

# **Code of Conduct**

## of the BERNSTEIN Group

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**Foreword:** Wherever the term "employee" is used in this Code of Conduct, it refers to all persons working for the BERNSTEIN Group. For better readability, the masculine form (generic masculine) is used. This always refers to all genders in the sense of equal treatment. The abbreviated form of language has editorial reasons and is value-free.

## 1 Scope

This Code of Conduct applies to all employees within the BERNSTEIN Group.  
The BERNSTEIN Group consists of:

Parent company:

- BERNSTEIN AG | Germany

Subsidiaries:

- BERNSTEIN GmbH | Austria
- BERNSTEIN Ltd | Great Britain
- BERNSTEIN S.A.R.L. | France
- BERNSTEIN A/S | Denmark
- BERNSTEIN S.r.l. | Italy
- BERNSTEIN Safe Solutions Co. Ltd. | China
- BERNSTEIN Kft | Hungary
- BERNSTEIN Schweiz AG | Switzerland

Our suppliers will receive a Supplier Code of Conduct based on this Code of Conduct.

## 2 Honest and faithful conduct of the business

BERNSTEIN employees comply with all relevant laws, ordinances and official regulations in their working environment, as well as internal instructions and guidelines.

Employees should behave honestly and fairly in their working environment.

All employees are encouraged to speak to the compliance contact person or their supervisor if they notice that someone behaves in a non-compliant manner.

The internal whistleblower system (Germany and Hungary only) can also be used to report violations. No employee who makes a report in good faith need fear any disadvantages - even if the report turns out to be unfounded.

Managers have a role model function. They are responsible for their own behaviour and the behaviour of employees in their area of responsibility, as well as for proper compliance with all procedures laid down to avoid reputational and legal risks.

## 3 Compliance

### 3.1 Corruption

We do not tolerate corruption, bribery or extortion.

In our business relationships, we do not promise, offer, grant, demand or accept inducements with the intention or appearance of influencing business decisions or gaining any other prohibited advantage, nor do we allow ourselves to be promised such inducements. Particularly strict requirements apply when dealing with persons to whom special criminal and liability regulations apply (e.g. public officials).

No employee is allowed to accept benefits - in all forms, especially personal gifts or benefits resulting from business relationships of BERNSTEIN - which must reasonably be assumed to be able to influence business decisions or transactions. The acceptance of any kind of cash benefits (e.g. gift cards or shopping vouchers) for personal use or use by a third party is not permitted in any case.

### 3.2 Fair competition

We act in accordance with national and international competition and antitrust law and do not participate in price fixing, market sharing or customer, market or supply agreements.

Employees are strictly prohibited from entering into such agreements or arrangements.

In contacts with competitors and business partners, BERNSTEIN employees do not discuss internal matters, such as prices and terms of sale or financing, costs, market overviews, organizational procedures or other confidential information from which competitors or business partners could derive competitive advantages.

### 3.3 Prevention of money laundering and terrorist financing

Money laundering refers to the process of smuggling illegally obtained money or illegally acquired assets into the legal financial and economic cycle.

We fulfil our legal obligations to prevent money laundering and do not participate in transactions that serve to conceal or integrate criminal or illegally acquired assets. BERNSTEIN has established risk-appropriate precautions to prevent money laundering and the financing of international terrorism in accordance with the law and the requirements of the regulatory authorities.

### 3.4 Protection of information and intellectual property

We protect confidential information and respect intellectual property. Technology and know-how transfer must be carried out in such a way that intellectual property rights and customer information, business secrets and non-public information are protected. We observe the applicable laws for the protection of business secrets and treat confidential information of our business partners accordingly. Furthermore, BERNSTEIN employees do not pass on customer names to external third parties. Disclosure is only permitted if the customer has expressly agreed to this in advance.

### 3.5 Data protection

We process, store and protect personal data in compliance with legal regulations. Personal data is collected confidentially, only for legitimate, previously defined purposes and in a transparent manner. Personal data may only be collected, processed or used if this is necessary and there is a corresponding legal basis or consent from the data subject. The use of data must be transparent for the data subjects. Their rights to information and rectification and, where applicable, to objection, blocking and erasure must be safeguarded. Confidential information and documents relating to customers, BERNSTEIN or employees must be protected in an appropriate manner from access by third parties.

### 3.6 Information security

Protecting the confidentiality, availability and integrity of information and information-processing systems is of central importance. Therefore, information security is the responsibility of all BERNSTEIN

employees.

When taking technical and organisational measures to protect information and systems, we consider the respective risks and the current state of the art.

Information security is continuously improved through regular reviews and IT security training for relevant departments.

### 3.7 Export/export control

When shipping and exporting our products, we commit to comply with the relevant legal standards for export control - in particular authorisation requirements, export and support bans.

### 3.8 Avoidance of conflicts of interest

BERNSTEIN strives for sustainable business relationships with its customers and business partners for the benefit of both parties. All employees must avoid situations in which their personal or financial interest conflict with those of BERNSTEIN. It is prohibited to acquire shares in companies of competitors, suppliers or customers or to enter business relationships with them in a private context if this could lead to a conflict of interest.

## 4 Product compliance

### 4.1 Compliance with product regulations

We comply with all relevant regulations and laws for our products. This includes, for example, compliance with product safety laws and the guidelines and standards they contain.

### 4.2 Responsible sourcing of minerals

BERNSTEIN takes appropriate measures to avoid the use of conflict minerals (gold, tin, tantalum, tungsten) in our products, which originate from conflict and risk areas and contribute to human rights violations, corruption, the financing of armed groups or similar negative effects.

## 5 Health and safety at work

Processes, facilities and equipment must comply with applicable legal and internal requirements for occupational safety and health, fire and environmental protection.

We ensure that all our employees are instructed accordingly.

We protect the health of our employees by taking appropriate health and safety measures:

- Compliance with applicable laws and orientation towards international standards in terms of health and safety at work.
- Appropriate and ergonomic workplace design, safety regulations and provision of suitable personal protective equipment.
- Implementation of preventive controls, emergency measures and other suitable measures for continuous improvement.

## **6 Respect for human rights**

As an international company, we are committed to respecting human and labour rights. The following human rights and labour practices must be observed depending on their compatibility with local legal requirements:

### **6.1 Prohibition of discrimination**

We maintain a corporate culture that is characterised by respect, openness, honesty and appreciation as well as privacy, professionalism and loyalty. We respect and support the observance of internationally recognised human rights (e.g. ILO Conventions No. 100 and 111):

- We respect the personal dignity, privacy and personal rights of everyone.
- We protect and grant the right to freedom of opinion and expression.
- We do not tolerate unacceptable treatment of employees, such as physical and psychological hardship, sexual and personal harassment, insults or discrimination based on age, disability, origin, gender, ideology, political or trade union activity, race, religion or sexual orientation.
- We do not tolerate inappropriate treatment of workers, such as psychological and physical hardship, sexual harassment or other inhumane behaviour.
- We respect equal opportunities and equal treatment of employees regardless of skin colour, origin, nationality, ethnicity, political affiliation, disability, sexual orientation, religious beliefs, gender and age.

### **6.2 Prohibition of forced labour (ILO Conventions No. 29 and 105)**

- No direct or indirect involvement in modern slavery, forced and compulsory labour or human trafficking.
- No use of labour as a punitive measure or as a means of ideological or political discrimination.
- No depositing of identity documents as a labour pledge and freedom of termination after reasonable notice.

### **6.3 Prohibition of child labour (ILO Conventions No. 138 and 182)**

- No employment of workers who cannot prove that they are at least 15 years old (14 years old in exceptional cases). Special national legislation may determine the minimum age of workers differently (such as 16 years old as for a.g. ).
- No employment of workers under the age of 18 for physically dangerous work or night work.

### **6.4 Regulated labour relations**

- Establishment and exchange of written and comprehensible information on working hours, remuneration and working conditions between employee and employer in advance of work.
- Compliance of the contractually agreed working hours with national legislation.
- Payment of appropriate, sufficient wages in line with national requirements or the industry standard and compliance with all applicable pay and remuneration regulations.
- No application of wage deductions as disciplinary measures and obtaining the consent of the employee concerned for legally permissible wage deductions. If local law permits different regulations, the legal provisions of the respective country apply. We always strive to promote best practice in line with international labour standards and to ensure that working conditions are fair and safe for all employees.

#### 6.5 Freedom of assembly and association (ILO Conventions No. 87 and 98)

- Respect for the independence of trade unions and recognition of the right to form and join trade unions and to participate in collective bargaining.
- No preferential or discriminatory treatment of trade union members.

### **7 Environmental and climate protection and protection of natural resources**

BERNSTEIN is committed to act in accordance with applicable legal requirements and international standards relating to the environment.

- Minimise environmental pollution and continuously improve environmental protection.
- To reduce the emission of pollutants into the air and greenhouse gases (especially CO<sub>2</sub>) as well as harmful soil and water pollution and noise emissions.
- To increase energy efficiency, use renewable energies and reduce water consumption as far as possible.
- Reduce waste and ensure its proper treatment and disposal.

Employees should strive to protect natural resources in their work and ensure that BERNSTEIN's business activities have the least possible impact on the environment through material conservation, by energy-efficient planning of systems and processes and by reducing and recycling waste.

When selecting suppliers, advertising materials or other external services, every employee should consider ecological and social criteria in addition to economic aspects. BERNSTEIN fulfils environmental protection regulations and acts in an environmentally conscious manner at all sites.

### **8 Communication with customers, business partners and the public**

All BERNSTEIN announcements and reports must be complete, honest, accurate, timely and understandable, whether to business partners, customers or the public. This also applies to information and advertising material about our products.

Information to business partners, customers or the public about our company or our products must only be provided by authorized employees.

### **9 Social networks**

Anyone who speaks out in a public discussion or on social media about issues that affect BERNSTEIN, should state clearly that they are acting as a private individual.

Please consider that statements in e-mails or social networks can be made informally and spontaneously but are then recorded and can be viewed by the recipient or the Internet public for a long time.

### **10 Customer complaints**

Customer complaints provide valuable information about opportunities for improvement in our business and offer an opportunity to strengthen or regain customer relationships. BERNSTEIN ensures that all significant customer complaints are handled in a fair and understandable manner.

**11 Donations and sponsoring**

The Executive Board decides on donations and sponsoring. They are not allowed to be used to indirectly obtain unfair advantages with business partners.

**12 Handling of company property and assets**

All employees have a duty to handle the company's property and assets appropriately, sparingly and responsibly in every respect. The assets and business documents of BERNSTEIN must not be used for private purposes under any circumstances.

**13 Requests for information from public authorities**

BERNSTEIN will cooperate with all relevant public bodies and regulatory authorities. Any communication by employees in this regard is only allowed to be communicated by the employees appointed for this purpose.

**14 Consequences of violations**

Any breach of these rules can cause significant reputational damage and legal disadvantages for employees and BERNSTEIN. The consequences can be significant, from fines to criminal proceedings or restrictions on official permits. In addition, the infringement of the duties resulting out of the employment contract may lead to measures under employment law by BERNSTEIN.