



# BECHEM Code of Conduct 2025

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## General information

For BECHEM employees, compliance with the existing laws and regulations of the Federal Republic of Germany and the European Union is standard. Their actions are based on honesty and integrity and are guided by “common sense”.

No employee will abuse his or her business position for personal gain or promote actions that contradict the BECHEM rules of conduct. Especially, immoral, or corrupt practices by employees or business partners will not be tolerated. BECHEM strictly prohibits any involvement in bribery and any other form of corruption or even condoning that sort of behavior. This expressly includes any active, passive and/or complicit involvement in fraudulent activities.

Every employee of the BECHEM Group is also its representative and significantly influences the reputation of the company through his or her appearance, behavior, and actions. Therefore, all employees observe and respect the cultural particularities of the respective country and are guided by them in all aspects of their operational duties.

In their daily interaction, all employees of the BECHEM Group contribute to a corporate culture that is based on the established BECHEM values characterized by open-mindedness, honesty, appreciation, and tolerance.

BECHEM employees are reliable business partners who keep promises.

Every supervisor serves as a role model. He or she earns the recognition of their employees through performance, respectful treatment, fairness, and open-mindedness. Supervisors are the contact person for business-related and – where desired – personal matters. Within the scope of their management duties, supervisors set clear and realistic goals. They encourage employees to act independently and give them the necessary freedom. Every manager has organizational and supervisory duties to fulfill. In carrying out these duties, all managers or employees entrusted with personnel management tasks have a special responsibility to ensure that everyone complies with the BECHEM values. Supervisors also retain responsibility over delegated tasks.

## Fair business relations

In the spirit of fair business relations with customers, suppliers, service providers, or other contractual partners, BECHEM expects the highest performance from its employees and business partners in terms of quality, pricing, and reliability. Any confirmation or acceptance of deliveries and services as well as all payments must have a justifiable relationship to the value of the delivered goods or rendered services and must be traceable. All facts, entries, and payments relating to these business transactions must be fully documented and show the business transaction purpose and relationship.

### **Fairness**

The BECHEM Group conducts its business in the global markets in line with the highest ethical principles and complies with the nationally applicable laws of competition law. This particularly includes compliance with anti-trust prohibitions, such as the prohibition of price fixing, and refraining from other agreements and conduct that could adversely affect competition.

Convinced that the interests of business partners are best protected by fair competition, BECHEM does not take unfair advantage of customers, suppliers, or competitors.

In international trade, we comply with all applicable national and international regulations and agreements controlling the trade of goods. We also expect identical conduct from our suppliers!

### **Bribery and acceptance of benefits**

All decisions in the company are based on the company's objectives, not personal interests. Corporate decisions are made solely to increase customer benefits and achieve long-term corporate success.

In order to maintain their independence, employees may not solicit gifts or other benefits, personal services, or favors from business partners. BECHEM employees are prohibited from accepting favors from business partners that could sway an objective and fair decision. As a general rule, gifts or favors exceeding a value of €50 may not be accepted. In case of refusal, the respective business partner must be informed of the BECHEM Code of Conduct. In the event of exceptions in justified individual cases, the responsible managing director must be notified. For example, this is the case if in an international setting the rejection of a gift would be considered impolite and the acceptance would not result in a conflict of interest. The employee must turn in the gifts received to BECHEM.

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The employee must bear the costs of expenses – especially for entertainment and gifts where it is not possible to precisely separate business and personal interests. Attempts by suppliers to influence BECHEM employees in their decision by offering unjustified benefits will (depending on each individual case) generally lead to the termination of the business relationship.

#### **Offering and granting benefits to business partners and public officials**

No employee may offer, promise, or grant – directly or indirectly – unjustified benefits to public officials or business partners or approve such benefits. Any offer, promise, gratuity, or gift must comply with applicable laws. Consequently, offers, promises, gratuities, and gifts may not be made if they could be construed as an attempt to bribe a business partner or public official to obtain business benefits for BECHEM.

#### **Travel, invitations, and hospitality**

Without exception, travel must be planned according to business needs and approved by the employee's supervisor (see BECHEM Travel Expense Policy). Invitations from business partners to business meals or to events can only be accepted if they are granted voluntarily, the acceptance serves a legitimate business purpose, and takes place within the scope of ordinary work relations. The assumption of travel or accommodation costs by third parties is not permitted.

#### **Transparency in awarding contracts**

Every offer is examined fairly and without bias. Employees involved in awarding contracts must especially observe the following rules:

- Suppliers must be treated equally when competing for contracts.
- Employees must report to their supervisor any conflict of interest that may exist in connection with the performance of their job duties.
- Employees who are related to (directly or by marriage) to owners of supplier companies may not decide, directly or indirectly, on awarding contracts to these companies.
- It is strictly forbidden to award contracts to BECHEM employees or to companies in which a BECHEM employee is a shareholder (without special management approval and reporting to the compliance officer).
- No vendor or service company in which employees use their expertise formerly acquired at BECHEM may be contracted without management approval.
- No employee may have personal orders carried out by companies with which he or she has business relations, if this could result in advantages for him or her. This applies in particular, if the employee can directly or indirectly influence the awarding of contracts to these suppliers.

#### **Money laundering**

We maintain and promote fair economic and financial transactions. We take measures to identify and prevent illegal payments and to detect funds of dubious origin, and we expect the same from our suppliers.

#### **Customs, export control and sanctions**

We operate in accordance with legal regulations and international conventions. In all countries, we comply with the applicable laws and regulations regarding export control, including sanctions and customs processing.

This applies not only to cross-border trade in goods, but to the entire business transaction, including, in particular, financial transactions, the transfer of technology and technical knowledge, as well as procurement.

## Avoiding conflicts of interest

BECHEM attaches great importance to ensuring that employees do not become involved in conflicts of interest or loyalty in the performance of their duties. This may occur if an employee works for or has an interest in another company. Should such a conflict arise, the employee must immediately notify his or her supervisor or the compliance officer.

#### **Non-compete agreement**

BECHEM reserves the right to include non-compete clauses in employment contracts in individual cases. Non-compete clauses serve to prevent damage to the company. Their purpose is to prevent a transfer of information if an employee moves to a competitor.

The use of specific BECHEM expertise for a competitor can cause greater economic damage than the transfer of strategic management knowledge. The duration of non-compete agreements may be structured accordingly.

#### **Permitted and unauthorized sideline activities**

Employees are required to obtain approval for sideline activities from the Human Resources department. Employees must also notify the HR department in writing of any such activities and of any direct or indirect shareholdings in a company, and such activities must be approved in advance. Purchases of shares for investment purposes are exempt from this regulation. Approval may be denied if the sideline activity conflicts with the legitimate interests of the company, leads to an impairment of the employee's work performance, negatively impacts the employee's duties within the company, or if there is a risk of a conflict of interest.

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### **Social commitment and political activities**

BECHEM axiomatically supports the social commitment of its employees in associations and organizations or in public functions at the municipal and supraregional level. For this commitment, in particular for participation in public functions, the superiors grant their employees the necessary freedom. Every employee of the BECHEM Group or of a BECHEM company must ensure, within the scope of his or her personal commitment, that the company does not become involved in political campaigns or public disputes.

## External communication

### **Media, publications, and public appearance**

All media inquiries relating to the BECHEM Group or its companies must be referred to the Marketing Department. Only shareholders, managing directors, and authorized company spokespersons make statements to the media. All press releases, interviews, or presentations related to the image of the BECHEM Group must be approved by the Marketing Department prior to publication. This applies especially if an employee appears as a representative of the company or is addressed as such.

This does not apply to statements made by the works council, if and to the extent that they are necessary for the fulfillment of its statutory duties and the employer has caused it. The right to express one's opinion, which is expressly designated as a personal expression of opinion, remains unaffected.

### **Donations and sponsorship**

The donations and sponsoring budget is approved by the management. All activities related to donations and sponsorship of the BECHEM Group are exclusively planned, approved, and implemented by the marketing department in collaboration with the BECHEM companies.

## Protection of trade secrets and preservation of corporate values

Information is one of the company's most valuable assets. Open, targeted, and effective information sharing is critical to business success. However, information in the BECHEM Group is confidential or legally protected, which is why the respective confidentiality obligation in employment contracts must be observed.

### **Confidentiality**

Confidentiality must be maintained about matters within the BECHEM Group. If an employee receives information that is not public knowledge as a result of his or her employment with the company, he or she must treat this information as confidential. He or she may only disclose such information to employees or contractual partners who are authorized to obtain knowledge thereof by virtue of their duties.

### **Information protection**

In the interest of the company, each employee must protect confidential company information that is only intended for a limited group of persons from access by unauthorized persons.

### **Privacy**

BECHEM treats all personal information about employees, customers, business partners, and suppliers carefully, confidentially and in compliance with all data protection laws. In order to maintain mutual trust, the protection of this information is extremely important.

Information to investigating authorities will only be provided by the BECHEM Data Protection Officer if there is a legal obligation to do so.

### **Use of AI**

BECHEM recognizes the potential of artificial intelligence to enhance operational processes. The use of AI systems is always carried out with strict adherence to the high standards we maintain for protecting our trade secrets and data. Employees using AI are required to ensure that these technologies do not process confidential information without authorization and are always used in compliance with applicable data protection laws and internal policies. Furthermore, BECHEM is committed to promoting transparent and verifiable AI applications that are free from discrimination and contribute to upholding our corporate values.

### **Responsible handling of assets**

It is the duty of every employee to handle company property (e.g. furniture, equipment, company vehicles) responsibly, to treat it with utmost care, and to protect it against loss, damage, misuse, theft, embezzlement, or destruction. This regulation also applies to intellectual property such as trademarks, patents, copyrights, and know-how. This includes business and corporate plans, technical knowledge, databases, product samples, designs, business papers, and reports.



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The production of personal work in the company and the use of company facilities for personal purposes are prohibited. Exceptions require the approval of the supervisor or are described in appropriate company regulations.

#### **Strictly confidential business records**

All employees who have access to strictly confidential information about the BECHEM Group or about a company with which BECHEM has a business relationship must exercise special care in handling business documents and information as part of their confidentiality obligation (see also Company Security Directive). This applies to the handling of plans and reports, as well as information about new products or processes, mergers, acquisitions or divestitures, negotiations, contracts, business relationships, litigation, business developments, or key financial figures.

#### **Reporting**

All financial statements and annual reports, whether in electronic or printed form, must fully present transactions and operations and comply with the company's internal requirements and accounting policies. Inaccurate reporting within the company or disclosures to outside organizations or persons are strictly prohibited. The responsible specialist in each case ensures that all reports and documents contain correct information in terms of content and times.

## Fairness and diversity

#### **Diversity**

The diversity of employees is crucial to the company's success as a global company. BECHEM strives to recruit, train, retain, and promote the most competent employees. Career advancement in the BECHEM Group is based on skills and performance. BECHEM is committed to equal opportunity as well as adherence to fair hiring practices and compliance with anti-discrimination laws.

#### **Remuneration**

BECHEM respects the right to fair compensation based on minimum wages guaranteed by law, employee performance, and the relevant labor market. All employees receive compensation that is adequate for their work.

#### **Dissociation from discrimination and harassment**

BECHEM respects and promotes human rights. The company recognizes that human rights must be considered fundamental and universal rights based on accepted international laws and practices, including the United Nations Declaration of Human Rights. BECHEM recognizes the rights of Indigenous peoples and is

committed to respecting and protecting them. BECHEM rejects all forms of forced and child labor within the company and among our business partners. BECHEM promotes a work environment that allows for diversity. Differences among employees are therefore valued and respected. Discrimination, harassment, or intimidation of any kind based on race, gender, skin color, religion, nationality, age, marital status, sexual orientation, ancestry, social status, or physical disability is prohibited, as it contradicts the goal of respectful and fair treatment. Any kind of mental or physical violence is strongly condemned.

Employees are therefore not permitted to use BECHEM's electronic systems to transmit or receive images or text that constitute harassment as defined above.

If employees believe they have been subjected to discrimination or harassment, or if they observe or become aware of such conduct, they are encouraged to report it to their supervisor, a Human Resources representative, a Works Council member, or the Compliance Officer. BECHEM will investigate all reports of harassment or discrimination and take appropriate action as required by local law.

## Responsibility in the workplace

#### **Rejection of forced labor and child labor**

All BECHEM officers and employees categorically reject forced and/or child labor. Within the company and with our business partners, we strictly observe the rights of protected wards and consistently pursue any violations.

#### **Security**

The safety of employees in the workplace is an extremely important concern of BECHEM. Therefore, based on the respective national legislation, all international and site-specific health and safety regulations as well as the respective national working time laws must be complied with. BECHEM supports continuous development to improve the work environment.

#### **Alcohol- and drug-free workplace**

In order to meet our responsibility of providing a healthy and productive work environment for employees and business partners, the use of substances prohibited by law is forbidden in the company. The same applies to drugs (substances prohibited by law) and alcohol. Employees may also not be under the influence of these substances in the workplace. This also includes the consumption of cannabis, regardless of any potential legalization, as its effects can impair work performance and safety.

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### **Works Council**

Everyone has the right to organize in a trade union. National legal regulations and existing agreements must be observed. Collaboration with employees and employee representatives must be constructive. A fair balance must be struck between the economic interests of the company and the interests of the employees. Even in the event of contentious disputes, the goal remains to maintain a viable constructive working relationship in the long term.

## Quality and environmental protection

### **Quality**

Top quality and continuous quality improvement are essential to the growth and success of the company. All employees are called upon to meet the expectations of internal and external customers and to continuously improve the quality of our products and services.

### **Environmental protection**

Environmental protection and careful use of natural resources are high priorities for us. Through appropriate leadership responsibility on the part of management and commitment on the part of employees, BECHEM strives to conduct its business in an environmentally friendly manner and is constantly working to improve eco-efficiency. BECHEM managers and employees ensure compliance with laws and the company's high standards. An environmental management system implemented by BECHEM assists in this process. During development of our products, we already target environmentally friendly design, technical safety, and health protection. All employees must contribute to the achievement of these goals in a sustainable way through their own behavior.

### **Commitment**

Compliance with the BECHEM Code of Conduct and other applicable instructions is binding for all employees. Any conduct to the contrary will not be tolerated by the company and may result in legal action.

It is the responsibility of each supervisor to ensure that employees assigned to them are aware of and comply with the BECHEM Code of Conduct.

## Procedure in case of uncertainties and questions

If employees are uncertain about the correct conduct, they should contact their supervisor, the responsible HR manager, or the works council. If the situation is still not clarified, the employee may contact the Compliance Officer of the BECHEM Group. The matter will be treated confidentially.

### **Whistleblower Hotline**

CARL BECHEM GMBH has established the following channels for reporting of unlawful acts by the whistleblower:

- Email: [bechem.whistleblowing@via-consult.de](mailto:bechem.whistleblowing@via-consult.de)
- Post: VIA Consult  
c/o Whistleblowing Bechem GmbH  
Martinstraße 25  
57462 Olpe

Alternatively, there is an option to use a hotline. For reports via the hotline, please use the aforementioned form to provide the complete relevant information.

- Phone: +49 (0)2761 / 8375 23

