

Code of Conduct – Zoerkler Gears GmbH & Co KG

Preamble

Zoerkler Gears GmbH & Co KG is committed to responsible, lawful, and ethical conduct across all areas of business. As part of the internationally operating Xtrac Group, we adhere to the highest standards of integrity, sustainability, human rights, and compliance. This Code of Conduct serves as a binding framework for all employees, managers, and business partners.

A. Compliance with Laws and Regulations

Zoerkler complies with all applicable national and international laws, in particular:

- Austrian labour, tax, environmental, and corporate law,
- EU regulations (where applicable),
- international standards such as the OECD Guidelines and the FCPA.

B. Integrity and Ethical Conduct

We act honestly, fairly, and responsibly. Conflicts of interest must be avoided or disclosed. Decisions are always made in the best interest of the company and its stakeholders.

C. Human Rights and Labour Standards

Zoerkler respects human rights in accordance with the UN Guiding Principles and the ILO Core Labour Standards:

- prohibition of child and forced labour,
- equal treatment and non-discrimination,
- freedom of association and the right to collective bargaining,
- fair working conditions and appropriate remuneration.

D. Occupational Health and Safety

We ensure a safe and healthy working environment. All legal requirements regarding occupational safety are met. Prevention, training, and continuous improvement are key priorities.

E. Environmental Protection and Sustainability

Zoerkler is committed to environmentally responsible practices:

- conservation of resources and energy efficiency,
- waste reduction and recycling,
- compliance with all relevant environmental laws,

- implementation of an environmental management system in accordance with ISO 14001.

F. Tax Strategy and International Tax Regulations

1. Tax Strategy

Zoerkler fulfils all tax obligations accurately and on time. Tax-related decisions are made in accordance with applicable law and economic substance.

2. International Tax Regulations

As an Austrian subsidiary of a UK-based company, Zoerkler observes the Austria–UK Double Taxation Agreement, the OECD Transfer Pricing Guidelines, and the non-applicability of EU tax benefits in relation to the United Kingdom.

G. Import and Export Regulations

Zoerkler Gears GmbH & Co KG strictly complies with all international export control regulations. This includes adherence to applicable sanctions lists and the prohibition of business relationships with sanctioned individuals or organisations. Country-, goods-, and person-specific embargoes are also observed. This obligation applies to all employees, managers, business partners, suppliers, and customers.

H. Anti-Corruption and Fair Business Practices

- Zero tolerance for bribery, granting or accepting undue advantages.
- No price-fixing or anti-competitive behaviour.
- Business partners are carefully selected and required to uphold comparable standards.
- **Confidentiality:** Business partners are obliged to protect trade secrets, particularly technical and commercial information.

I. Data Protection and Information Security

Zoerkler protects personal data and confidential information in accordance with the GDPR and internal policies. IT security and data integrity are of the highest priority.

J. Whistleblower Protection

Employees may report violations anonymously and confidentially. Zoerkler guarantees protection against retaliation for reports made in good faith. All reports are thoroughly reviewed and appropriate measures are taken if necessary.

Reports can be submitted anonymously via the digital whistleblowing system
at: <https://zoerkler.integrityline.app/>

K. Implementation and Scope

This Code of Conduct applies to all employees, managers, and business partners of Zoerkler. Compliance is regularly reviewed and updated as necessary. Violations may result in disciplinary and legal consequences.

