



CODE OF CONDUCT

BUHLMANN Group – June 2024





Dear Colleague,

Since its introduction, the BUHLMANN Code of Conduct remains a document that expresses the fundamental vision and values of the BUHLMANN Group with regard to ethical behaviour and transparency, and what we expect from everyone who works for and with BUHLMANN.

As we strive to strengthen our position in the market, our responsibility towards society and the environment is constantly increasing. The globalised economy presents the BUHLMANN group, its suppliers, customers and business partners with complex challenges. This Code of Conduct can never address every possible situation we may face, so if in doubt please seek advice from your supervisor, our Compliance Officer or the Legal Department, as appropriate.

The reputation of our Group reflects the actions of each of us every day, and is one of our greatest assets. Therefore, the board of directors and I count on your commitment to our principles and to inspiring others to behave ethically and responsibly at all times, both internally and externally.

June 2024

Jan-Oliver Buhlmann
Chairman and CEO

Tradition

We perform our work in the best tradition of a successful family business, in which mutual trust forms the basis for our success.

Relations

We develop and foster long-lasting, respectful and fair relationships with our customers and suppliers.

Cooperation

We live and breathe global thinking and action by working in cooperation with our customers and suppliers all around the world and respecting cultural differences and traditions at all times.

Flexibility

We shape the future in an active and visionary manner, striking new paths to success by reacting flexibly, rapidly and prudently.

Family

We value the long-term, reliable and successful commitment of the BUHLMANN FAMILY over generations and contribute together to the sustainable and inclusive future success.

Investments

We invest in our continuing development, share our knowledge with our colleagues and learn from our experiences.

Quality

We attach great importance to the high quality of our products, services and the professionalism of our employees.

OUR GUIDING PRINCIPLES

The BUHLMANN Group has adopted core values based on international standards for the protection of human rights, labour standards and fair business cooperation. The rules contemplated in this Code of conduct are intended to reinforce, and ensure compliance with these principles.

SCOPE OF APPLICATION

The provisions of this Code of Conduct are fundamental aspects of our corporate culture. These guidelines for professional behaviour apply to our day-to-day activities and must be observed by all directors, managers, executives, employees and temporary workers, regardless of the management level or function within the Group.

We expect our business partners to adhere to all the principles and values established in this Code of Conduct both within their own organisation and throughout their supply chain. If risks or violations are identified in a partner's supply chain, the BUHLMANN Group will initiate appropriate countermeasures, including the termination of the cooperation, if necessary.

COMPLIANCE WITH THE LAW

- The BUHLMANN Group operates globally and therefore treats traditions and social norms of our partner countries with the utmost respect. This includes compliance with all applicable national and international laws and regulations.
- Any illegal behaviour can result in liability for us and our employees not only in the country where the incident occurred but also in other countries in which the BUHLMANN Group is active.
- Therefore, all managers are responsible for making themselves aware of any laws or regulations applicable to their area of work and for ensuring that these are communicated to and implemented by their employees.



PROHIBITION OF CORRUPTION

We are aware that the fight against corruption and bribery is an international issue of the utmost importance. Therefore, the BUHLMANN Group does not tolerate corruption or bribery in any form. Specifically, we do not solicit, accept, offer or grant prohibited personal benefits or incentives either directly or indirectly, to influence a business outcome. In particular, no benefits may be offered or given to a domestic or foreign public official for the purpose of influencing or expediting an official act or obtaining an improper advantage.

We expect our business partners to comply with these ethical standards and legal requirements to combat corruption and bribery. When in doubt our employees must obtain the approval from their supervisors and/or the Compliance Officer before offering or accepting any benefit. If an act of bribery or corruption is suspected, the Managing Director or Compliance Officer must be informed.

LABOUR RIGHTS

The BUHLMANN Group complies with internationally recognised human, labour and personal rights. We are committed to fair working conditions, including remuneration, regulation of working hours and protection of privacy.

Our actions are in particular based on the universal principles of the International Labour Organization (ILO). There is no place in our company for modern slavery or human trafficking or for any form of discrimination or harassment.

We guarantee the fair treatment of our employees, strive for better standards of pay and offer appropriate wages and salaries corresponding to the local and industry standards.

All forms of forced labour and child labour are strictly prohibited. All business partners in our supply chain are required to adhere to these principles not only within their organization but also in their supply chain through the implementation of appropriate measures and control mechanisms.

Any violation of the above mentioned principles or labour rights shall be notified to the BUHLMANN Group immediately.



EQUAL TREATMENT AND NON-DISCRIMINATION

The BUHLMANN Group promotes a culture of equal opportunity, mutual trust and mutual respect. We condemn discriminatory practices in employment and occupation and do not tolerate discriminatory behaviour for any reason whatsoever. In addition, gender equality plays an important role in our corporate policy.

We expect our business partners to adhere to the principles of non-discrimination and respect for employees and will ensure such compliance within their supply chain as well.

PROMOTION OF OUR EMPLOYEE'S CPD (CONTINUOUS PROFESSIONAL DEVELOPMENT)

The success of the BUHLMANN Group depends on the skills and expertise of our employees. We promote a working environment characterised by mutual support, teamwork and open communication, where motivated employees can also impart and further develop their skills and expertise. The BUHLMANN Group offers internal and external trainings to support the continuing professional development of our employees.

CONFLICT OF INTEREST

Our employees act in the best interests of the Group and not on the basis of personal interest. We expect our employees to avoid any situation that could result in a conflict between personal interests and the interests of the company.

PARTICULAR CARE SHOULD BE TAKEN IN CASES OF:

- business relationships where a relative or a personal friend, is an employee, an owner or a direct or indirect shareholder;
- any offered benefits (e.g. gifts, hospitality) that could improperly influence business decisions;
- the potential disclosure of confidential information
- any sideline activities. Such activities must be approved in advance by senior management. Activities that could compromise the integrity or loyalty to the company will not be approved.



HEALTH AND SAFETY

The BUHLMANN Group is committed to providing a healthy and safe working environment for our employees. In addition, it is a fundamental duty of each and every employee to create and maintain safe and healthy working conditions at all Group locations in order to protect their own safety and that of their colleagues. All accidents, malfunctions and other hazardous conditions must be reported to the QEHS department.

We work in accordance with the recognised management systems ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018. The high safety requirements of the BUHLMANN Group are taken into account when assessing suitable business partners.

ENVIRONMENT

The protection of the environment as well as saving resources are key objectives of the BUHLMANN Group. We comply with environmentally relevant laws and regulations and strive to act in a sustainable and environmentally friendly manner.

FAIR COMPETITION

The BUHLMANN Group and its employees are unconditionally committed to the principles of fair competition and comply with the applicable antitrust and competition laws.

We act fairly and transparently towards our business partners, customers and suppliers and do not make false or misleading statements. Unlawful agreements with competitors and concerted practices that restrict or limit competition, in particular agreements on prices, offers, sales quotas and the allocation of customers, markets and programmes, are prohibited. This applies not only to formal agreements but also to concerted practices resulting from informal discussions.

Employees may only attend association meetings that are conducted for proper business purposes. If participants from competitors make statements at such events that raise competition law concerns, employees must leave the meeting immediately and inform management or the Compliance Officer.



PROTECTION OF ASSETS (CONFIDENTIALITY)

All employees are responsible for protecting the Group's tangible (sites, facilities, products, vehicles, documents) and intangible (expertise, software, property rights, trade secrets) assets within their area of activity. All assets are always to be used for business purposes, unless private use has been expressly permitted.

Business and trade secrets, as well as information that becomes known to us in the course of our activities and is not in the public domain, are subject to the strictest confidentiality. Such information will not be disclosed externally or to employees who are not involved in the specific business transaction.

All of the above duties of care also apply to any assets or confidential information of our business partners. Conversely, we expect our business partners to protect any of our confidential information or assets that come into their possession.



DATA PROTECTION

The protection of personal data in general, but especially the data of employees, business partners, customers and suppliers, is a high priority for us. As a matter of principle, we collect and process personal data only in accordance with statutory provisions and only to the extent that is necessary for the performance the relevant task or is required by law. Otherwise, we process personal data only with the consent of the data subject, always in accordance with the rules and principles stipulated in the applicable statutory laws, specifically, in the European Data Protection Regulation.

In all cases, we ensure data security, confidentiality and minimisation. Personal data will only be disclosed to authorised persons. All employees treat personal data as strictly confidential and store it securely so that it cannot be misused.

COMPLIANCE WITH INTERNATIONAL TRADE LAWS AND EXPORT CONTROL REQUIREMENTS

As a global company, the BUHLMANN Group complies with all applicable customs and export control regulations. We expect our business partners to cooperate with us, to provide us with all necessary information and to comply with export control regulations in order to avoid trading with sanctioned goods, persons or companies.



PUBLIC RELATIONS

Statements made on behalf of the BUHLMANN Group must be authorised by the relevant department, such as Corporate Communications, the Legal Department, the Compliance Officer or the General Management. Questions or interview requests from the media in general (e.g. newspapers, radio stations, blogs) must be forwarded to and will be handled by Corporate Communications.

We trust that our employees will conduct their private use of social media in a responsible manner, never jeopardising the reputation or business interests of the BUHLMANN Group and avoiding any confusion between an employee's opinion and the position of the BUHLMANN Group as a company.



SOCIAL COMMITMENT

Out of a sense of social and moral responsibility, the BUHLMANN Group and its shareholders have been involved in social projects, charitable organisations and associations for many years.

From sponsoring children's and youth sports teams and supporting voluntary aid programmes to establishing the "Solidarität Ukraine" (Solidarity with Ukraine) foundation. An active contribution to the common good and social cohesion is a fundamental part of our corporate philosophy. This is the only way to create the conditions for a peaceful, just and humane coexistence that is a prerequisite for a sustainable world.

Not only the company as a whole, but also the employees themselves are encouraged and supported to become individually active in the community. In addition, the BUHLMANN Group approaches customers and partners for specific projects in order to generate synergy effects that extend the scope of the support.

REPORTING MEASURES

All employees are required to report violations or suspected violations of the laws in force or this Code of Conduct, to either the Managing Director or the Compliance Officer.

The BUHLMANN Group promotes a climate of free dialogue. If an employee brings criticism or misconduct to our attention, intimidation or retaliation will not be tolerated, regardless of the party involved. All data, information and reports received will be treated with strict confidentiality and respect at all times.

Once a violation or suspicion has been reported, an initial assessment will be made to determine the scope of the investigation. The employee will be informed of the outcome of the assessment and the progress of the investigation to the extent permitted for by confidentiality requirements. The BUHLMANN Group ensures that any report of a possible compliance violation will be treated fairly and appropriately.

Our Compliance Officer is available at compliance@buhlmann-group.com or at compliance.buhlmann@posteo.de.





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