws and guidelines.



## Employees

- We have a mutual duty of care towards all employees.
- We are aware that our team makes a substantial contribution to the success of the company.
- We have motivated staff that identifies with the company and that is committed to its goals.
- We work in an innovative environment and promote qualification and further education.
- We communicate information promptly and openly, forming the basis for trust and motivation.
- We cultivate teamwork and a situational management style and display mutual respect.
- We work with clear, agreed upon, realistic goals and with ongoing monitoring of success.
- We demand and promote personal initiative and responsible, goal-oriented and entrepreneurial action.
- We are proud of our company and identify with it completely.



## Goals

*We determine our company goals on the basis of the guidelines and every member of the PROTEGO® Group is actively involved in their implementation.*

- We set ourselves new revenue targets every five years for solid and profitable growth and work persistently to realise them.
- An appropriate return on assets must be considered when assessing strategic objectives and operational measures.
- Our goal is to maintain technological leadership in the markets we serve.
- We want to provide our customers the highest level of service through our subsidiaries or qualified partners in all the important markets around the world.
- Targeted measures in personnel development are allowing us to train employees with special skills in all areas of operation.
- Excellence dictates our actions in the PROTEGO® team.





*A high in-house production depth and the safeguarding of our distinct quality requirements are the guarantee for the safety of PROTEGO® fittings.*

DIRK ZIRBES,  
HEAD OF PRODUCTION

# Management are Role Models for us all

*Respect and trust form the basis for good management.*

This is why our managers are mentors for their colleagues. They focus on our company goals in everything they do. They never lose sight of the needs of the individual in doing so.

Our employees are one of the decisive factors for our success in our company. Every individual uses their skills for the good of the company while continually developing them.

Management plays a special role in this process. They maintain a situational management style and help employees to understand the company goals and strategies. They embrace the importance of the commitment of all employees to achievement of corporate success.

In a two-way, dynamic process, we jointly create a positive and motivating environment whereby employees can achieve agreed goals using their own initiative and with their own sense of achievement. Our interactions with one another are characterised by mutual respect, open information and communication.

These management guidelines were derived from the PROTEGO® guidelines, which aim to provide all managers a framework for their conduct and provide employees with a road map to a culture of trust.

”  
*We have a mutual duty of care towards all employees.*

We take our duty of care seriously, especially in that we challenge and promote our employees in accordance with their personal opportunities. We continually ensure the health of our team by implementing measures for the prevention of accidents and by designing workplaces to be as low-strain and ergonomic as possible.

”  
*We are aware that our employees make a substantial contribution to the success of the company.*

The success of our company is the sum of the successes of all our employees. We acknowledge their contributions and ensure that overall success is made transparent for all and that each individual is informed how their contribution and commitment have made a difference to our company. Remuneration is performance-based.

” *We have motivated staff who identifies with the company and that is committed to its goals.*

Management's task is to motivate the employees to fulfil its tasks. We create optimum working conditions to this end, ensuring a trusting working climate and explaining our strategy and company goals. We help our employees to achieve their personal development goals and give appropriate feedback.

Strengthening the image of the company in the region, improves the reputation of our employees.

” *We work in an innovative environment and promote qualification and further education.*

We train our employees based on with current and future requirements, strengthening their know-how and developing their potential. We promote the internal exchange of information so that knowledge is increased, including our own. We explicitly invite our colleagues to suggest improvements and always examining their ideas objectively and constructively.

” *We are open and honest with each another and share our knowledge.*

We pass along information that is relevant to the achievement of goals to the corresponding employees in a timely fashion. This communication includes background and context. Employees are obliged to obtain all necessary information.



We will share information freely amongst all departments.

We give prompt and factually oriented feedback. Positive work results are acknowledged. Less positive results are discussed together with the employees. We avoid negative statements in front of third parties.

We encourage feedback on our management conduct and deal with it constructively.

We clarify differences of opinion in a factually oriented manner, maintaining personal respect for one another. We are open about conflicts and look for a fair solution while acknowledging the arguments and opinions of all involved. Further persons may be consulted in the resolution of conflicts in order to ensure neutral consideration of interests. Conflicts are always viewed as a potential for learning and are addressed constructively.

We involve our employees in decisions for the most part. We draw on their knowledge, experience and expertise and ask for and take into account their opinions. We justify our decisions based on factual reasons.

We achieve our goals together where possible and we work together with clear responsibilities. We put project teams together based on skills and potential. We pursue the handling of topics in a complex and dynamic environment with agile teams with a high degree of creativity and decision-making autonomy.

Conflicts can occur when employees or departments work together. Unresolved conflicts affect the operating climate and represent an unnecessary waste of resources. That is why the perception, analysis and resolution of conflicts is one of the particular tasks of managers.

We expect constructive criticism from our employees.

*We cultivate teamwork and a situational management style.*

*We set our goals and measure ourselves against them.*

Goals derived from the company's goals are agreed with the employees in regular staff appraisals. The managers are responsible for the provision and optimal use of resources. The colleagues are responsible for the manner in which the goals are achieved. We expect initiative and commitment in this process. The milestones that have been achieved are discussed in interim meetings.

We focus on our tasks and prioritise them. We pass tasks and responsibility to employees as appropriate, giving them the information they need.

The creativity of our employees is the innovative potential of our company. Knowing this, we promote independent assumption of responsibility and create incentives for suggestions for improvement with regard to processes, products, the organisation, the environment and contributions to quality development.

We measure ourselves through our compliance with these management guidelines. Adhering to them makes us responsible role model for all other managers and colleagues.

*We demand and promote personal initiative and responsible goal-oriented and entrepreneurial action.*





# The Employees are Representatives of our Company

*Our employees and their commitment are the face of our company. We accept this responsibility every day and stand up confidently for our joint values.*



## Competence Management

We promote the competence and development of each individual. Annual staff appraisals between superiors and employees form the basis for this. In these meetings we define measures for further education and qualifications, promote the mutual understanding of professional challenges and make the development steps visible.

Through our company suggestion program, we encourage and demand active participation in shaping our company.

Effective and efficient suggestions are awarded prizes.







*What makes us successful  
is many years of experience,  
technical and practical  
know-how and a focus on  
scientific development.*

STEFAN MARZOK,  
RESEARCH AND DEVELOPMENT

# Excellence in Safety and Environment

*Safety for people, the environment, and businesses is a central goal of our actions. Each of us contributes to meeting this commitment. We invest in research and development in order to meet this responsibility. Our very good solutions are the result of our motivation to get even better and to consistently measure ourselves against new quality goals.*

Our ever increasing know-how and high safety standards make us a valuable partner for pioneering developments and solutions. PROTEGO® stands for excellence and is a global synonym for quality. We are committed to helping shape our markets with safe, reliable, and forward-looking solutions.

SAFETY AND ENVIRONMENT





*QHSE is a mindset,  
not a department!*

NICLAS SCHLÜTER,  
HEAD OF  
QUALITY ASSURANCE AND HSE



## ***Occupational Safety, Health and the Environment***

Occupational safety and health protection as well as environmental protection and sustainability determine our actions. It is our goal to minimise risk in order to not harm people or the environment, nationally or internationally.

We comply with laws, regulations and guidelines regarding occupational safety and we ensure that all legal requirements are fulfilled in the long term. We also have processes to ensure the safety of our employees in the workplace. Regular safety checks of work procedures, the maintenance of machines as well as systems and technical safety measures ensure the minimisation of health and safety risks at the workplace and avoids accidents and occupational illnesses.



## ***Safety Awareness***

Everyone is required to comply with safety regulations and to be actively involved in the improvement of working conditions. In this way we increase awareness of health protection and occupational safety, promote safe conduct and prevent occupational illnesses. We ensure a safe working environment using regular safety minutes. Our compliance and monitoring committee convenes four times a year (environment/labour committee meeting). The contact person for questions related to work safety and health protection is our HSE Manager. Employees who have been ill for longer periods are supported by an assimilation process and are reintegrated into the operational procedures.

[PROTEGO.COM/QUALITY-AND-HSE](https://protego.com/quality-and-hse)





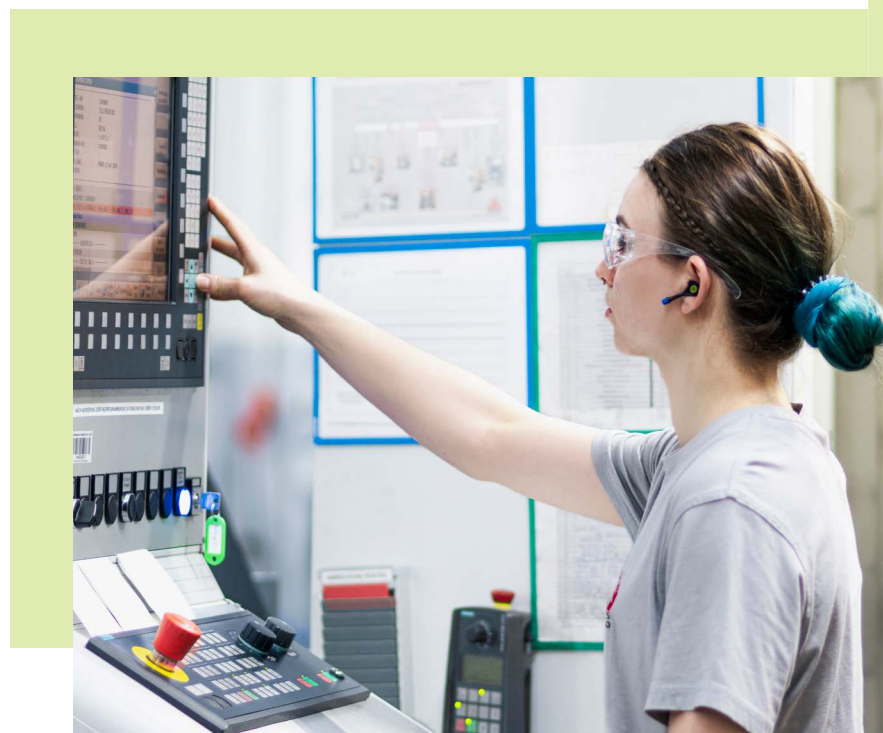
## ***Lower Energy Consumption, Emissions, Waste***

For the benefit of present and future generations, we regard environmental protection and the responsible use of resources as key corporate responsibilities. We are committed to identifying, complying with, and monitoring all applicable environmental regulations. Environmentally conscious action is part of our corporate strategy and vision. Environmental goals and sustainability are therefore an integral component of the overarching planning premises.

We strive to sustainably reduce raw material and energy consumption, as well as emissions, waste water, waste and hazardous substances through clear targets and improvement strategies within the scope of what is economically and technically feasible. The business sector we are in gives us direct influence on environmental protection. We work continuously on the development of sustainable solutions and products for our customers.

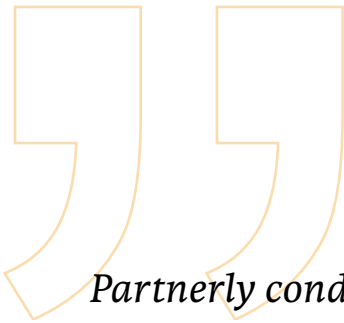
We demand and promote environmentally conscious action across our company. Our employees use resources responsibly and carefully and make a substantial contribution to the improvement of environmental performance.

[PROTEGO.COM/SUSTAINABILITY](https://protego.com/sustainability)





# We stand for Respect and Tolerance



*Partnerly conduct is an important element in our corporate culture. We treat our colleagues with respect and tolerance. Bullying and discrimination is not tolerated. Diversity is a strength, because it gives rise to new ideas and opportunities. That is why we promote a work environment in which we treat each other fairly and with respect.*





## ***Human Rights***

We support the observance of internationally recognised human rights, in particular the following in accordance with the Universal Declaration of Human Rights (UN Resolution 217 A (III) of 1948):

Protection of privacy: we protect our employees' privacy.

Health protection: we promote and ensure a working environment that is safe and promotes health in order to avoid accidents and injuries.

Protection from harassment: We protect our employees from physical punishment and from physical, sexual, psychological and verbal harassment and abuse.

Protection of freedom of opinion: we protect and grant the right to freedom of opinion and expression.



## ***Employee Rights***

We respect the right of employees to freedom of association, assembly and collective bargaining insofar as this is legally permissible and possible in the relevant country.



## ***Against Child and Forced Labour***

We reject every form of child and forced labour in our Group and supply chain. The definition of child and forced labour is based on the core labour standards ILO 29, 105, 138 and 182 as well as the basic principles of the Global Compact of the United Nations (UNGC). The relevant national laws and provisions of each country apply.



## ***Against Bullying and Harassment***

We will not tolerate actions and conduct of a humiliating, intimidating or hostile nature. Interactions are characterised by esteem and respect. We shall express criticism in an appropriate and respectful manner. Inappropriate behaviour can be discussed with our HR Manager, Workers' Council, Management or other trustworthy persons at any time.



## ***For equal Opportunities and Integration***

The equal treatment of all employees is an essential principle of our corporate policy. We respect cultural differences and encourage to inclusion of different ideas and competences in our company. We will not tolerate any disadvantaging or discrimination on the grounds of age, ethnic background, skin colour, sex, sexual orientation, gender identity, marital status, national origin, religion or disability. These principles are applied in all HR decisions such as appointment, promotion, disciplinary measures and termination. Here too, we are guided by the ILO core labour standards (111).



## ***Working Hours, Remuneration & Fringe Benefits***

We undertake to adhere to the applicable legal working hour provisions around the world and to pay appropriate remuneration. Employees are clearly, thoroughly, and regularly informed about the composition of their remuneration. Unlawful wage deductions as a disciplinary measure are not permitted. The (collectively agreed) pay and remuneration regulations applicable in the respective country must be adhered to. Here too, we are guided by the ILO core labour standards (100).





*I like my apprenticeship at PROTEGO® because we are a great team of apprentices and we are like a family. I have been integrated completely into the production team since the start.*

AYLIN ÖZCELIK,

APPRENTICE INDUSTRIAL MECHANIC



# We know and observe the Laws and Regulations

*We comply with national and international laws, our internal rules and this code of conduct. Each of us is required to be familiar with these regulations and to make decisions on this basis.*







## ***Patent and Trademark Protection***

We are committed to protecting and safeguarding our patent and trademark rights. We protect and respect the intellectual property of others. The inventions and new developments of our employees are protected and recognised.



## ***Data Protection***

We are committed to upholding the relevant valid legal and data protection requirements and regulations (including the EU General Data Protection Regulation 95/46/EC). These include the protection of natural persons in the processing of personal data and the free circulation of such data.

The guidelines are monitored by an external data protection officer. Our employees receive regular training and instruction on compliance. Each of us is obliged to protect the confidential, personal, secret company data entrusted to him or her from improper use and to protect business and trade secrets.

The personal data of our employees is also kept confidential.



## ***Gifts and Hospitality***

Gifts, hospitality and events for information, representation or entertainment purposes can be a legitimate means of developing and supporting business connections. However they may not serve to obtain unfair commercial advantage nor be carried out to the extent or in a way that may put in doubt the professional independence or judgement of the participants.

The giving or receiving of a gift or an invitation must also be in line with internal company regulations and the valid local laws. Certain situations demand the prior authorisation of a superior or another person authorised by the superior in order to protect the individual and the company.

As a matter of principle, we do not grant any cash payments to persons outside the company nor benefits to any public officials.

Payments to our company or to our employees may not be causally connected with a business transaction nor exceed the legally prescribed value. Gifts of a higher value that are offered must be declined and the management informed. Accepting cash is strictly prohibited.



## ***Prevention of Corruption, Money Laundering and the Financing of Terror***

We comply with anti-bribery laws and laws to combat corruption.

We do not make or receive any payments to or from business partners whom we do not know nor do we support any money laundering.

New business partners are evaluated using official documents (e.g. extract from the commercial register, certificate of establishment, Creditreform).

Our correct accounting ensures that payments are reported accurately and transparently and that funds within the company are not used for illegal purposes.

Management must be involved in any cases of doubt.



## ***Fair Competition***

We are committed to fair and open competition and do not enter into collusion that distorts or limits competition.



## ***International Trade, Import and Export Controls***

We are committed to determining and monitoring all the relevant regulations on import and export controls that affect our company such as, e.g. checking anti-terror lists and upholding bans, embargoes, sanctions and trade controls. We have an export control officer and a safety officer for air freight for the compliance with and monitoring of these regulations.



## ***Cybersecurity***

We are committed to adequately protecting digital systems, connected products, and digital services against attacks from cyberspace and to complying with all cybersecurity regulations applicable to us.



## ***Artificial Intelligence (AI)***

We are committed to the responsible use of AI systems, in compliance with applicable laws, regulatory requirements, and our corporate values.



*Our code of conduct serves to strengthen our supply chain and contributes to increased safety and transparency. This supports our company's long-term success.*

LARS-OLIVER PIONTEK,  
PURCHASING



## ***Conflicts of Interest***

We do not want conflicts of interest to impede the success of our company if uneconomic decisions are made, customers get upset or sensitive, confidential information is disclosed.

This can mainly occur when private interests of the individual conflict with the economic interests of the company. We separate private and business interests.

We have guidelines (e.g. the dual control principle) in place so that operational decisions are made by more than one person. This reduces the risk of company actions being influenced too greatly by the secondary interests of an individual.

The granting of contracts to relatives, life partners or other persons close to employees must be authorised in advance by a superior and/or the compliance unit. This also applies to business with companies in which relatives have direct or indirect interests.

We educate our employees by pointing out the possible negative consequences of disregarding conflicts of interest. Everyone is called upon to question his or her own actions and to speak openly about possible conflicts of interest.



## ***Political Activities***

We respect the right of our employees to carry out political activities in their free time as long as the relevant activities do not take place on our premises.

Employees may not use our name in a way that implies that we support any political position. They may not use their position at the company for political purposes. We do not make political donations.



## ***Sustainability in Purchasing***

We pursue the common goal of shaping social, environmental and ethical standards with our partners through sustainability in our supply chain. In doing so we focus on their products and services. We deal responsibly with our suppliers and rely on our suppliers also being responsible. We offer our support where necessary so that our partners can take this responsibility. Together with our suppliers we contribute to our cooperation becoming trusting and long term partnerships.

[PROTEGO.COM/SUSTAINABILITY](https://protego.com/sustainability)



## ***Code of Conduct for Suppliers***

Our code of conduct for suppliers is based on the principles of the Global Compact of the United Nations, the ILO core labour standards and our human rights position. In order to meet our sustainability requirements it is important that our suppliers comply with this self-obligation or have their own standard that reflects our approach. They must provide corresponding methods in their companies in order to integrate sustainable principles into their guidelines and procedures. Whenever we identify deviations from the principles in our supplier code, we push to correct them.

Within the framework of our human rights requirements for purchasing, we emphasise on the prevention of child labour and modern slavery. Our suppliers must know and comply with all applicable international, national and local laws and regulations, contractual agreements and internationally recognised standards. They must also align their practices with the generally recognised sector standards, all applicable authorisations, certificates, licences and permits, keeping them up to date and adapting

their activities at all times in accordance with the limitations and requirements in the authorisations is mandatory.

With our code of conduct for suppliers we aim to create awareness of sustainable actions in all our partners. It is applied in the selection and approval of suppliers. In order to achieve this we are developing a system for the evaluation of sustainability performance in order to audit suppliers and document the results. Discrepancies can be analysed exactly together with our partners and then resolved in order to promote the further development of social, ethical and environmental standards.





# We treat our Company Assets with Care

*We are all responsible for the protection of our assets and for handling them with care.*



## ***Company Property***

The assets of our company include material and immaterial goods, including fittings, buildings, equipment, IT systems and information. Our company property must be protected from loss, damage and theft. It is intended solely for use for business purposes. We encrypt sensitive data and confidential information.

We are vigilant against cyber attacks and have implemented appropriate measures.



## ***Accounting Compliance***

We advocate a scheduled, chronological and seamless recording of all business transactions. Our accounting entries form the basis for the annual financial statements for external addressees such as creditors, shareholders and tax authorities. The annual report provides a true and fair view of the assets, liabilities, financial position and profit or loss of the corporation. It is audited and published by an independent auditor after it has been prepared in accordance with statutory requirements.

We use our control systems to ensure that all data and the corresponding documentation complies with legal regulations. Financial accounting provides information for profitability control as well as creditor protection and serves as a basis for tax collection. All records also form the basis for internal accounting (financial controlling), providing a basis for transparency and company controls.

# Compliance with the Code of Conduct is our shared Task

*Our code of conduct applies to all employees. We are all called upon to act in accordance with it. It is also our responsibility to ensure that violations are recognised in a timely manner.*



## **Violations against the Code of Conduct**

*How can I report violations against the code of conduct?*

Every colleague can inform his or her superior, the workers' council or their CSR Manager about incorrect conduct or malpractices. Reports can be submitted in German or English.

If there are concrete indications, our compliance unit will look into the matter and - if necessary - initiate countermeasures. The compliance unit is comprised of our CSR Manager, Data Protection Officer, HR Manager, Workers' Council and Managing Director.

*Will my report be treated confidentially?*

All reports will be treated confidentially. If the identity of the person who made the report is known, then it will be kept secret. The person who reported the violation will be informed about the progress of the complaint.

*What if I violate the code of conduct unintentionally?*

Everybody makes mistakes. Admitting errors helps us to learn from them and to constantly improve. We promote and require open communication in order to work together to prevent harm to our employees and our company. We will not disadvantage anybody who openly speaks about mistakes and inappropriate conduct. We will treat employees who are accused of inappropriate conduct fairly.

*What kind of violations do I need to report?*

We encourage all of our employees, including those in our PROTEGO® Group, to use our confidential reporting system to report illegal conditions or impending damage. No one has to worry about sanctions of any kind.

If violations are recognised early, then damage for employees, customers, business partners and the company can be averted.

It must be noted that it is a criminal offence in many countries to knowingly disseminate false information. We will not sanction reports that are submitted in good faith.

*Can I also report violations against the rules anonymously?*

Our confidential reporting system allows the anonymous reporting of violations of the code of conduct. We are aware that these contact points should be used especially in cases of serious misconduct or violations with a high risk for the PROTEGO® Group. If you have this type of information you can contact us at:



E-MAIL:  
WeWantToKnow@protego.com



POST:  
Braunschweiger Flammenfilter GmbH,  
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