

# Binding guidelines for all Bernecker Group employees

The Bernecker Group's Code of Conduct, which applies equally to all employees, i.e. management, executives and each individual employee, forms the centrepiece of the Bernecker Group's corporate culture.

It is aimed specifically at all employees and provides concrete and binding guidelines for situations in which employees must pay particular attention to responsible behaviour. Using examples, it describes how to deal with conflict situations in day-to-day business.

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## **1. Preamble**

The trust of our business partners, customers, authorities, the public and other social stakeholders in the responsible and lawful behaviour of all employees is of great importance for the reputation and success of our company.

A high level of social and ethical competence is expected of all employees. This standard also applies to the selection of our business partners. To empower employees in this respect, the Bernecker Group will inform and actively support them through its managers.

Responsible and lawful behaviour should be a matter of course. This Code of Conduct therefore does not contain any new rules, but rather illustrates the requirements for behaviour both externally and internally in the fulfilment of our tasks. In this context, employees are committed solely to the company and not to individuals - such as their superiors.

## **2. The basic rules of behaviour**

### **2.1 Fair competition**

The purpose of antitrust law is to safeguard and maintain free and undistorted competition in the interests of all market participants. Antitrust law requirements and prohibitions concern in particular:

- the prohibition of agreements between competitors on prices, territorial allocations, customer groups or production volumes
- the prohibition of abuse of a dominant market position. Concerted behaviour, informal discussions or agreements that have the purpose or effect of restricting competition are also prohibited. No confidential information about prices and forthcoming price changes or customer and supplier relationships may be exchanged during discussions with competitors. Fair competition also includes never offering or granting unauthorised advantages to third parties in connection with business activities, either in the form of monetary payments or other benefits. This also applies to countries in which there may be different customs.

## **2.2 Prohibition of corruption and granting of advantages**

Corruption and the granting of advantages - in any form whatsoever - are not tolerated in our company. No personal advantages may be demanded, accepted, offered or granted in connection with our business activities. If an employee is confronted with such an offer or request, they must report this immediately to their line manager.

Gifts and invitations may not be given or accepted as a matter of principle. Exceptions apply only in the case of generally customary occasional or promotional gifts and gifts that are in keeping with custom and courtesy in a country. The same applies to invitations. Cases of doubt must be clarified with the line manager.

## **2.3 Data protection**

Protecting the personal data of our customers and employees and complying with national and international data protection regulations is a matter of course for us. We base our security standards and our actions on protecting personal data from access and unlawful use by unauthorised persons. Our business partners are also obliged to handle such data with care.

## **2.4 Safety and environmental responsibility**

Avoiding and safely controlling risks to people and nature is an essential part of responsible behaviour. This applies to all areas of our company, in particular product development, production and product monitoring. The balance between production costs and product safety must always be in favour of safety.

Compliance with all safety regulations is essential, regardless of whether they are prescribed by law, issued by the responsible authorities or regulated in company guidelines. In your own interest, but also in the interest of your colleagues and the company as a whole, the safety regulations must be applied consistently at all times. Everyone is jointly responsible for safety in their working environment. All employees are thoroughly trained and instructed in this regard. Environmentally conscious behaviour is an ethical and entrepreneurial duty for us. In doing so, we contribute to the preservation of natural resources, biodiversity and the protection of our climate for future generations and thus secure our own profitability and competitiveness in the long term. Compliance with the applicable environmental regulations is a basic prerequisite for this. Environmental aspects are taken into account in every business decision. We conduct our business activities and at our sites in such a way that environmental damage is avoided or reduced to the lowest possible level. Each of us is called upon to act in an environmentally conscious manner.

## **2.5 Social responsibility**

Respect for human rights and fundamental social standards is a basic principle of all human coexistence. Working conditions that violate such rights and standards contradict this principle. This applies both within our company and in our co-operation with business partners. Every employee is responsible for ensuring that human rights and fundamental social standards are not violated within their area of responsibility and influence.

## **2.6 Prohibition of discrimination**

All employees have the right to fair, courteous and respectful treatment by superiors and colleagues. No one may be discriminated against because of their race, skin colour, nationality, origin, gender, faith or ideology, political views, age, physical constitution, sexual orientation, appearance or other personal characteristics, i.e. disadvantaged without objective reason. We are all obliged to respect the personal dignity and sphere of other employees. Harassment and any form of unwanted physical contact are prohibited.

## **2.7 Protection of company property and trade secrets**

The property of the Bernecker Group may only be used for business purposes. Each of us is obliged to protect it from loss, damage or theft. Office and work materials as well as company products are company property. Business secrets and other sensitive information must be treated confidentially and protected from disclosure to unauthorised persons. Employees who have access to business secrets and confidential information must not disclose them to third parties (including family members and friends) or use them for purposes other than for business purposes.

## **2.8 Protection of intellectual property**

Each of us is responsible for this and must do everything necessary to protect Bernecker's intellectual property, such as patents, trademarks, brands or expertise, from attack or loss. This also includes refraining from behaviour that could damage the reputation and value of the company. We must respect the intellectual property of others.

## **2.9 Avoidance of conflicts of interest - private activity**

All of us must inform our line manager or the relevant HR department of our intention to take up a position in another company, to take up paid secondary employment or to become actively involved in business activities. This applies in particular to the assumption of functions in or for a company with which the company has or could have a business relationship or competition, as

well as to capital and profit participation in such a company. Conflicts of interest between an employee's official duties and their personal interests must be avoided. Behaviour that could harm the interests of the company should also be avoided in the private sphere. When expressing private opinions in public, employees should not refer to their function in the company. Unauthorised conflicts of interest can also arise between Bernecker and affiliated companies. To avoid this, all agreements and contracts with affiliated companies must be structured as if they were agreed with an independent third party. Deviations from this require the approval of the Executive Board.

## **2.10 Legally compliant, complete and truthful accounting**

The use of assets or funds of the Bernecker Group and the execution of transactions are only permitted if the respective transactions are properly recorded and reported. All entries in the Bernecker Group's books and records must be true, complete and accurate. They must be made without gaps and in accordance with the general accounting regulations. Payment applications and payments may only be submitted or made in the interests of the company and only for legally authorised purposes. They must match the corresponding payment documents.

## **2.11 Economical use of company resources**

The economical use of company resources is a matter of course. Every time resources are used, it must be checked whether it is in the interests of the Bernecker Group. If different solutions are conceivable and equivalent, the more economical one should be chosen.

## **2.12 Ambassador of the company**

We are all perceived as representatives of the company in our actions. We must be aware of this on a daily basis. Behaviour that damages our reputation will not be tolerated. By contributing to the positive perception of the Bernecker Group through our work, we also support the economic success of the entire company.

# **3. Validity and implementation of the Code**

The rules of this Code of Conduct apply to all employees of the Bernecker Group, not only verbatim but also in spirit. Insofar as rules of conduct for individual areas of activity are laid down in separate guidelines, these guidelines apply without restriction in addition to the Code of Conduct. In cases of doubt, the stricter rule must be observed. A breach of the Code of Conduct can lead to labour law measures for all employees, i.e. also for managers.

The company management ensures that the principles and ethical values of this code are communicated to all employees of the company in an appropriate manner and on a regular basis. In addition to their role model function, all line managers with disciplinary responsibility have the task of communicating the Code of Conduct to the company and monitoring compliance with it. As part of their management responsibility, all line managers are responsible for ensuring that all employees in their area of responsibility understand and comply with the rules of the Code. We therefore include the Code as a primary obligation in the employment contract of these employees. They are asked at regular intervals to confirm that they have acquired and complied with the rules of the Code, have reported any breaches of which they become aware and are aware of their responsibility to ensure that their employees comply with the rules of the Code of Conduct.

Every employee is authorised and encouraged to report violations of this Code of Conduct or the guidelines applicable at the Bernecker Group. The company undertakes not to penalise any employee for bringing a violation or suspected violation of this Code of Conduct to the attention of management or a senior executive. No one will be held responsible for any business disadvantages resulting from compliance with the Code.