

# Code of Conduct

## Berghof Products + Instruments GmbH

### Our principles

Berghof Products + Instruments GmbH commits itself in the following to act responsibly and lawfully with regard to

- corporate ethics
- the prevention of child labour
- the special needs of underage employees and trainees
- working hours
- human rights, equal treatment and working conditions
- occupational health and safety
- freedom of association
- environmental protection

The corporate policy and the principles derived from it are based on fundamental principles of economic, ecological and social responsibility that conform to applicable law and are in line with international standards, in particular the core labour standards of the International Labour Organisation (ILO) and their underlying conventions.

### Corporate ethics

Berghof Products + Instruments GmbH commits itself to act responsibly and lawfully. This includes in particular:

- Compliance with applicable anti-corruption laws/avoidance of corruption.
- Refraining from anti-competitive business practices
- Protection of intellectual property and trade secrets
- Compliance with legal requirements in the area of export/import control
- Avoiding conflicts of interest, i.e. situations where our own interests conflict with those of our business partners.

### Material Compliance

In order to ensure the environmentally compatible and occupationally safe handling of substances and products in development and production, use, recycling and disposal of the resulting intermediate and end products, Berghof Products + Instruments GmbH has summarized the requirements regarding all known prohibited, regulated and declarable substances in current form in a "Material Compliance Guideline". Berghof Products + Instruments GmbH requires that all products or product parts, product packaging and transport materials supplied to it comply with the requirements of this guideline.

### Conflict minerals

Berghof Products + Instruments GmbH avoids the use of "conflict minerals" and actively requests its suppliers to

- ensure that goods and materials supplied to Berghof have not been obtained in an illegal or unethical manner.



- confirm the implementation of appropriate due diligence measures for the responsible sourcing of minerals to ensure compliance with relevant regulations
- in the case of production, purchase or trade of regulated conflict minerals (tantalum, tin, tungsten, gold or other minerals or their derivatives deemed to finance conflicts) from the Democratic Republic of Congo (DRC) or its neighbours, to inform us and take due diligence measures to eliminate the possibility of supplying such minerals.

### **Child labour and underage workers**

Berghof Products + Instruments GmbH operates in accordance with legal and labour law principles and stands for responsible and lawful action in accordance with legal and statutory requirements. The company acts and operates in accordance with the respective applicable laws with the highest integrity, honestly and fairly. This includes in particular the

- prohibition of child labour
- the prohibition of the employment of vulnerable children and adolescents
- as well as the consideration of the special interests of minors in training relationships.

No children or minors may or will be employed who are below the minimum age stipulated by the International Labour Organisation in ILO Conventions No. 138 and No. 182 or by national laws, or whose employment would contradict the requirements stipulated therein. The highest minimum age specified in each case shall apply. Berghof Products + Instruments GmbH is particularly aware of its special responsibility towards minors who are in vocational training or other training relationships.

### **Working hours**

Berghof Products + Instruments GmbH works and acts in accordance with the statutory provisions and guidelines as amended from time to time. It is guided by the legally compliant treatment of its employees and ensures that working time models are aligned and implemented in accordance with the legal requirements and guidelines and that the legally stipulated maximum working hours are not exceeded.

### **Human rights, equality and working conditions**

For Berghof Products + Instruments GmbH, social responsibility towards employees is of paramount importance. Berghof Products + Instruments GmbH respects and takes into account applicable social standards and is committed to social responsibility in all its activities. Berghof Products + Instruments GmbH respects the dignity, privacy and personal rights of its employees and pays attention to workplace offers that do not impair the physical or mental integrity of a person. Sexual harassment or abuse, intimidation, discrimination, bullying and corporal punishment will not be tolerated in any way.

Berghof Products + Instruments GmbH promotes or develops the professional and personal talents and competences of its employees and enables this, if necessary, through qualifications and training measures while maintaining equal opportunities for all employees.

The following principles are of particular importance:

- respect for human rights.
- no discrimination (ILO Convention No. 111), granting of equal opportunities and equal treatment.
- prohibition of human trafficking, child labour and forced labour.
- respect for freedom of association and the right to collective bargaining.
- remuneration irrespective of gender in accordance with ILO Convention No. 100 and in compliance with national laws.
- compliance with the respective country-specific legal provisions on working time and paid rest leave.
- compliance with the respective national standards for occupational health and safety.
- compliance with applicable data protection standards for the protection of the privacy of employees, customers and third parties.

**Occupational health and safety**

At Berghof Products + Instruments GmbH, we ensure a healthy working environment. With constantly evaluated and adapted measures for health protection, as well as regular instructions on occupational safety, we are committed to the well-being of our employees. For us, health is an asset that is particularly worthy of protection, which we protect through the consistent implementation of applicable legal regulations. Last but not least, it forms the foundation for the willingness to perform of our entire team.

As part of our occupational health and safety policy, we raise awareness of, for example:

- observing and ensuring order and cleanliness in the workplace
- avoiding unnecessary hazards for our staff and third parties
- following all instructions on occupational safety and health protection
- complying with legal and company regulations and requirements
- using the personal protective equipment provided for its intended purpose and handling it with care
- to visually inspect all work equipment before each use to ensure that it is in a safe condition and suitable for its intended use
- to work in a safety- and health-conscious manner
- the safe handling of hazardous substances
- reporting or independently remedying identified defects, as far as possible
- addressing and/or reporting unsafe behaviour
- the implementation of and compliance with the relevant fire protection regulations

**Freedom of association**

Berghof Products + Instruments GmbH operates within the applicable legal framework. It respects the right of its employees to form and join free associations and to exercise employee representation. Employees who are organised and active in employee organisations are not disadvantaged or favoured in any way.

**Environmental protection and sustainability**

Berghof Products + Instruments GmbH is committed to its economic, ecological and social responsibility and in this sense supports the climate protection ambitions of the EU (EU Green Deal). In particular, energy and water consumption as well as waste must be reduced. We

- run our operations safely and minimise the environmental impact of our business activities
- strive to operate in a sustainable manner, in particular to continuously reduce the impact of our products and production on the environment
- comply with applicable environmental laws and permits.