

Supplier Code of Conduct

(Last update: July, 1st 2023)

I. Introduction

Bohle AG and the affiliated companies of Bohle Group in all parts of the world attach the greatest importance to assuming and fulfilling their social and corporate responsibility – in addition to the mandatory compliance with applicable law. Our actions are above all guided by the values of integrity, fairness, justice, sustainability, and high ethical and moral standards. Our daily interactions with each other are based on mutual respect. These principles express the responsibility our company has for society, the environment, their business partners, employees, and other stakeholders.

Apart from economic criteria, our procurement activities are therefore also guided by social and ecological aspects. Accordingly, costs, quality, reliability, innovation, and sustainability are essential factors when choosing and evaluating Suppliers.

For this reason, we actively involve Suppliers in our sustainability strategy. In everything they do, we expect our Suppliers to adhere to applicable national law and international regulations, the United Nations Universal Declaration of Human Rights, the Principles of the United Nations Global Compact, the International Labour Organisation (ILO) Core Labour Standards, and the Bohle Supplier Code of Conduct.

II. Principles of social responsibility

1. Human rights

The Suppliers of Bohle shall respect and support the observance of internationally recognized human rights. They shall not be involved – not even indirectly – in any violations of human rights.

2. No discrimination

The Suppliers of Bohle shall undertake to neither abet nor tolerate any discrimination based on sex, gender identity, social or ethnic origin, nationality, language, skin colour, religion, sexual identity, physical or mental disabilities, or political conviction.

The dignity of humans is inviolable. It shall be respected and protected. This principle applies both to Bohle and its Suppliers.

3. Health and safety at work

The Suppliers of Bohle shall, at minimum, adhere to the applicable national legislation regarding health and safety at work or exceed it where necessary.

They are expected to establish and implement an appropriate work safety management and take precautionary measures to protect employees and ensure the mitigation of actual and potential work safety risks. Employees shall receive appropriate training to prevent accidents and (occupational) diseases.

4. Fair working conditions & freedom of assembly

The Suppliers of Bohle shall guarantee their employees, at least in accordance with the applicable national legislation, their freedom of assembly and of association.

5. Child & forced labour

The Suppliers of Bohle shall observe the United Nations regulations on human and children's rights. This applies in particular to the Convention concerning Minimum Age for Admission to Employment (ILO 138 Minimum Age Convention) and the Convention Concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (ILO 182 Worst Forms of Child Labour Convention). If the national legislation requires stricter rules in this respect, the corresponding stricter rules shall be given preference.

Bohle will not conduct business with companies that use, foster, support, or draw economic benefits from child labour.

6. Working time & remuneration

The Suppliers of Bohle shall adhere to the applicable national legislation concerning working time.

The remuneration shall at least correspond to the statutory national minimum wage. In the absence of any such regulation, the remuneration must be sufficient to secure the livelihood (shelter, food, and education) of employees. It must be paid on a regular basis.

III. Environment

1. Sustainable environmental protection

The Suppliers of Bohle shall, at minimum, adhere to the applicable national environmental legislation, regulations and standards or exceed them where necessary. In addition, Suppliers are expected to establish and implement an appropriate environmental management system to reduce environmental impacts and hazards and improve environmental protection. The ultimate goal must be to minimise unavoidable ecological burdens caused by resource consumption and emissions and keep reducing it further through the ongoing development of internal processes, operating materials and equipment.

If the Supplier's business activities bear a pollution risk, appropriate measures must be conceived and taken to reduce the impact and prevent any further damage.

This applies especially to the handling of waste. The related processes must not have harmful effects for air, soil, water and the health of employees or society as a whole. At the same time, the Supplier shall actively look for and implement measures to reduce and prevent waste.

IV. Business relationships

1. Corruption

The Suppliers of Bohle are called upon to ensure that corruption is not tolerated under any circumstances and that the private interests of the company on the one hand and of employees on the other hand are treated separately when dealing with business partners (customers/suppliers) and government institutions. The applicable national anti-corruption law must be adhered to under all circumstances.

Neither employees of Suppliers nor employees of Bohle must offer, promise, demand, grant or accept gifts, payments, invitations, or services in the course of business with the intention to exercise undue influence on a business relationship or which might endanger the professional independence of the business partner. This does not apply to gifts or invitations only if they fall within the limits of customary hospitality, convention, and courtesy in the business context. Unless otherwise agreed, applicable tax regulations, for example the exemption limit for non-cash benefits of 50 EUR net per person and per year in Germany, shall be used as a benchmark.

2. Fair competition

The Suppliers of Bohle shall be committed to fair competition and adhere to the applicable national legislation for the protection and promotion of competition.

Suppliers shall neither engage in anti-competitive agreements with competitors nor shall they abuse any dominant position in the market.

3. Avoiding conflicts of interest

The Suppliers of Bohle shall ensure that all decisions with respect to business activities conducted with Bohle are taken exclusively based on objective criteria. Conflicts of interest of a private nature, economic or other activities, also involving family members or other close persons or organisations must be avoided.

4. No money laundering

The Suppliers of Bohle shall comply with the applicable national anti-money laundering legislation and shall not engage in any money laundering activities.

5. Customs and export controls

The Suppliers of Bohle shall guarantee compliance with the corresponding national legislation and tariff regulations, as well as export bans, sanctions, and embargoes in international trade.

6. Conflict minerals

The Suppliers of Bohle shall adhere to all applicable statutory regulations concerning the so-called conflict minerals. Suppliers shall under no circumstances deliver products whose base minerals or derivatives stem from a conflict region where they contribute directly or indirectly to finance or support armed groups.

7. Trade secrets and privacy

The Suppliers of Bohle shall treat all company and business secrets confidentially. When dealing with personal data from employees, customers, suppliers and other business partners, the Suppliers shall guarantee compliance with the applicable national and international legislation. These data must be effectively protected from unauthorised access by third parties – also beyond the contractual relationship.

8. Intellectual property

The Suppliers of Bohle respect intellectual property and comply with the corresponding applicable regulations. Intellectual property includes all proprietary data, such as copyrights, trademarks, developments, patents, designs, and know-how.

V. Complaints procedure

The Suppliers of Bohle shall grant their employees access to internal and external complaints procedures and make those publicly known. The procedures shall grant the possibility to report deviations from the above-mentioned requirements anonymously. The employees of Suppliers shall also be entitled to complain directly to Bohle. You will find the corresponding contact data and information on the Bohle website.

Whistleblowers shall be protected and supported by Bohle as per the EU Whistleblower Directive and the German legislation.

VI. Compliance with the Bohle Supplier Code of Conduct

The Suppliers of Bohle shall undertake to comply with all principles and requirements laid down herein, communicate them to their upstream suppliers, and also take compliance into account when choosing their upstream suppliers. The Suppliers of Bohle shall encourage their upstream suppliers to comply with the described standards when fulfilling their contractual obligations and shall make appropriate efforts to guarantee the compliance of their upstream suppliers with the principles and requirements laid down herein.

In addition, Bohle expects their Suppliers to use only materials from legal sources and be able to provide the corresponding evidence on demand.

Audits can be conducted on site by Bohle or a third party commissioned by Bohle in coordination with the Supplier to verify compliance with the principles and requirements from the Bohle Supplier Code of Conduct.

The Bohle Supplier Code of Conduct is an integral part of the contracts concluded between Bohle and its Suppliers and must be complied with in its entirety. The Bohle Supplier Code of Conduct is valid for Bohle AG and all affiliated companies of Bohle Group worldwide. If there is a suspicion of non-compliance of the described principles and requirements, the Supplier shall support the clarification of the facts. Bohle is furthermore entitled to extraordinarily terminate the contractual relationships with a Supplier who demonstrably fails to comply with the Bohle Supplier Code of Conduct or does not embrace or implement improvement measures after having been granted a reasonable period of time for this purpose by Bohle.

References

Bohle AG | www.bohle.com

United Nations Global Compact | www.unglobalcompact.org/what-is-gc/mission/principles | <https://www.globalcompact.de/en/about-us>

United Nations Universal Declaration of Human Rights | www.un.org/en/about-us/universal-declaration-of-human-rights | www.un.org/depts/german/menschenrechte.aemr.pdf

International Labour Standards (ILO) | www.ilo.org/declaration/lang-en/index.htm | www.ilo.org/berlin/arbeits-und-standards/kernarbeitsnormen/lang-de/index.htm