

Code of Conduct

for Business Partners / Suppliers



Foreword

In than 70 years since its foundation, the BAHMÜLLER company has gained an excellent reputation worldwide as a supplier of corrugated board converting systems, precision grinding and precision tools.

From a worldwide corporate activity also arises the responsibility to pay special attention to the basic rules of human coexistence. Therefore, the observance of the relevant laws and regulations and especially the respect of the rights of all people represent a fundamental principle of the activity of the company BAHMÜLLER and its subsidiaries.

We demand this not only from ourselves, but also from our suppliers of goods and services as well as from our business agents, consultants and other business partners (hereinafter referred to as "business partners"). The following Code of Conduct defines the principles and requirements that BAHMÜLLER places on its business partners. This Code of Conduct is intended to ensure that the business practices of our business partners are consistent with the values of BAHMÜLLER and the applicable laws and regulations.

The principles and requirements that form the basis of the following Supplier Code of Conduct are based on the Human Rights Policy, the Code of Conduct of BAHMÜLLER as well as the UN Guiding Principles on Business and Human Rights, the principles of the UN Global Compact, the International Bill of Human Rights and the United Nations Convention against Corruption.

1. COMPLIANCE & RESPONSIBLE CORPORATE MANAGEMENT

Compliance with laws

Business partners agree to comply with all applicable national laws and international regulations.

Prohibition of active and passive corruption

The business partners commit themselves not to tolerate or engage in any form of active corruption (offering and granting benefits; bribery) or passive corruption (demanding and accepting benefits). The business partners commit themselves not to offer BAHMÜLLER employees or close relatives of the aforementioned group of persons any gifts or other personal benefits (e.g. invitations) if their total value and the specific circumstances give the impression that a certain behavior is expected from the recipient in return. Whether this is the case depends on the specific circumstances of the individual case. Gifts of minor value and hospitality within the scope of customary business practices are permissible. Furthermore, the business partners commit themselves to offer BAHMÜLLER employees who purchase goods or services for their personal use from a business partner these at normal market prices and discounts, so that no advantage can be derived from this.

Money Laundering

Business partners commit themselves to comply with the applicable legal provisions for the prevention of money laundering and not to engage in money laundering activities.

Fair Competition

Business partners commit themselves not to restrict free competition and not to violate national or international antitrust regulations. In particular, the business partners commit themselves in this context not to enter into any agreements on business matters that determine or influence the competitive behavior of companies (e.g. price agreements or sharing of markets or customers), and not to exchange information on confidential matters of BAHMÜLLER such as prices, sales conditions, costs, capacity utilization, inventories, etc. - not even unilaterally.

Protection of information, intellectual property and data

Business partners commit themselves to adequately protect all information and intellectual property of BAHMÜLLER. In particular, business partners must ensure that confidential information is kept secret. In addition, business partners must comply with all applicable legal provisions for the protection of intellectual property (patents, trademarks, copyrights) and, in particular, respect the intellectual property of third parties and avoid infringements of intellectual property rights (such as through plagiarism). Any processing of personal data of employees, customers and business partners of BAHMÜLLER, e.g. in the context of collection, use and storage, must be carried out in accordance with the applicable data protection laws.

Trade controls and sanctions

Business partners ensure compliance with applicable trade control and sanctions regulations in the countries in which they operate.

2. SOCIAL RESPONSIBILITY**Respect for human rights & working conditions**

Business partners commit to respect and comply with human rights as fundamental values based on the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the principles of the UN Global Compact.

Prohibition of child labor

Business partners shall not tolerate child labor within their own operations or at direct suppliers under any circumstances and shall, at a minimum, comply with International Labor Organization ("ILO") Convention No. 138 of June 26, 1973, concerning Minimum Age for Admission to Employment and ILO Convention No. 182 of June 17, 1999, concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor.

Beyond the prohibition of child labor, it is important to ensure that the employment of young workers does not jeopardize their health, safety and development.

Prohibition of forced and compulsory labor, human trafficking and modern slavery

Business partners undertake to comply with ILO Convention No. 29 of 28 June 1930 concerning Forced or Compulsory Labor, including the Protocol of 11 June 2014, and ILO Convention No. 105 of 25 June 1957 concerning the Abolition of Forced Labor, and to prohibit all forms of forced or compulsory labor, human trafficking and modern slavery in their own business operations and those of their direct suppliers. Forced and compulsory labor refers in particular to all work or services that are forced from persons under the threat of punishment, and includes the withholding of identity cards and passports, restrictions on movement and debt bondage.

Collective Negotiations and the Right to Freedom of Association

Business partners respect the right of employees to join trade unions. In addition, business partners commit themselves to respect and promote the right of their employees to collective bargaining and freedom of association as defined in ILO Convention No. 87 of July 9, 1948 concerning Freedom of Association and Protection of the Right to Organize and No. 98 of July 1, 1949 concerning the Application of the Principles of the Right to Organize and to Bargain Collectively.

Diversity, equal opportunities and the prohibition of discrimination

Business partners commit to effectively prevent discrimination or harassment based on gender, marital status or parenthood, ethnic or national origin, age, disability, sexual orientation, religion or other personal characteristics. With regard to compensation, the principle of equal pay for work of equal value regardless of gender must be observed in particular. In doing so, business partners shall observe the principles of ILO Convention No. 100 of 29 June 1951 concerning Equal Pay for Men and Women Workers for Work of Equal Value and No. 111 of 25 June 1958 concerning Discrimination in Respect of Employment and Occupation, as well as the Convention on the Elimination of All Forms of Discrimination against Women.

Compensation and working hours

The compensation of male and female employees must comply with the applicable legal and collective bargaining regulations and must be sufficient to cover the basic needs of the employees and their families and to provide them with an adequate standard of living. Business partners ensure to set clear guidelines for the working hours of employees. The regulations on working hours must comply with legal requirements and, among other things, counteract excessive physical and mental fatigue among employees.

Health and safety in the workplace

Business partners shall ensure that they provide safe and healthy working conditions for all employees working for or under their supervision. This also includes the provision of personal protective equipment. In any case, business partners shall comply with the occupational health and safety obligations applicable under the law of the place of employment.

Security staff

Business partners who provide private or public security personal to protect BAHMÜLLER's operations and subsidiaries must ensure that the rights of all persons concerned are respected when providing their services. Business partners who use private or public security staff to protect their own operations must ensure that the security staff respects human rights.

Local communities and indigenous peoples

BAHMÜLLER expects all business partners to support local communities and indigenous peoples in the vicinity of their companies. In particular, negative impacts of business partners' operations on the health, safety and livelihood of local communities and indigenous peoples are to be avoided. In this regard, business partners also undertake to respect the prohibition of unlawful forced evictions and, when acquiring, developing or otherwise using land, forests or waters, not to unlawfully contribute to the deprivation of land, forests or waters from those indigenous peoples or local communities whose livelihoods they safeguard.

3. ENVIRONMENT & CLIMATE PROTECTION

Business partners are committed to complying with all applicable laws and regulations and internationally recognized environmental standards. In particular, business partners must comply with the requirements of the Minamata (mercury), Stockholm (persistent organic pollutants) and Basel (hazardous waste) international conventions. In addition, business partners commit to avoiding any risks to people and the environment, to minimize impacts on the environment and to use resources sparingly. The implementation of an environmental management system with business partners such as ISO 14001 or EMAS is based on the existing legal requirements. An environmental management system can help to identify environmental risks and implement targeted measures to avoid environmental risks.

CO2 footprint

BAHMÜLLER is committed to the goals of the Paris Climate Agreement and pursues the objective of low-carbon production in order to continuously reduce the CO2 footprint with the long-term goal of climate neutrality.

BAHMÜLLER also expects its business partners to continuously reduce their own CO2 footprint and that of the products purchased from BAHMÜLLER. Business partners therefore commit to develop reduction targets for CO2 emissions in their own business area and along their own supply chain (Scope 1, 2 and 3 of the Greenhouse Gas Protocol) and to take measures that are suitable for working towards achieving the goals of the Paris Climate Agreement. As BAHMÜLLER is also accountable to its customers, BAHMÜLLER's business partners also undertake to provide information on their own CO2 emissions and those of upstream activities.

4. SUPPLY CHAIN MANAGEMENT

BAHMÜLLER expects its business partners to take appropriate and reasonable measures to identify negative impacts on human rights or the environment that arise along the supply chain and to eliminate such negative impacts or, if this is not immediately possible, to minimize the extent of such impacts.

Business partners are also obliged to pass on the principles and contents of this Code of Conduct for BAHMÜLLER Business Partners, in particular the contents on the subject of "Social Responsibility" and "Environment & Climate Protection", to their own suppliers and subcontractors, to commit them accordingly and to check their compliance in the supply chain.

At BAHMÜLLER, shareholders, management and staff agree that a common value base is the basis for a team- and success-oriented cooperation. Based on this value base, the further development of BAHMÜLLER will also take place in line with our corporate goals.

5. REPORTING OF MISCONDUCT

BAHMÜLLER has created the possibility for business partners as well as employees to anonymously report violations of the provisions of the Code of Conduct or other guidelines, regulations or legal provisions in the following areas against legal regulations in the areas of » antitrust law, corruption, fraud, conflicts of interest, capital market compliance; » discrimination, sexual harassment, mobbing, human rights; » data protection; » technical compliance, in particular compliance with technical standards and certifications in production processes as well as IT security; » environment; » health & safety as well as » violations in other areas.

The internal Compliance Officer at BAHMÜLLER is the first point of contact for these issues in the event of violations and infringements, or for a binding interpretation of the BAHMÜLLER Code of Conduct for Business Partners.

The Compliance Officer at BAHMÜLLER can be reached by business partners at the following contact details:

compliance@bahmueller.de

Anonymous reports can be made by BAHMÜLLER business partners using the web-based whistleblower protection system installed at BAHMÜLLER anonymously at the following email address: hinweise@diomiko.com.

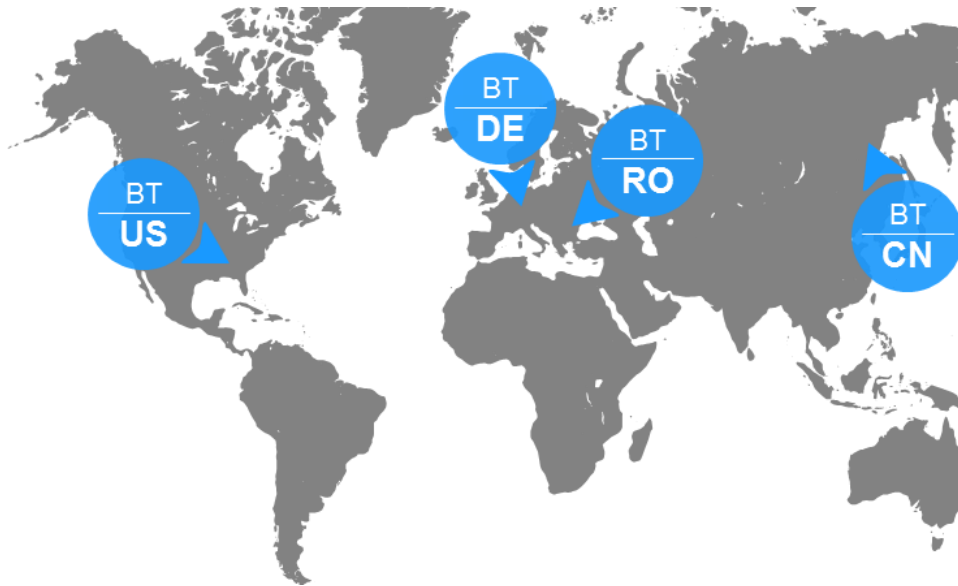
In addition, anonymous reports can also be made by telephone at +49 151 50 59 0736.

6. COOPERATION AND COLLABORATION

As far as this is or becomes necessary due to BAHMÜLLER customer demands or legal requirements, BAHMÜLLER is entitled to inspect or audit the processes introduced at the business partners for compliance with the principles and requirements of this Code of Conduct, including the due diligence measures taken in connection with human rights and the protection of the environment, as well as the timely implementation of any corrective action plan, or to have them inspected or audited by service providers commissioned by BAHMÜLLER. Business partners will provide BAHMÜLLER or a service provider appointed by BAHMÜLLER with requested information and documents for inspection and give them the opportunity to talk to or interview directors, managers and employees as reasonably necessary for these purposes.

This document is available to our business partners in digital form on the BAHMUELLER website.

Mehr unter: www.bahmueller.de



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