

BJB

Code of Conduct

This Code of Conduct brings together our most important basic rules and principles in one document, which are binding for us both today and in future. All employees, including the management of all subsidiaries and business units of BJB worldwide, are bound by the rules of this Code of Conduct. It sets out the values, principles and practices that govern BJB's business activities. Management's goal is to uphold ethical standards and create a work environment that promotes integrity, respect and fair conduct. Strict business policies that comply with laws and principles serve the long-term interests of the company.

BJB is committed to promoting compliance with this Code of Conduct also among its suppliers and in the wider value chain to the extent of its respective capabilities.

This Code of Conduct has been adopted by the managing directors of BJB. It has been coordinated with and is supported by the Works Council in Arnsberg. The BJB Code of Conduct makes a claim on ourselves, at the same time it is a promise to the outside for responsible behavior towards business partners and the public, but also in dealing with each other within the company.

Preamble / Guiding principle

Our corporate vision statement expresses what our company stands for today and in future:

BJB: Technology for Light

Our mission:

We secure the future of the company by developing it powerfully and profitably.

Our strategic focus:

➤ **Customer focus**

We know what our customers want and gear our products to it. Customer satisfaction is our top priority.

➤ **Innovation and change**

We respond proactively to changes in markets and exploit our opportunities with innovative products.

➤ **Top performance**

The best competitors are our benchmark, we work agilely and precisely. With efficient processes and lean structures, we ensure high productivity and increase the value of the company.

Our strengths:

➤ **Best quality**

We supply products with the best quality and reliability.

➤ **Innovative strength**

We act entrepreneurially and continuously develop our processes and products.

Our values:

- We act responsibly in the interests of our company, taking into account the impact on people and the environment.
- We act on our own initiative, with corporate responsibility and are consistent in pursuing our goals.
- We communicate openly and in a timely manner, creating the basis for a trusting working relationship.
- We consider fairness in cooperation within the company and with our business partners to be a prerequisite for our success.
- We are reliable, credible and observe law and order

Based on this, this Code of Conduct summarizes the key principles and rules for our actions and sets out the standards we expect of ourselves, also vis-à-vis our business partners and our environment.

Behavior in the business environment

Compliance with laws and other regulations

In all business decisions and actions, BJB strives to comply with applicable laws and other authoritative regulations. Integrity and honesty promote fair competition, also in relation to our customers and suppliers.

Avoidance of conflicts of interest

At BJB, business decisions are made exclusively in the best interests of the company. Conflicts of interest with private interests or other economic or other activities, including those of relatives or otherwise related persons or organizations, should be avoided from the outset. If they nevertheless arise, they must be resolved in compliance with the law and applicable corporate guidelines. The prerequisite for this is transparent disclosure of the conflict.

Conflicts of interest

BJB expects its employees to be loyal to the company.

All employees must avoid situations in which their personal or financial interests conflict with those of BJB. Therefore, in particular, it is forbidden to have an interest in competitors, suppliers or customers or to enter into business relationships with them in a private capacity to the extent that this may lead to a conflict of interest. Conflict situations must not adversely affect BJB's interests.

Such conflicts of interest can arise in many situations: For example, no employee may accept benefits - in any form - that could reasonably be expected to influence BJB's business decisions or transactions. Invitations must remain within the bounds of customary hospitality. Employees shall not personally benefit, directly and/or indirectly, by virtue of their position in BJB through access to confidential information. All employees have a duty to promote BJB's legitimate interests to the extent possible. Any competitive situation with the company is to be avoided.

Any actual or potential conflict of interest must be reported and discussed with the supervisors concerned. Violations will not be tolerated and will result in sanctions against the persons concerned.

Donations

We see ourselves as an active member of society and therefore get involved in various ways. We make donations and other forms of social commitment solely in the interests of the company.

We do not make financial contributions, in particular donations and sponsorship measures, to political parties in Germany and abroad, party-affiliated or party-like organizations, individual elected officials or candidates for political office.

Ban on corruption

BJB is against corruption and bribery. Conduct in which business is conducted by unfair means will not be tolerated. BJB employees must not offer or accept any benefits from business partners that could impair or even appear to impair an objective and fair business decision.

Money Laundering Prevention

BJB complies with its legal obligations to prevent money laundering and does not engage in money laundering activities. Every employee is requested to have unusual financial transactions, in particular involving cash, which may give rise to suspicion of money laundering, checked by the finance department or management in case of doubt.

Insider rules

All employees of BJB are obliged to comply with the insider trading rules of the German Securities Trading Act, in particular the insider trading ban. This includes in particular employees who have access to non-public information about BJB - and/or its shareholders or about a company with which the BJB Group does business.

Such inside information includes, for example, management plans, new product or manufacturing introductions, corporate transactions, significant contracts or business relationships, financial information or significant litigation, among others.

Behavior towards colleagues and employees

Equal treatment and non-discrimination

A culture of equal opportunity, mutual trust and mutual respect is of great importance to us. We promote equal opportunities and prevent discrimination in the hiring of employees as well as in the promotion or granting of training and development measures. We treat all employees equally, regardless of gender, age, skin color, culture, ethnic origin, sexual identity, disability, religious affiliation or ideology.

Human and workers' rights

We respect internationally recognized human rights and ensure that - especially with regard to compliance with international treaties and national laws on trade in conflict minerals and other natural resources - no human rights are violated along the supply chain and support their observance. We strictly reject any form of forced labor, child labor and human trafficking. We recognize the right of all employees to form trade unions and employee representatives on a democratic basis within the framework of national regulations. The right to adequate remuneration is recognized for all employees. Remuneration and other benefits correspond at least to the legal standard.

Cooperation with employee representatives

Unless local laws set a higher age limit, no person of compulsory school age or younger than 15 years of age may be employed (exception according to ILO Convention No. 138). Workers under the age of 18 are not permitted to perform hazardous work and are restricted from working at night in consideration of the requirements of their education. BJB respects the right of employees to freedom of association and collective bargaining. For BJB, a trusting cooperation with the employee representatives is a

decisive component of the company policy. The basis of mutual trust and cooperative interaction is an open and constructive dialogue characterized by mutual respect.

Occupational safety and health

The safety and health of our employees are equally important corporate goals alongside the quality of our products and our economic success. Occupational safety and health protection are an integral part of all operating processes and are included in the technical, economic and social considerations.

Each of our employees promotes health and safety in his or her work environment and complies with occupational health and safety regulations. Each manager is obligated to instruct and support his or her employees in the fulfillment of this responsibility. Employees of subcontractors working on behalf of BJB are subject to the same safety standards as our employees. This is taken into account in the selection and cooperation.

Behavior within the company

Handling internal knowledge

All employees of BJB are obliged to ensure a fast and smooth exchange of information within the company. Information must be passed on correctly and completely to the areas concerned, unless in exceptional cases, in particular due to confidentiality obligations, overriding interests exist. Relevant knowledge may not be unlawfully withheld, falsified or selectively passed on.

Dishonest reporting within the Company or to non-Company organizations or persons is strictly prohibited. All of BJB's financial statements and annual reports, business papers and books of account must accurately present business events and transactions and comply with legal requirements and BJB's accounting policies and internal accounting procedures.

Handling of assets

All BJB employees are responsible for the proper and careful handling of company property. Each employee has a duty to protect BJB property against loss, damage, misuse, theft, misappropriation or destruction. Each employee has a duty to notify his or her supervisor immediately of any use of assets contrary to the foregoing.

Sustainable environmental and climate protection

Sustainable environmental and climate protection and resource efficiency are important corporate goals for us. Both in the development of new products and services and in the operation of production facilities, we ensure that any resulting impact on the environment and climate is kept as low as possible and that our products make a positive contribution to environmental and climate protection for our customers. We also expect this position from our suppliers and service providers.

Each employee has a responsibility to treat natural resources with care and to contribute to the protection of the environment and climate through his or her individual behavior.

Handling information

Reporting

BJB is built on strong values: reliability and honesty, credibility and integrity. Thus, we emphasize open and truthful reporting and communication about the company's business transactions to lenders, employees, customers, business partners, the public in general, and government institutions.

Each employee ensures that both internal and external reports, records and other documents of the company are in compliance with the applicable legal rules and standards and are therefore always complete and accurate, and are made in a timely and system-compatible manner.

Confidential company information/insider information

We take the necessary steps to protect confidential information and business documents from access and insight by non-involved colleagues and other third parties in an appropriate manner.

Secrecy and data protection

A large part of BJB's business information is confidential or legally protected, so that there is a duty of confidentiality. This does not apply if publication of the information has been authorized by BJB or is mandatory by law or regulation.

The duty of confidentiality relates in particular to intellectual property. This includes trade secrets, patents, trademarks and copyrights, but also business and marketing plans, drafts, business papers, salary data and all other unpublished financial data and reports.

All personal information about employees, customers, business partners and suppliers as well as other third parties will be used carefully and treated confidentially by BJB in full compliance with data protection laws. The protection of this information must be fulfilled with the utmost care.

Protection of company property

We use the company's property and resources properly and carefully and protect them from loss, theft or misuse. The intellectual property of our company represents a competitive advantage for BJB and thus an asset worth protecting, which we defend against any unauthorized access by third parties.

We use tangible and intangible property of the company exclusively for company purposes and not for personal purposes, unless this has been expressly permitted. Our employees, together with their supervisors, bear responsibility for ensuring that the nature and extent of business trips are always in reasonable proportion to the purpose of the trip in question and are planned and carried out economically, taking into account time and cost aspects.

Implementation and monitoring (compliance)

The rules contained in this Code of Conduct form a core part of BJB's corporate culture. Consistent compliance with these principles is essential. Every employee is responsible for this.

If an employee has concerns or complaints about any of the items listed in this Code of Conduct, or has knowledge of any breach of the Standards of Conduct contained herein, he or she should immediately bring this to his or her supervisor for clarification. This may also be done anonymously or in a confidential manner. If an employee is not satisfied with the clarification, he or she may bring the concern or complaint not only to his or her supervisor, but also to a member of Group Management Board (Geschäftsleitung) or the Human Resources Department.

It is also possible to contact us anonymously:

E-Mail: compliance@bjb.com

Mail address: BJB GmbH & Co. KG, Compliance representative, Werler Str. 1, 59755 Arnsberg


BJB does not permit retaliation for complaints made in good faith under this Code of Conduct.

Responsibility

All employees, the executives as well as the management of BJB are bound by the rules of this Code of Conduct. Violations of this Code of Conduct will result in consequences. In serious cases, this may lead to termination of employment.

BJB obliges its suppliers to comply with this Code of Conduct.

Arnsberg, February 12, 2021



Philipp Henrici



Heiko Piossek



Olaf Baumeister



Gerrit Dulige



Detlef Rahmann