



## Foreword

Over the 70 years since its founding, the company BAHMÜLLER has gained an outstanding reputation as a supplier of corrugated board converting systems, grinding machines and precision tools.

At BAHMÜLLER, the shareholders, management and workforce agree that the foundation for working together as a team and in a future-oriented way is having a common set of shared values. BAHMÜLLER's further development with regard to our company goals will also take place based on these shared values.

The most important aspects for our common goals are:

- Respect for individual personalities as well as confidence in their performance capacity
- The willingness to delegate as well as take on responsibility
- Reliability, commitment in keeping our word, honesty and loyalty
- Open communication about goals, successes, mistakes and necessary correction measures
- The openness to use offers as opportunities for personal development

The BAHMÜLLER Code of Conduct is the foundation on which we engage in our activities with clients, suppliers, employees, business parties and third parties. The Code of Conduct describes values, principles and guidelines that BAHMÜLLER identifies with as an internationally active company, and from which we derive our daily conduct. This set of shared values applies to all employees and gives meaning to our actions. We believe that we must live these values and in doing so strengthen the trust in our work and in our actions, while increasing the emotional tie to the company. The Code of Conduct provides an orientation while simultaneously offering a basis for handling situations that cannot be ascertained with a determinist set of rules.

We are striving for sustainable development of our business activity, characterized by respect and responsibility towards all employees and business partners as well as towards the environment and society. We are proud of our technically innovative products and system solutions and we know that this can only be sustained with motivated and qualified employees who find orientation in a firmly defined value system.

Michael Holtmann  
CEO / Managing Director

## I. Social responsibility

As an internationally active company it is natural for us to observe the rights, laws, values and standards of the countries in which we do business, and to align these with our operational goals. We expect our business partners to act in a comparable manner.

### **Partnership and integrity**

Our actions are characterized by an open dialog with our business partners and third parties. Commitment in keeping our word, honesty and loyalty are permanent aspects of our company culture. All BAHMÜLLER employees are obligated to comply therewith.

### **Fairness and respect**

We consider being fair with each other and good interpersonal relationships - both internally and externally - to be an important basis for sustainable business success. Respect for personal worth, personal rights and the privacy of each individual are basic requirements here.

### **Management and responsibility**

The managers at BAHMÜLLER are a reflection of the company culture. They are responsible for coordinating tasks and assuming responsibility for the persons entrusted to them. In order to reach company goals, they compose and delegate tasks and are authorized and responsible for their employees. Encouraging personal responsibility is just as much a component of managerial duties as is creating freedom of action in order to attain successes. Naturally, our managers are also aware of their supervisory duties, are mindful of observing legal regulations and are aware of their own personal responsibility.

### **Work world with a standard**

BAHMÜLLER identifies with the principle of the social market economy and fair competition. We reject any kind of forced labor or child labor. It is natural for us to offer all persons equal opportunity when hiring or employing, as well as a safe work environment while observing occupational safety and health to a high degree.

We ensure that our employees are paid according to applicable laws and mandatory rules. Our work contracts, work hours and work conditions are in line with applicable legal requirements.

### **Equality and respectful interaction**

Mutual respect is the basis for a work environment characterized by appreciation. We commit to respecting human dignity and human rights and to protect the personality of the individual at the workplace.

Any type of discrimination, for example based on gender, age, race, skin color, ancestry, social background or religion, political view, sexual orientation etc. is prohibited at BAHMÜLLER.

All employees are obligated to contribute to an atmosphere of treating each other with respect, where any kind of personal harassment is excluded. Harassment at the workplace, sexual harassment, unwanted physical contact, indecent proposals or other personal offenses against persons will not be tolerated. We do not accept any discriminating harassment, threats, intimidation or bullying at the workplace.

### **Welfare**

The abuse of alcohol or other addictive substances will not be tolerated at BAHMÜLLER. The principles of occupational safety law must be observed hereby. Because of general duty of care and to ensure the proper course of operations, help programs are available to those affected.

## **II. Principles of our business activity**

The dialog we maintain with our clients is fair, open and based on partnership. We are a reliable partner and we only make promises that we can keep. Furthermore, we also comply with applicable legal provisions.

### **Economic success.**

We sustainably strengthen our profitability and financial power with profitable growth. We thereby ensure the existence and long-term further development of BAHMÜLLER. The shareholders identify with the company and ensure that it continues to be a family company.

### **Customer advantage**

Our strict orientation towards customers' needs guarantees our success and the satisfaction of our customers. Our products and services provide ideal solutions to problems with high customer advantages, that we implement quickly, flexible and efficiently for our customers.

### **Competition instead of corruption**

BAHMÜLLER turns away from corruption and bribery. We obtain orders in a fair and competition-oriented manner, impressing with the quality and price of our innovative products and services. In so doing we do not offer any inadmissible advantages, either directly or indirectly through consultants, intermediaries or other third parties. Doing business fairly in compliance with national and international rules of competition corresponds with our ethical principles. All employees are obliged to observe national and international laws to maintain fair competition. This includes all regulations regarding unfair competition and antitrust laws.

### **Accepting gifts**

Our employees are not permitted to use their official positions to request, accept, procure or promise personal advantages. We do not accept any gifts or invitations that could put us into an obligatory dependence. Accepting the occasional gift with symbolic value, such as an invitation to a meal or an event within reasonable limits, is permitted - if local customs and BAHMÜLLER guidelines are respected.

### **Donating and sponsoring**

BAHMÜLLER does not make any political donations. As a responsible member of society, BAHMÜLLER only gives money and in-kind donations for education, sports and science as well as for social and humanitarian projects.

Sponsoring activities must serve a serious business purpose and be reasonably proportionate to the counter-value that the organizer is offering. Sponsoring for events that are carried out by organizations or individual people whose objectives are not compatible with BAHMÜLLER company principles, or events that damage the reputation of the group of companies, is generally prohibited.

## **III. Avoiding conflicts of interest**

### **Maintaining the principles of fair competition**

Our employees cannot simultaneously work for a company that is in competition with BAHMÜLLER. All of their actions, commercial or private, cannot lead to a competitive disadvantage for BAHMÜLLER.

### **Secondary employment only officially**

Our employees provide their work primarily to BAHMÜLLER. Therefore, the superior or personnel department must be notified of secondary employment and their written approval provided. Approval cannot be given if the secondary employment is contrary to BAHMÜLLER's interests. Approvals that have been granted can be revoked if there are valid reasons.

## **IV. Information security**

### **Data protection and data security**

The worldwide electronic network gives BAHMÜLLER and our business partners distinct advantages with regard to effectiveness in handling business processes as well as accessibility for each individual. On the other hand however, this kind of communication and data processing leads to certain risks with regard to security in data and privacy protection. Responsible action in processing and forwarding data in accordance and compliance with data protection regulations effectively minimizes these risks - so it is the responsibility of all of us, as well as a managerial responsibility for superiors.

The following set of rules provide the legal framework for this:

- Internal BAHMÜLLER IT-policies in their current edition
- Personal data can only be collected, used or processed within a legally permissible scope
- The technical protection of all data (customer, supplier and personal data) must meet a high standard
- Obligation to maintain EU basic regulations for data protection (DSGVO)

All BAHMÜLLER employees are obliged to observe these rules and the respective applicable laws. In addition, BAHMÜLLER is serious about protecting the personal information of employees. In accordance with local data protection laws, the personal data of BAHMÜLLER employees is only processed to the degree that is necessary within the work relationship.

### **Duty of confidentiality**

Confidentiality must be maintained by all BAHMÜLLER employees with regard to confidential or protected BAHMÜLLER information. Non-public information that concerns business partners, employees and other third parties must be protected in accordance with legal regulations or contractually arranged requirements and cannot be passed on. The obligation to maintain confidentiality applies to all employees beyond the end of the employment relationship.

Confidential or protected information can be:

- Key figures from internal bookkeeping
- Information about the company, such as sales, profit, markets, prices
- Information about research and new development projects
- Information, data, contact partner and projects with customers

Confidential information of any kind obtained in the context of professional activities, including information outside one's own field of activity, may neither be used for the pursuit of one's own interests nor made accessible for the use of the interests of third parties. It must be ensured that company information of any kind (documents, extracts, files, drawings, plans, forms, etc., including copies thereof on paper as well as electronic or other data carriers) is always kept safe. If such information has to be taken outside the company for business reasons, it must be secured against inspection or access by third parties. Strict confidentiality must be maintained with regard to all company and business secrets and topics relevant to the company, in particular development priorities, acquisition and sales strategies, regardless of the source of the information. If external customers or business partners (suppliers, consultants, etc.) are involved, appropriate non-disclosure agreements must be concluded. Information from which company and business secrets can be derived must also be treated confidentially and may only be made available to those employees who require it in the course of their professional activities. They must be stored securely by the employees. This also applies to information in which contractual partners of BAHMÜLLER have an interest in secrecy, especially if a corresponding secrecy agreement has been concluded. The obligation to maintain confidentiality shall continue to exist without restriction even after termination of the employment relationship. In addition, the relevant confidentiality provisions of the respective service contracts apply.

### **Corporate Communications**

Press releases and other information intended for the public concerning the BAHMÜLLER company or individual subsidiaries are issued exclusively in coordination with and after approval by the management or the Marketing and Communications department. This applies to both classic and digital communication.

## V. Environment, safety, health

### **Environment and sustainability**

From the development of our products to rendering services and designing business processes and products, the highest priority is the responsible handling of natural resources in order to preserve the environment. All employees at BAHMÜLLER contribute to this company goal through their responsible and sustainable actions.

Sustainable production processes, responsible handling of resources and the use of the best possible technologies are part of the corporate philosophy and operational activities of the BAHMÜLLER. This premise forms the basis for the claim to long-term quality leadership in products and services. The production chain is geared towards the most economical use of resources (especially raw materials and energy) and minimizing the environmental impact of processes and products. Emission reductions and energy savings as well as a transparent and efficient environmental management enable the sustainable minimization of the environmental impact of the processes and products of BAHMÜLLER. The employees have to comply with all relevant environmental laws and regulations as well as the internationally recognized environmental protection standards. These include, among others, the requirements of the international conventions of Minamata (mercury), Stockholm (persistent organic pollutants) and Basel (hazardous waste). BAHMÜLLER is committed to the goals of the Paris Climate Agreement and low-carbon production, and in the long term aims to achieve production that is as climate-neutral as possible. BAHMÜLLER not only pays attention to the minimization of environmental impacts in its own production processes, but also expects this from its direct suppliers.

### **Occupational safety and health at the workplace**

The safety and health of employees is the first priority at BAHMÜLLER. The ergonomic design of the workplace combined with monitoring of external service providers ensures that all workplaces meet the current requirements with regard to technical security, occupational safety and health care. Each employee is obliged to provide an ongoing contribution to minimizing accident risks through responsible action. Our goal is a workplace that is absolutely free of accidents, because each accident is one too many.

## VI. Declaration

Part of our company politics is that BAHMÜLLER and its employees respect all laws, values and standards worldwide. Our managers as well as other employees with supervisory responsibility must ensure that their subordinate employees know and follow these legal regulations.

These policies must be strictly observed by each BAHMÜLLER employee.

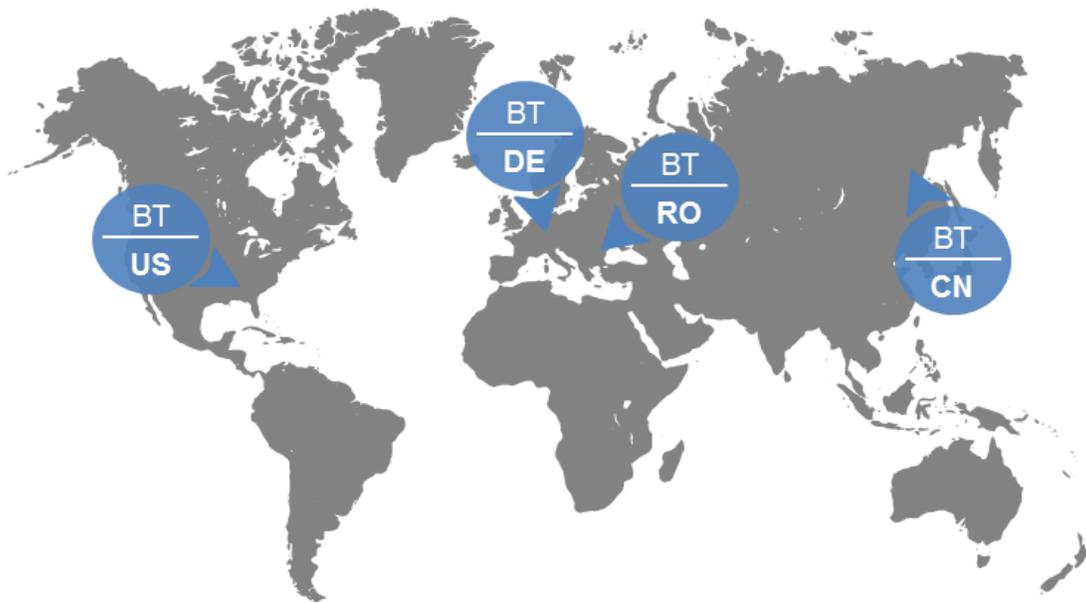
When interpreting the rules of the Code of Conduct, employees must also be guided by common sense and question whether, on the basis of reasonable ethical and moral standards, a specific course of action could give rise to criticism. Above all, country-specific standards and customs must also be taken into account. Where statutory regulations exist, there is no scope for discretion. In the case of uncertainties or questions, employees can turn to their direct superiors for advice and decision-making support. In addition, the responsible legal and human resources department of BAHMÜLLER, as well as the Compliance Officer, can also be contacted.

The Compliance Officer is the highest authority for the binding interpretation of the Code of Conduct in matters of dispute and interpretation. The Compliance Officer can be reached at the following contact details: [compliance@bahmueller.de](mailto:compliance@bahmueller.de)

Employees of BAHMÜLLER also have the option of reporting violations of the requirements of the Code of Conduct, other internal guidelines and regulations, or statutory provisions 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, » the environment, » health & safety, and also » violations in other areas, both on an identified and anonymous basis.

Anonymous reports can be made using the web-based whistleblower protection system installed at BAHMÜLLER anonymously at the email address: [hinweise@diomiko.com](mailto:hinweise@diomiko.com) or by telephone at +49 151 50 59 0736. Further information can also be found on the BAHMÜLLER intranet.

More at: [www.bahmueller.de](http://www.bahmueller.de)



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