



Code of Conduct

Principles of conduct of the BOS Group

*focused on customer
- driven by innovations*

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INTENT OF THE CODE OF CONDUCT

Ostfildern, March 2023

Dear Employees,

The BOS Group is a globally active company. The Code of Conduct with its rules and principles provides the guidelines within which we operate. With it, we are guided by the ten principles of the United Nations Global Compact, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. The Code of Conduct sets the standards of the BOS Group with regard to employees, external partners and our environment.

Observance of the law, adherence to internal regulations and respect for basic ethical values at all times and in all places (compliance) are the basis of our economic success. The Code of Conduct serves each of us, whether manager or employee, as a framework of orientation for our daily work. It sets a standard for ourselves, while at the same time helping us to behave responsibly toward business partners, the public and colleagues. We also expect this responsible behavior from our business partners and suppliers. Together we have the responsibility for the reputation of BOS.

Therefore, we ask you, dear employees, to read the Code of Conduct carefully and to use it together with us as a guideline for our daily behavior.



Marcel Lehmann
Managing Director

1. INTRODUCTION

1.1 Aim of the Code of Conduct of the BOS Group

It is our duty to conduct all business transaction ethically and legally sound with the objective to create an environment of mutual trust both with our business partners as well as with our colleagues internally. We see this as the foundation for long term prosperity and success.

The BOS Group is committed to respecting internationally recognized human rights. We also expect our business partners to adhere to human rights, in particular the UN Global Compact, and actively work towards compliance with and implementation of these principles along the value chain.

1.2. Fundamentals

Our good reputation and the trust of our customers, employees and the public depend largely on the behaviour of each individual in this company. Each employee is therefore equally responsible to adhere to the values and objectives of the company and to act accordingly within the realm of their responsibilities.

Therefore, we need a proper set of rules and guidelines. This present Code of Conduct summarizes the most important rules and guidelines that all BOS employees worldwide should follow. The principles explained in this document apply in interactions with all colleagues, customers, suppliers, business partners and public bodies worldwide, at all locations and for all business units of the BOS Group.

We expect that all employees, without exception, not only follow internal rules but also obey the laws, avoid conflicts of interest, protect BOS assets and uphold the traditions and values of those countries that we have business dealings with.

We expect from our management personnel in their position as role models that they not only communicate these rules but also lead by example and call on their employees to follow. They are the first point of contact for all questions and concerns related to the code.

2. HUMAN RIGHTS, WORK CONDITIONS AND ASSETS

We are convinced that the sustainable success of our family business depends greatly on a value based corporate culture and every single employee contributes an important part to the success of the company. We are taking our responsibility very serious and pledge to respect the human rights of our employees. We aim to exceed the minimum standards with our working conditions.

2.1 Personal Responsibility

We expect all employees of BOS Group to comply with legal requirements and company guidelines, all managers are requested to assume a role model function. The personal dignity of each individual must be respected and protected. All executives are requested to prevent any violation of the code in their respective units. Each employee must be explicitly advised of this code.

2.2 Equal Opportunities / Ethical Recruitment/ Protection against Discrimination

As a globally active company, we promote diversity within the company as well as cooperation with employees and partners of different cultures, ways of thinking or nationalities and are convinced that successful cooperation is only possible with mutual respect and regard for the individual.

We do not tolerate any discrimination, harassment, sexual harassment or other forms of discrimination against our employees on the grounds of origin, nationality, gender, age, skin colour, religion or world view, sexual identity, disability, illness or pregnancy.

We maintain the same equal opportunities both in the search for new employees and during the employment relationship.

We do not mislead or deceive potential employees about the nature of the work. We never charge them recruitment fees and never steal their identification documents. At the beginning of the hiring process, applicants receive a written employment contract in a language they understand, clearly and honestly outlining their rights and responsibilities.

2. HUMAN RIGHTS, WORK CONDITIONS AND ASSETS

2.3 Fair Work Conditions

We do not tolerate any form of forced or compulsory labour. In accordance with the ILO Core Labour Standards, we strictly reject the use of forced or unlawful compulsory labour.

We do not tolerate any form of child labour. In accordance with the ILO core labour standards, we observe the minimum age for employment and strictly reject child labour. We do not want children to be inhibited in their development and their safety and health to be impaired.

Our employees have a free choice of employment. They can terminate their employment relationship at any time in line with the contract terms.

We uphold the freedom of association and the effective recognition of the right to collective bargaining and ensure that our employees can openly discuss working conditions with management without fear of disadvantage. We respect the right of our employees to associate, join a union, appoint and be elected to representation.

Our culture is characterized by trusting and constructive cooperation with the respective employee representatives. The common goal is to maintain a viable working relationship for the benefit of the company and its employees.

Compensation and benefits for our employees comply with basic principles regarding minimum wages, applicable overtime regulations and statutory social benefits. Our working hours and non-working hours comply at a minimum with applicable laws, industry standards or relevant ILO conventions, whichever is more stringent.

We comply with the applicable national working time regulations worldwide. In addition, our working time regulations describe the applicable principles regarding rest periods, time off, vacation and work-life balance as well as possible sabbaticals. Our working hours can be found on the BOS intranet of locations.

Professional development and qualification are based exclusively on the individual's personal performance, individual ability and personal suitability. We compensate our employees for their individual or collective performance in accordance with local principles.

2. HUMAN RIGHTS, WORK CONDITIONS AND ASSETS

2.4 Health, Safety and Environmental Protection at the Workplace

We consistently comply with applicable occupational health and safety legislation worldwide.

With our management system for environment, health and safety at work (USGA), which includes the health and safety management system to ISO 45001 and the environmental management system to ISO 14001, we also set our own standards for improving occupational safety and reducing the risk of accidents. Details about the USGA can be found on the BOS Intranet.

In this way, we are committed to complying with the highest occupational safety requirements, regardless of whether lower requirements would be permissible in each country.

We all share responsibility for protecting people and the environment. It is the responsibility of our employees to maintain their workplace in a tidy and safe condition, to protect the environment and to use available resources sparingly and carefully. Any abnormalities must be reported to the manager.

2.5 Avoidance of Conflicts of Interest

We ensure that employees' own interests are in harmony with the interests of the company. For this reason, every employee should avoid situations that could lead to a conflict between personal interests and the interests of the company. This could occur, for example, in the case of activities or shareholdings in other companies or in business dealings with friends or relatives. Such business relationships must be avoided and reported immediately to the supervisor. Secondary employment for remuneration must be approved in writing in advance by the supervisor or the Human Resources Department.

2.6 Protection of Corporate Assets

We require our employees to protect tangible and intangible assets. These assets include buildings, land, vehicles, office equipment as well as know-how, patents, innovations, technologies and other information that is valuable for the BOS Group and therefore has to be protected. Our innovations and capabilities should not only be protected against theft, but also against imitation.

All equipment and facilities may be used for private purposes only with express permission.

2. HUMAN RIGHTS, WORK CONDITIONS AND ASSETS

2.7 Information Security and Data Protection

We oblige our employees to keep confidential data, information, inventions and know-how secret and to use them only for BOS business purposes. These are the basis for our sustainable success and may not be disclosed to or obtained from third parties in any form. The same applies to personal data of employees of the BOS Group.

In order to protect the personal rights of our employees and customers with regard to the use of their personal data, we maintain high data protection standards. We are fundamentally guided by German and European data protection standards in order to ensure the best possible respect for personal rights worldwide. Our data protection works to ensure that the use of personal data complies with the law and that the rights of each individual are protected.

2.8 Rights of Minorities and Indigenous People / Land Rights

We respect and honor the rights of local communities to adequate living conditions, education, employment, social activities and the right to free, prior and informed consent (FPIC) to developments affecting them and the land on and in which they live, with particular attention to the presence of vulnerable groups.

We do not hire or employ private or public security forces to protect the business project if the use of security forces may result in human rights violations due to lack of training or control on the part of the company.

We avoid forced evictions and deprivation of land, forests and waters when acquiring, developing or otherwise using land, forests and waters.

3. INTERACTIONS WITH BUSINESS PARTNERS

We want to be reliable partners, both in cooperation with our customers, suppliers and business partners and within our company. In addition to our expertise, innovative strength and the quality of our products, this includes communicating openly, honestly and transparently and keeping our promises and contractual relationships.

3.1 Selection of Business Partners

The selection of our business partners (e.g. suppliers, service providers, sales representatives, distributors, project partners, consultants) is made without bias on the basis of offers that are evaluated according to previously defined objective criteria. We reject any un-objective preference or disadvantage.

We expect our business partners worldwide to respect the principles manifested in our Code of Conduct, such as respect for people and the environment, the requirement of strict compliance with the law, the outlawing of corruption and integrity in competition, and to act accordingly in the course of their business activities. This can be done by contractually committing to our sustainability standard for suppliers or by providing evidence of a pre-audited code of conduct comprising comparable business principles.

Further details are regulated in the BOS Code of Conduct - Sustainability Standard for Suppliers.

3.2 Fair and Sustainable Competition

We follow the rules of fair and sustainable competition and support the idea of open markets and free trade. Unfair practices are to be refrained from.

Our economic and financial activities are monitored internally on an ongoing basis and are subject to the control of auditing firms and the relevant banking and financial supervisory authorities.

We observe the various rules of foreign trade, tax and customs law in our global activities, comply at all times with mandatory economic sanctions and are aware of our social responsibility in fulfilling our tax and customs obligations.

3. INTERACTIONS WITH BUSINESS PARTNERS

3.3 Conflict Minerals

We take special care to transparently document the supply chain for conflict minerals in accordance with EU Regulation 2017/821 and the U.S. Dodd-Frank Act, Section 1502.

3.4 Competition and Antitrust Law

We expect every employee to be fully committed to fair competition and to comply with the competition laws of all countries in which BOS does business. This also includes business in countries against which economic sanctions have been levied. It is therefore inadmissible to enter into agreements with competitors that could influence competition. The same applies to the exchange of information regarding prices, conditions, capacities, market shares, margins, costs as well as offer contents or behaviour.

3.5 Gifts and Benefits

We do not tolerate any form of corruption, bribery, extortion and embezzlement. All our activities are driven by honest and responsible thinking and action. Employees who allow themselves to be unfairly influenced by customers or suppliers or who influence them will be held disciplinarily responsible. No gratuities may be linked to the demand or granting of consideration.

Our employees may not accept rewards or gifts related to their professional activities. If employees are offered rewards or gifts in relation to their professional activities, they must inform the employer immediately. Monetary gifts are to be rejected as a matter of principle.

3.6 Donations

We are approached by various organizations and institutions for donations. Donations are only made with the prior approval of the management. The recipient of the donation and the specific use must be known and traceable. Here, too, the principle of altruistic action must be observed.

4. COMPLIANCE WITH AND IMPLEMENTATION OF THE CODE OF CONDUCT

Our Code of Conduct is communicated to all employees. We expect all BOS employees to comply with the legal provisions and operational guidelines and to align their professional actions accordingly.

4.1 Responsibility

Our managers are obliged to inform their employees about the content and significance of this Code and to advise and support them in complying with our Code of Conduct in their daily actions.

Every employee of the BOS Group is obliged to comply with our Code of Conduct and to make its principles the binding standard in the daily performance of tasks. For this purpose, it is necessary to actively and continuously inform oneself about the existing requirements and to participate in the offered trainings.

4.2 Violations

Violations can have serious consequences for the entire company and, depending on the circumstances, lead to sanctions under labour law or even criminal law.

However, we trust that all employees will make the right decision and report any violations to the appropriate manager and resolve them locally through constructive dialog. However, for certain issues - particularly those involving illegal business practices - it may be better to address them outside the local work environment. The following points of contact are available to both employees and third parties:

- Your manager
- Your management
- Your human resources, finance department or, where available, your employee representative committee
- The BOS Code of Conduct contact person

Employees who raise actual or suspected misconduct in good faith should not suffer any disadvantage because of it. To the extent possible and permitted by law, BOS will keep the employee's identity confidential, pursuant to a whistleblowing process.

4. COMPLIANCE WITH AND IMPLEMENTATION OF THE CODE OF CONDUCT

4.3 Contact Points

If you cannot voice your concerns, hints or complaints locally or you do not receive proper support, you can always contact the Director of Human Resources International by phone: 49 711 9360 1346 and/or by email under hinweisgeben@bos.de or directly contact the Managing Director.

Contact Person internal:

Director Human Resources International
BOS GmbH & Co. KG
Ernst-Heinkel-Str. 2, D-73760 Ostfildern
Germany
Phone: +49 (0) 711 9360-1346
Email: hinweisgeben@bos.de

Contact Person external:

Executive Vice President Supply Chain
BOS GmbH & Co. KG
Ernst-Heinkel-Str. 2, D-73760 Ostfildern
Germany
Phone: +49-(0)711-9360-1646
Email: hint@bos.de

4.4 Investigation and Reporting

Reported issues are investigated and the necessary steps are taken. Violations of the principles described in this code of conduct by employees may lead to consequences under labor law in accordance with local legislation.

Any investigation regarding violations of the code of conduct will be conducted with the utmost confidentiality, protection of the reporting party and consideration of data privacy laws.

5. FINAL CLAUSE

The Code of Conduct of the BOS Group is effective from the day of its signing. No individual claims or claims of third parties may be derived from it. Only the German version of this code of conduct is binding.