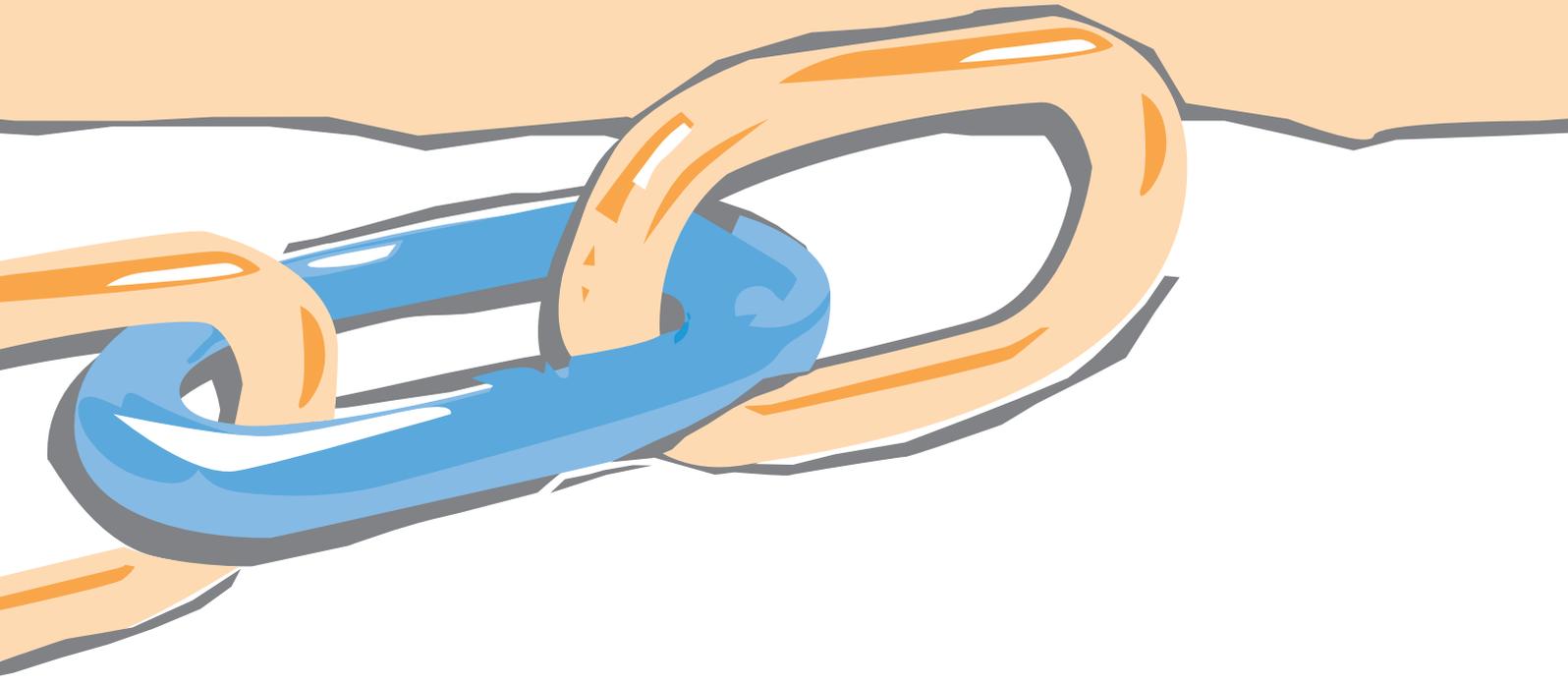
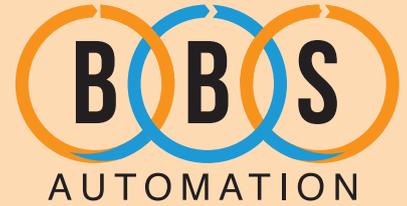


# Code of Conduct

BBS-Group Code of Conduct • February 2022



## Introduction

**Our claim is clear:** Automation solutions from BBS Automation set standards. Our products exemplify efficiency, safety, reliability and innovation. Our corporate values form the basis of this promise. Every employee, every customer, every supplier, every partner and even society as a whole can all count on us: We take responsibility, and we are performance-oriented, open, fair, respectful and exemplary. These corporate values shape our company culture. And this value orientation is something everyone can rely on. That is the promise we make to you by this Code of Conduct.

The BBS-Gruppe's Code of Conduct summarizes the general principles of our work and documents the duties of all employees with respect to the company. It also contains binding ethical guidelines based on the UN Global Compact, the world's largest and most important initiative for responsible corporate governance.

**Our aim is to set standards! And we invite you to measure us by those standards!**



Josef Wildgruber

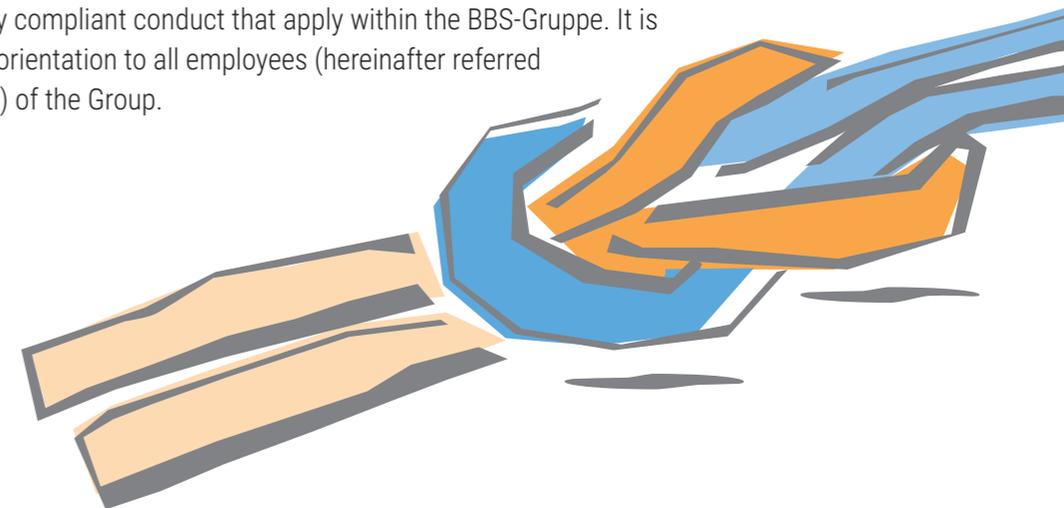


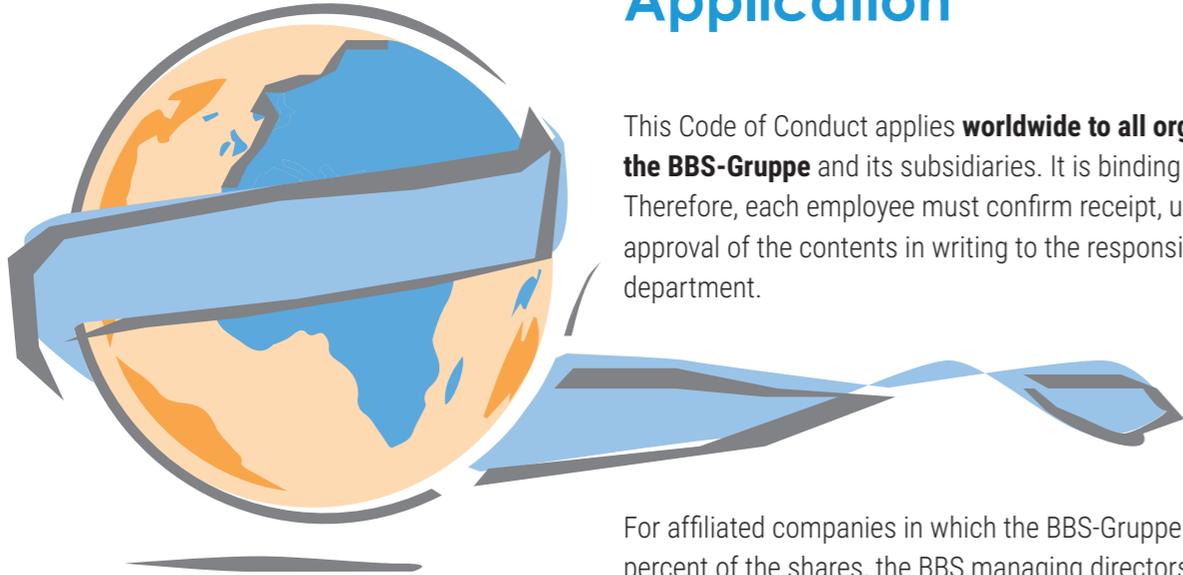
Christian Hammel

## Background

The fundamental prerequisite for successful corporate growth is **trust**.

Employees, customers, suppliers, creditors, authorities and the general public - all must be able to rely on the fact that the BBS-Gruppe and its subsidiaries comply at all times with **existing laws** and observe **voluntary rules** that go beyond them. This Code of Conduct summarizes the basic rules for ethical and legally compliant conduct that apply within the BBS-Gruppe. It is intended to provide assistance and orientation to all employees (hereinafter referred as "employees" to be gender-neutral) of the Group.





## Application

This Code of Conduct applies **worldwide to all organizational units of the BBS-Gruppe** and its subsidiaries. It is binding for all employees. Therefore, each employee must confirm receipt, understanding and approval of the contents in writing to the responsible human resources department.

For affiliated companies in which the BBS-Gruppe holds less than 50 percent of the shares, the BBS managing directors must work towards compliance with requirements comparable to the Code of Conduct.

## General principles

All rules in the Code of Conduct must be learned and observed by every employee. All managers are required to **set an example and shall be responsible** for actively implementing this Code of Conduct. They should provide their employees with **reliable advice** on all ethical and legal issues and ensure that their employees comply with the rules of the Code.

### Compliance with laws

The Code of Conduct is to be understood as a minimum standard which takes precedence over more lenient national laws. If there are stricter national laws in countries, these take precedence. All business matters and processes must be designed to comply with applicable laws, government regulations, voluntary commitments and all other regulations. Every employee of the BBS-Gruppe is obligated to comply with these regulations.

### Accepting benefits

Employees of the BBS-Gruppe are not permitted to exploit their position to claim or accept personal benefits. Employees are prohibited from giving gifts, favors, hospitality or other benefits to third parties in order to obtain orders or benefits on behalf of BBS.

The acceptance of **occasional gifts** is permitted up to a value of 35 euros. Any gifts or benefits in excess of this must be rejected and such offers must be reported to the supervisor. In the event of uncertainty about the value of a gift or benefit, the employee is required to obtain the consent of his or her supervisor.

### Competition

Every employee of the BBS-Gruppe is obligated to comply with all **aspects of competition law**. In particular, it is forbidden to have formal or informal discussions on the following aspects:

- Agreements on prices or capacity with competitors
- Agreements with the competition regarding sham offers
- Agreements with the competition on the allocation of customers or geographical areas
- Agreements with the competition to abandon competition



### (Foreign) trade

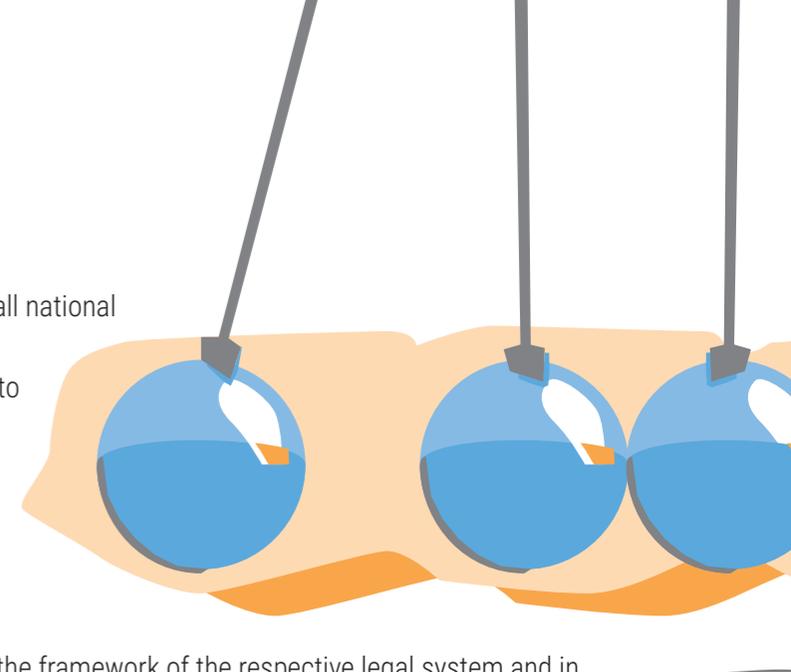
Employees of the BBS-Gruppe are obligated to comply with all national and international legal regulations for trade, transport and currency when importing and exporting goods. This applies to boycott regulations also. This includes **all customs regulations as well as trade and production controls**. Attempts by employees of the BBS Gruppe to reduce the tax burden on business partners are not supported.

### Donations to political associations/officials

Donations and sponsorship funds may only be made within the framework of the respective legal system and in accordance with the applicable internal regulations. **Political donations and contributions to political parties** must be approved by the management of the BBS Group.

### Business transactions with family members

**Business transactions with family members** (spouses, parents, children as well as other relatives and life partners with whom the employee lives in the same household) are generally prohibited. Exceptions may be made only when approved by management, however.





## Ethical principles

We take responsibility, and are performance-oriented, open, fair, respectful and exemplary. These corporate values shape our company culture. The **ten guiding principles** of the UN Global Compact guide our actions. Every employee of the BBS-Gruppe is committed to the following principles:

- We respect those internationally proclaimed human rights and promote their observance within our sphere of influence.
- We ensure that we do not participate in the violation of human rights.
- We respect the rights of our employees to join trade unions and effectively recognize their right to collective bargaining.
- We do not support any form of forced or compulsory labor.

- We do not support child labor and are actively involved in abolishing it.
- We do not support any discrimination based on ethnic origin, race, sex, age, religion, nationality, sexual orientation, social background or political affiliation, to the extent that such categories are based on democratic principles, and promote equal opportunities.
- We advocate a precautionary approach to environmental hazards.
- We take initiatives to promote greater environmental awareness.
- We encourage the development and spread of environmentally friendly technologies.
- We are strongly opposed to all forms of corruption – including extortion and bribery.

# Obligations towards the company

## Use of internal resources for private purposes

The **use of company resources for private purposes** is strictly prohibited.

Approval in individual cases is subject to the approval of the supervisor.

Exception: Appropriate private use of the Internet during working hours is permitted.

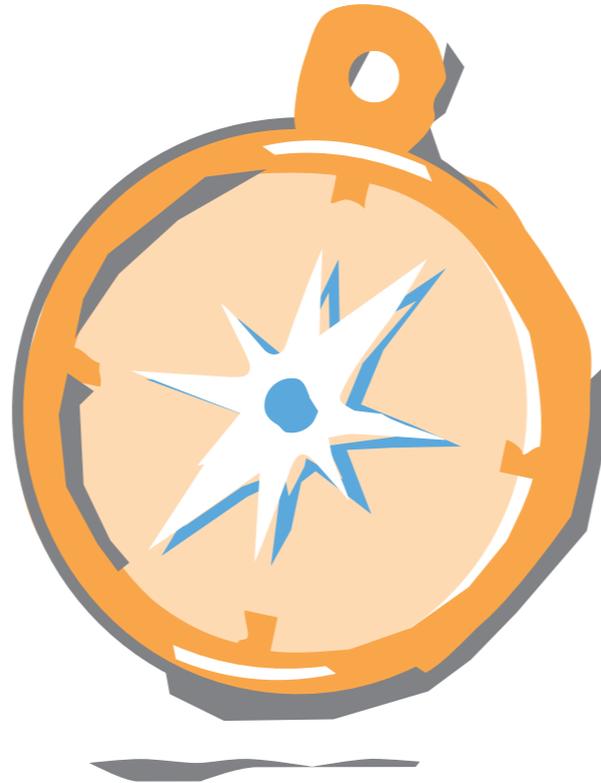
This excludes pornographic, politically extremist or violence-glorifying websites as well as other websites that are questionable according to common sense.

Private use may be restricted or prohibited by the supervisor at any time.

## Commitment to correct reporting

All corporate documents (e.g. accounting records, annual reports, audit reports, etc.) for internal and external use must be **correct** and **truthful**.

Data collection and other records must always be complete, accurate, timely and system-compliant.



## Correct accounting

All employees of the BBS-Gruppe comply with **national and international laws and regulations** for invoicing, financial planning and controlling. Cash and cash equivalents that are not accounted for or recorded may not be accepted.

## Company presentations to the outside world

**Official statements** on company matters shall be made only by employees expressly authorized to do so. When expressing private opinions, employees shall not refer to their role as an employee of BBS and shall refrain from damaging the public profile of the company.

### IT and data security

It is prohibited to independently install or delete software and change system settings on computers and other electronic data carriers of the BBS-Gruppe.

These activities shall be performed by the IT department only.

All business data must be stored on the servers of the BBS-Gruppe to ensure **regular data backups**. Company data may only be stored on devices provided by the company or on external, licensed storage solutions approved by management and the IT department.

Personal business e-mail addresses may not be used to subscribe to paid online services or subscriptions. Such services or subscriptions are subject to authorization and may only be contracted through general corporate email addresses (e.g., departmental email addresses).

### Data protection

Personal data shall only be collected within the BBS Group if they are absolutely necessary for legitimate purposes. All employees of the BBS Group are obliged to ensure a high level of **data quality and technical security** against unauthorized access.

### Protection third party rights

Employees of the BBS-Gruppe shall respect the valid **intellectual property rights of third parties**; unauthorized use is prohibited. At the same time, employees are required to protect the Company's rights to patents, inventions, designs, property, copyrights and trademarks and to protect and defend them against unauthorized use.



## Administratives

### Point of contact

The point of contact for all questions relating to the Code of Conduct is the Human Resources Department (hr@bbsautomation.com). The responsibilities for reporting possible violations of individual rules of conduct are regulated as follows:

### Reporting obligation

Every employee is obligated to inform his or her supervisor or the responsible persons listed in the previous section if he or she becomes aware of violations of this Code.

### Management

Managers are required to ensure compliance with the regulations within their area of responsibility and to support compliance through their own **exemplary conduct**. Should an employee contact them regarding a possible violation, they are obligated to keep this information confidential and to inform the contact persons mentioned in the previous section.

### Confidentiality

Every employee is guaranteed absolute **confidentiality** in the event of a report. Reporting shall not result in any disadvantages to the employee reporting the violation, except in the case of employees reporting themselves. In this case, however, the fact that an employee has volunteered the information will count in their favor.

### Violations and sanctions

**Violations of this Code of Conduct** may be sanctioned by the Company. Depending on the extent of the violation, this may include consequences impacting the existence of the employment relationship and claims for damages.

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