

<b>Verhaltenskodex</b> <b>Code of Conduct</b> BEN Buchele Elektromotorenwerke GmbH						
erstellt am / von 14.02.19 / QM Kress	Version: 1	geändert am / von	geprüft am / von 16.04.19 / GF HPS	freigegeben am / von 16.04.19 / QM Kress	Seite 1 von 3	Dokument DOK 513

## Preface

For many decades BEN Buchele Elektromotorenwerke GmbH has been developing, producing and selling a wide range of electrical machines in the low voltage range in a variety of designs for industrial needs. The production of electric motors is based on demand in small series and individual pieces for the ship and offshore sector, the air and air conditioning sector, general engineering sector and other industries. In addition to the own electric motors, controllers and accessories are offered and sold as commercial products.

The ultimate goal of our actions is to take responsibility for our employees, our products and our environment. Only on this basis we can achieve sustainable success for our company. In this process satisfied customers play a decisive role, maintaining them is our central task. Therefore we rely on a partnership-based and cooperation with our customers and suppliers which is successful in the long run.

Our business philosophy and integrity ensures our credibility. It is self-evident that all employees in the company comply with the law and internal regulations and fulfill their obligations in a reliable manner.

We are committed to ecologically and socially responsible business management and expect the same behavior from all our suppliers. Moreover we assume that the principles of ecological, social and ethical behavior are observed and integrated into the corporate culture by our employees. Furthermore, we strive to continuously optimize our entrepreneurial activities, our products and services in the interests of sustainability and urge our suppliers to contribute to this in the sense of a holistic approach.

## Legally compliant behavior

Our Code of Conduct is based on national laws and regulations as well as international conventions such as the "United Nations Universal Declaration of Human Rights", the "Children's Rights and Business Principles", the United Nations Guiding Principles on "Business and Human Rights", the "International Labour Standards" of the "International Labour Organization" and the "Global Compact of the United Nations". We expect our suppliers to comply with all relevant laws and regulations as well as the requirements of standards.

## Cooperation with customers, suppliers and other business partners

### Fair competition

An indispensable part of a free market economy are rules for the protection of fair competition. Agreements with competitors regarding prices, conditions, allocation of customer groups and area divisions are inadmissible. Dominant positions may not be abused.

### Prohibition of corruption

Any form of corruption, bribery or grant of benefits that can influence decisions is prohibited. The regularities of fair business, fair advertising and fair competition must be observed.

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### **Avoidance of conflicts of interest**

We expect loyalty to the company from our employees. All employees must avoid situations where their personal or financial interests are in conflict with the company's. In particular, it is prohibited to participate in, or enter into any business dealings with competitors, suppliers or customers in a private environment, if this may create a conflict of interest.

### **Protection against business secrets and intellectual property**

To maintain and expand our technological position, continuous development of our products and processes is required. We expect the unconditional protection of our intellectual property from every employee. In particular, each employee is responsible for ensuring that information related to our intellectual property is not disclosed to anyone on the outside. As we protect our own intellectual property, we also respect foreign intellectual property. Business secrets are to be treated confidentially. They may only be disclosed to employees in the course of their business activities.

### **Prevention of Money Laundering**

We comply with our legal obligations to prevent money laundering and do not participate in money laundering activities. Each employee is required to have unusual financial transactions, in particular with the addition of cash, which may justify suspicion of money laundering, checked by the responsible financial accountant in case of doubt.

### **Dealing with employees**

#### **General principles**

BEN Buchele Elektromotorenwerke GmbH bears the responsibility towards all employees. We respect the personality and individuality of each employee. Outstanding achievements, many years of experience and the knowledge and social competence of our employees are the prerequisite for our sustained, entrepreneurial success. We encourage this through consistent training of employees, open communication at all levels and the improvement of the working atmosphere. We ensure compliance with the "Law on the implementation of occupational safety measures to improve the safety and health of workers at work".

#### **Prohibition of discrimination**

Discrimination against employees in any form is prohibited. All employees are treated equally by both superiors and colleagues, regardless of race, color, gender, religion, national and social origin, personal circumstances, state of health or age. The personal dignity, privacy and personal rights of each individual are respected. We commit ourselves to implementing the "General Equal Treatment Act in accordance with the EU Directive on Protection against Discrimination in Employment and Occupation".

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### Data protection and Information Security

Personal data of individuals may only be collected, processed and used in accordance with the legal regulations and operational requirements. In case of doubt, the responsible data protection officer should be involved. Our experience is of particular importance for the long-term success of our company. That is why we protect our intellectual property against disclosure by third parties and against unauthorized access by third parties. IT security helps to protect intellectual property from data theft, or the impact of malware through a variety of IT security measures.

### Protection of company property

The company property may only be used for business purposes. Every employee is obliged to treat the company property entrusted to him with care and to protect it against loss, damage and theft.

### Compliance with the Code of Conduct

The principles and rules of this Code of Conduct form a core element of our corporate culture. The observance of these principles and rules of conduct is indispensable and must be practiced company reality and thus part of the everyday work. It is the task of every executive in the company to ensure that all employees know this Code of Conduct and comply with its regulations. All supervisors are available to answer questions about this Code of Conduct. Each employee is entitled and obliged to report any breaches that have come to his attention to his supervisor.

Nuremberg, 2019/04/16

  
 GF/Schwegler  
 Executive Director