Code of Conduct

OBO places an emphasis on social responsibility.

Building Connections

OBO BETTERMANN

Table of contents

1. Preamble 3

2. Principles **4**

2.1 Principle of compliance with the law (principle of legality) 4

2.2 Integrity 5

2.3 Fairness 5

2.4 Diversity 5

2.5 Sustainability 6

2.6 Transparency 8

2.7 Conflicts of interest 9

3. Protection of confidential relationships **10**

4. Handling of information **11**

4.1 Principle of documentation 11

4.2 Data protection and data security 11

4.3 Prevention of direct and indirect influence 11

4.4 Respect for the intellectual property of third parties 11

4.5 Customs and export control 11

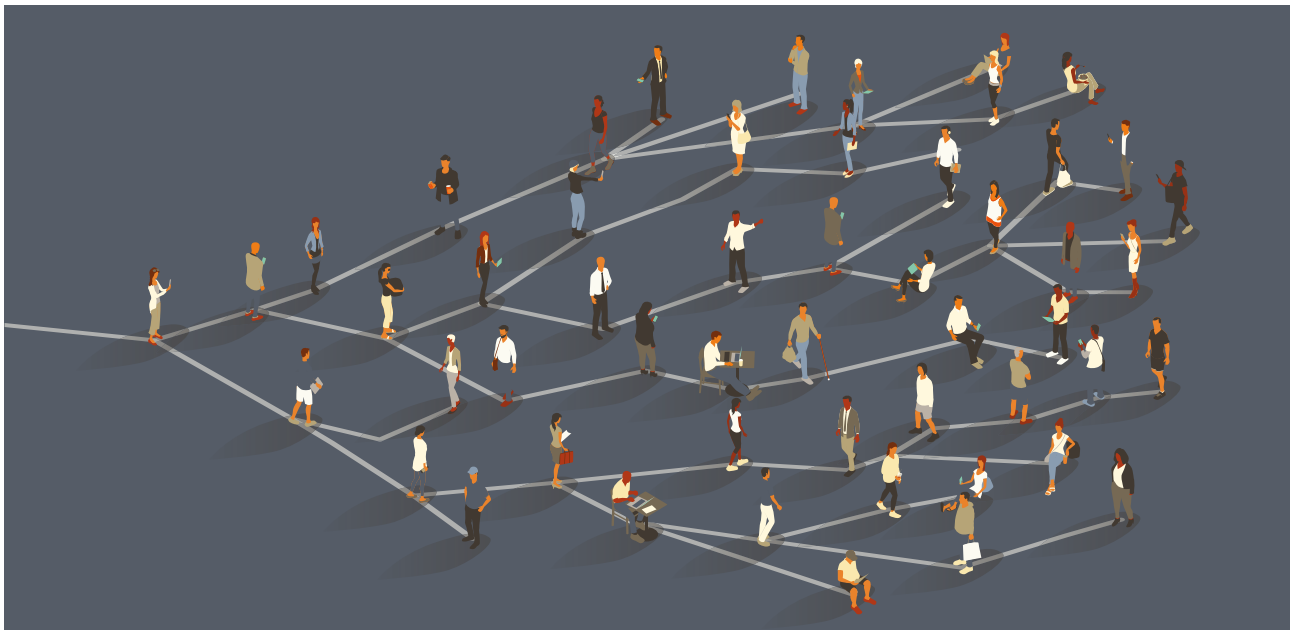
5. Breaching of the CoC **12**

5.1 Controls 12

5.2 Consequences of the offences 12

6. Miscellaneous **13**

1. Preamble



Since its beginnings more than 110 years ago, the OBO Bettermann Group (hereinafter referred to as “OBO”) has attached great importance to social responsibility and sustainable corporate management and development, both in ecological and economic terms as well as in social terms. OBO takes this responsibility very seriously – towards its employees and business partners, towards society and towards the environment, which forms the foundation for humanity. Integrity, fairness and diversity are fixed components of the OBO corporate culture. OBO acts in a sustainable, transparent and performance-oriented manner.

In order to live the above-mentioned values, OBO undertakes to comply with this Code of Conduct (hereinafter referred to as “CoC”) in its activities and expects the same from its suppliers and service providers (hereinafter referred to as “business partners”).

This CoC is part of the individual agreements between the member companies of OBO and their business partners. OBO and its business partners are obliged to comply with this CoC. Furthermore, OBO and its business partners are obliged to pass on the contents of this CoC to their employees.

The regulations and principles of this CoC should also apply to OBO’s indirect suppliers and service providers, i.e. the suppliers and service providers of OBO’s direct business partners who are necessary for the fulfilment of contracts with OBO. OBO’s business partners are therefore obliged to promote the regulations and principles to the best of their ability and to encourage their suppliers and service providers to comply with them.

The rules and principles described in this CoC are based on

- the UN Charter of Human Rights (Universal Declaration of Human Rights, UN Resolution 217 A (111) of 1948),
- the United Nations Convention against Corruption,
- the core labour standards of the ILO (International Labour Organization),
- the Rio Declaration (the 27 principles of the “Rio Declaration on Environment and Development”),
- the Minamata Convention,
- the Stockholm Convention, and
- the Basel Convention.

2. Principles

2.1 Principle of compliance with the law (principle of legality)

OBO and its business partners adhere to the principle of strict compliance with the law (principle of legality) in all activities. In regions where laws and regulations are less restrictive, OBO and its business partners shall comply with the principles of this CoC. In cases where there is a direct conflict between the applicable local law and the principles of this CoC, the local law shall prevail. However, OBO and its business partners shall endeavour to comply with the contents of this CoC.

Compliance with the principle of legality includes, in particular

- obtaining all necessary regulatory permits,
- cooperating fully with the authorities,
- payment of taxes and duties in accordance with applicable laws,
- compliance with competition and antitrust laws,
- the strict prohibition of corruption and money laundering,
- respect for human rights and human dignity,
- compliance with the legal requirements of the respective country regarding the employment of personnel,
- respect for the legal rights of third parties,
- compliance with legal requirements for the protection of social and environmental standards,
- disclosure of information required by applicable law,
- compliance with applicable international economic sanctions,
- compliance with applicable conflict of interest rules, and
- compliance with local legal requirements for accurate accounting in accordance with financial documentation requirements.

2.2 Integrity

OBO and its business partners reject any form of corruption, fraud, undue influence and corrupt business practices (in particular money laundering). In this context, they and all OBO employees must ensure that the acceptance or granting of gratuities – from third parties or to third parties – only takes place in accordance with the applicable local laws.

2.3 Fairness

OBO and its business partners adhere to honest and recognised business practices and fair competition. They therefore distance themselves from illegal agreements or concerted practices that restrict free competition. These include, for example, price fixing, market sharing, agreements on contractual conditions or the fixing of resale prices or lower price limits for products.

In addition to refraining from the aforementioned behaviour, all employees and business partners of OBO are obliged to expressly reject such offers from existing and future business partners and to inform their supervisor or the Compliance Officer of OBO.

Unfair competitive behaviour occurs, for example, when a market participant agrees with one or more competitors to not sell a specific product or specific service below a certain price. If employees from OBO are faced with such an offer, they must reject it firmly and in a way that cannot be misunderstood and notify the OBO legal department immediately.

2.4 Diversity

OBO and its business partners are committed to protecting the personal dignity, privacy and personal rights of each individual. OBO and its business partners protect and grant the right to freedom of opinion and expression. They undertake to respect and actively support the human rights recognised in the UN Charter of Human Rights (including the rights of individuals, local communities and indigenous peoples). Women's rights shall be protected and promoted by OBO and its business partners. OBO and its business partners do not tolerate discrimination or harassment of their employees and promote diversity and equality.

Unlawful discrimination occurs, for example, when the decision regarding the filling of a position is not made based solely on the qualification of the applicants, but instead a male applicant is given preference because a female applicant's age leads one to suspect she may have children in the near future.

a) Prohibition of child labour, forced labour and slavery

In accordance with the ILO's core labour standards, OBO and its business partners only employ staff who have reached the statutory minimum age. OBO and its business partners expressly reject the use of forced labour and any form of slavery.

b) Working conditions

OBO and its business partners undertake, in accordance with the ILO core labour standards, to employ their staff exclusively in compliance with local health and safety and working-time regulations. OBO and its business partners undertake to create working conditions in their business activities that are free from any form of harassment or humiliation of their employees.

To maintain workplace safety and avoid possible accidents, it is essential for all workplace accidents to be reported and documented in accordance with local law. This is the only way to ensure that suitable measures are taken to maintain workplace safety.

c) Freedom of association

OBO and its business partners respect the freedom of association of their employees. In this context, OBO and its business partners must comply with all applicable laws and cooperate with their employees in accordance with the applicable laws.

d) Prohibition of unequal treatment

OBO and its business partners reject any kind of discrimination, including discrimination based on national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion or belief, unless this is a statutory requirement for employment. Unequal treatment includes the payment of unequal remuneration for work of equal value.

e) Appropriate wage

OBO and its business partners undertake to pay their employees an appropriate wage. This must be at least at the level of the minimum wage laid down by the law of the country in question.

f) Preservation of natural resources

OBO and its business partners shall ensure that the acquisition of land, forests or bodies of water, whereby the use of which secures people's livelihoods, does not take place through unlawful forced evictions or through unlawful expropriation. Harmful environmental changes (e.g. soil changes, water pollution, excessive water consumption) that significantly affect health, access to drinking water and food production must also be avoided.

g) Use of private or public security forces

OBO and its business partners undertake not to use private or public security forces to protect the business project if, due to a lack of instruction or control, the use of security forces violates the prohibition of torture and cruel, inhuman or degrading treatment, causes injury to life and limb or impairs freedom of association and trade union rights.

2.5 Sustainability

a) Environmental standards

OBO and its business partners have the right to use their own resources within the framework of their own environmental and development policy. They are responsible for ensuring that the environment is not damaged by activities within their sphere of influence. This includes, in particular, unauthorised changes to the soil, water pollution, air pollution, harmful noise emissions and excessive water consumption. OBO and its business partners undertake to comply with all environmental protection regulations, to act in accordance with the principle of sustainable development and thus to operate as environmentally friendly as possible.

OBO and its business partners are committed to protecting the environment. Wherever possible, OBO and its business partners have a certified environmental management system in accordance with DIN ISO 14001 or EMAS. Waste separation, recycling, air pollution control and water protection are consistently implemented by OBO and its business partners. Hazardous substances are handled properly and verifiably and the necessary safety data sheets are made available. OBO and its business partners appoint an environmental protection officer where this is required by law.

To protect the environment, OBO and its business partners apply the precautionary principle as far as possible. In the event of imminent serious or permanent damage, the lack of complete scientific knowledge about the extent of the damage must not be a reason for OBO and its business partners to postpone effective and cost-intensive measures to prevent environmental damage.

OBO's sustainability strategy and commitment are published in a sustainability report based on international laws and standards.

b) Materials and disposal

OBO and its business partners are committed to minimising the environmental impact of the use of materials. They endeavour to recycle as many of the materials used as possible.

OBO and its business partners also undertake to comply with the bans on hazardous chemicals in accordance with the applicable laws (in particular, the Minamata, Stockholm and Basel Conventions). This also ensures compliance with the bans on the export and import of hazardous waste and guarantees the environmentally sound handling of waste. In addition, when disposing of waste, OBO and its business partners comply with the legal provisions of the respective country and the official requirements.

A violation of waste disposal regulation occurs, for example, when chemical or electronic waste is not disposed of in accordance with the country-specific standards, thereby polluting the soil and sources of drinking water, which are essential to the livelihood of the local people.

c) Energy efficiency/consumption

OBO and its business partners are committed to using renewable energy sources wherever possible and to working as energy-efficiently as possible. To this end, energy consumption is monitored and documented.

OBO and its business partners provide the Company Carbon Footprint (CCF/Scope 1–3) and the Product Carbon Footprint (PCF) for products, processes and services wherever possible and at the specific request of the customer. The collection, calculation, evaluation and communication of the relevant CO_2e (CO_2 equivalent) data should be carried out in accordance with the applicable norms and standards of the Greenhouse Gas Protocol (GHG Protocol) and ISO 14064. OBO has a decarbonisation strategy. Based on the CCF and PCF, the business partner shall have and pursue a decarbonisation strategy where possible.

d) Handling of conflict minerals

OBO and its business partners must comply with the legal provisions applicable in the respective country with regard to conflict minerals.

OBO and its business partners undertake to:

- check their respective supply chain with due diligence as to whether products containing tin, tantalum, tungsten or gold are sold to them and, if so, whether and to what extent these metals originate from conflict and high-risk areas;
- share the results of this assessment with their customers as appropriate; and
- strive to be or become “conflict-free” to ensure that such metals are not sourced from conflict and high-risk areas.

2.6 Transparency

a) Whistleblower system

- All OBO employees are requested to take action against violations of this CoC and to report them to their superiors or the Compliance Officer. OBO managers undertake to promote the reporting of violations, to be available as contact persons for reports and to act as role models for their employees. OBO has implemented a whistleblower system and a whistleblower guideline for the receipt and processing of reports, which are available on the OBO website (www.obo.global -> whistleblower system).
- Information will be treated in the strictest confidence. If the whistleblower acts in good faith, retaliation against them is prohibited, even if the information subsequently proves to be unfounded.
- Violations of the provisions of this CoC will generally be subject to labour law consequences, regardless of the position of the employees involved in the company hierarchy.
- All business partners, their subcontractors and their employees are called upon to report possible violations of this CoC.
- Alternatively, reports can also be made to OBO's Compliance Officer via e-mail, by telephone or in person. The business partners shall inform their employees and subcontractors as far as possible about the various alternatives.

b) Complaints procedure

- In order to fulfil our legal obligations, OBO has also set up a complaints procedure and a corresponding code of procedure in accordance with the German Supply Chain Act (LkSG), which are available on the OBO website (www.obo.global -> whistleblower system).
- The complaints procedure makes it possible to draw attention to human rights and environmental risks and violations of human rights or environmental obligations that have occurred as a result of OBO's own business activities or the business activities of a direct supplier. Complaints will be handled in the same way as whistleblower reports.
- Alternatively, corresponding complaints can also be made to OBO's Human Rights Officer or Compliance Officer via e-mail, by telephone or in person. The business partners shall inform their employees and subcontractors as far as possible about the various alternatives.

2.7 Conflicts of interest

OBO and its business partners undertake to avoid conflicts of interest. A conflict of interest occurs when the personal interests of an employee are incompatible with those of OBO and/or with the interests of the business partners and result in a loyalty conflict. Employees must not participate in decisions or influence them if their own interests may conflict with those of OBO and/or OBO's business partners. Employees must not use their position at OBO or OBO's business partners inappropriately for personal benefit or for the benefit of relatives or persons close to them. In the event of a conflict of interest, the concerned employees must notify their superior immediately to find an adequate solution.

For example, a conflict of interest may arise if a potential supplier invites one of the client's employees responsible for technical analysis of offers to a sports event. Such invitations should always be turned down to avoid any appearance of undue influence.

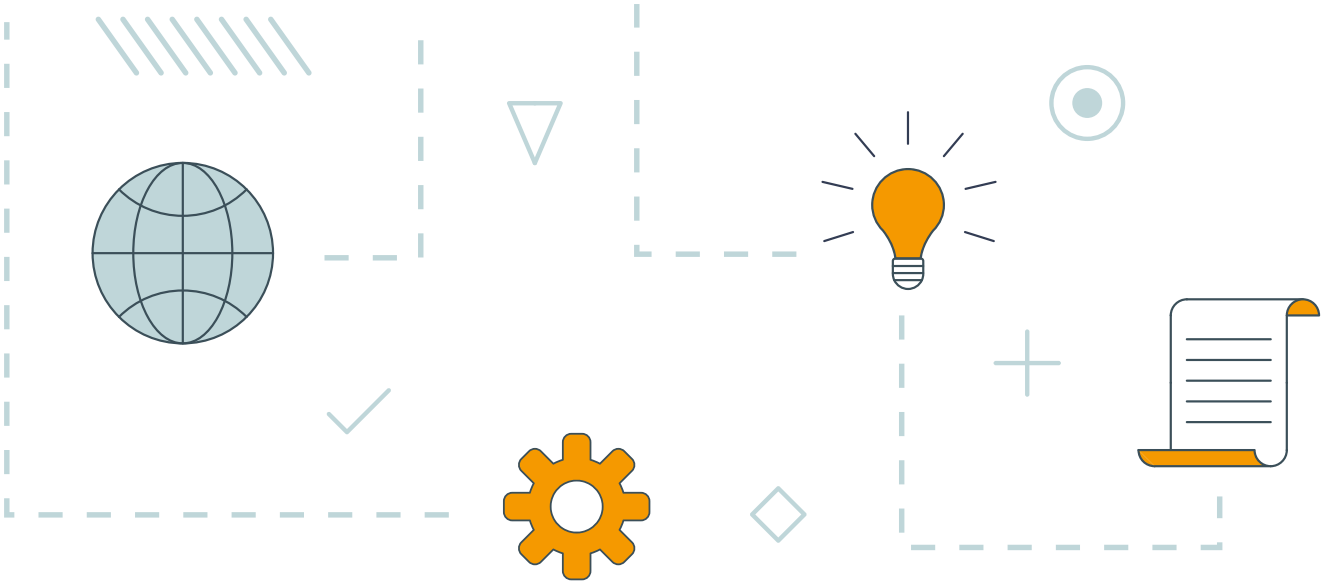
3. Protection of confidential relationships

The transparent and professional handling of procurements is implemented by OBO and its business partners as follows:

OBO and its business partners undertake to select suppliers or service providers according to a documented and transparent procurement process and to organise their own supply chain in a socially and ecologically responsible manner.

Furthermore, OBO or the business partners are prohibited from passing on confidential information of which they become aware in the course of their activities without the prior consent of the holder of the rights. In particular, competitors of the business partner may not be informed of prices/offers negotiated with other business partners or other business information.

4. Handling of information



4.1 Principle of documentation

All documents and records (internal or external) prepared by OBO and its business partners in the course of their business activities must be complete, accurate and truthful.

OBO and its business partners shall fulfil their obligations to disclose financial and other company information in accordance with the applicable local laws. In the course of their business activities, OBO and its business partners shall only create documents and records if this is required by the applicable local law or is in their direct interest.

4.2 Data protection and data security

OBO and its business partners are bound by the legal provisions of the country in question on data protection and data security. OBO and its business partners endeavour to maintain their processes and information systems at an appropriate level in order to adequately protect personal data and business secrets.

4.3 Prevention of direct and indirect influence

OBO and its business partners comply with the applicable anti-corruption laws. To ensure this, both OBO and its business partners will ensure that no promises are made by employees or subcontractors in order to gain an unfair advantage.

4.4 Respect for the intellectual property of third parties

The intellectual property of third parties is respected by OBO and its business partners. OBO and its business partners shall not use any third-party intellectual works without the express consent of the rights holder.

4.5 Customs and export control

OBO and its business partners are obliged to comply with the international customs and export control regulations of the respective country and to cooperate with the relevant competent authorities.

5. Breaching of the CoC

5.1 Controls

OBO reserves the right to carry out announced on-site inspections and audits at the business partners' premises in order to check compliance with this CoC, provided this does not disrupt operations to an unreasonable extent, there is a specific reason for doing so, there is no risk of trade and business secrets being compromised and this does not violate any data protection regulations.

5.2 Consequences of the offences

Violations of the CoC shall be stopped and corrected as soon as possible. However, if a breach cannot be remedied in the foreseeable future, a joint concept must be drawn up and implemented with a timetable for ending or minimising the breach. If the measures are not implemented in a timely manner or if they prove to be ineffective, OBO shall be entitled to terminate the respective contract with immediate effect within the framework of the statutory provisions.

6. Miscellaneous

OBO undertakes to review the CoC each year and make any changes necessary based on this review.

Information and contact persons

You can find more information at Compliance | OBO

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