

The Code of Conduct of BBC Cellpack GmbH

I. Principles and scope

We at BBC Cellpack GmbH and the Electrical Products division have made it our mission to develop and market innovative products and solutions with high practical value for and with our customers in order to make our customers even more successful. ¹

At the same time, we are laying the foundation for continuous, profitable growth and a sustainable, long-term increase in the value of BBC Cellpack GmbH in order to preserve the company for future generations. We base our actions on personal responsibility, sincerity, loyalty and respect for our employees, fellow human beings and the environment. Managers bear a decisive responsibility here.

The following Code of Conduct illustrates these principles. Our goal is to prevent situations that could call into question the honesty of our behavior and confidence in our performance. At the same time, every employee is encouraged to act independently and receives orientation in this regard. The values on which these principles are based represent the "common sense" of every single employee of BBC Cellpack GmbH.

This Code of Conduct sets out the basic rules, standards and practices necessary to achieve these objectives. The "Code of Conduct" is an integral part of the terms and conditions of employment of all employees of BBC Cellpack GmbH and those who work for BBC Cellpack GmbH. This includes the governing bodies, managers, employees (including our temporary workers, etc.) and other persons who work with us.

BBC Cellpack GmbH requires full compliance with the Code. BBC Cellpack GmbH is a globally active industrial company and is therefore also confronted with different laws, cultures, customs, and traditions that affect our daily actions. That is why BBC Cellpack GmbH respects the customs and traditions of the countries in which we do business- as long as they do not conflict with our laws and regulations. It is the responsibility of senior management and officers to ensure that all employees are aware of, understand and act on the BBC Cellpack Code of Conduct.

Waldshut-Tiengen, June 2023

The Management of BBC Cellpack GmbH / Head of the Electrical Products Division

Roger Braun
(Managing Director)

ppa. Christian Taube
Operations & Development:
(COO & CTO)

ppa. Jasmin Reineck
Product Portfolio Management
(CPO)

ppa. Markus Schmidt
Finance & Controlling
(CFO)

ppa. Rainer Crevecoeur
Sales & Marketing
(CSO)

¹ Unless otherwise indicated, the personal designations used in this document refer to all genders.

II. Respect for human rights

BBC Cellpack GmbH respects internationally recognized human rights and is guided by the United Nations Guiding Principles on Business and Human Rights.

BBC Cellpack GmbH rejects all forms of discrimination, slavery, child labour, threats against human rights defenders and other human rights violations. In addition, BBC Cellpack GmbH attaches particular importance to the protection of fundamental rights in the workplace.

III. Behavioral requirements and expectations

1. Trust through honest and regulated corporate governance – a personal challenge and the result of joint efforts

We can only achieve these goals if everyone involved works towards them. For this reason, the Code of Conduct of BBC Cellpack GmbH sets out binding requirements for all employees.

The executives of BBC Cellpack GmbH have a role model function. They are responsible for their own conduct and that of the employees in their area of responsibility, as well as for proper compliance with all procedures established there to avoid reputational and legal risks. You must take the necessary and appropriate measures to ensure full compliance with the Code of Conduct in our business processes and practices. All employees are supported so that they know and comply with all relevant laws and official regulations in their working environment. The internal instructions and guidelines provide essential support and guidance.

All employees are obliged to behave honestly and fairly in their working environment and to avoid conflicts between the private and business interests of BBC Cellpack GmbH or the interests of our customers. All employees are specifically encouraged to contact their supervisors if they notice that someone may be acting in a non-compliant manner. This can prevent small problems from turning into big ones. Employees who report such violations in good faith will not have to fear adverse consequences – even if the report proves to be unfounded. The management is responsible for this. Reports can also be made anonymously.

2. Respectful interaction– non-discrimination – development according to performance and potential

Our success is essentially based on respectful interaction. We are willing to learn from our mistakes and value open discussions. BBC Cellpack GmbH does not tolerate discrimination or harassment in the workplace, whether on the basis of age, disability, origin, gender, political opinion or race, religion or sexual orientation. Therefore, the most important criteria for employee development include individual performance and potential.

We at BBC Cellpack GmbH respect the personal rights of our employees. We strive to foster a culture of tolerance in which we can develop individually to reach our full potential in the workplace. Any form of discrimination, harassment or bullying contradicts our mission statement and has no place within BBC Cellpack GmbH. Our common goal is to promote a fair, tolerant, appreciative, and collegial working environment.

3. Protection of personal data and confidential information – requests for information from public authorities

We strictly adhere to the regulations on the protection of personal data and respect the general personal rights of all individuals in relation to their personal data. Confidential information and documents about customers, BBC Cellpack GmbH or employees must be protected in an appropriate manner against access by third parties or colleagues who are not involved.

Personal data may only be collected, processed, or used to the extent necessary for specified, explicit and legitimate purposes. The use of the data must be transparent for the parties involved. Your rights to information and correction and, if necessary, to objection, blocking and deletion must be examined. Employee data is protected in accordance with legal requirements and, if necessary, by further company regulations and agreements. For technical protection against unauthorized access to data and information

as well as against loss or destruction of such data and information, an appropriate standard of the state of the art must be ensured.

BBC Cellpack GmbH cooperates with all relevant authorities and supervisory authorities. In the event of requests for information, the corresponding communication will be made via the employees designated for this purpose.

4. Protection of company assets

Our company's intellectual property is our most valuable asset, which must be protected by all employees. We respect the intellectual property of others in the same way. Intellectual property includes, but is not limited to, copyrights (including copyrights for software and databases), trademarks, know-how or other proprietary information. Trade secrets are important company resources.

Every employee is therefore obliged to protect them. This also includes strict adherence to the information security regulations of BBC Cellpack GmbH. The assets and operating resources, business documents and work equipment of BBC Cellpack GmbH may not be misused for private purposes or passed on to third parties without authorization.

5. Protection of the environment and its natural resources

BBC Cellpack GmbH is aware of its impact on the environment. It is therefore committed to conducting its business in such a way that the environment for life on earth is preserved and protected in the best possible way now and in the future, by developing offers and products that can provide solutions.

- We therefore support ecological and responsible action and promote environmentally friendly technologies.
- BBC Cellpack GmbH prohibits the manufacture and/or sale of products that pose an unacceptable risk to the health of individuals and the environment and aligns the selection of business partners according to their ability to comply with the principles of BBC Cellpack GmbH.
- Our suppliers must also support a precautionary approach to dealing with environmental issues.
- We take initiatives to promote a greater sense of responsibility for the environment.
- Promoting the development and dissemination of environmentally friendly technologies.

Accordingly, each of our employees must reflect these values in their personal behavior and contribute to the protection of the environment, the fight against climate change and the conservation of natural resources, while complying with the environmental standards applicable to their activities and behavior in the workplace.

Employees are always required to conserve natural resources and to pollute the environment as little as possible through material savings, energy-saving planning and the reduction and recycling of waste. When selecting suppliers or other external services, each responsible person must take into account not only economic aspects, but also ecological and social criteria.

6. Safety and protection of employee health

The health, safety, and well-being of our employees is a high priority at BBC Cellpack GmbH. We offer a working environment where everyone can do their best while maintaining their physical and mental health. Our work is based on high technical and operational safety standards. The aim is to prevent accidents at work and occupational diseases. In doing so, we are also dependent on the cooperation of our employees.

We at BBC Cellpack GmbH comply with occupational health and safety regulations and use the prescribed protective equipment. We do not work under the influence of alcohol or drugs and do not endanger our own safety or the safety and integrity of others.

BBC Cellpack GmbH offers programs that promote health and focus on prevention. In addition, it relies on the active participation of its employees in the following areas, among others:

- Occupational health and health and safety
- Promoting health at work
- Ergonomics
- Reintegration
- Social counselling

7. Personal conflicts of interest

If employees are involved in conflicts between their personal interests and their professional duties, or the interests of BBC Cellpack GmbH or our customers, this may damage the reputation of those employees and BBC Cellpack GmbH as a whole. Employees should therefore avoid such situations both in the interest of BBC Cellpack GmbH and in their own interest.

In detail, the following applies:

- No financial interests in companies that may be affected by professional decisions made by the employee or BBC Cellpack GmbH.
- If known, the awarding of contracts to relatives, life partners or other persons close to the employee must be reported in advance to the management or the supervisor. This also applies to transactions with companies in which relatives are directly or indirectly involved.
- No assumption of corporate responsibility positions (e.g., board member, managing director, ex-board member, supervisory board, advisory board) with customers, business partners or competitors without the prior consent of the management.

The decisive factor is how third parties perceive the situation. The mere appearance of a personal conflict of interest can be harmful. In this context, employees may also request to be relieved of certain individual tasks that could lead to a conflict of interest if they have a legitimate interest.

8. No conflicts of interest with customers, suppliers, cooperation partners or other business partners

BBC Cellpack GmbH strives to build sustainable business relationships with its customers and other business partners for mutual benefit. Every employee must therefore ensure that the interests of our customers, suppliers, cooperation partners and other business partners are fairly taken into account. The interests of customers or other business partners may not be put in the foreground to the detriment of other customers, suppliers, cooperation partners or other business partners.

We carefully select our business partners and expect them to behave in accordance with the basic rules of our Code of Conduct and to require their suppliers to do the same.

9. Protection of competition

Competition law prohibits conduct that hinders free and fair competition and restricts trade. These laws apply equally to us as a supplier and buyer of services and goods.

BBC Cellpack GmbH does not participate in illegal agreements and restrictive practices, in particular agreements on prices, conditions and market sharing with competitors. Before employees deviate from standard contracts or procedures set out in cooperation agreements, they must clarify with our legal advisors that this does not have unreasonable effects under competition law.

In general, cooperation with competitors must be approved by management and the intention must be clearly specified. Meetings must be documented.

In contact with competitors and business partners, employees of BBC Cellpack GmbH are responsible for not discussing internal matters such as prices and terms of sale or financing, costs, market overviews, organizational processes or other confidential information from which competitors or business partners could gain competitive advantages.

BBC Cellpack GmbH provides support through regular training and other appropriate measures to ensure that problematic behavior can be detected in a timely and accurate manner by all employees.

10. No tolerance for corruption, special caution towards officials

Our success in the market is based on innovation, enthusiasm, performance, flexibility, and service and must not be achieved through unfair advantages. Our business partners rely on the professional judgment of our employees. For this reason, BBC Cellpack GmbH does not tolerate any form of bribery or corruptibility or acceptance or granting of benefits.

Anyone who does not comply with the rules for gifts and invitations in § 13 of this Code of Conduct risks criminal prosecution for corruption violations. The promise or solicitation of unfair advantages can also be punishable by law.

In the case of invitations and gifts to persons outside BBC Cellpack GmbH by employees, the internal rules for gifts and invitations must always be observed. This applies to contact with public officials.

The granting of benefits to public officials may be punishable as acceptance or granting of benefits solely because it is made in connection with a public official. This does not require unfair interference in the exercise of the office. Anyone entrusted with the performance of public duties can be a office bearer, and not just civil servants and public employees.

11. Anti-money laundering and countering the financing of terrorism

Money laundering is the process used to disguise the origin of assets from illegal activities by giving them a legitimate appearance. BBC Cellpack GmbH undertakes to carry out its activities in accordance with applicable laws and regulations in the field of anti-money laundering and countering the financing of terrorism.

Every employee of BBC Cellpack GmbH must be vigilant in the performance of his or her duties in order to support this:

- Observe the rules of keeping and archiving documents that prove the origin of funds for all completed transactions.
- Identify potential irregularities and, if necessary, report them to your direct manager, legal or finance department.

12. Financing of political activities

Although BBC Cellpack GmbH respects the right of its employees to invest individually in the political and social life of their countries, financial or in-kind contributions to organizations, parties or political figures cannot be paid by or on behalf of BBC Cellpack GmbH or-, any of its entities.

Funding activities are all direct or indirect contributions to support a political organization, candidate, or elected official. This contribution may consist of a monetary payment or other benefit (sponsorship of a campaign meeting or charity dinner, gifts, free or discounted provision of facilities or services – offices, photocopies, etc.).

For this reason, the employees of BBC Cellpack GmbH are obliged to comply with the following rules of conduct:

- Engage in political activity only outside of their working hours.
- Refrain from speaking in the name of or on behalf of BBC Cellpack GmbH in connection with political activities.
- Never use BBC Cellpack GmbH resources for this purpose

If you have any questions about this topic, please contact your direct supervisor or the Human Resources Department.

13. Gifts, business lunches, and events

Gifts, business lunches, and events for informational, representational, or entertainment purposes can be a legitimate method of establishing and supporting business relationships. However, they shall never be used to secure unfair commercial advantage and shall not be used to such an extent or in a manner that impairs

the professional independence and judgment of the parties involved. Instead, they must comply with applicable laws and local regulations and be appropriate to the occasion, position, and function of the recipient. Gifts and expenses for hospitality and leisure activities immediately before a business deal or during a tender are particularly critical. Monetary gifts are not allowed under any circumstances. Giveaways (e.g., alcoholic/non-alcoholic beverages, foods with an expiration date of at least six months, and other items of daily use) are provided to the company for the annual employee events. If you have any doubts about the appropriateness of gifts or invitations, contact your supervisor.

14. Donations and sponsorship

Donations and sponsorship are essential tools to live up to our social responsibility; Financial support for the common good is always designed for the greater good. Donations and sponsorship are decided on by the management. They must not be intended to indirectly obtain unfair advantages from business partners. BBC Cellpack GmbH is generally willing to support volunteer work, based on the principle that employees who volunteer in other areas are usually also interested and valuable employees in the company. This also includes the promotion of special leisure activities, voluntary committee work in associations or foundations as well as other voluntary activities, e.g., in social institutions for the elderly, disabled or homeless or in the fire brigade or disaster preparedness (corporate volunteering). The management decides on the type of funding on a case-by-case basis.

BBC Cellpack GmbH understands the sponsorship of social, cultural, sporting, or other non-profit organizations as a mutual business in which, for example, a non-profit (sports) club provides BBC Cellpack GmbH with additional advertising space on letterheads, jerseys, or other advertising spaces. The management decides on the amount and duration of a corresponding benefit on a case-by-case basis.

15. Communication with customers, other business partners, and the public as well as in social networks

All material statements and reports of BBC Cellpack GmbH must be complete, honest, accurate, up-to-date, and understandable. This applies to other business partners, customers, and the public, as well as, in particular to information and advertising material on our products.

Only authorized employees may provide information about BBC Cellpack GmbH, our products, our customers or business partners to customers, other business partners or the public.

Employees of BBC Cellpack GmbH who express themselves outside their respective responsibilities within BBC Cellpack GmbH in a public discussion or on social networks on topics concerning BBC Cellpack GmbH or our business partners must make it clear that they are acting as private individuals. This must be done regularly through the use of private accounts and email advertisements, etc. In addition, the content must be presented in such a way that it does not give the impression that BBC Cellpack GmbH shares the opinion expressed. Employees must not violate the interests of BBC Cellpack GmbH or other business partners. Therefore, the contractual obligation of consideration and loyalty to the employer and its business relations must be respected in the exercise of the protected right to freedom of expression.

It must be considered that statements made in e-mails or social networks can be made informally and spontaneously but are then still stored and accessible to the recipient or the public on the internet for a long time. It is important to note that the private use of e-mail is not permitted at BBC Cellpack GmbH. In case of doubt, e-mails are permanently archived and can be viewed by third parties.

16. Consequences of violation

Violation of these rules can lead to considerable reputational damage and legal disadvantages for the affected employees, their colleagues, and BBC Cellpack GmbH, up to, and including, fines, criminal proceedings, or restrictions on official approvals. In most cases, such misconduct is then also considered a breach of obligations under labor law and can lead to appropriate sanctions.

IV. Code of Conduct Guidelines

1. Implementation

The management is responsible for ensuring that the current version of the Code of Conduct of BBC Cellpack GmbH is disseminated, and that regular training is carried out in an appropriate manner in accordance with the contents of this Code. The management and the human resources department are

available for all consultations relating to the Code of Conduct of BBC Cellpack GmbH and its applicability and comprehensibility.

2. Questions and comprehensibility

All employees are obliged to ask their superiors for clarification if they do not understand this Code of Conduct or do not fully understand it. In the event of ethical conflicts with colleagues and/or superiors, BBC Cellpack employees should trust their common sense.

The following questions may be helpful:

- Have I thoroughly informed myself about the internal guidelines and external regulations at BBC Cellpack GmbH?
- Am I behaving fairly, honestly, and responsibly?
- Have I thought about the impact my behavior can have?
- Do I want to be treated the same way?
- Do I always check for alternatives before I maintain myself in a certain way?
- What is the external effect of my behavior?

3. What to do in the event of a breach of the BBC Cellpack GmbH Code of Conduct

Violations of the Code of Conduct of BBC Cellpack GmbH will not be tolerated and may result in disciplinary action up to and including termination of employment. Disciplinary action can be taken not only against employees who have violated the BBC Cellpack GmbH Code of Conduct, but also against employees who knowingly allow violations of the Code of Conduct or attempt to manipulate or punish other employees for reporting violations.

4. Dealing with misconduct and reporting office

Employees who in good faith report, provide information about, or otherwise participate in an investigation or investigation of possible misconduct are acting lawfully. Reference is made to possible criminal liability for knowingly making false statements (defamation).

Misconduct is defined as any conduct that is in clear contravention of BBC Cellpack GmbH's Code of Conduct and therefore violates the relevant principles and/or applicable laws and regulations. All employees of BBC Cellpack GmbH are requested and entitled to inform the competent authorities of possible misconduct. Employees who become aware of possible misconduct or are themselves informed of possible misconduct should inform the company accordingly - if possible, internally first - via the operational channels described below:

- Direct supervisor or head of department
- Representatives of the Human Resources Department
- Management

We strongly recommend an open and confidential dialogue with one of the persons (or groups) mentioned here instead of anonymous reports. Direct dialogue offers the best possible opportunity to detect and investigate misconduct confidentially, but also directly and professionally.

The following contact is available as another alternative external reporting office for reports, e.g., for business partners or third parties:

External reporting office

Dirk Heinzemann

Lawyer and Diploma in Public Administration

Dimmlerstr. 10 in 79117 Freiburg

Phone: 0179 40 77 431

E-Mail: kontakt@anwalt-heinzemann.de

This external reporting office is also available to our employees without restriction.

If, from the employee's point of view, an internal report is not promising, employees can also contact the responsible authorities directly and point out possible misconduct.

All reports will be kept strictly confidential and will have no disciplinary consequences for those employees or other persons who have made such a report in good faith – even if a suspicion later expressed proves to be unfounded and unsubstantiated. However, this does not apply if intentionally false information about a possible violation is provided in the context of reports (e.g., malicious and abusive accusations), solely with the aim of discrediting other employees or persons.

Furthermore, this is also regulated in the "Regulations of BBC Cellpack GmbH on the whistleblowing system", which can be accessed on our intranet BBC Cellpack Electrical Products via a link in the red tiles.

5. Application

This Code of Conduct of BBC Cellpack GmbH was adopted by the management of BBC Cellpack GmbH in June 2023 and must be applied and implemented by all companies affiliated to the Electrical Products division and their employees.