

# Code of Conduct

## for Corporate Social Responsibility

### 1. Basic Understanding of Social Responsibility in Corporate Management

Bürkle GmbH is committed to ethical, socially and ecologically responsible corporate management and expects the same from its suppliers.

This Code of Conduct („CoC“) is based on a common basic understanding of socially responsible corporate management. For Bürkle GmbH and all its suppliers, this means assuming responsibility by considering the consequences of business decisions and actions in economic, technological, social, ethical and ecological terms and achieving an appropriate balance of interests.

Bürkle GmbH voluntarily contributes to the well-being and sustainable development of global society within the scope of its respective possibilities and scope of action. Bürkle GmbH is guided by generally accepted ethical values and principles, in particular integrity and honesty and respect for human dignity along the supply chain.

Bürkle GmbH has set itself the goal of contributing to sustainable development, constantly optimising products and services in terms of sustainability and expects its suppliers to contribute to this in the sense of a holistic approach.

It is important to Bürkle GmbH to work with suppliers who are aware of their social responsibility. For this reason, Bürkle GmbH carries out risk analyses. Business partners are assessed with regard to compliance with fundamental and labour-related human rights and environmental concerns. If the results are unsatisfactory, appropriate preventive measures are taken.

### 2. Scope of application

**2.1** This CoC applies to Bürkle GmbH and to all employees of Bürkle GmbH. For reasons of better readability, the simultaneous use of the language forms male, female and diverse (m/f/d) is avoided in this CoC.

**2.2** This CoC applies to the suppliers of Bürkle GmbH, including all subsidiaries and business units worldwide.

**2.3** Bürkle GmbH and its suppliers undertake to promote compliance with the contents of this CoC in the further value chain within the scope of their respective possibilities and scope of action.

### 3. Legal provisions

If national laws conflict with this CoC or have stricter requirements, the national laws apply. For companies based in countries with a weak institutional framework, it carefully examines which good corporate practice from its own home country can be used to support responsible corporate governance.

### 4. Key aspects of socially responsible corporate governance

The parties named under „2. Scope of application“ actively endeavour to ensure that the values and principles set out below are observed and complied with in the long term.

#### 4.1 Ethical business behaviour

Entrepreneurial behaviour should be guided by generally accepted ethical values and principles, in particular integrity, honesty, respect for human dignity, openness and non-discrimination of religion, ideology, gender and ethnicity.

##### 4.1.1 Corruption and bribery

Corruption and bribery are to be rejected in accordance with the UN Convention. Transparency, acting with integrity, responsible management and control within the company should be promoted in an appropriate manner.

Bürkle GmbH does not work with suppliers and customers who have been convicted of money laundering. Attempted fraud or attempts to influence employees of Bürkle GmbH are also an exclusion criterion for further business relations. Bürkle GmbH employees are prohibited from accepting gifts that exceed the normal level.

#### 4.1.2 Fair competition

Clean and recognised business practices and fair competition should be pursued. Competition should be based on professional behaviour and high-quality work. Relations with the supervisory authorities should be based on partnership and trust.

#### 4.1.3 Conflicts of interest

Conflicts of interest should be avoided. A conflict of interest exists when personal interests are in conflict with the company's tasks and requirements. If conflicts of interest are identified, corrective measures must be taken.

#### 4.1.4 Communication / Information security

The requirements of this CoC and its implementation should be communicated to employees, customers, suppliers and other interest and stakeholder groups in an open and dialogue-oriented manner. All documents and records must be prepared in accordance with the requirements, not altered or destroyed unfairly and stored appropriately. When recording, storing, processing, transmitting and passing on confidential information, the laws on data protection and information security and the official regulations must be observed.

Trade secrets and business information of the partners should be treated sensitively and confidentially.

## 4.2 Social responsibility

The parties named under „2. Scope of application“ actively endeavour to ensure that the values and principles set out below are observed and complied with in the long term.

This CoC represents the minimum standard expected by Bürkle GmbH, based on the international Business Social Compliance Initiative (BSCI), the conventions of the International Labour Organization (ILO) and the principles of the United Nations Global Compact. The prohibitions in Section 2 (2) LkSG are to be implemented in full, unless the corresponding risks have been identified as irrelevant for the company's supply chain.

#### 4.2.1 Forced Labour

The prohibition of forced labour of any kind, in accordance with ILO Conventions 29 and 105 and the fourth principle of the Global Compact. Employees should be protected from corporal punishment and from verbal, psychological, physical or sexual harassment, humiliation or abuse.

#### 4.2.2 Child Labour

The prohibition of child labour, in accordance with ILO Conventions 79, 138, 142 and 182 and the fifth principle of the Global Compact. Employment of persons under the age of 15 and before completion of compulsory education is prohibited, unless local legislation stipulates higher age limits and exceptions are permitted. Persons under the age of 18 may not be employed for any work that is harmful to health, dangerous or detrimental to the morals of children. Special protective regulations must be observed.

If the prohibition is violated, corrective measures must be initiated and documented immediately. Procedures must be initiated that serve the social

integration, rehabilitation and attainment of the general school leaving certificate of the children concerned.

#### 4.2.3 Wage Compensation

The labour standards concerning compensation, especially with regard to the level of compensation, must be complied as stated in the applicable laws and regulations. Fair remuneration should be in accordance with ILO Conventions 26 and 131 and Article 7 of the UN Social Covenant.

#### 4.2.4 Hours of Work

The work standards regarding the maximum permissible working hours must be complied with in accordance with the applicable laws and regulations or industry standards. This should be done in accordance with ILO Conventions 1 and 14.

#### 4.2.5 Prohibition of discrimination

Discrimination should be eliminated both in employment and in gainful employment. Non-discriminatory treatment should be in line with ILO Conventions 110, 111, 159 and Art. 2 Para. 2 and Art. 3 of the UN Social Package and the sixth principle of the Global Compact. Unequal treatment or harassment on the basis of gender, age, social, ethnic or national origin, skin colour, physical or mental disability, health status, religion, ideology, political conviction, pregnancy or sexual orientation is prohibited. The personal rights, personal dignity and privacy of each individual should be protected and respected.

#### 4.2.6 Freedom of Conscience

The right to freedom of conscience and expression should be protected and upheld.

#### 4.2.7 Freedom of association and the right to collective bargaining

Freedom of association and the right to collective bargaining should be upheld in accordance with ILO Conventions 87, 98, 135 and 154 as well as ILO Recommendation 143. Companies based in countries where the formation of free trade unions is strictly regulated or prohibited should enable their employees to organise freely and independently for the purpose of collective bargaining as far as possible within the framework of the respective legal system.

#### 4.2.8 Civic Commitment

Social and economic developments in the country and the region should be promoted as far as possible. This also includes supporting corresponding voluntary activities by employees.

#### 4.2.9 Health protection and occupational safety

Maintaining health and safety at work, in particular ensuring a safe and healthy working environment to prevent accidents, injuries, damage to health and excessive physical and mental fatigue, in accordance with ILO Conventions 155, 164 and 187.

The necessary measures must be taken: Establish and implement appropriate occupational health and safety systems to identify and prevent potential health and safety hazards in the company, provide regular training for employees on health and safety standards and safety measures. Provide access to sufficient quantities of drinking water and clean sanitary facilities.

## 4.3 Ecological responsibility

The protection of the environment and nature and the associated preservation of natural resources is of great importance. The decisions and actions of companies have a direct impact on the environment and society, so that the ecological responsibility of companies is becoming increasingly important. The parties named under „2. Scope of application“ work actively to ensure that the values and principles listed below are observed and complied with in the long term.

### 4.3.1 Environmental protection laws

Applicable environmental protection laws and regulations must be complied with. Obligations under the Minamata Convention (ban on the manufacture and use of mercury in products and the ban on the improper handling of mercury waste), the Stockholm Convention (ban on the environmentally unsound handling of persistent organic pollutants (POPs)) and the Basel Convention (ban on the export and import of hazardous waste) must be complied with.

### 4.3.2 Resources and environmental impact

The aim is to act in an environmentally conscious manner by using resources sustainably and taking measures to minimise negative effects on the environment and reduce greenhouse gas emissions as much as possible.

Energy, water and raw materials should be used sparingly and efficiently. The generation of waste should be minimised or even avoided.

The aim is to protect natural resources. Water pollution, harmful soil changes, air pollution and harmful noise emissions must be avoided.

## 4. Implementation and Application

The parties named under „2. Scope“ shall make every appropriate and reasonable effort to continuously implement and apply the principles and values described in this CoC.

### 5.1 Risk management

Bürkle GmbH has established a risk management system with regard to the supply chain and expects its suppliers to provide the necessary information in the event of suspected violations. On request and within the framework of reciprocity, reports should be provided on the key measures so that it is clear how compliance with these measures is ensured. There is no entitlement to the disclosure of trade and business secrets, competition-related information or other sensitive information.

### 5.2 Verification of compliance with the CoC

Bürkle GmbH checks compliance with the principles and values listed in this CoC with the help of self-disclosures and risk-based supplier audits on site. The supplier agrees that audits to verify compliance with the CoC may be carried out at the expense of Bürkle GmbH for specific reasons and after reasonable advance notice. The supplier may object to individual audit measures as soon as data protection concerns would be violated.

### 5.3 Complaints procedure

Bürkle GmbH offers its employees, business partners and external third parties the option of reporting possible violations of the Supply Chain Due Diligence Act. If violations of this CoC are identified, the reporting system on the Bürkle GmbH electronic platform can be used. Complaints can also be submitted anonymously.

#### [Reporting system Bürkle GmbH](#)

No adverse or disciplinary action may be taken against whistleblowers unless the report is intentionally false, abusive or grossly negligent.

### 5.4 Sanctions and remedies

If it is determined that the human rights-related or environmental obligations specified in this CoC are being violated, Bürkle GmbH shall follow the procedure as set out in Section 7 (2) and (3) LkSG. As a corrective measure, a concept for ending or minimising the violation shall be introduced.

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