

# Code of Conduct

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Sustainable, responsible behaviour and high standards in the careful use of resources in accordance with the company's economic objectives form the basis for our daily conduct and decision-making. Our Code of Conduct serves as the guideline for all measures to promote solid business practices, good working conditions and well-being.

## 1. To whom does the Code apply

Bode GmbH expects itself – as well as its business partners – to comply with the Code.

## 2. Your obligations

This Code provides an overview of our ethical principles. Conduct yourself in such a way that your work is always safe and ethically correct and complies with the applicable laws, rules as well as the requirements of Bode GmbH. The Code of Conduct can be viewed on Bode GmbH's website/Intranet site; you can also find it on the Company's notice boards or speak to your line managers.

You are encouraged to familiarise yourself with the Code of Conduct and keep up to date with it.

## 3. Obligations of managers

They have a special responsibility that includes:

- Leading by example and implementing this in the day-to-day work with the employees reporting to them
- Consideration of actions and decisions in terms of compliance with corporate policies
- Ensuring guidelines and processes in the company
- Providing training for the employees reporting to them
- Creation of an environment that is respectful and inclusive
- Encouraging all team members to raise issues and concerns
- Addressing concerns expressed and appropriate response

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### **4. Principles of conduct**

#### **4.1. Work safety**

We expect our business partners – as well as ourselves - to ensure a safe and healthy working environment. This includes appropriate sanitary conditions, health as well as security guidelines and procedures. We immediately report accidents, injuries and dangerous equipment, practices or conditions to a line manager or the health and safety officer. No one shall assume that the risk or problem has already been reported by another person. Listen to the concerns of others. Familiarise yourself with the emergency procedures for your workplace.

#### **4.2. Environmental protection and energy management**

Sustainable environmental and climate protection as well as resource efficiency are important corporate objectives for us. We expect from our suppliers, business partners and employees both in developing new products and services and in operating production facilities that any resulting impact on the environment and climate is kept as low as possible and our products make a positive contribution to environmental and climate protection at our clients.

We are certified in accordance with DIN EN ISO 14001:2015 and DIN EN ISO 50001:2011. Bode GmbH's environmental objectives are mandatory for us and our business partners. Get actively involved in environmental protection - make this your personal priority.

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### **4.3 Quality management**

For us, quality is the result of our identification with the corporate philosophy and our day-to-day endeavours to meet our customers' requirements in the best possible way. We stand for high performance, innovation and quality. Quality includes compliance with the legal framework and standards as well as conduct in accordance with corporate social responsibility objectives and environmental concerns. Quality cannot be taken for granted and errors that occur are regarded as potential for improvement. They are investigated and the causes of the errors analysed for the purposes of initiating corrective and preventive action.

The aim is to ensure that recurring errors are avoided. Our company is certified in accordance with the ISO 9001:2015 quality standard. Furthermore, we are committed to continually improve our already high level of quality.

### **4.4 Fair business practices**

We differentiate ourselves from our competition in a fair and ethical manner by supplying excellent services and products that stand out due to their design and performance.

We cannot be bribed, we are not corrupt, we categorically exclude child labour and stand for fair remuneration.

### **4.5 Anti-discrimination**

The cultural diversity of our workforce is one of our greatest strengths. We provide in every respect for equality of opportunity, mutual trust and respect and do not tolerate any form of discrimination or harassment, which includes comments, unwelcome advances of any type, mobbing or similar conduct.

We are committed to treating our customers, suppliers, competitors and employees in a fair and respectful manner, irrespective of their position in the company, gender, culture and/or status.

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### 4.6.        **Secrecy/Data protection**

We protect confidential information against access and improper use by unauthorised third parties. Confidential information includes in particular:

- Business secrets
- Know-how
- Formulas and production processes
- Innovations/ideas for products and product developments
- Business records
- All unpublished or not yet published financial data and reports
- Everything that is marked as confidential
- All information that competitors may use
- Everything that could have a detrimental effect on our company or customers if such became known.

We ensure that all data available to us is used solely for communication with our customers.

We comply with all relevant data protection regulations and only collect or process personal data if this is essential for carrying out the specific work activity. It goes without saying that sensitive data and information is treated confidentially internally and externally. An in-house data protection officer is responsible for compliance and implementation.

### 4.7         **We protect our property**

We are committed to treating operating facilities, particularly machinery and tools, as well as information and communication systems carefully and appropriately and using them solely for business purposes.

Company property may not be used for private purposes nor removed from the Company's premises without the express consent of the unit responsible in the Company.

We always maintain our workstations and equipment, which we use and serve the Company's operations, in good working order. We report any damage to the unit responsible or supervisor where appropriate.

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We conserve the Company's own resources not only to avoid the weakening of the Company but also to protect the environment.

### **4.8 Operational reporting**

It is the responsibility of every single one of us to review our own conduct in light of the above standards and to determine areas of activity where improvements are possible.

The Company will enforce compliance with the above rules. Violations may result in consequences under civil, criminal or labour law.

In cases of legal doubt regarding conduct or incidents in our work environment we ask the line managers, relevant departments or employee representatives for advice and help. This is treated confidentially if requested. Openness and trust are extremely important particularly regarding any threat of damage to the Company.

Henstedt-Ulzburg, 11 November 2019

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