

Code of Conduct Business Compliance



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Foreword

Dear Colleagues, Dear Business Partners,

The Bott Group maintains high standards not only in our products and processes, but also in our interactions with each other and all our business dealings.

The behaviour of every single one of our employees and business partners has an influence on the reputation and success of the company. As the executive board, we have therefore decided to summarise in this code of conduct the principles of ethical and moral behaviour we expect all employees and business partners to observe.

For bott, the applicable model in this regard is that of the reputable businessman. The code of conduct prescribes specific modes of behaviour based on this model. The essential thing is compliance with the law and that the interests of bott and its business partners are not improperly compromised.

We expect every employee and business partner to act in accordance with this code and our values, and to be aware of their responsibility for the reputation of our company and the bott brand.



Jan Willem Jongert
Chief Executive Officer, Bott Group

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Overriding principle

This code of conduct for bott employees is at the same time the business compliance guide for the business partners of bott. It summarises the basic principles of conduct that are binding on all employees and business partners, regardless of their contractual relationship to the Bott Group, be it contracts for employment, suppliers, subcontractors, services, consultancy, brokerage or other contractual performance relationships.

bott and its business partners comply strictly with the laws of the countries in which they operate. Unlawful conduct is not in the interests of the company because it is unethical, leads to a serious loss of reputation and can result in criminal prosecution, damages and loss of orders. Employees and business partners acting unlawfully must be aware that they are at risk of prosecution. Acting within the law serves to protect the employees and business partners of bott.

Every employee and business partner of bott is obliged to inform themselves about and comply with the regulations applicable to their sphere of responsibility. In cases of doubt, clarification should be sought from the employee's superior or the corresponding contact person.

- **bott rejects bribery and corruption.**
- **bott does not evade taxes or misuse subsidies.**
- **bott focuses on fair competition.**
- **bott observes the regulations of cross-border trade.**
- **bott respects intellectual and material property rights.**
- **bott is careful in its handling of personal data.**
- **bott documents business processes in a proper and timely manner.**
- **bott maintains open communication.**
- **bott protects people and the environment.**
- **bott respects human rights and protects children and young people.**
- **bott ensures fair treatment in its interactions with employees.**
- **bott does not tolerate harassment and discrimination.**
- **All employees and business partners of bott support the company's interests.**

bott abides by the law.

Bribery, corruption, gifts, donations

Bribery and corruption are illegal and unethical. Both are associated with a high degree of risk for the employees, the company and the business partners of bott. Bribery and corruption represent an existential threat to the company and its business partners and are therefore contrary to the interests of bott. Consequently, they are prohibited in all countries that bott operates in; in doing so, bott accepts any ensuing loss of sales. The laws applicable in the countries in which bott and its business partners maintain contractual or other performance relationships must be strictly observed.

bott and its business partners do not offer other international business partners, whether private nor public bodies, unlawful advantages, nor do they avail themselves of such advantages.

Among the things that bott considers to be acts of corruption are facilitation payments, kick-back payments, incentive donations and the involvement of third parties or intermediaries to conceal such payments. These practices are prohibited without qualification.

The employees of bott and its business partners are restrained when accepting and giving gifts and other gratuities (e.g. invitations to dinner or other events). On no account must gratuities be arranged such that their acceptance by bott or its business partners must be concealed or entail anything more than a trivial moral obligation. In cases of doubt the matter should be coordinated with the respective superior or contact person.

Commissions must be in an appropriate relation to the services provided.

bott rejects bribery and corruption.

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Taxes and subsidies

The prosecution of tax evasion and corruption cases by the tax authorities and public prosecutor's office has intensified. This applies in Germany as well as abroad.

Every employee and business partner of bott must be aware that in the case of tax offences, there is a high chance of being discovered due to the regular and diligent checks made by the tax authorities.

Suspicious facts often lead very rapidly to the involvement of the prosecution authorities. Where business partners, customers and

suppliers are involved, tracer notes are sent to their respective tax authorities and vice versa.

An assessment of facts relating to tax and subsidy laws is often difficult, particularly if it involves international transactions. In cases of doubt, it may be necessary to seek clarification from bott, the involvement of a superior and/or clarification by executive management.

bott does not evade taxes or misuse subsidies.

Safeguarding fair competition.

bott upholds the laws protecting free competition, both national and international.

bott does not come to agreement with competitors over competitive behaviour.

The following are prohibited in particular: arrangements affecting prices and terms, the division of markets and regions, the allocation of customers and the agreement of proposal, development and production strategies.

Merely exchanging information with competitors, which can be the basis of a concerted practice, is prohibited, especially in relation to prices, costs, margins, terms, customers, offers, product developments and production capacities.

Violations of these prohibitions will be rigorously pursued by the competition authorities and may result in sanctions for the company that jeopardise its existence.

bott focuses on fair competition.

International trade

This mainly concerns the observance of existing import or export restrictions, the obtaining of necessary approvals and the payment of the set custom duties and taxes. In cases of doubt, the export officer of bott must be consulted.

Compliance with these provisions is subject to regular inspection by the authorities. Those committing violations face the threat of considerable sanctions.

bott and its business partners will not enter into business relations with individuals or organisations that are subject to trading restrictions. If relevant trade restrictions are imposed on an existing business partner, bott and its business partners will terminate this business relationship.

bott observes the regulations of cross-border trade.

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Company property and business secrets

Operating resources must be handled with care.

Company property must be used responsibly.

bott and its business partners take business decisions based on a commercially verifiable analysis of risks and opportunities. In doing so, bott respects the integrity of other business partners.

As an innovative company with a considerable expenditure on research and development, bott is reliant on protecting its inventions and expertise.

bott and its business partners are therefore particularly careful

how they handle trade secrets. It is necessary to ensure that confidential information does not find its way into the hands of unauthorised third parties.

The same applies to confidential information that bott receives from its business partners. If, due to special circumstances special confidentiality is required (e.g. sensitive development projects by customers or during corporate acquisitions), then the employee shall maintain confidentiality with respect to colleagues.

bott and its business partners respect third-party intellectual property.

bott respects intellectual and material property rights.

Data protection

bott and its business partners only use the personal data of employees and contractual partners for the purposes for which it was made available. Data must be treated with strict

confidentiality. bott and its business partners strictly observe personal data protection laws.

bott is careful in its handling of personal data.

Documentation of business transactions

Internal and external reports must be correct and complete, so that the recipient is accurately informed. In doing so, bott and its business partners adhere to a presentation of the facts and an objective mode of expression.

Documents that are required for current or future in-house or official investigations must not be destroyed, removed or modified.

bott documents business processes in a proper and timely manner.

Disclosure of information

In accordance with the applicable statutory provisions and standard industry practice, bott and its business partner disclose financial and non-financial information.

In such instances, bott and its business partners provide information about working conditions, health, safety and environmental aspects, business activities, and foreseeable risks.

bott maintains open communication.

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Product safety, occupational safety and environmental protection

bott and its business partners set the highest quality and safety standards for their products and services. bott and its business partners observe the quality of their products in the market and support customers in preventing hazards.

bott and its business partners make every effort to minimise the risk of counterfeit materials or components being incorporated into its own products. bott and its business partners provide a safe working environment. bott and its business partners strictly comply with safety regulations and assess their effectiveness. Deficiencies are identified and removed. without delay.

bott and its business partners are sparing in their use of natural resources and also strive for economy in the use of their products. bott and its business partners avoid damaging effects on the environment. For bott and its business partners, compliance with environmental protection legislation is taken as a given.

All these measures are designed so that we can play our part in sustainability.

bott protects people and the environment.

Human rights

bott and its business partners respect and support compliance with internationally recognised human rights. In particular, it maintains human rights in accordance with the

UN Human Rights Charter (Universal Declaration of Human Rights, Resolution 217 A (III) adopted by the General Assembly on 10 December 1948).

bott respects human rights.

Child labour and young workers

bott and its business partners are committed to the prohibition of all forms of child labour. When employing minors, Bott and its business partners observe the minimum age for admission to employment under national regulations.

Workers under the age of 18 are excluded from night work where this does not disrupt educational needs. Neither are they permitted to carry out work that endangers their health and safety.

bott protects children and young people.

Modern slavery

bott and its business partners are committed to the prohibition of all forms of forced labour. This includes all forms of work or services forced on an individual under threat of punishment or which an individual does not perform voluntarily.

bott strictly rejects forced labour.

Wages and social benefits

bott and its business partners pay all employees at least the minimum wage in accordance with relevant laws on remuneration, and provide all statutory social benefits. In addition to their salary for their standard working hours, employees

receive a payment for overtime which as a minimum complies with the applicable laws and regulations. Disciplinary measures in the form of deductions from salary are not permitted.

bott pays fair wages

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Working time

bott and its business partners will not exceed the respective legally stipulated maximum number of hours in relation to the weekly working hours. Furthermore, the weekly working time is not permitted to exceed 60 hours, including overtime.

Exceptions include emergencies and exceptional circumstances. In a seven-day week, employees are granted at least one free day.

bott ensures appropriate breaks.

Workplace co-determination

bott is committed to the principle of workplace co-determination and maintains good communication and interaction with the Works Council.

bott welcomes workplace co-determination.

Harassment and non-discrimination

bott and its business partners reject all forms of discrimination in the working environment and respect employees' privacy.

bott and its business partners are committed to promoting equal opportunities and diversity and work to ensure that all employment decisions (or example recruitment, promotion, training and further development) are made solely on the basis of individual ability and qualification.

Aspects such as race, ethnic origin, religion or belief, gender,

sexual identity, age, nationality, disability, social origin, personal relationships or membership of a trade union have no impact on employment decisions.

bott and its business partners reject all forms of sexual harassment of employees.

bott does not tolerate harassment or discrimination.

Avoiding conflicts of interest

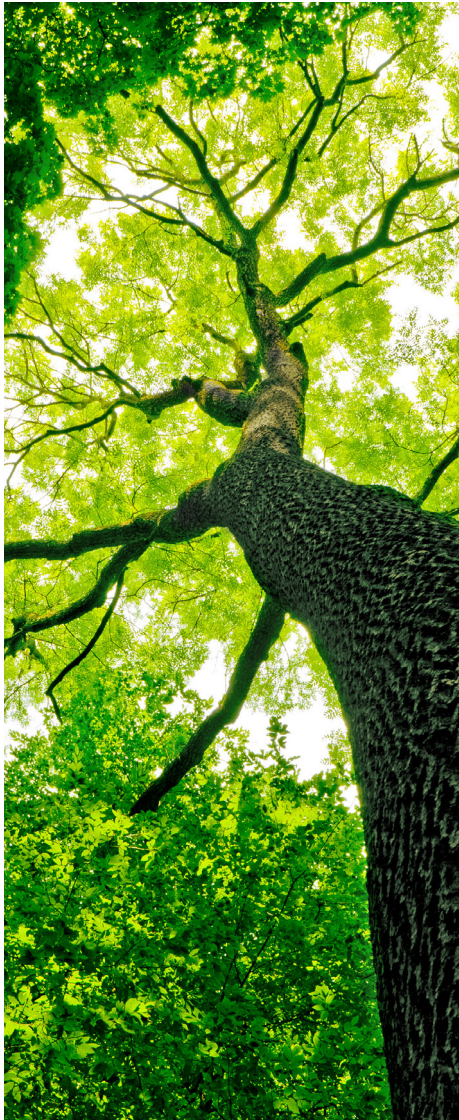
Ancillary business activities require the prior approval of bott. Here it is important to ask the respective line manager or contact person. This applies particularly to carrying out ancillary activities on behalf of, or having financial interests in the suppliers, customers or competitors of bott. If close family members are

engaged in such activities, this must be disclosed. Employees and business partners of bott strictly separate business and private interests and do not exploit their activities with or for bott for private gain. The commissioning of business partners must not be preferred out of private interest.

All employees and business partners of bott support the company's interests.

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Afterword

This code of conduct is binding on all employees of the Bott Group. It may be supplemented or defined by subject-specific or country-specific regulations and training sessions.

Our managers have a special responsibility; they are asked to exemplify and embody the rules and values of bott described in this code. They are the first point of contact for answering employees' questions about correct behaviour.

It is their task to ensure compliance with the code within their sphere of responsibility.

Answers to questions about the correct behaviour in particular cases will be provided by the respective line manager or executive management.

Violations of the code will not be tolerated and can lead to dismissal or criminal charges or both.

Implementation of bott business compliance

By signing a declaration (see Appendix), the business partners of bott commit themselves to adhering to the basic principles and standards of conduct outlined in this document. They assure and demonstrate to bott that they operate according to ethical standards and may already have comparable compliance systems. bott reserves the right to ask further questions and to inspect documentation in this regard.

bott employees shall report violations of laws, regulations, directives, this guide and other applicable reciprocal rules so that appropriate measures can be taken. bott also expects the same of its business partners.

bott guarantees protection for whistle-blowers and will do everything in its power to keep whistle-blowers safeguarded against any disadvantages.

For their part, the business partners of bott shall carefully select their own business partners who work directly or indirectly for the Bott Group, and shall pass on the principles stated in this guide or their own equivalent guidelines.

The Bott Group reserves the right to take appropriate measures against business partners who violate the legal provisions and principles of conduct described in this guide. This may lead to the immediate termination of the relationship, claims for damages and/or entail reporting the offence to the responsible authority. The same applies to the relationship between bott's business partners and third parties.

Where reasonable changes are made to the bott business compliance system, the Bott Group reserves the right to also change individual details of this guide. In this case, bott expects its business partners to accept such reasonable changes.

A handwritten signature in black ink, appearing to be 'Jan Willem Jongert', with a small dot at the end.

Jan Willem Jongert
Chief Executive Officer, Bott Group

