

Preamble

Bode GmbH is committed to its social responsibility within the scope of its entrepreneurial activities worldwide. Sustainable, conscious action and high demands on the careful use of all resources, in harmony with the economic goals of the company, are the basis of our decision-making every day. This Code of Conduct sets out as a guideline what this means in particular with regard to working conditions, social and environmental impact, as well as transparency, trusting cooperation and dialogue. By committing to this Code of Conduct, Bode GmbH is better able to respond to the different environments in a global market and to meet the challenges and social expectations resulting from increasingly networked cooperation in value chains.

Bode GmbH assumes responsibility by considering the consequences of its entrepreneurial decisions and actions in economic, technological as well as social and ecological terms and by achieving an appropriate balance of interests.

1. Scope

Bode GmbH expects itself and its business partners to comply with the Code of Conduct.

2. Principles

Employees must comply with all relevant laws and official regulations in their work environment, as well as internal instructions and guidelines.

Employees are required to behave honestly and fairly in their working environment and to avoid any conflict between private interests and the business interests of Bode GmbH or the interests of our customers.

All employees are strongly encouraged to talk to their superiors if they notice that someone is not behaving according to the rules.

Managers have a role model function. They are responsible for their own conduct and the conduct of employees in their area of responsibility, as well as for proper compliance with all procedures provided therein to avoid reputation and legal risks.

3. Treating others with respect

Our success is also essentially based on respectful interaction with one another. We are willing to learn from mistakes and appreciate frankness. The essential criteria for employee development are performance and potential.

Bode GmbH bases its actions on generally accepted ethical values and principles, in particular integrity, honesty, respect for human dignity, openness and equal treatment irrespective of religion or belief, gender, or ethnic origin.

4. Principles of conduct

4.1 Fair business practices

We set ourselves apart from our competition in a fair and honest way by delivering excellence and products that stand out for their design and performance. We do not take bribes, we are not corrupt, we categorically reject child labour, and we stand up for fair pay. Our relationship with the supervisory authorities is based on partnership and trust.

4.2 Combating corruption

Every business partner of Bode GmbH undertakes not to tolerate corruption and thus to comply with international and local anti-corruption laws and standards. Accordingly, any inducements paid or offered to government officials or other third parties in order to obtain a business advantage are prohibited. Nor may corresponding payments or benefits be demanded from or offered to a business partner by Bode GmbH.

4.3 Antitrust law and competition

Bode GmbH complies in all respects with all commercial laws, in particular with antitrust regulations, which prevent the unreasonable restriction of a functioning, free and competitive market. Furthermore, Bode GmbH also complies with all laws prohibiting unfair or deceptive trade practices. Bode GmbH expects its business partners to promote free competition.

We do not tolerate conduct prohibited by antitrust and trade laws under any circumstances. This means that anti-competitive arrangements are not permitted. Bode GmbH does not enter into any coordinated or informal agreements to boycott customers or other business partners. We follow a philosophy that does not tolerate price fixing under any circumstances. Every business partner of Bode GmbH undertakes not to participate in anti-competitive arrangements.

4.4 Money laundering

Bode GmbH's business partners comply with all laws prohibiting money laundering or the financing of illegal or unlawful purposes. They must ensure that they do business only with reputable business partners, i.e., business partners who conduct legal business with funds from legal sources.

4.5 Confidentiality and data protection

We protect confidential information from access and unlawful use by unauthorized third parties. We assure that the data available to us is used exclusively for our communication with the customer. We observe all relevant data protection regulations and only collect or process personal data if this is absolutely necessary for the fulfilment of the respective area of work. We as well as our business partners treat all sensitive information and data confidentially at all times. An external data protection officer is responsible for compliance and implementation.

The business partners of Bode GmbH observe the applicable regulatory framework under data protection law. Data are only processed to the extent that this is transparently necessary. The right of access and the right to rectification and, if applicable, the right to object, the right to restrict processing and the right to erasure ('right to be forgotten') must be safeguarded.

5. Nature conservation and climate action

Effective nature conservation and sustainable climate action as well as resource efficiency are important corporate goals for us. In their work, employees shall strive to protect natural resources and ensure that Bode GmbH's business activities have the least possible impact on the environment. This can be achieved by an efficient use of materials and energy as well as by reducing and recycling waste. We expect our business partners, both in the development of new products and services and in the operation of production facilities, to minimise any impact they may have on the environment and climate and to ensure that our products make a positive contribution to nature conservation and climate action with our customers.

We are certified according to DIN EN ISO 14001:2015 and DIN EN ISO 50001:2018.

6. Quality management and product responsibility

For us, quality is the result of our identification with the company philosophy and the fact that we are always striving to meet the needs of our customers in the best possible way. We stand for performance, innovation, and quality. Quality includes compliance with legal and other rules and regulations as well as actions that are in line with socio-political goals and nature conservation concerns. Quality is not something that can be taken for granted and any errors that occur are potential for improvement. They are evaluated and causes of errors are analysed in order to initiate effective corrective and preventive measures. This is to ensure that repeat errors are avoided.

Our company is certified according to ISO 9001:2015 quality standards. In addition, we are committed to continuously improving our already high level of quality.

Bode GmbH's business partners undertake to offer Bode GmbH products that are harmless for the intended use. In addition, all relevant product information, in particular on composition, use (safety data sheets, processing instructions or assembly instructions as well as occupational health and safety measures) and, if applicable, disposal of the products must be provided in good time before delivery / performance.

7. Occupational safety and working conditions

We expect our business partners - as well as ourselves - to provide a safe and healthy working environment. This includes adequate sanitary conditions, health, and safety policies and procedures. We immediately report accidents, injuries, and hazardous equipment, practices, or conditions to a supervisor or the Occupational Health and Safety Officer. No one assumes that someone else will have already reported the risk or problem. Listen to concerns from others. Familiarise yourself with the emergency procedure for your workplace.

7.1 Bode GmbH undertakes to comply with the following core labour standards of the International Labour Organization (ILO):

7.1.1 Child labour

The prohibition of child labour, i.e., the employment of persons younger than 15 years of age, unless local law sets higher age limits and unless exceptions are permitted.

7.1.2 Forced labour

The prohibition of all forms of forced or compulsory labour.

7.1.3 Wages

The labour standards regarding compensation, especially regarding the level of compensation in accordance with applicable laws and regulations.

7.1.4 Right to collective bargaining

Respecting the right of employees to freedom of association, freedom of assembly, and collective bargaining, to the extent that this is legally permissible and possible in the respective country.

7.1.5 Collaboration

Bode GmbH promotes open communication and teamwork. An environment was created that is respectful and inclusive. In order to promote the development of employees, Bode GmbH offers training courses.

7.1.6 Conflicts of interest

Conflicts of interest between employees and the company must be avoided. This includes issues that may lead to conflict.

7.1.7 Equal treatment

The cultural diversity of our workforce is one of our great strengths. We provide equal opportunity as well as mutual trust and respect in all respects and do not tolerate any type of discrimination or harassment, including insulting or degrading comments, unwanted advances of any kind, bullying or similar behaviour.

We are committed to fair and respectful treatment of the company's customers, suppliers, competitors, and employees, regardless of their position in the company, gender, culture and/or status.

8. Protection of corporate assets and conservation of natural resources

The assets and business equipment, business documents and working materials of Bode GmbH may neither be misused for private purposes nor handed over to third parties if this could impair the interests of Bode GmbH. We always keep our workplaces and all facilities that we use and that serve company operations in good order. We will report any damage to the responsible department or, if necessary, to the superior.

We conserve the company's own resources. We do this not only to save costs but also in order to protect the environment.

9. Communication

Bode GmbH communicates the requirements of this Code of Conduct as well as its implementation openly and in a dialogue-oriented manner to employees, customers, suppliers, and other stakeholders. The Code of Conduct shall also be communicated by our business partners within their organisations.

10. Implementation and enforcement

Bode GmbH makes all appropriate and reasonable efforts to continuously implement and apply the principles and values described in this Code of Conduct.

Violations of these rules can result in considerable reputational damage and legal disadvantages for the employees concerned, their colleagues and Bode GmbH, including fines, criminal proceedings or limited official permits. In addition, violations that constitute a breach of the obligations under the employment contract may lead to measures under labour law by Bode GmbH.

Henstedt-Ulzburg, 13. April 2023

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