

## **Code of Conduct**

### **regarding corporate responsibility**

#### **Preamble**

BodeDynamic commits to its corporate social responsibility (CSR<sup>1</sup>) in connection with its worldwide business activities. This present Code of Conduct is a guideline, stipulating what this means in connection with work conditions, social and environmental responsibility, as well as transparency, trustful cooperation and dialogue. Based on its commitment to this Code of Conduct, BodeDynamic is able to react to the different framework conditions on a global market and to face the challenges and social expectations resulting from the increasingly cross-linked cooperation in the value-added chains. BodeDynamic assumes responsibility by considering the economic, technological, social and ecological consequences of its actions and by ensuring an adequate reconciliation of interests. In accordance with its possibilities and scopes of action, BodeDynamic makes a voluntary contribution to the wellbeing and sustainable development of global society at the sites at which it operates. We are guided by general ethic values and principles, in particular integrity and honesty and by respect for human dignity.

#### **1. Scope**

This Code of Conduct shall apply to all subsidiaries and entities of BodeDynamic. We undertake to support our suppliers and our entire value-added chain in their compliance with this Code of Conduct to the extent possible and in accordance with the relevant scope of action.

#### **2. Basic points of the Code of Conduct**

BodeDynamic actively promotes sustainable compliance with the following values and principles.

##### **2.1 Compliance with laws**

BodeDynamic complies with applicable laws and regulations in the countries in which it operates. In countries with a weaker institutional framework, we carefully consider which of the good corporate practice of our home country should be applied to support responsible corporate management.

## **2.2 Integrity and company management**

BodeDynamic orientates its actions towards generally applicable ethic values and principles, in particular integrity, honesty, respect of human dignity, openness and no discrimination based on religion, ideology, sex and ethnic group.

## **2.3 Antitrust laws and competition**

BodeDynamic complies in all aspects with commercial legislation, in particular with the antitrust regulations which prevent unreasonable restriction of a functional, free and competition-oriented market. In addition, BodeDynamic complies with all laws prohibiting unfair or fraudulent trade practices. In no case do we tolerate behavior which is prohibited by antitrust laws and commercial laws. This means that anticompetitive agreements are prohibited. BodeDynamic does not make any coordinated or informal agreements on the boycott of customers or business associates. Our philo-sophy does not tolerate price agreements.

## **2.4 Fight against corruption**

BodeDynamic is against corruption and bribery as described in the relevant UN Convention<sup>ii</sup>.

BodeDynamic supports transparency, actions of integrity and responsible management and control within the company. We pursue clean and recognized business practices and fair competition. BodeDynamic's competitive actions are guided by professional conduct and high-quality work.

Our relationship with the regulatory authorities is based on partnership and trust.

## **2.5 Consumers' interests**

To the extent consumers' interests are concerned, BodeDynamic complies with consumer protection regulations and reasonable sales, marketing and information practices. We pay particular attention to consumer groups that are in special need of protection (e.g. protection of children and young people).

## **2.6 Communication**

BodeDynamic communicates openly and dialogue-oriented about the requirements of this Code of Conduct and its implementation with employees, customers, suppliers and other stakeholders. All documents are properly prepared, not unfairly changed or destroyed and stored in accordance with relevant laws and regulations. Our business partners' trade secrets and business information will be treated with care and strict confidence.

## **2.7 Human rights:**

BodeDynamic is committed to the support of human rights. It complies with the human rights requirements in accordance with the UN Universal Declaration of Human Rights<sup>iii</sup>, including but not limited to:

### **2.7.1 Privacy**

Protection of privacy.

### **2.7.2 Health and safety**

Protection of health and safety, in particular guarantee of a safe and healthy work environment in order to avoid accidents and injuries.

### **2.7.3 Harassment**

The employees are protected from physical punishment and from physical, sexual, mental or verbal harassment or abuse.

### **2.7.4 Free expression of opinion**

The right to free expression of opinion and freedom of speech is protected and granted.

## **2.8 Work conditions**

BodeDynamic complies with the following core labor standards of ILO:<sup>iv</sup>

### **2.8.1 Child labor**

The prohibition of child labor, i.e. the prohibition to employ people who are younger than 15 years, unless local laws provide for a higher age and unless exceptions are admissible.<sup>v</sup>

### **2.8.2 Forced labor**

The prohibition of forced labor of any kind.<sup>vi</sup>

### **2.8.3 Remuneration**

The labor standards regarding remuneration, in particular regarding the amount thereof in accordance with applicable laws and regulations.<sup>vii</sup>

#### **2.8.4 Employee rights**

We respect the employees' rights to freedom of association, freedom of assembly and to collective bargaining and union contract negotiations to the extent this is legally admissible and possible in the relevant country.<sup>viii</sup>

#### **2.8.6 Cooperation**

BodeDynamic supports open communication and teamwork. All employees are to treat their colleagues with respect. In order to support the development of employees, BodeDynamic offers training opportunities.

#### **2.8.7 Conflicts of interest**

Conflicts of interest between employees and the company are to be avoided. This includes any topics that might lead to a conflict.

#### **2.8.8 Ban on discrimination**

No discrimination of any kind against employees.<sup>ix</sup>

#### **2.8.9 Illegal drugs**

Consumption, sale and possession of illegal drugs on the company's premises or during a stay within the company are prohibited and shall be subject to disciplinary actions. The sale and consumption of alcohol on the company's pre-mises is also prohibited. We do not tolerate any employee coming to work or working under the influence of alcohol or any drugs that were not prescribed.

### **2.9 Working hours**

BodeDynamic complies with the labor standards based on applicable laws regarding the maximum number or working hours.

### **2.10 Environmental protection**

BodeDynamic complies with regulations and standards for environmental protection applicable to its respective companies and always acts in an environmentally friendly manner at all sites. In addition, we act responsibly with regard to natural resources in accordance with the principles contained in the Rio Declaration.<sup>x</sup>

### **3. Corporate citizenship**

BodeDynamic makes a contribution to the social and economic development of the countries and regions in which it operates and supports related voluntary activities of its employees.

### **4. Implementation and enforcement**

BodeDynamic uses its best efforts that are suitable and reasonable in order to continually implement and apply the principles and values described in this Code of Conduct. Upon request and on a reciprocal basis, contractual partners shall be informed of essential measures in order to ensure transparency of consistent compliance therewith. There shall be no right to demand disclosure of trade and business secrets, of information related to competition or of information deserving protection.

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<sup>i</sup> Corporate Social Responsibility (CSR)

<sup>ii</sup> United Nations Convention against Corruption of 2013, in effect since 2005

<sup>iii</sup> Universal Declaration of Human Rights, UN Resolution 217 A (III) of 1948

<sup>iv</sup> ILO = International Labour Organization

<sup>v</sup> ILO Convention no. 138 of 1973 and ILO Convention no. 182 of 1999

<sup>vi</sup> ILO Convention no. 29 of 1930 and ILO Convention no. 105 of 1957

<sup>vii</sup> ILO Convention no. 100 of 1951

<sup>viii</sup> ILO Convention no. 87 of 1948 and ILO Convention no. 98 of 1949

<sup>ix</sup> ILO Convention no. 111 of 1958

<sup>x</sup> The 27 principles contained in the „Rio Declaration on Environment and Development“ of 1992 as the result of the Conference of the United Nations on Environment and Development in Rio de Janeiro