



## CODE OF CONDUCT OF BENDER GROUP

### Preamble

The Bender Group, consisting of the Bender Industries GmbH & Co. KG and its affiliated companies, affirms its social responsibility as a part of its global business activities. The Bender Group assumes this responsibility by committing itself to the directives laid down in the Code of Conduct (“CoC”).

### 1. Basic Understanding of Social Responsibility in Corporate Management

A mutual, basic understanding of social responsibility in corporate management forms the basis of this CoC. This means, the Bender Group assumes responsibility by considering the consequences of its business decisions and actions in economic, technological, social and environmental terms and to bring about an appropriate balance of interests. The Bender Group volunteers to contribute to the benefit of all and to the sustainable development of the global society within the framework of its competences and entrepreneurial actions at the locations where it is active. This is based on universal ethical values and principals, in particular on integrity, honesty and on the respect for human dignity.

### 2. Scope

- 2.1 This CoC applies to all branches and business units of the Bender Group worldwide.
- 2.2 The Bender Group commits to the keeping of the contents of this CoC at every point it can for its suppliers and in other parts of the value chain.

### 3. Core Values for Social Responsibility in Corporate Management

The Bender Group will proactively work to ensure that the values mentioned below are put into practice and adhered to both now and in the future.



### **3.1 Adherence to Laws**

The Bender Group will abide by the laws in effect and other legal requirements of the countries where it is in business. For countries that have a weak institutional framework, the company will carefully examine what good company practices from their home country should be applied to enable supportive, responsible company management.

### **3.2 Integrity and Organizational Governance**

3.2.1 The Bender Group gears its activities towards universally held ethical values and principals, especially integrity, honesty, respect of human dignity, openness and non-discrimination based on religion, ideology, gender and ethnicity.

3.2.2 The Bender Group rejects corruption and bribery as stated in the relevant UN Convention<sup>1</sup>. It uses suitable means to promote transparency, trading with integrity, responsible leadership and company accountability.

3.2.3 The Bender Group pursues clean and recognized business practices and fair competition. In regard to competition, it focuses on professional behavior and high standards of quality for work. It fosters partnership and trusting interaction with the supervisory authorities.

### **3.3 Consumer Interests**

To the extent consumer interests are affected, the Bender Group abides by regulations that protect the consumer, as well as appropriate sales, marketing and information practices. Groups that are in special need of protection will receive special attention.

### **3.4 Communication**

The Bender Group will communicate in an open way and is oriented towards dialogue about the requirements of this CoC and about its implementation among employees, clients, suppliers and other stakeholders. Every document and all information will be duly produced. They will not be unfairly changed or destroyed. They will be properly stored. Company secrets and partner's business information will be handled sensitively and will be kept in confidence.

---

<sup>1</sup> UN Convention against corruption in 2003, in force since 2005

### **3.5 Human Rights**

The Bender Group is committed to promote human rights. It respects human rights stated in the Charter of the United Nations<sup>2</sup>, especially those named in the following.

#### **3.5.1 Privacy**

Protection of privacy.

#### **3.5.2 Health and Safety**

Ensuring health and work safety, especially the guarantee of a safe and health-promoting work environment, avoiding accidents and injuries.

#### **3.5.3 Harassment**

Employee protection against bodily punishment and against physical, sexual, psychological or verbal harassment or abuse.

#### **3.5.4 Freedom of Conscience**

Protection and guarantee of the right to freedom of conscience and freedom of expression.

### **3.6 Working Conditions**

The Bender Group abides by the following core work standards from ILO<sup>3</sup>:

#### **3.6.1 Child Labor**

The prohibition of child labor, i.e. the employment of persons younger than 15 years old, as long as the local legal requirements do not specify a higher age limit and as long as no exceptions are permitted.<sup>4</sup>

#### **3.6.2 Forced Labor**

The prohibition of forced labor of any kind.<sup>5</sup>

---

<sup>2</sup> General explanation of human rights, UN Resolution 217 A (III) from 1948

<sup>3</sup> ILO = International Labour Organization

<sup>4</sup> ILO Convention No. 138 from 1973 and ILO Convention No. 182 from 1999

<sup>5</sup> ILO Convention No. 29 from 1930 and ILO Convention No. 105 from 1957

### **3.6.3 Wage Compensation**

Work standards concerning compensation, especially in regard to the level of compensation as stated in the laws and requirements that are in force.<sup>6</sup>

### **3.6.4 Employee Rights**

Respecting the rights of the employee to freedom of association, freedom of assembly and collective bargaining, as long as this is legally permitted and possible in the respective country.<sup>7</sup>

### **3.6.5 Prohibition of Discrimination**

Treatment of all employees in a non-discriminatory fashion.<sup>8</sup>

### **3.7 Hours of Work**

The Bender Group abides by work standards concerning the longest permitted time of work.

### **3.8 Environmental Protection**

The Bender Group fulfills the requirements and the standards for environmental protection that affect their operations and acts in an environmentally conscious way at all locations where it is in operation. For additional responsibility with natural resources, it holds to the principles from the Rio Declaration.<sup>9</sup>

### **3.9 Civic Commitment**

The Bender Group contributes to the social and economic development of the countries and regions where it is in business and promotes appropriate, volunteer activities by its employees.

---

<sup>6</sup> ILO Convention No. 100 from 1951

<sup>7</sup> ILO Convention No. 87 from 1948 and ILO Convention No. 98 from 1949

<sup>8</sup> ILO Convention No. 111 from 1958

<sup>9</sup> The 27 principles from the “Rio Declaration on Environment and Development“ from 1992 as the result from the UN Conference on Environment and Development in Rio de Janeiro

#### **4. Implementation and Application**

The Bender Group will make every appropriate and reasonable effort to implement and to apply the principles and values described in this CoC.

Grünberg, 18 June 2024

Management Board

Heinz Nowicki, CSO

Dr. Sven Hartung, CFO