

# PRINCIPLES OF ETHICAL AND LEGALLY CORRECT BEHAVIOUR

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## BEEresponsible

As an international operating company with 250 employees, we are exposed to global competition. Growing demands, ever-increasing availability demanded by our customers, extreme fluctuations within the global economy or even digitalization: tests that we face as a company in order to be competitive and successful in the long run. The more volatile the times, the more important it is to have a clear and reliable understanding of values and principles, on which our customers and business partners can refer to and rely on. That is why the BeeWaTec company group has formulated principles of action under the motto "BEEresponsible", which determine our actions – both internally and externally.

This Code of Conduct underlines the basic understanding of ethically sound cooperation. This is binding for all employees of the BeeWaTec Group of Companies worldwide. In accordance with the motto "BEEresponsible" – "be responsible", we expect all employees to act accordingly and thus underline our global reputation in the market.



**Joachim Walter**



**Hans-Peter Walter**

Chairman of the Board of Management BeeWaTec AG

## Content

<b>Principles of ethical and legally correct behaviour</b> .....	<b>1</b>
<b>Code of Conduct</b> .....	<b>1</b>
BEE responsible .....	2
1. Scope and area of application .....	4
2. Principles .....	4
a) Law-abiding behaviour .....	4
b) Behaviour towards employees .....	4
c) Protection of assets .....	5
3. Avoiding conflicts of interest .....	5
4. Handling information .....	5
a) Documentation and documents .....	5
b) Secrecy .....	5
c) Data protection and information security .....	6
d) Fake parts .....	6
e) Whistleblowing / Protection from retaliation .....	6
5. Power of representation and subscription .....	6
6. Behaviour towards business partners and third parties .....	6
a) Competition and antitrust law .....	7
b) Gifts and invitations, other gifts .....	7
c) Donations and sponsorship .....	7
7. Compliance with export control and customs regulations .....	7
8. Product quality and product safety .....	7
9. Support of human rights and good working conditions .....	7
a) Prohibition of child labour and protection against discrimination .....	8
b) Working hours .....	8
10. Safety and Healthy at work .....	9
11. Environmental protection .....	9
a) Reducing consumption of raw materials and natural resources .....	10
b) Handling waste and hazardous substances .....	10
c) Avoidance and reduction of environmental pollution (especially air emissions) .....	10
d) Air quality .....	10
e) Water quality and consumption .....	10
f) Environmentally friendly production .....	10
12. Responsibility .....	10
a) Obligation to report and breaches .....	10

## 1. Scope and area of application

The Code of Conduct applies to all employees within the BeeWaTec Group of companies. BeeWaTec also expects all other employees (trainees, students, consultants) and persons or companies acting on behalf of BeeWaTec to comply with these regulations.

The minimum standard set out in this Code of Conduct can be adjusted by stricter legal requirements or regulations. This standard is supplemented and, if necessary, concretised by guidelines and requirements, which are updated in the internal communication platform Microsoft Teams in the global team "all employees global". The scope of application is the respective companies within the BeeWaTec group of companies or persons acting on behalf of BeeWaTec; rights of third parties are expressly unfounded.

## 2. Principles

Every BeeWaTec employee is responsible for compliance with the provisions of the Code of Conduct – "BEEresponsible". The management and executives of the BeeWaTec Group of Companies have a main role to play here. Through their exemplary behaviour in communication and implementation of the rules, they present the contents to the employees every day in their day-to-day work.

### a) Law-abiding behaviour

As employees of the BeeWaTec Group of Companies, we comply with applicable laws in all actions of our daily work and beyond. Each of us is responsible for compliance with these laws. It is prohibited to knowingly participate in illegal activities such as corruption, extortion and bribery or to induce third parties to engage in such acts.

Every employee is invited to question his or her actions for legality at all times and to inform his manager in case of doubt. Executives and management are responsible for complying with legal regulations and internal guidelines in their areas.

### b) Behaviour towards employees

Diversity instead of simplicity. Enshrined in the fundamental right, we respect and protect the dignity of each individual. The employees of the BeeWaTec Group of Companies are committed to a fair and cooperative cooperation. We meet openly and with an attitude of mutual respect, tolerance and fairness. Any form of harassment and discrimination shall not be tolerated in any form, in particular with regard to:

- Gender, descent, origin and nationality
- Religion and worldview
- Political, social or trade union activity
- Sexual identity and orientation
- Physical and/or psychological limitations or age

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**c) Protection of assets**

BeeWaTec expects and demands from all employees to protect the material property and the intangible assets of the company. "BEEresponsible" – be responsible" means to use the property of the BeeWaTec Group properly, carefully, purposefully and gently, as well as to protect against loss, damage, misuse theft or destruction. Acts that violate applicable law, such as fraud, theft, embezzlement or money laundering, will be reported and prosecuted. This also includes the resources available not to use them for personal enrichment or external purposes.

### 3. Avoiding conflicts of interest

For BeeWaTec, it is the highest priority that employees do not get into conflicts of interest or loyalty in the performance of their duties. It is therefore necessary to examine and approve the commencement of an ancillary activity for remuneration by the employee before he or she starts work.

If an employee, his (marriage) partner or a family member is involved in companies that are directly competing with BeeWaTec or associated with participations and ancillary activities with customers or suppliers of BeeWaTec, a notification to the HR department is required.

BeeWaTec welcomes all kinds of political, social and charitable commitment of our employees. However, this commitment is made exclusively as a private individual. Conflicts of interest with official interests must therefore be avoided in general.

### 4. Handling information

**a) Documentation and documents**

All documents of the BeeWaTec Group must reflect the character of a business transaction, which means truthful, complete, unambiguous and near-term. A fast and smooth exchange of information within the company is a top priority for every member of the BeeWaTec Group. Knowledge and information must not be unlawfully withheld, falsified or selectively treated when passed on. All business transactions in particular verbal and written agreements and contracts, must be documented and stored in accordance with legal and internal requirements.

**b) Secrecy**

Our know-how is of particular importance for the past and future success of the BeeWaTec Group. The protection of this know-how against unauthorized access by third parties is very important for BeeWaTec. All employees are therefore required to comply with the requirements and safety standards in connection with personal and electronic communication with third parties. All information that is not publicly available and is subject to confidentiality may not be disclosed during or after termination of the employment relationship. The use of confidential business information for one's own benefit, for the benefit of third parties or to the detriment of the BeeWaTec Group is prohibited.

Conversely, this applies, of course, to information that is provided to us confidentially by third parties.

**c) Data protection and information security**

Protection of privacy when using personal data, as well as protection of all business data in compliance with applicable legal data protection requirements in all business processes must be ensured. The internal and external data protection officer is available to all employees for this purpose. Every employee complies with the reporting obligation and can submit it immediately at [datenschutz@beewatec.de](mailto:datenschutz@beewatec.de).

**d) Fake parts**

Our products have clear markings and are traceable within the supply chain. By quality checking in the goods receipt in cooperation with product management, we implement methods to reduce the risk of using counterfeit parts and materials. We will notify our customers immediately and take appropriate legal action to protect the market if we become aware of counterfeit parts in circulation.

**e) Whistleblowing / Protection from retaliation**

"FAIL – FIRST ATTEMPT IN LEARNING": In order to create awareness, to point out misconduct, we are working sustainably to create an open and hierarchy-free culture that is free of fears of negative consequences for the individual. Employees are encouraged to seek advice and support without fear of negative consequences.

Reported violations of the Code of Conduct will be kept strictly confidential. This includes the prohibition of retaliation against persons who report violations or misconduct. They will not receive any disadvantages (termination, discrimination).

## 5. Power of representation and subscription

In order to protect our employees and our partners, proper representation in the conclusion of contracts is a prerequisite. Each employee must be aware of or check his or her authority before signing a contract. The BeeWaTec organization chart of the respective national organization shows the powers of representation and signature.

## 6. Behaviour towards business partners and third parties

The business partner (customer, supplier, sales partner) is the focus of our trade. These relationships are based on mutual reliability and sustainability. Business relationships are entered into exclusively on the subject of factual and economic criteria. Respect, fairness and sincerity are the keywords that accompany us here every day. This presupposes that decisions are made, documented and communicated transparently and in a comprehensible manner.

Agreements with customers, suppliers and sales partners must be made in writing, in full and unequivocally, changes and additions require written form. This also applies to regulations such as the payment of bonuses, advertising or promotion subsidies.

#### **a) Competition and antitrust law**

The cornerstone of our social and economic system is effective and unhindered competition. This is a guarantee of growth and secures jobs. Each employee plays an important role in complying with the laws and internal regulations that are relevant in his or her respective areas.

We do not accept any agreements with competitors, distributors representatives, etc. with regard to prices, delivery conditions, customer and supplier relationships, benchmarking, marketing information on the marketing of the products, positioning and distribution strategies.

#### **b) Gifts and invitations, other gifts**

Gifts and invitations (donations) are permitted in dealing with business partners and customers, within reasonable limits. Employees must be able to act objectively, fairly and unaffected in their business decisions. Benefits that have the appearance of influencing these decisions are not permissible. An orientation for an appropriate order of magnitude for gifts from third parties is a value of 50€, for invitations from third parties 100€. In case of doubt about the adequacy of gifts or invitations, the employees shall coordinate this with his or her manager.

The acceptance of direct or indirect bribes from employees of customers, suppliers, competitors and others is strictly prohibited. Conversely, employees are also strictly prohibited from offering direct or indirect bribes to employees of customers, suppliers or competitors for the purpose of maintaining the business relationship.

#### **c) Donations and sponsorship**

For BeeWaTec, entrepreneurial success is inextricably linked to social responsibility. The award of donations and sponsorship must not be in temporal or factual context with the award of contracts by or for a company of the BeeWaTec Group. With donations BeeWaTec does not pursue any economic self-interest, BeeWaTec uses the sponsoring in a targeted manner to positively shape the reputation and perception of the BeeWaTec Group in the public.

## **7. Compliance with export control and customs regulations.**

All employees of the globally operating BeeWaTec Group comply with the generally applicable control regulations with regard to the import, export or domestic trade of goods, technologies and services. Whether official approvals are required and what the respective customs regulations are must be checked before the actual action is carried out.

## **8. Product quality and product safety**

BeeWaTec meets the high quality and safety requirements of our customers by continuously improving its processes and further training of its employees. Valid technical standards are taken into account and no compromises are made at the expense of product safety or quality.

## **9. Support of human rights and good working conditions**

Safe working conditions are a top priority for the BeeWaTec Group of Companies. The BeeWaTec Group respects human rights and the joint work and behaviour is based on the

company values of appreciation, responsibility, transparency, openness and mutual honesty and trust. The working environment in each country meets all legal requirements.

The following sections address the main topics of focus for the BeeWaTec Group on human rights and working conditions.

### **a) Prohibition of child labour and protection against discrimination**

BeeWaTec does not tolerate any form of child labour or exploitation of children and adolescents. We reject forced labour and exploitation in any form. We do not support any form of modern slavery (political imprisonment, forced prostitution, recruitment of child soldiers, classical forms of serfdom and economic exploitation) No employee may be forced to work directly or indirectly through violence and/or intimidation. Physical punishment or psychological or physical coercion are prohibited.

The BeeWaTec Group does not tolerate any kind of harassment or discrimination, in particular with regard to:

- Gender, descent, origin and nationality
  - Religion and worldview
  - Political, social or trade union activity
  - Sexual identity and orientation
- Physical and/or psychological limitations or age

### **b) Working hours**

In principle, the BeeWaTec Group complies with the applicable national working time regulations. In addition, the BeeWaTec working time model stipulates that holiday periods and rest periods are to be observed. Through the flexitime regulation, BeeWaTec promotes the reconciliation of work and private life and thus enables a healthy life balance. There is also a choice of different working time models.

The organization of working hours and breaks takes into account both company and individual concerns. Digital time recording ensures that the flexitime (overtime) generated remains within a defined framework and is reduced as soon as possible. In accordance with the ILO core labour standards, the BeeWaTec Group rejects the use of forced labour or unlawful compulsory labour in the context of its business activities and maintains the minimum age for employment.

### **c) Performance + Qualification**

The BeeWaTec Group attaches great importance to a competitive and performance-based remuneration, which is supplemented by additional services.

The remuneration system is based on the principle of fairness and is based on performance and the results achieved.

The statutory guaranteed minimum fees or minimum standards of the respective sectors are complied with.

BeeWaTec offers further education and promotion measures based on individual skills and individual expectations/objectives. The aim of BeeWaTec is to secure long-term satisfied employees with a high level of performance and motivation.

The comparison of the self-image and external image takes place annually in employee yearly discussion.



If a training requirement is detected during the year this can be addressed with the human resources department via the manager. The focus is not only on professional qualification, but also on personal development. Access to training and training is based on the principle of equal opportunities for all employees.

## 10. Safety and Healthy at work

The health, safety and well-being of all employees, as well as the creation of a working environment in which everyone can perform as best as possible while maintaining one's physical and mental health, are the top priority within the BeeWaTec Group of Companies, and the area of workplace ergonomics is precisely defined for each employee in the safety instruction. The company consistently complies with the applicable occupational health and safety laws and also sets its own standards for improving occupational safety. Regular inspections by external occupational safety officers, in cooperation with the internal safety officers and the visit of regular company doctors, make it possible to carry out a regular review of the relevant requirements relating to occupational safety and ergonomics in the design of workplaces, in order to reduce the risk of accidents. In our annual safety instruction, which every single employee in the company has to counter-sign, we specifically point out emergency preparedness, behaviour in the event of a fire, as well as our company-wide accident and fault management. We hand this over to each employee in writing.

The BeeWaTec Group also takes appropriate protective measures to ensure the safety of its employees and visitors at all locations. In addition, the BeeWaTec Group actively promotes the physical and mental health of employees under the motto "BEEHealthy" (health management: fitness offers, free water/tea/coffee bar, social rooms, events...).

## 11. Environmental protection

We attach great importance to innovation and sustainability. "BEEresponsible"! This means constant optimization of products and technologies with regard to responsible resource management, prevention of environmental impacts, compliance with environmental laws and standards in development and production, and constant striving for new environmental protection potentials. The BeeWaTec AG explicitly strives to reduce greenhouse gas emissions. Business trips are mainly carried out by train, and air travel is dispensed with whenever possible. The water is also heated in the internal heating system, in which our wood waste from the joinery is burnt. By laying out the entire production with LED lamps, we use less energy here than conventional lamps. At the entire site, we use DIN A4 paper made of recycled material, and refrain from printing documents wherever possible. "BEE responsible" on the way to the paperless office. Thus, with 1000 A4 sheets made of recycled paper instead of fresh fibre paper, we save as much CO<sub>2</sub> as a car emits over 5km. In this way we do our part to protect natural resources. Together with our waste disposal company we have recognized how to use our waste as a valuable resource. Thus, we are closing the cycle of recycling through fuel production for energy production.

**a) Reducing consumption of raw materials and natural resources**

BeeWaTec tries to reduce the consumption of raw materials in its business operations to the minimum possible. In particular, it attaches importance to the economical use of energy and water. Where possible, the use of renewable energy & resources shall be applied.

**b) Handling waste and hazardous substances**

BeeWaTec shall, wherever possible, avoid substances that pose a risk to people and the environment when released. Chemicals or other materials that pose a hazard when released into the environment shall be identified and acted upon in a manner that ensures safety when handling, transporting, storing, using, recycling or reusing and disposing of them.

BeeWaTec shall attempt to avoid or recycle waste as far as possible. Efforts shall be made to reuse the materials used. BeeWaTec shall develop procedures that regulate the transport, storage and safe and environmentally friendly treatment and disposal of waste.

**c) Avoidance and reduction of environmental pollution (especially air emissions)**

BeeWaTec ensures that any emissions are reduced to a minimum in accordance with the state of the art. A control system is implemented to control polluting emissions and treat them before they are released into the environment. We are committed to finding economic solutions to reduce any emissions to the minimum possible.

**d) Air quality**

We are committed to monitoring air quality and strive to avoid compromising it.

**e) Water quality and consumption**

BeeWaTec monitors and, where possible, reduces its water consumption and monitors water quality. We strive to avoid any impairment of water quality.

**f) Environmentally friendly production**

In all phases of production and development, we take care to ensure the responsible use of raw materials and natural resources. We are encouraged to examine and, where possible, use renewable energies. We must ensure that energy is used sparingly and that products can be recycled or reused in natural cycles.

## 12. Responsibility

Each employee, especially those in management positions, assumes personal responsibility for compliance with the Code of Conduct and for addressing and reporting violations of the Code of Conduct.

**a) Obligation to report and breaches**

If employees of the BeeWaTec Group of Companies find that the Code of Conduct has been violated, they are obliged to report it to be used to avert damage to BeeWaTec, employees and business partners.

In general, the direct manager is the first point of contact for questions about this Code of Conduct or a possible violation of it. Where circumstances do not permit this, the managing director, department head or other BeeWaTec manager should be approached. In addition, suspected cases can be reported via [compliance@beewatec.de](mailto:compliance@beewatec.de).