



Code of Conduct

*focused on customer
- driven by innovations*

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INTENT OF THE CODE OF CONDUCT

Based on the international activities of the BOS Group we have revised the Code of Conduct and determined the basic rules and principles according to which we would like to work together at BOS – today and in the future. The BOS code of conduct is leaning largely on the UN Global Compact (www.unglobalcompact.org) and summarizes the high standards at BOS Group regarding our employees, our environment and our external partners.

The Code of Conduct serves all of us whether it be for leadership or individual employees as guideline in our daily work. It sets the bar for each of us and at the same time shall help practice responsible behavior both externally towards our business partners and the public as well as internally in the conduct with each other. Together we are responsible for the reputation of BOS.

Last but not least, the strict adherence to the “Code of Conduct” is a mandatory component of the IATF 16949 certification, the successor of the ISO/TS 16949 certification and therefore required for every supplier within the automotive industry.

Thus, we would like to ask you, esteemed colleagues to carefully observe the Code of Conduct and to use it as a guideline for our daily behavior.



Stefan Grein
Chairman of the Board

1. GENERAL REQUIREMENTS

Our good reputation and the trust of our customers, employees and the public depend largely on the behavior 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.

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.

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.

2. LEADERSHIP AND COOPERATION AT BOS

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 uphold internationally recognized Human Rights.

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 Mutual Respect

We do not tolerate any discrimination of our employees based on gender, age, skin color, nationality, race, religion, social background, disability, or sexual orientation. As a company operating worldwide we are working with employees and partners of diverse cultures and mindset or nationalities and are convinced that successful collaboration can only be achieved with mutual respect and appreciation of each individual.

2.3 Fair Work Conditions

We observe local law on work hours. We also adhere to legal minimum wages and offer fair work conditions to all employees in line with legal requirements. We reject any form of forced or child labor. All career development is strictly based on abilities, qualification and achievements of each individual.

2. LEADERSHIP AND COOPERATION AT BOS

2.4 Avoid Conflicts of Interest

We ensure that the interest of the employees are in accordance with the interest of the company. Therefore, each employee should avoid any situation that could lead to a conflict between personal and corporate interests. These situations could arise for example in case of activities or joint ventures with other companies or business with friends or family members. Any such business relations should be avoided and the respective supervisor should be informed immediately. Any secondary work with pay needs to be approved in writing by the respective supervisor and/or human resource department.

2.5 Handling of Assets

We expect that our employees treat all tangible and intangible assets with respect. These assets include among others, buildings, properties, vehicles, office equipment as well as know-how, patents, technologies and other valuable information for the BOS group that needs to be protected. All facilities and equipment can only be used for private purposes with prior special permission.

2.6 Handling of Information

We require our employees to handle sensitive information, innovations and know-how confidentially and use them for business purposes only. They are the foundation for our sustained success and may not be passed on to or made available for third parties under any circumstances. The same applies to all personal data on employees of BOS group.

2.7 Occupational Safety, Health, and Environmental Protection

We are all responsible for the protection of people and the environment. It is a duty of our employees to maintain their workspace in an orderly and safe condition, protect the environment and handle available resources in an economical and considerate manner. Respective supervisors should be informed about any deviations. Important guidelines are the Environmental Management System according to ISO 14001, our own environmental policy as well as occupational safety standards. BOS is committed to the highest standards in occupational safety even if internationally local requirements are less strict.

3. COLLABORATION AT BOS

We strive to be reliable partners, both in collaboration with our customers, suppliers and business partners as well as within our company. Besides our competence, innovative power and quality of our product this also requires honest and transparent communication and that we keep our commitments and contractual relationships.

3.1 Selection of Suppliers

We review all offer of our suppliers in a fair and unbiased manner. Awarding the business and execution of the order are strictly based on relevant factors. All agreements are negotiated in full and unambiguously, any amendments or modifications later on are duly documented. All employees have to comply with the internal system of dual control, the so-called “four eyes principle or two-man rule”.

3.2 Fair Competition

We follow the rules of fair competition and support the idea of free markets and fair trade. Any unfair practices are prohibited.

Transparent documentation of the supply chain for “conflict minerals” requires special diligence that we exercise in accordance with the US American law “Dodd-Frank Act, Section 1502”.

3.3 Competition and Antitrust Law

We expect every employee to adhere without exception to the idea of fair competition and trade rules of all countries that BOS operates in. It is therefore inadmissible to engage in agreements with the competition that could sway the competition. The same applies to exchanging information regarding price, conditions, capacities, market shares, margins, cost as well as offer details.

3. COLLABORATION AT BOS

3.4 Gifts and Benefits

We will not tolerate any type of corruption, bribery, extortion or embezzlement. All our activities are carried out with responsibility and honesty. Any employee that should be influenced by unethical behavior from customers or suppliers or vice versa will be held responsible and disciplined. There may be no benefits connected in any way to requesting and receiving of services and materials.

Gifts and invitations can only be accepted if their value cannot be considered worth altering a decision or behavior. Monetary gifts can never be accepted.

3.5 Donations

Various organizations and institutions are approaching us for donations. Any donation is subject to approval by upper management. The recipient and purpose of such donation must be known and conceivable. The principle of selfless action applies.

4. COMPLIANCE WITH THE CODE OF CONDUCT

We expect that all employees of BOS will comply with legal and company guidelines. Our executive are encouraged to support their employees to comply with the code of conduct.

Any violation can lead to severe consequences for the whole company and depending on the seriousness lead to labor law or criminal persecution.

4.1 Violations

However, we trust that all our employees make the right decisions and report any violations to the respective superior to resolve them locally in constructive discussion. Never-the-less there may be circumstances – especially if it is related to illegal business practices – to address the situation outside the immediate work environment. The following points of contact are available to employees and third parties:

- Your supervisor
- Upper management
- Your Human Resource or Finance and Controlling Department or where applicable your employee representative.

Employees that report in good faith on any real or perceived misconduct, may not be discriminated against. BOS will treat the identity of the employee confidentially whenever possible and legally permissible.

4.2 Contacts

If you cannot voice your concerns 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. 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.

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Director Human Resources
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