

Bohnenkamp Group Code of Conduct

The Bohnenkamp AG Board of Directors is convinced that sustainable economic corporate success is inseparably connected to compliance with internal and external laws, principles and values. The following Bohnenkamp Group Code of Conduct is binding for all employees in our company. Within the framework of their employment, they are obliged to follow the law and to observe the principles of the Code of Conduct.

1. Scope

The Code of Conduct applies to all national and international companies and subsidiaries in the Bohnenkamp Group. It is binding for all employees.

2. Legally and ethically impeccable behaviour

Every employee is bound to behave in an ethically impeccable way, and to comply with all current national and international laws. Their actions are to be characterised by fair, respectful and trustworthy dealings with colleagues, customers, suppliers and business partners. The employees are to preserve and promote the Bohnenkamp Group's reputation.

Any form of discrimination based on ethnic, national and social origin, colour of skin, gender, age, religion and ideology, political activity, membership in employee organisations, disability, sexual orientation or other personal characteristics is to be refrained from. The appropriate legal provisions apply.

3. Environmental and climatic protection

Environmental and climate protection create the fundament of our future. For this reason we observe the prevailing standards and legal provisions, minimize the burdens on the environment and continuously improve environmental and climatic protection. This involves the avoidance of waste, responsible dealings with resources and pollutants, appropriate and flawless disposal of unusable products and the implementation of renewable energies.

4. Corporate asset protection

We expect responsible handling of our company assets by our employees. Every employee is to protect the assets through honest and careful handling. Assets are generally only to be used for business purposes unless private use has been specifically authorised. Every employee is to protect the Bohnenkamp Group's intellectual property, e.g. patents, brands and know-how from attack or loss.

5. Information and Communication

All employees are to protect the confidentiality and security of data and information through compliance with data protection regulations. Particularly regarding business activities, internal and external projects they are bound to secrecy regarding the type of cooperation with customers as well as all information relating to the Bohnenkamp Group and their customers. The dissemination or notification of such information to third parties is to be avoided in all cases. The obligation of confidentiality also includes, additional to the ban on dissemination, the obligation to protect against insight and access by third parties. This obligation continues beyond the period of employment.

Information is only to be given to persons with a legitimate interest. Only specially authorised employees are permitted to give information to the public or to the media.

6. Cartel and competition law

We respect fair competition with competing companies. From our employees, we expect compliance of all national and international cartel laws as well as the laws against unfair competition relating to their relevant areas of responsibility. Agreements or activities that influence prices or conditions, assign sales areas or customers or unlawfully impede free and open competition are prohibited.

7. Corruption prevention

The appropriate legal regulations regarding the combatting of corruption are to be complied with. When dealing with business partners as well as state institutions, the interests of the Bohnenkamp Group and the private interests of the employee are to be strictly separated. Actions and (purchasing) decisions always occur free of extraneous considerations and personal interests. This means that particularly money or personal pecuniary advantages as a form of reciprocation for the preference in business transactions are neither to be

accepted nor offered.

Our employees oblige themselves not to offer, to promise, to demand, to grant or to accept presents, payment, invitations or services in the course of business which could influence the business relations in an unlawful manner. All acceptances of provisions of advantages have to be within the scope of legal regulations and correspond to normal business practices. Particular care applies when dealing with public officials.

A solid scope of action regarding contact with customers is provided by the Bohnenkamp Group Compliance Regulation.

8. Conflicts of interest

Bohnenkamp employees are to avoid activities that could lead to a conflict of interests. The granting of orders to people with a personal connection (e.g. spouses, partners, relations and friends) or to companies in which such people with personal connections are employed in key positions, or in which they are intrinsically involved, or for which they act as our negotiations partner, are to be regarded with special care.

9. Combatting money laundering

The Bohnenkamp Group only works together with reputable business partners who work within the framework of legal regulations and do not use illegal financial funds. All employees are to be careful that the Bohnenkamp Group is not misused for the laundering of money or other legal purposes. Financial or economic transactions which introduce unlawfully gained cash into the legal financial system are termed money laundering. Every employee is to comply with the laws against money laundering and to report instances which point to money laundering without delay.

10. Implementation

The Bohnenkamp Group will be active and ethically responsible in ensuring that employees support and comply with the conduct principles. Actions that are not in agreement with this codex are to be corrected immediately. Violations will lead to disciplinary measures

regardless of the person's position.

Bohnenkamp AG
Board of Directors