

Code of Conduct

1. Introduction

We at BINDER GmbH and BINDER Central Services GmbH & Co. KG have set ourselves the goal of developing and marketing innovative products and solutions with a high practical benefit for and with our customers to help make our customers even more successful.

At the same time, we are creating the basis for lasting, profitable growth and a long-term, sustainable increase in the value of the company and can thus strengthen BINDER GmbH and BINDER Central Services GmbH & Co. KG as an independent family business for future generations.

Our actions are based on personal responsibility, honesty, loyalty as well as respect for other people and the environment. The management bears a special responsibility in this regard.

This Code of Conduct clarifies these principles. Our aim is to prevent situations that could call into question the integrity of our conduct and the trust in our services. At the same time, each employee should be encouraged to act on his or her own responsibility and given guidance in this regard.

This Code of Conduct sets out the basic rules, standards and conduct that are essential to achieving these goals.

The Code of Conduct applies to all of us who work in or for BINDER GmbH and BINDER Central Services GmbH & Co. KG ("employees"). These are the executive officers, managers, employees (including temporary employees, etc.) and other employees of BINDER GmbH and BINDER Central Services GmbH & Co. KG. If the Code of Conduct mentions BINDER GmbH and BINDER Central Services GmbH & Co. KG, this refers to BINDER GmbH and BINDER Central Services GmbH & Co. KG and all companies directly or indirectly controlled by them.

2. Trust through honest and rule-abiding management of the business – a personal challenge and the result of joint efforts

We can only achieve these goals if all those involved are actively engaged. For this reason, the Code of Conduct formulates binding requirements for all employees.

Managers and executives must be a role model in this respect. They are responsible for their own conduct and the conduct of employees in their area of responsibility as well as for the proper observance of all procedures intended to avoid reputational and legal risks. They must take the necessary and appropriate measures to ensure full compliance with the Code of Conduct in our business practices and procedures.

All other employees will be supported in knowledge of and compliance with all relevant laws and official regulations in their working environment. In this context, the internal instructions and guidelines provide essential support and orientation.

All employees are required to act honestly and fairly in their working environment and to avoid any conflict between the private and business interests of BINDER GmbH and BINDER Central Services GmbH & Co. KG or the interests of our customers.

All employees are expressly encouraged to contact the compliance officer or their manager if they discover that an employee may not be complying with the Code. This can prevent small problems from turning into big ones. No employee who communicates in good faith need fear adverse effects – even if the information turns out to be unfounded. The management of the company is firmly committed to this principle. Communications can also be anonymous.

3. Respectful treatment of each other – Non-discrimination – Development according to performance and potential

Our success is also founded to a large extent on our respectful interaction with one another. We are prepared to learn from mistakes and value open communication.

We strive to ensure that our employees are as diverse as our customer base. BINDER GmbH and BINDER Central Services GmbH & Co. KG therefore will not tolerate any discrimination or harassment in the workplace, be it due to age, disabilities, nationality, gender, political position or trade union/company constitutionality, race, religion or sexual orientation. The key criteria for the development of employees are thus their individual performance and potential.

4. Protection of personal data and confidential information – Requests for information from authorities

We strictly adhere to the regulations for the protection of personal data and respect the general right of privacy of all persons with regard to their personal data.

Confidential information and documents about customers, BINDER GmbH and BINDER Central Services GmbH & Co. KG or its employees must be adequately protected from access by third parties or colleagues who are not affiliated with the company.

Personal data may only be collected, processed or used to the extent necessary for specified, unambiguous and legitimate purposes. The use of data must be transparent to those concerned. Your rights to information and correction, and where applicable to objection, prohibition and deletion shall be protected. Employees' data is protected by appropriate corporate agreements.

An appropriate standard corresponding to the state of the art must be maintained for technical protection against unauthorized access to data and information and against loss or destruction.

BINDER GmbH and BINDER Central Services GmbH & Co. KG cooperates with all relevant public authorities and supervisory authorities. In the event of inquiries, the employees appointed for this purpose will communicate the information. Corresponding requests must be channeled. The management must always be informed of any requests for information.

5. Protection of company assets and natural resources

Our company's intellectual property is our most valuable asset and must be protected by all employees. Likewise, we respect the intellectual property of others. Intellectual property includes, but is not limited to, copyrights (including software and database copyrights), trademarks, expertise or other copyright information. Technical operational secrets and commercial business secrets are important company resources. Every employee is thus obliged to protect these. This includes strict compliance with the information security regulations of BINDER GmbH and BINDER Central Services GmbH & Co. KG.

The assets and equipment, business documents and working materials of BINDER GmbH and BINDER Central Services GmbH & Co. KG may neither be misused for private purposes nor made available to third parties without authorization.

Employees are required to protect natural resources and ensure that the business activities of BINDER GmbH and BINDER Central Services GmbH & Co. KG impact the environment as little as possible by reducing material consumption, energy-saving planning and reducing and recycling waste. When selecting suppliers, advertising materials or other external services, each employee responsible should consider not only the economic aspects but also the ecological and social criteria.

6. Conflicts of personal interest

If employees' personal interests conflict with the professional tasks or interests of BINDER GmbH and BINDER Central Services GmbH & Co. KG or our customers, the reputation of these employees and of BINDER GmbH and BINDER Central Services GmbH & Co. KG in total can be negatively affected.

Employees are therefore requested to avoid such situations for the sake of BINDER GmbH and BINDER Central Services GmbH & Co. KG as well as for their own sake.

The following shall apply in detail:

- No financial investments in companies that may be affected by professional decisions of the employee or BINDER GmbH and BINDER Central Services GmbH & Co. KG. The only exceptions are investments in companies of BINDER GmbH and BINDER Central Services GmbH & Co. KG as part of an employee stock option program.
- Assignments to relatives, life partners or other related persons of employees must – if known – be reported to their superiors and Compliance in advance. This also applies to transactions with companies in which relatives have a direct or indirect interest.
- No assumption of positions of company responsibility (e.g. board member, managing director, executive board, supervisory board, advisory board) with customers, business partners or competitors without the prior consent of the executive board after notifying Compliance.

The perception of third parties is decisive. Even the appearance of a personal conflict of interest can be detrimental. Employees may also request release from specific individual tasks that could lead to a conflict of interest.

7. No conflicts of interest with customers and business partners

BINDER GmbH and BINDER Central Services GmbH & Co. KG strives for sustainable business relationships with its customers and business partners to their mutual benefit.

Each employee must therefore ensure that the interests of our customers and business partners are taken into account in a fair manner. The interests of customers or business partners must not be placed in the foreground to the detriment of other customers or business partners.

8. Protection of competition

Competition laws prohibit conduct that hinders free and fair competition and restricts trade. These laws apply equally to us as suppliers and buyers of services and goods.

BINDER GmbH and BINDER Central Services GmbH & Co. KG does not participate in illegal agreements and practices that restrict competition, and, in particular, agreements with competitors about prices, conditions and market sharing. Before employees deviate from standard contracts or procedures provided for in cooperation contracts, they must verify with our legal department that this will not have any undue effects on competition law. In contacts with competitors and business partners, employees of BINDER GmbH and BINDER Central Services GmbH & Co. KG shall not discuss internal matters, such as prices and sales or financing conditions, costs, market overviews, organizational processes or other confidential information, from which competitors or business partners could derive competitive advantages.

BINDER GmbH and BINDER Central Services GmbH & Co. KG provides regular training and other suitable measures to ensure that problematic behavior is recognized by all employees in a prompt and appropriate manner.

9. Zero toleration of corruption, special caution with officials

Our success on the market is based on innovation, enthusiasm, performance, flexibility and willingness to provide services and must not be obtained by dishonest financial contributions. Our business partners rely on the professional judgment of our employees.

BINDER GmbH and BINDER Central Services GmbH & Co. KG therefore does not tolerate any form of bribery or corruption, acceptance or granting of advantages.

Failure to observe the rules for gifts and invitations in Section 10 of this Code of Conduct carries the risk of prosecution for corruption offenses. Promising or seeking unfair advantages can be a criminal offense.

For invitations and donations by employees to persons outside BINDER GmbH and BINDER Central Services GmbH & Co. KG, the internal rules for gifts and invitations must always be complied with. This particularly applies to contact with public officials.

The granting of benefits to public officials may be punishable as an acceptance or granting of advantages simply because it is made with regard to the official position. It is not necessary for the exercise of office to be influenced surreptitiously. Any person entrusted with the performance of public duties may be a public servant, not only public officials and civil servants.

10. Gifts, business meals and events

Gifts, business meals and events for informational, representational or entertainment purposes can be a legitimate means of establishing and supporting business relationships. However, they must never be used to obtain unfair commercial advantage or to an extent or in such a way as to jeopardize the professional independence and judgment of the parties involved. At BINDER GmbH and BINDER Central Services GmbH & Co. KG, every employee is supported by co-determined guidelines, regular training and clear limits on amounts.

Particularly strict standards are required for contacts with public officials. The rules for gifts and invitations of the respective employer must be observed in this regard.

Limits on amounts at BINDER

- The acceptance of gifts up to a value of 35.- € is permitted if the receipt has been reported to the superior.
- If possible, invitations to dinner should be reported to the manager in advance. If this is not possible, the report is made subsequently.
- Gifts, which exceed the value of 35.- € are to be rejected in all cases. Gifts which, for whatever reason, cannot be refused must be submitted to the personnel office.
- If the recipient/donor is currently in a competitive situation and the gift, irrespective of its value, is suitable for obtaining advantages, then acceptance is prohibited. The process must be reported to the manager.

11. Donations and sponsoring

Donations and sponsoring are essential instruments for fulfilling social responsibility; the financial support of public welfare concerns is principally intended for the public good. The executive board makes decisions on donations and sponsorship. They must not be used to obtain indirect, unfair advantages from business partners.

12. Communication with customers, business partners, the public, and in social networks

All material statements and reports of BINDER GmbH and BINDER Central Services GmbH & Co. KG must be complete, honest, precise, timely and comprehensible. Be it towards business partners, customers or the public.

This particularly applies to information and advertising material about our products.

Information to business partners, customers or the public about BINDER GmbH and BINDER Central Services GmbH & Co. KG, our products, our customers or business partners may only be supplied by employees authorized for this purpose.

Anyone who expresses themselves outside the corresponding responsibility of BINDER GmbH and BINDER Central Services GmbH & Co. KG in a public discussion or in social networks on topics that affect BINDER GmbH and BINDER Central Services GmbH & Co. KG or our business partners shall make it clear that he or she is acting as a private person. This is done regularly using private accounts (accounts), email addresses and the like. Moreover, the content will be such that the impression cannot be misconstrued that BINDER GmbH and BINDER Central Services GmbH & Co. KG share the expressed opinion. In doing so, he/she shall not violate the interests of BINDER GmbH and BINDER Central Services GmbH & Co. KG and the business partners. In the context of the protected freedom of expression, it is therefore necessary to maintain the contractual obligation to show consideration and loyalty towards the employer and its business relations.

Please be aware that statements made in emails or social networks can be informal and spontaneous but can still be stored and viewed by the recipient or the Internet public for a long time. Please also note that an increasing number of companies and authorities do not allow the use of email for private purposes, so that in case of doubt emails are permanently archived and viewed by third parties.

13. Consequences of non-compliance

Non-compliance with these rules can lead to considerable loss of reputation and legal damage for the employees concerned, their colleagues and BINDER GmbH and BINDER Central Services GmbH & Co. KG, including fines, criminal proceedings or restrictions of official permits. In most cases, such misconduct will then also be a breach of duty under labor law and may lead to corresponding sanctions.