

COMPLIANCE GUIDELINE

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INTRODUCTION

Dear employees!

More than 120 years of experience in the development and production of machines for the construction and maintenance of rail infrastructure have made ROBEL an internationally recognised partner in the railway system. Today we, the companies of the ROBEL Group, contribute significantly to the safety, reliability and economic success of this system.

Thanks to the great commitment of our employees and the outstanding quality of our products and services, the companies in the Group have earned an excellent reputation over the decades.

This is a decisive factor in our success and must not be jeopardised by unlawful behaviour, particularly corruption. With this in mind, and above all because we stand for a comprehensive commitment to compliance, we take a clear stance on this issue:

Compliance with all laws and regulations, in particular those relating to combating corruption, and adherence to this compliance guideline is a top priority for us and an important part of our corporate culture.

We do not tolerate business transactions that are conducted in violation of legal regulations or with the use of corruption and bribery (zero tolerance policy). As an export-orientated and globally active group of companies, we have to comply with a large number of regulations and laws to combat corruption. This guideline explains the key anti-corruption principles that apply in all jurisdictions.

By complying with this guideline, you will help to protect our companies from the negative consequences of corruption. Each and every individual contributes to the success of our company and our reputation through their legally compliant and transparent behaviour.

We therefore ask you to read our compliance guidelines carefully and let us set a positive example together through our actions.

Wolfgang R. Fally
CEO ROBEL Holding GmbH



This Compliance Guideline is a binding guideline for all companies of the ROBEL Group under the umbrella of ROBEL Holding GmbH.

A. ROBEL GROUP: COMPREHENSIVE COMMITMENT TO COMPLIANCE

1. The companies of the ROBEL Group design maintenance processes on track and in railway infrastructure: We provide our customers with solutions for track maintenance, rail processing, rail logistics, track measurement technology, process automation and services with comprehensive service over the entire machine life cycle. With a constant focus on safety and ergonomics, we create modern conditions for working on track worldwide.

In addition to our production facilities, we operate a global network of sales and service centres, repair workshops and spare parts warehouses.

2. The ROBEL Group is committed to the following principles:

We stand for sustainable products, services and processes for long-term relationships

Our strong customer relationships and understanding of applications result in user-friendly solutions.

We stand for agreement and trustworthiness

Commitment and reliability are the basis of our identity. This results in high quality standards for our products and services.

We stand by our products and services – over the lifetime of the product

Safety is the top priority in track construction. Maintaining this over the entire service life of the machine is one of the foundations of what we do.

The ROBEL Group stands for consistent action according to these values at all levels, as well as for the transparency of our own actions through internal documentation. This is the only way we can maintain our reputation as a trustworthy company.

3. Our reputation is a decisive factor in our success and must not be jeopardised by unlawful behaviour, especially corruption. With this in mind, and above all because we stand for a comprehensive commitment to compliance (legal conformity, adherence to the law, integrity, honesty and business ethics), the management of ROBEL Holding takes a clear stance on this issue:

Compliance with all laws and regulations, in particular those relating to anti-corruption, and adherence to this compliance guideline is a top priority for us.

4. As an internationally active company, we must comply with a large number of anti-corruption regulations and laws. This guideline explains the key anti-corruption principles that apply in all jurisdictions. It applies to all employees, all managers and the management of ROBEL Group companies worldwide (company employees). It also applies to all those who perform actions, and provide or receive services on behalf of the company (e.g. commercial agents/ authorised dealers, general agents, deputies, sub-agents, suppliers, brokers, consultants, etc.).
5. The guideline does not release you from scrutinising and examining the legal framework of your actions. However, it can be a valuable aid in dealing with frequently occurring situations in everyday business life.
6. Our clients around the world trust us to act in a legally compliant manner. All company employees are personally responsible for ensuring that this trust is not betrayed. We will not tolerate any transactions that are carried out in breach of legal regulations or with the use of corruption and bribery (zero tolerance policy). By observing this policy, you will help to protect our company from the negative consequences of corruption and violations of the law in general. We are counting on you!
7. If you have any questions, please always contact the Compliance Officer.

B. THE MOST IMPORTANT THINGS AT A GLANCE

8. The following points are intended to give you an initial orientation on how we can work together to prevent corruption.
9. We want to impress our customers with the quality of our products and services. Corruption is always the wrong way to achieve this goal!

I. Corruption

10. Corruption generally means that a person exploits the authority entrusted to them. Corruption affects both the public sector (public officials) and private business transactions.
11. This primarily refers to situations in which a behaviour is „bought“. This can occur not only through monetary payments, but also through gifts, invitations to meals and any other act or service that provides the recipient (or a person close to them or a company economically attributable to them) with an advantage of any kind.

II. Payments

12. Payments may only be made as appropriate consideration for services and products actually provided.
13. Avoid cash payments!
14. Further details can be found under point D. of this guideline.

III. Donations and sponsorship

15. Not every donation or sponsorship is permissible. Always discuss donations and sponsoring with the Compliance Officer, especially donations to organisations that are not registered as „non-profit“.
16. Donations or sponsorship are not permitted if there is a connection to business partners, public officials or political parties.
17. Further details can be found under point E. of this guideline.

IV. Relationships with public officials

18. In principle, do not give any benefits such as gifts, invitations or donations to public officials or their relatives.
19. In exceptional cases, it may be permissible to give minor gifts in kind or to issue invitations to a meal as part of a company event, but this should always be discussed with the Compliance Officer. In the case of public officials, it is necessary to enquire in advance whether the invitation or gift may be accepted by the public official.
20. Further details can be found under point F. of this guideline.

V. Benefits in business transactions (private sector)

21. Minor gifts and invitations to meals or events are part of everyday business dealings.
22. Expenditure on gifts in business transactions and hospitality expenses are subject to constant change and must be considered individually and depending on the country, in particular their tax limits. It is therefore important to ensure that such expenses are within the usual local limits and are appropriate for the occasion. If you are unsure, contact the responsible Compliance Officer or your line manager.
23. A gift, hospitality or invitation to an event must never be used to “buy” certain behaviour! Any appearance of unauthorised influence must be avoided. For this reason, bribery is also prohibited.
24. The regulations and permissible value limits for gifts apply not only when giving gifts, but also when accepting them. If it subsequently transpires that an accepted gift exceeds the permissible value limit and it is not possible to return it, the gift must be forwarded to the Compliance Officer, who will donate it to charitable purposes. The same applies if gifts exceed the value limit, but their acceptance cannot be refused taking all circumstances into account (e.g. because this would be perceived as an offence). Gifts to the recipient’s private address are never permitted.
25. Further details can be found under point G. of this guideline.

VI. Representatives, agents, consultants, intermediaries

26. The companies of the ROBEL Group can be held liable for the actions and legal violations of representatives, agents, consultants and intermediaries. You should therefore be particularly careful when selecting and monitoring such persons.
27. Further details can be found under point H. of this guideline.

VII. Documentation

28. Help us to ensure transparency! Document all benefits that you make or receive in the course of your work for the ROBEL Group.
29. Further details can be found under point I. of this guideline.

VIII. Consequences

30. A violation of anti-corruption regulations and laws can have a variety of consequences for the companies of the ROBEL Group and for you personally, including consequences under labour law.
31. The consequences can be so severe that the existence of the company is jeopardised. Corruption must therefore always be avoided!

IX. Summary

32. In general, you should act in such a way in your everyday business operations that you can openly explain and justify your behaviour to your superiors and colleagues at any time. In particular, you should question your behaviour if you feel that you cannot speak freely about it with other members of the company.
33. Additional details, in particular practical examples, can be found in the following sections of this guideline. If you have any questions about this guideline in your day-to-day work, please contact the Compliance Officer, who will be happy to provide you with advice and assistance.

C. GENERAL INFORMATION ON CORRUPTION

34. Corruption is generally understood to be the misuse of assets for the private benefit or advantage of a third party (e.g. the employer). It is the umbrella term for corruptibility, bribery, accepting and/or granting advantages.
35. This includes offering, granting, requesting and accepting advantages if this is done as an incentive to do something that is dishonest, illegal or in violation of duty.
36. Corruption can occur both in dealings with public officials (see in detail the explanations under point F. of this guideline) and business partners (see the explanations under point G. of this guideline) and must be rejected in both cases. Corruption must be avoided in any case, even if it appears to promote business. We only want legal, “clean” business.

I. Benefits can take different forms

37. Advantages are all benefits that improve the recipient’s situation in any way without there being a legal entitlement to them.
38. This means that not only monetary, but also intangible benefits should be considered. Benefits can be, for example, invitations or discounts, but also the facilitation of an internship or employment with a company of the ROBEL Group, which would otherwise not take place or not at the same remuneration.
39. A personal advantage may also be that the benefit goes to a third party such as a relative of a business partner, decision-maker or public official or to a company/organisation that is economically attributable to one of these persons or is in their private sphere of interest.

II. Benefits and acceptance of benefits

40. Members of the ROBEL Group are prohibited from offering, granting, demanding or accepting unauthorised benefits, both to public officials and in private business dealings, if this could improperly influence a decision or give the impression of doing so.
41. You may therefore only offer, promise, grant or accept personal advantages if this is done in accordance with the applicable laws. There must be no appearance that personal advantages influence certain behaviour.
42. The granting or acceptance of benefits in the form of gifts, favours and invitations may be permissible in individual cases if these benefits are socially appropriate. In this context, socially appropriate means that the benefit is of low value, and in the specific case is not suitable for influencing the recipient’s business or official decisions (e.g. promotional items).
43. The following chapters D. to G. of this guideline describe some sensitive situations that frequently occur in day-to-day business and also specify value limits that you can use as a guide. Donations to public officials (see the detailed explanations under point F. of this guideline) are subject to much stricter standards than donations to persons in the private sector (see the explanations under point G. of this guideline).
44. In individual cases, you must first check whether a donation is socially appropriate and therefore permissible. The following explanations may be of valuable assistance to you. If you have any questions, you can also contact the Compliance Officer.

D. PAYMENTS

45. Payments must be appropriate and may only be made in return for services or products actually provided!
46. Please note that payments may only be made to third parties for services or products that have been properly rendered or delivered. The payments must represent fair value for these services or products.
47. Cash payments are to be avoided!
48. To ensure transparency in connection with payment transactions, cash payments should always be avoided. If these are absolutely necessary, the execution and reason for the cash payment must be documented precisely.

E. DONATIONS AND SPONSORING

I. General information

49. The ROBEL Group supports organisations and events worldwide through sponsorship and donations. This not only contributes to the good reputation of our company, but is also in line with our understanding of our social responsibility.
50. Sponsoring is the promotion of people, organisations and events in the form of money, goods or services with the purpose of promoting our own marketing objectives.
51. Donations are voluntary contributions in cash or in kind that are made without expectation of compensation or alternative objectives.
52. Donations and sponsorship do not always have to be monetary payments. Contributions in kind also fall under these terms, such as time spent by paid company employees during working hours.

II. Permissibility of donations and sponsoring

53. Not every donation or every form of sponsorship is permissible!
54. Donations to a registered charitable organisation with a reputable reputation are generally permissible, especially if this is an organisation entitled to a tax deduction, which must be clarified with the tax department in each individual case. Sponsorship may only ever be provided for corporate purposes.
55. Our donations and sponsorship are always transparent. Cash payments are therefore also prohibited for charitable purposes and every donation or sponsorship must be reported to the Compliance Officer. Please also provide proof of payment and inform them of the purpose of the donation or sponsorship. Payments must be made directly to the organisation's account and never to private accounts. Any donation or sponsorship must also be compatible with the corporate principles of the ROBEL Group.
56. Prior written approval from the Compliance Officer is required for any form of sponsorship and for donations to organisations that are not registered as charities.
57. For donations and sponsoring in connection with public officials, see the details under point F. III.

58. When sponsoring or making a donation from or on behalf of the ROBEL Group, prior written authorisation from the Compliance Officer is required, even if only one of the following points applies:

- The sponsorship or donation is made at the request of a business partner of the ROBEL Group;
- the recipient of the sponsorship or donation is known to be related to a company employee of a business partner of the ROBEL Group or their relatives;
- the recipient of the sponsorship or donation is known to be connected to a public official or their relatives (see para. 76 of this guideline);
- there are other factors that could indicate a connection between the ROBEL Group and the sponsorship or donation and the procurement or maintenance of business relationships.

III. Political donations

59. Political donations are made for the benefit of a political candidate, cause, campaign, party or politician, i.e. not necessarily to public officials.
60. The ROBEL Group is politically independent and therefore prohibits all forms of political donations.
61. Donations to public officials are always prohibited. For details on donations and sponsoring in connection with public officials, see the explanations under point F. III.
62. If you have any questions, please contact the Compliance Officer.

IV. Your donation

63. We welcome donations to charitable organisations by company employees as private individuals. However, you should ensure that a personal donation does not give the impression that it is connected with the activities of the ROBEL Group. Make it clear that the donation is not made in the name of the company or in connection with the activities of the ROBEL Group. Employees of the ROBEL Group may not make private donations if the intention or effect of such a donation is to influence the business behaviour of a person outside the ROBEL Group.

F. RELATIONSHIPS WITH PUBLIC OFFICIALS

I. General information

64. You must be particularly careful when dealing with public officials!
65. In all legal systems, offering, promising or granting benefits to public officials is prohibited if the aim is to improperly influence a decision by the public official.
66. All advantages that are intended to „buy“ the decisions of a public authority are prohibited. This prohibition extends to both domestic and foreign public officials and may also be prohibited under foreign legislation.
67. In this context, „public officials“ do not necessarily have to be civil servants. It also refers to persons who are in any other official relationship under public law, as well as persons who are appointed to carry out public administration tasks on behalf of public authorities or other bodies. Depending on the legal system, public officials may also be the authorised representative bodies and employees of a legal entity which the public sector has a stake in (e.g. Deutsche Bahn). Employees of international organisations or institutions, for example at the European level, can also be considered public officials. Please always contact the Compliance Officer if you have any doubts about whether you are a public official.
68. Donations are not only prohibited if they are made directly to public officials, but also if they are granted to private persons if you know or consider it very likely that the donation will influence the decision of a public official. This is regularly the case, for example, for donations to related parties of public officials. For example, it would be unlawful for a private individual to grant a loan to the spouse or siblings of a public official at below-market conditions in order to influence the public official's decision. The same applies if the benefit is passed on to the public official by a third party.

II. Gifts and hospitality

69. You must be particularly careful when giving gifts or offering hospitality to public officials. In individual cases, gifts in the form of mass-produced items such as ballpoint pens or writing pads bearing the ROBEL Group logo may be socially appropriate. A snack or simple meal may also be legally permissible if this is offered as part of a company-related event which a public official participates in as part of his or her official duties (e.g. company tours, contract award meetings).

70. Corruption and even the mere appearance of corruption must be avoided at all costs, especially in connection with public officials. For this reason, gifts and hospitality of any kind to public officials must be avoided. This should only be done in exceptional cases and always requires the prior consent of the Compliance Officer in the case of gifts and, in the case of hospitality, if it is unavoidable, limited hospitality.

III. Company-related visits

71. For various reasons, visits by public officials (or business partners; see point G. II.) to companies of the ROBEL Group take place from time to time. The reasons for such visits are in particular:
 - to demonstrate the high quality standards of the company during company tours,
 - the (joint) organisation of training and further education events,
 - the organisation of meetings for the purpose of planning and executing orders,
 - carrying out Factory Acceptance Tests (FAT) when processing orders or before acceptance of machines by the customer. In some of these cases, the ROBEL Group assumes the costs (or part of the costs) for the organisation, travel, catering and/or accommodation of the participants in such meetings. Sometimes the contracts with customers stipulate who bears which costs or how the costs are divided.
72. Both when determining the assumption of costs in the contract and when assuming other costs, care must be taken to ensure that the costs assumed by the ROBEL Group are reasonable and socially appropriate, so that no undue advantage is granted to public officials or other persons from their environment. To ensure this, particular attention must be paid to the following:
 - i) The purpose of the visit and the persons participating must be documented in an overview (e.g. schedule and timetable for FAT for project ..., schedule and timetable for joint training relating to project ...). The scheduled dates (training courses, acceptance tests, etc.) must be recorded in this overview.
 - ii) It goes without saying that as a local company, it is easier to organise the reservation of accommodation and catering for the participants during the dates. Care should be taken to ensure that the accommodation and restaurants chosen are of an appropriate standard, but not of an unnecessarily high standard, unless the participants themselves bear the costs.

- iii) It is polite and in the company's interest to look after the (often unfamiliar) participants, not only during the company tours, training sessions or technical acceptance tests, but also during the rest of their visit, so that they are not left to their own devices (often in unfamiliar surroundings). This support and a corresponding framework programme, which fills gaps in the schedule, must be limited to what is necessary. It is essential that it is (only) a matter of looking after the people necessary for the company's business appointments. Supporting programmes that are not related to the business appointments, such as leisure activities on days without business appointments or after the business appointments or the assumption of costs for the participation of relatives who have nothing to do with the business appointments, would not be permitted.

In case of doubt, the opinion of the Compliance Officer should always be sought.

IV. Donations, sponsoring and public officials

73. Donations (for the term donation, see margin no. 51) to public officials or sponsoring (for the term sponsoring, see margin no. 50) of public officials are always prohibited!
74. Supporting organisations through donations and sponsoring is also always prohibited if it is offered, promised or granted in return for the performance of a public official's duties.
75. Donations and sponsorship are also prohibited if they are advertised directly or indirectly by a public official in connection with a decision over which this public official has the power to influence.
76. A donation made by or on behalf of the company to a recipient who is known to be connected to a public official requires the prior written authorisation of the Compliance Officer.

V. Facilitation payments

77. The ROBEL Group also expressly rejects the provision of so-called facilitation payments (also known as "bribes"). This usually refers to smaller payments that are offered, promised or granted in exchange for the execution of an official transaction in order to bring about the faster completion of this official transaction. Such bribes are prohibited. In Germany, for example, they may constitute the offence of granting an advantage in accordance with Section 333 of the German Criminal Code (StGB) or bribery in accordance with § 334 StGB.

G. BENEFITS IN BUSINESS TRANSACTIONS (PRIVATE SECTOR)

78. In most of the countries in which we operate, the targeted provision of benefits to persons in the private sector is also punishable by law if it is likely to improperly influence the behaviour of the business partner. This applies accordingly to the acceptance of incentives. The ROBEL Group therefore prohibits all incentives or the acceptance of benefits that even give the appearance of being intended to improperly influence or cause a decision to be made. This is regularly the case when benefits are offered, promised, granted or accepted in connection with a business transaction.

I. Gifts to and hospitality for private individuals

79. The permissibility of gifts and hospitality in private business transactions must be assessed according to the following five criteria:

- Proportionality: The value of the gifts/hospitality must be in proportion to the business position, the occasion and the seniority of the persons involved and must be appropriate in this context.
- Intention: Gifts/hospitality must not be intended to influence the objectivity of the recipient.
- Transparency: Gifts/hospitality should be provided in a transparent manner. The reason for the gift or hospitality should be documented internally (see point I.).
- Frequency: If the same persons receive gifts/hospitality more frequently or regularly, the permissibility should be assessed more critically than usual (bribery).
- Timing: Gifts/hospitality should not be provided at an inappropriate time. If, for example, a business decision between the company and a business partner is imminent, the decision to offer or accept gifts/hospitality should be carefully scrutinised. This should avoid conflicts of interest from the outset.

1. GIFTS

80. Gifts to business partners are generally permissible if they are small tokens of appreciation and gifts in kind whose value does not exceed the low-value limit of approximately EUR 35.00. Irrespective of their value, they may never be exchanged in return for specific behaviour.

81. Examples of typically permissible gifts are mass promotional items, such as pens bearing the ROBEL Group logo, calendars, writing pads or inexpensive local specialties as a token of appreciation after attending an event.
82. Please note that the low-value limit can also be exceeded if the recipient is regularly or repeatedly granted benefits.
83. In any case, gifts of money or „money-like“ gifts, such as vouchers, the granting of a loan that does not bear interest at market rates, the free transfer of securities or the upgrade of flight tickets, are not permitted. All benefits that are unlawful or perceived as immoral are also inadmissible.
84. All gifts given and accepted should be documented, in order to be able to prove the purpose of these gifts upon request.

2. HOSPITALITY

85. It is recognised that the company will entertain its business partners on certain occasions in order to create and maintain lasting business relationships. For this purpose, it is possible to offer or accept invitations to a business meal in the usual setting and, in individual cases, to a sporting or cultural event (see the requirements for this in detail under point G.III.). It is required to document all hospitality provided and accepted in order to be able to prove the purpose upon request at a later time.
86. Hospitality for business partners is normally permitted if it is not of an unreasonably high value, taking into account the professional position and other living standards of the recipient. It must also take place in the context of normal cooperation and may not serve as an incentive for specific behaviour on the part of the recipient.
87. The appropriate value of hospitality cannot be assessed across the board. As a rule, however, hospitality for a mid-level employee, for example, will be assessed differently than hospitality for executives. The quality, price and ambience of the invitation should correspond to the normal living standards of the recipient and should not be perceived as offensive or uncomfortable. Reciprocal invitations are typically socially acceptable in the context of an equal relationship.
88. In the case of hospitality for executives and board members, a significantly higher amount may also be appropriate under certain circumstances. In areas with a particularly high cost of living, higher amounts may still be socially appropriate. In such cases and if you are unsure about an upcoming hospitality event, please contact the Compliance Officer.

II. Business-related visits by business partners

89. See point F. III. The statements made there also apply to visits by business partners.

III. Sporting and cultural events

90. Invitations from business partners to sporting and cultural events are generally only to be issued with the prior written consent of the Compliance Officer. They may be permissible in individual cases, particularly if the invitation serves the purpose of exchanging views on business issues with political, business, media and cultural leaders and the travel and accommodation costs are borne by the invitees themselves. This also applies to the acceptance of invitations to such events.

H. AGENTS, BROKERS, CONSULTANTS, INTERMEDIARIES

91. The involvement of commercial agents, authorised dealers, consultants, sponsors and other intermediaries is important in many countries, and in some cases even essential for our company's successful market presence. Intermediaries are often required and utilised, particularly for business transactions abroad. They can, for example, be commissioned as consultants or intermediaries to broker, negotiate or finalise transactions. They must also comply with local laws and these guidelines.
92. The companies of the ROBEL Group can be held liable for the actions and legal violations of such intermediaries. Therefore, exercise due care when selecting and monitoring such persons!
93. If possible, always contact internal consultants of the ROBEL Group. Before finalising contracts with intermediaries, you must carefully check the integrity of the potential intermediary with a colleague/supervisor in accordance with the dual control principle, record the results in writing and consult with the Compliance Officer in individual cases. The course of the selection process must also be documented in writing, as must the precise description of the intermediary's tasks. You must also ensure that fees, commissions and other remuneration are only paid on presentation of verifiable proof of performance and proper invoices, and only to a bank account in the intermediary's name. Otherwise, the internal guidelines for the selection of intermediaries apply.

I. DOCUMENTATION

94. All donations must be made transparently and documented so that any appearance of secrecy is ruled out, and in the event of any enquiries by investigating authorities (e.g. tax investigation), the permissibility can be proven without any problems. Donations to the recipient's private address are never permissible.
95. You should therefore ensure that you
 - maintain books, business records and accounts in such a way that they show transactions and asset dispositions correctly, properly and with reasonable accuracy;
 - record transactions in accordance with applicable generally recognised accounting standards or principles;
 - maintain effective internal controls to ensure compliance with applicable laws and this policy, to prevent misuse of company assets.
96. Any request for a payment or other asset that could constitute an improper benefit must be reported to the Compliance Officer (see section K. of this policy for contact details).

J. CONSEQUENCES

97. A violation of anti-corruption regulations and laws can have a variety of different consequences for the ROBEL Group and the employees involved.
98. In particular, in addition to claims for damages under civil law, there is also the threat of imprisonment and fines. Company employees who violate this directive and corresponding laws must also expect consequences under labour law.
99. In addition, ROBEL Group companies not only face the threat of exclusion from contract award procedures and tenders, but also irreparable reputational damage in some circumstances. Ultimately, the consequences could be so severe that the very existence of the ROBEL Group could be jeopardised.
100. No company employee is threatened with negative consequences for refusing to participate in corruption. This applies without exception, even if this refusal results in the ROBEL Group losing business opportunities or revenue. You do not have to fear any repercussions in the event of a report of suspected corruption or inappropriate behaviour. On the contrary: we count on you when it comes to consistently preventing and uncovering corruption!

K. CONTACT DETAILS

101. For further information, please contact the Compliance Officer. They can also provide you with information on the reporting channels to be followed if you become aware of a breach of this policy.
102. For reports relating to the Whistleblower Protection Act, please use the appropriate contact options:
 - By telephone via the Compliance Hotline: 08654/609-759
 - By e-mail to the e-mail address: compliance@robels.com
 - Personally to the respective Compliance Officer
 - External reporting centres of the federal government: www.bafin.de
www.bundeskartellamt.de