

## **Code of Conduct of the Bohnenkamp Group**

### **Preamble**

The Management Board of Bohnenkamp AG as the ultimate parent company of the Bohnenkamp company group is convinced that sustainable economic corporate success is inseparably linked to compliance with internal and external laws, principles and values. The Bohnenkamp Group Code of Conduct described below is binding for all employees of our company. Within the scope of their activities, they are obliged to comply with the applicable laws and to observe the clear principles of the Code of Conduct.

### **1. Scope**

The Code of Conduct applies to all national and international companies and branches of the Bohnenkamp Group. It is binding for all employees.

### **2. Lawful and ethical conduct**

Every employee is obligated to behave ethically and to comply with all applicable national and international laws. Their actions are characterised by fair, respectful and trustworthy dealings with colleagues, customers, suppliers and business partners. The employees must uphold and promote the reputation of the Bohnenkamp Group.

Any form of discrimination based on ethnic, national and social origin, skin colour, gender, age, religion and belief, political activity, membership in workers' organisations, disability, sexual orientation or other personal characteristics is to be prohibited. The respective legal regulations apply.

### **3. Environmental and climate protection**

Environmental and climate protection form the foundation of our future. That is why we comply with applicable standards and legal requirements, minimise the impact on the environment and continuously improve environmental and climate protection. This includes the avoidance of waste, the responsible use of resources and pollutants, the proper, clean disposal of unusable products and the use of renewable energies.

### **4. Protection of company assets**

We expect our employees to handle our company assets responsibly. Each employee takes care to protect the assets by handling them honestly and with care. Company assets may generally only be used for business purposes, unless private use is expressly permitted. Every

employee must protect the intellectual property of the Bohnenkamp Group, for example patents, trademarks and know-how, from attack or loss.

## **5. Information and communication**

All employees must maintain the confidentiality and security of data and information in compliance with data protection regulations. In particular, they must maintain confidentiality about business activities, internal and external projects, the nature of cooperation with customers and all information concerning the Bohnenkamp Group and its customers. Transfer or disclosure of such information to third parties is to be avoided under all circumstances. In addition to the prohibition on disclosure, the obligation to maintain secrecy also includes the obligation to protect against third-party access and inspection. This is valid beyond the duration of the employment relationship.

Information is only forwarded to persons who have a legitimate interest in it. Only specially authorised employees are authorised to disclose information to the public or the media.

## **6. Antitrust and competition law**

We respect fair competition with companies involved in the market. We expect our employees to comply with all applicable national and international antitrust laws relevant to their respective areas of responsibility, as well as laws against unfair competition. Arrangements or activities that affect prices or conditions, allocate sales territories or customers or impede free, open competition in an improper manner are prohibited.

## **7. Corruption prevention**

The respective legal provisions on combatting corruption must be observed. When dealing with business partners as well as government institutions, the interests of the Bohnenkamp Group and the private interests of the employee must be strictly separated on both sides. Actions and (purchase) decisions are always made free of extraneous considerations and personal interests. This means, in particular, that money or personal benefits of monetary value may neither be accepted nor offered in return for preferential treatment in business dealings.

Our employees undertake not to offer, promise, demand, grant or accept any gifts, payments, invitations or services in business transactions that could improperly influence a business relationship. Any acceptance or granting of a benefit must be in accordance with the legal regulations and comply with generally accepted business practices. Special care must be taken when dealing with public officials and elected representatives.

The Bohnenkamp Group's internal compliance guidelines provide a concrete framework for customer contact.

**8. Conflicts of interest**

Bohnenkamp employees must avoid activities that could lead to a conflict of interest. Particular care must be taken when placing orders with related parties (e.g. spouses, life partners, relatives and friends) or with companies in which related parties work in a decisive function or in which they have a significant shareholding or for which they act as our negotiating partner.

**9. Combatting money laundering**

The Bohnenkamp Group only works with reputable business partners who operate within the framework of legal regulations and do not use illegal financial resources. All employees must ensure that the Bohnenkamp Group cannot be exploited for money laundering or other illegal purposes. Money laundering is the term used to describe financial or economic transactions by which illegally acquired liquid funds are introduced into the legal financial system. Every employee must comply with anti-money laundering laws and report suspicions of money laundering immediately.

**10. Implementation**

The Bohnenkamp Group will actively and ethically ensure that employees follow and support the principles of conduct. Actions that are inconsistent with this Code must be corrected immediately. Violations will result in employment and disciplinary action regardless of an individual's position.

Bohnenkamp AG  
The Board of Management