

Code of Conduct



CLAAS



1 Foreword

Dear Claasians,

as the Executive Board, we are aware that mutual respect and trust are of paramount importance to CLAAS as the largest family business in the agricultural engineering industry. This Code of Conduct sets out clear principles and behaviors that apply to all CLAAS employees worldwide.

Compliance is our top priority; we do not tolerate any violations of the law. CLAAS is a place where all employees are respected and protected regardless of gender, age, ethnic origin, sexual orientation or world view. We want to ensure that everyone has the opportunity to reach their full potential and work in a safe and trusting environment.

Our expectation of all employees is that they will adhere to the Code of Conduct and actively contribute to creating and maintaining a respectful work environment.

This should be characterized by togetherness, mutual solidarity and trust. They are the supporting pillars that shape strong business relationships, both inside and outside the company – with our customers, sales partners, service providers and other business partners.

The compliance culture should be lived entirely in line with our corporate mission statement, in which we combine excellence, entrepreneurial thinking and action, and the values of a family business.

Openly addressing problematic issues is expressly encouraged. There is always a contact person who can help you – on site or via contact options defined in this Code of Conduct.

Thank you for your support in implementing our Code of Conduct.

Kind regards,

Your Group Executive Board



Jan-Hendrik Mohr
Chief Executive Officer



Martin von Hoyningen-Huene
Member of the Group Executive Board
Executive Vice President
BU Tractors & Implements /
SU Engineering



Christian Radons
Member of the Group Executive Board
Executive Vice President
BU Service & Sales



Thomas Spiering
Member of the Group Executive Board
Executive Vice President
BU Self-propelled Harvesters /
SU Manufacturing



Henner Böttcher
Member of the Group Executive Board
Chief Financial Officer



Emmanuel Siregar
Chief Human Resources Officer
Group Executive Director



Hendrik Horn
Chief Legal Officer
Group Executive Director





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2 Compliance with Applicable Law

For CLAAS, it is a matter of course to comply with applicable laws and regulations. All CLAAS employees, regardless of position, rank or location, are required to comply with applicable laws, regulations, guidelines and instructions.

Stricter regulations may apply in individual countries, business areas or markets, or to business partners. These take priority in such cases.

Any violation can have serious consequences for both CLAAS and its employees. These consequences may come under criminal and/or labor law, and may include claims for damages and damage to reputation.

2.1 Bribery and Corruption

Trust in the reliability and integrity of CLAAS and its employees must not be jeopardized by corruption or bribery. CLAAS rejects corruption and bribery as illegal and anti-competitive business practices.

The prohibition on bribery and corruption must not be bypassed by involving third parties such as intermediaries, representatives, agents, service providers, experts or consultants be bypassed.

Donations or sponsoring activities may not be used to gain unlawful business advantages.

2.2 Gifts, Invitations and Gratuities

Gratuities in the form of gifts, hospitality or invitations are customary signs of appreciation in business life, and vary worldwide depending on the country and culture.

Such gratuities may only be granted or accepted if they are reasonable and do not constitute an unlawful advantage. In addition, they must not be of an unreasonably high value, but have only a symbolic character, not exceeding the defined limits. The internal regulations must be observed in this regard.

2.3 Dealing with a public official

Particularly strict rules often apply to business relationships with government agencies. For this reason, CLAAS always acts honestly and transparently and in accordance with applicable law and internal regulations in all contacts with public officials and elected officers.

CLAAS will not tolerate payments to a public official to expedite routine official transactions ("facilitation payments").

2.4 Fair Competition

For CLAAS, compliance with applicable antitrust and competition laws is a top priority. All CLAAS business activities are subject to the principles and conventions of fair competition.

CLAAS rejects any arrangements or agreements with competitors, suppliers or customers that may interfere with free competition.

The relevant antitrust and competition regulations must be strictly observed when cooperating with sales partners and customers. The Corporate Legal Department must always be involved in matters relating to trust and competition law.

2.5 Conflicts Of Interest

Conflicts of interest can arise when private interests collide with the interests of CLAAS. However, a conflict of interest does not necessarily lead to misconduct.

A conflict of interest can have negative consequences for both CLAAS and the employee. This is particularly the case when employees put their own interests ahead of those of CLAAS, and do not make decisions impartially.

Therefore, conflicts of interest are openly addressed and resolved at CLAAS.

2.6 Money Laundering

CLAAS complies with all laws applicable to money laundering (Anti Money Laundering) and the financing of terrorism, and minimizes the general risk of money laundering by means of carefully checking its business partners and through training and information measures.

2.7 Export Control

CLAAS complies with all applicable laws governing foreign trade. This includes compliance with customs and foreign trade law, including compliance with export controls, sanctions, embargoes and other government regulations or directives that regulate foreign trade.





CLAAS takes appropriate and reasonable measures to ensure that transactions with third parties do not violate embargoes, regulations of customs and foreign trade law and regulations to combat the financing of terrorism.

2.8 Suppliers

CLAAS suppliers are required to comply with the basic values defined in this Code of Conduct. In addition, CLAAS expects suppliers to focus especially on the observance of laws governing human rights, fair working conditions and environmental protection, and to comply with national and international legal requirements in this context.

CLAAS reserves the right to verify suppliers' compliance with these basic values within the framework of the applicable regulations.

2.9 Financial Reporting and Tax Compliance

Violations of the legal requirements regarding proper financial reporting and tax reporting of even one country in which CLAAS is active can result in considerable disadvantages. This includes, in particular, conscientious observance of national and international tax regulations (tax compliance).

CLAAS complies with the legal requirements for proper accounting and financial reporting as well as national and international tax laws. Reports are made truthfully, completely and in a timely manner.



3 Working Environment

3.1 Human Rights

CLAAS is committed to the principles of the Universal Declaration of Human Rights and the United Nations Global Compact, and expects that suppliers and business partners also share and recognize these values.

CLAAS rejects and does not tolerate any form of child labor. Forced or compulsory labor, all forms of slavery or practices similar to slavery, bondage, human trafficking or other forms of domination or oppression in the workplace environment, or comparable measures that deprive employees of their freedom, are prohibited. All work must be voluntary, with the possibility of being able to terminate the employment relationship.

3.2 Mutual Respect and Trust

CLAAS is committed to diversity, inclusion and equal opportunities. The working environment is characterized by respect and tolerance. Every person has the right to be treated with respect, justice and dignity. CLAAS will not tolerate discrimination, bullying, abuse of power, intimidation or other forms of harassment or unequal treatment, e. g. on the basis of national and ethnic origin, skin color, social background, health status, disability, sexual orientation, age, gender, gender identity, religion, political opinion or world view.

3.3 Freedom of Association and Employee Representation

CLAAS is committed to an open and constructive dialog with employee representatives. CLAAS respects the right of employees to freedom of association and assembly in accordance with the provisions of applicable legislation.





4 Environmental Protection, Occupational and Product Safety

4.1 Environmental protection and sustainability

CLAAS acts in accordance with applicable laws to minimize any negative impact on the environment. Environmental and climate protection are continuously improved through appropriate measures.

In this context, CLAAS thinks and acts sustainably and keeps environmental aspects in mind when organizing its operations. These include climate protection (e. g. by increasing energy efficiency as well as using renewable energies), adapting business activities to climate change, ensuring water quality and reducing water consumption, ensuring air and soil quality, protecting biodiversity, promoting resource efficiency, reducing waste and disposing of it properly, and responsibly handling substances that are hazardous to people and the environment.

4.2 Occupational Safety

CLAAS gives high priority to occupational safety and health protection for all employees. CLAAS therefore ensures that the required occupational health and safety protection applies to all employees within the framework of legal requirements and regulations.

4.3 Product Safety

It is not only a legal obligation, but also a claim by CLAAS to comply with the legal and official regulations and internal standards applicable to its products. The claim is to provide customers with safe and high-quality products of impeccable quality. CLAAS develops and manufactures its products in such a way that they match the best technology available and meet legal requirements.



5 Information Handling and Company Assets

5.1 Confidentiality

In everyday business, information is often exchanged both within and outside the company, whether with customers, suppliers or other business partners. When doing so, CLAAS always handles information with caution and care, ensuring the appropriate integrity in information security.

Special care is taken when exchanging confidential and proprietary information, for which CLAAS is contractually or legally obliged to maintain confidentiality.

Discussing confidential information in public or unauthorized disclosure of information to third parties about the company or its customers is a breach of the confidentiality obligation.

5.2 Company Assets

All employees at CLAAS handle corporate assets, such as office and production equipment, tools, plant and intangible assets (know-how and intellectual property rights) conscientiously and responsibly.

Any form of fraud, embezzlement, theft, misappropriation or tax evasion is prohibited, regardless of whether it damages corporate assets or the assets of third parties.

5.3 Data Protection

CLAAS acknowledges its responsibility to collect, process and use personal data only in accordance with relevant data protection laws.

CLAAS attaches particular importance to the protection of privacy, personal rights and the protection of personal data.

For this reason, CLAAS is committed to complying with applicable laws and internal guidelines and regulations on data protection.

The basic principles of data protection are observed, including lawfulness of processing, transparency, purpose limitation, data minimization, accuracy, storage limitation. Furthermore, in order to maintain the confidentiality of personal data, CLAAS places correspondingly high demands on the secure use and storage of data.

5.4 Intellectual Property

CLAAS has always stood for development through innovation. The company's success is based on the inventions and ideas of CLAAS employees. It is therefore particularly important for CLAAS to protect its intellectual property from misuse or unlawful use by third parties.

CLAAS respects its own and third-party intellectual property, such as inventions, product prototypes, software developments and other proprietary information, and complies with applicable laws.





6 Communication

6.1 Open Discussion

All employees at CLAAS can freely express their ideas and address issues at any time.

Open discussion serves both to prevent misconduct and to identify and resolve problems early. For CLAAS, it is very important that there is open and trusting dialog between the company and its employees. For this reason, CLAAS encourages employees to express even critical issues or concerns freely.

Intimidation of and retaliation against employees who, in good faith, report actual or suspected misconduct, will not be tolerated.

In addition, reporting against one's better judgment, with the aim of intentionally falsely accusing another person constitutes a compliance violation that will be punished accordingly.

All indications of compliance violations are investigated. Violations will be intercepted and appropriate measures taken.

6.2 Communication Channels

Concerns can be discussed and resolved in constructive dialog on site.

Furthermore, everyone has the option of contacting persons in the local work environment, e.g. supervisors, management, compliance officers, human resources or legal department, or (if available) employee representative bodies. If concerns cannot be addressed locally or are not adequately addressed there, contact can be made with the central specialist departments of the CLAAS Group. In such departments, the request will be processed in accordance

Contact details:

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33428 Harsewinkel
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E-mail: compliance@claas.com

with the confidentiality requirement and in compliance with all applicable data protection regulations.

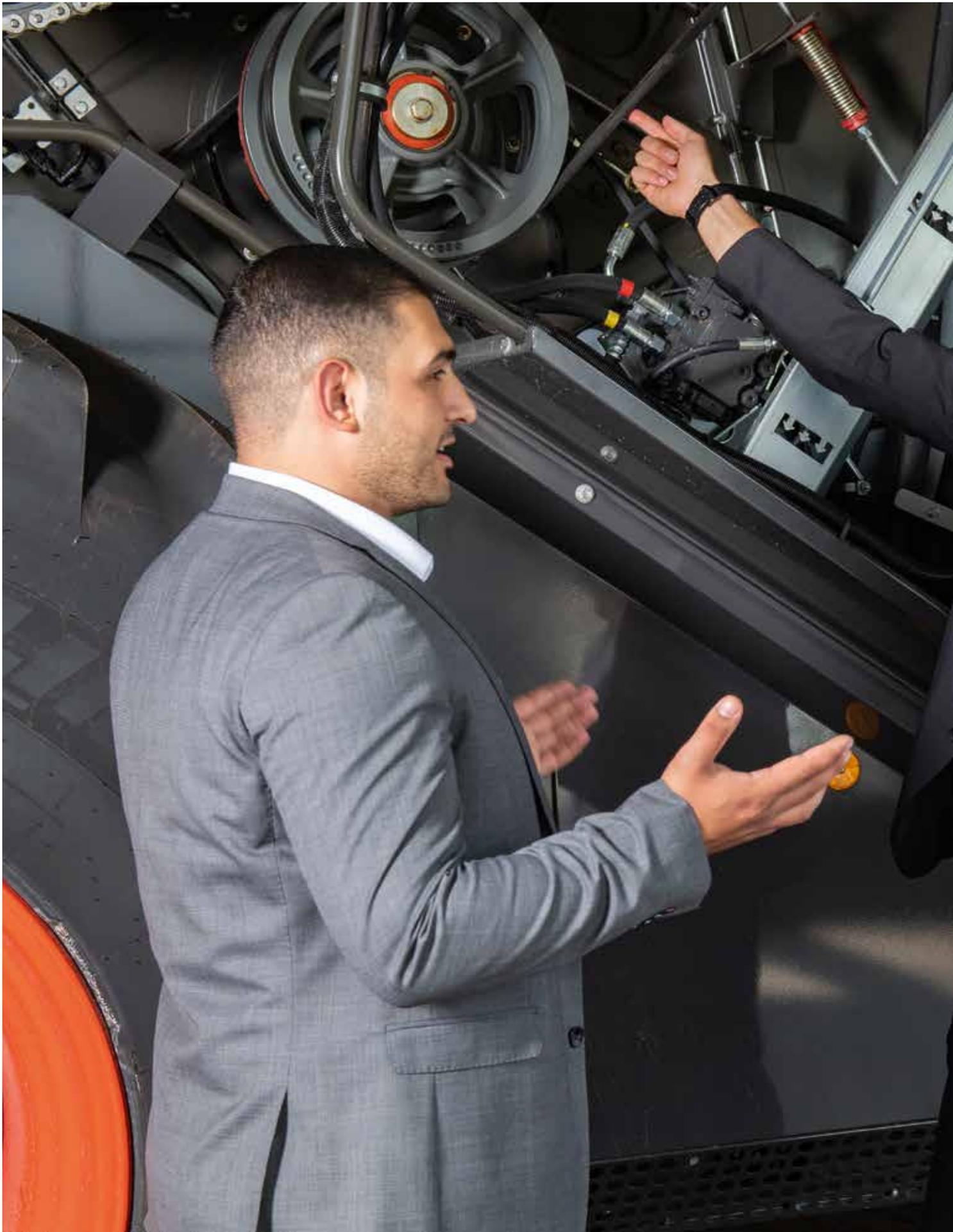
In addition, it is possible to make contact with the ombudsman, who serves as a neutral and independent contact person. Communication with anyone providing information is confidential. The facts of the case and the identity of the person providing information will only be disclosed to CLAAS with express consent.

Contact details of the ombudsman:

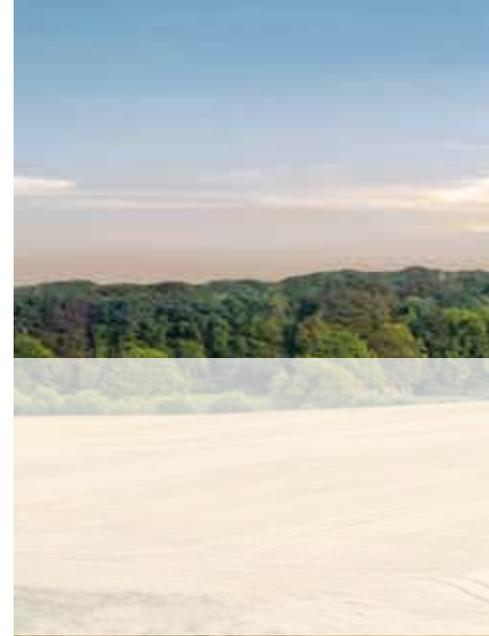
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