#### **BMZ HOLDING GMBH**

Zeche Gustav 1 · 63791 Karlstein am Main

Phone: +49 (0)6188 9956-0 Mail: mail@bmz-group.com Internet: www.bmz-group.com



## **Code of Conduct**

### 1. Preamble

The reputation and integrity of BMZ are the valuable assets that are vital to the Company's success. BMZ has an environmental, social and governance (ESG) responsibility towards customers, employees, subcontractors and other stakeholders who contribute to the success of our business. BMZ at all times remains committed to meeting the highest standards of business conduct. Nothing less will do.

The ethical requirements that pertain to business operations and workplace are becoming increasingly complex. For that reason, a Code of Conduct (Code) was further established in 2013 to safeguard responsible corporate governance in the key areas of human rights, employee relations, environmental management, society interaction, and anticorruption within the group.

Our Code of Conduct is the framework for guiding the behavior of all people at BMZ in their relationship with other employees, customers, and suppliers no matter where they are in the world. Furthermore, BMZ also requires suppliers, consultants, and other business partners to comply with the Code of Conduct. BMZ's success depends on a reputation for integrity and quality in everything we do. Good ethics is good business.

# 2. Scope

All our employees must be aware and comply with this Code of Conduct. Together with our Group policies, the Code forms the basis for the way we work at BMZ. Employees are required to familiarize themselves with BMZ policies that relate to their work and maintain these high ethical standards at all times. All our employees are always expected to act in the spirit of the Code. All employees should take the responsibility to report actual or potential violations on the Code of Conduct. Failure by any employee to comply with the Code will be subject to disciplinary action, including the termination of employment and may, where applicable, give rise to criminal prosecution under the relevant laws and regulations.

**All managers** are accountable for communicating the content of and for enforcing the Code within their organization. Managers are expected to act in such a way that their behavior is an example of the practice of the Code. Failure to comply with the Code can result in disciplinary action.

**All suppliers, dealers, subcontractors, consultants, and other business partners of BMZ** are required to adopt and follow these principles within their area of responsibility. BMZ also continuously evaluates and selects current and potential business partners on the basis of their ability to meet with the requirements of this Code.

Even though the Code sets out the main principles of corporate responsibility, it cannot address every situation or ethical problem that may arise.

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# 3. Soliciting / Accepting Advantages

It is the company policy that no employee may solicit any advantage from any person having business dealings with BMZ (e.g. clients, suppliers, contractors). Employees should decline any offer that may affect the objectivity in conducting BMZ's business, or induce them to act against the interest of BMZ, or lead to allegations of impropriety. This also includes presents of small values.

## 4. Improper Payments

BMZ is doing business with great integrity and within the law. To maintain our business partners' trust, we refrain from engaging in any and all forms of corruption or even actions that could potentially be construed as such. We are not allowed to offer, promise, or grant illegal benefits in order to achieve preferential treatment for, or to influence a decision in favor of BMZ. Bribery and other monetary gifts are not tolerated, nor practiced.

### 5. No Child labor

BMZ shall not employ any person below the age of 15 or applicable higher legal minimum age. Child labor is strictly prohibited in all company operations. BMZ does not tolerate child labor and will never take it into consideration and is obeying the local law for child protection, and is only employing persons who have reached legal age.

# 6. Employment at will / Hard Labor

BMZ is refusing involuntary work of any kind. Companies within BMZ shall not use any forced, bonded or compulsory labor and employees are free to leave their employment after giving reasonable notice as required by national law or contract. BMZ does not allow any practice that would restrict free movement of employees.

# 7. Compensation

Each employee shall be compensated in a correct and fair manner in accordance with their individual performance. BMZ is paying their employees competitive salaries. All regulations concerning payment and working hours comply at a minimum with national laws or industry standards. Wages must be paid regularly.

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### 8. Discrimination

BMZ is promoting diversity and equal opportunities to all individuals without regard to gender, race, religion, age, disability, sexual orientation, nationality, social or ethnic origin, citizenship, or any other characteristics protected by applicable law.

### 9. Environmental Protection

Protection of the environment is of high priority to BMZ. Our commitment involves reducing the environmental impact of our operations, products and processes. BMZ is respecting the environment and is complying with all rules and regulations concerning environmental protection.

## 10. Safety and Health Protection

BMZ is concerned about the safety and health protection of their employees. All companies within BMZ will provide information, instructions, training and supervision to reasonably safeguard the health and safety of the company's employees, contractors and customers. Therefore, BMZ is ensuring that all work places comply with the local regulations to avoid any safety or health hazards.

### 11. Conflict of Interest

Employees may not engage themselves, with or without compensation, in activities outside of BMZ that may conflict or appear to conflict with the Company's interests, without approval from the responsible manager.

### 12. Confidential Material / Information

Company assets, such as information, materials, supplies, intellectual property, facilities, software, and other assets owned or leased by BMZ, or that are otherwise in the companies possession, may be used only for legitimate business purposes. Confidential information, which employees often have access to about the company, which is not generally available to the public, must not be passed on to anyone outside of BMZ. This obligation also continues even after termination of employment at BMZ. The personal use of BMZ assets, without company approval, is prohibited.