

Code of Conduct

Preamble

Bode GmbH is committed to social responsibility in all respects of our global business activities. Our daily decision-making is based on sustainable, responsible conduct and holding the management of all resources to high standards of awareness in line with the company's economic goals. This Code of Conduct sets out guidelines on what this implies particularly to our working conditions, social and environmental compatibility, transparency, trust-based cooperation, and dialogue. It is precisely our commitment to this Code of Conduct that facilitates Bode GmbH to address all circumstances in the global market and confidently meet any ensuing challenges and social expectations that result from growing interconnectivity and cooperations along the value chain.

Consequence awareness towards the economic, technological, social, and ecological effects of our business decisions and actions enable Bode GmbH to assume responsibility by constructing 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 observe all laws and official regulations relevant to their working 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 their private interests and the business interests of Bode GmbH or the interests of our customers. All employees are expressly encouraged to speak to their superiors if they notice that someone is not behaving in accordance with the rules.

Managers serve as role models. They are responsible for their own conduct and the conduct of the employees in their area of responsibility, as well as for proper compliance with all procedures designed to avoid reputational and legal risks.

3 Respectful interaction with one another

Our success is also based largely on treating each other with respect. We are willing to learn from mistakes and value open communication. The key criteria for employee development are performance and potential. Bode GmbH bases its actions on universally accepted ethical values and principles, especially integrity, honesty, respect for human dignity, openness, and non-discrimination on the basis of religion, ideology, gender, or ethnicity.

4 Principles of conduct

4.1 Fair business practices

We set ourselves apart from our competitors in a fair and honest manner by delivering outstanding services and products that stand out for their design and performance. We do not accept bribes, we are not corrupt, we categorically reject child labor, and we advocate fair pay. We maintain a cooperative and trusting relationship with the regulatory authorities.

4.2 Fighting 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. This prohibits any payments or gifts made or offered to government officials or other third parties in order to gain a business advantage. Furthermore, Bode GmbH's business partners may not demand or offer such payments or gifts.

4.3 Antitrust law and competition

Bode GmbH complies in every respect with all trade laws, in particular antitrust regulations that prevent the unreasonable restriction of a functioning, free, and competitive market. Furthermore, Bode GmbH also complies with all laws that prohibit unfair or fraudulent trade practices. Bode GmbH expects its business partners to promote free competition.

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

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 only do business 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 you that the data available to us is used exclusively for our communication with the customer. We comply with all relevant data protection regulations and only collect or process personal data if this is absolutely necessary for the fulfillment of the respective area of work. As a matter of course we handle all sensitive information and data confidentially, both internally and externally. An external data protection officer is responsible for compliance and implementation.

The business partners of Bode GmbH comply with the applicable data protection regulatory framework. Data processing is only carried out to the extent necessary in a transparent manner. The rights to information and correction, as well as, where applicable, to objection, blocking, and deletion, must be upheld.

5 Environmental and climate protection

Sustainable environmental and climate protection as well as resource efficiency are important corporate goals for us. Employees should strive in their work to protect natural resources and ensure that the business activities of Bode GmbH have as little impact on the environment as possible through material savings, energy-saving planning, and the reduction and recycling of waste. We expect our business partners, both in the development of new products and services and in the operation of production facilities, to minimize any impact on the environment and climate and to ensure that our products make a positive contribution to environmental and climate protection for 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 our daily efforts 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 regulations as well as acting in accordance with socio-political goals and environmental protection concerns. Quality cannot be taken for granted, and any errors that occur represent potential for improvement. They are evaluated and the causes of errors are analyzed in order to initiate effective corrective and preventive measures. This is to ensure that repeat errors are avoided.

Our company is certified according to the 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 safe for their intended use. In addition, all relevant product information, in particular regarding composition, use (safety data sheets, processing instructions or assembly instructions, occupational 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 ensure a safe and healthy working environment. This includes adequate sanitary conditions, health and safety guidelines and procedures.

We report accidents, injuries, and dangerous equipment, practices, or conditions immediately to a supervisor or the occupational safety officer. No one assumes that someone else will have already reported the risk or problem. Listen to concerns from others. Familiarize yourself with the emergency procedures for your workplace.

7.1 Bode GmbH is committed to complying with the following core labor standards of the International Labor Organization (ILO):

7.1.1 Child labor

The prohibition of child labor, i.e., the employment of persons under the age of 15, unless local legislation sets higher age limits and no exceptions are permitted.

7.1.2 Forced labor

The prohibition of forced labor of any kind.

7.1.3 Remuneration

Labor standards relating to remuneration, in particular with regard to the level of remuneration in accordance with applicable laws and regulations.

7.1.4 Employee rights

Respect for the rights of employees to freedom of association, freedom of assembly, and collective bargaining, to the extent permitted and possible under the laws of the respective country.

7.1.5 Cooperation

Bode GmbH promotes open communication and teamwork. An environment has been created that is respectful and inclusive. Bode GmbH offers training courses to promote employee development.

7.1.6 Conflicts of interest

Conflicts of interest between employees and the company must be avoided. This also includes issues

that could lead to a conflict.

7.1.7 Anti-discrimination

The cultural diversity of our workforce is one of our greatest strengths. We offer equal opportunities, mutual trust, and mutual respect in every respect and do not tolerate any form of discrimination or harassment, including comments, unwanted advances of any kind, bullying, or similar behavior.

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

8 Protection of company assets and natural resources

The assets and operating equipment, business documents, and work equipment of Bode GmbH may not be misused for private purposes or made available to third parties if this could harm the interests of Bode GmbH. We always keep our workplaces and all facilities that we use and that serve the business in good order. We report any damage to the responsible department or, if necessary, to our supervisor.

We use the company's resources sparingly, not only with regard to weakening our company, but also with regard to the environment.

9 Communication

Bode GmbH communicates openly and in a dialogue-oriented manner about the requirements of this Code of Conduct and its implementation to employees, customers, suppliers, and other interest groups. The Code of Conduct should also be communicated by our business partners within their organizations.

10 Implementation and enforcement

Bode GmbH makes every appropriate and reasonable effort to continuously implement and apply the principles and values described in this Code of Conduct. Violations of these rules can result in significant reputational damage and legal disadvantages for the employees concerned, their colleagues, and Bode GmbH, including fines, criminal proceedings, or restrictions on official permits. In addition, violations that constitute a breach of employment contract obligations may result in labor law measures being taken by Bode GmbH.

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