



It's the **We** That Counts

Code of Conduct of the bilstein group

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Dear colleagues,

We, the bilstein group, are the reliable partner for replacement parts for the mobility of the future.

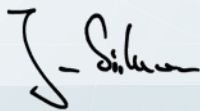
We cultivate a corporate culture characterised by mutual trust, to which all employees contribute by freely exchanging opinions. Through constant dialogue at and between all levels within our company, we achieve an open, trusting atmosphere in which all employees experience recognition and appreciation. This is how we create the conditions for the bilstein group to meet its diverse challenges and requirements.

This code of conduct sets out fundamental, binding rules and principles of the bilstein group and is intended to provide all employees with a compulsory framework for their professional actions. We expect our employees to comply with the principles and requirements set out here - regardless of whether they arise from our corporate culture or from legal framework conditions - regardless of their position. Employees with management responsibilities act as role models. Violations of this code of conduct may have legal and labour law consequences.

If you have any questions about how certain rules should be interpreted or applied, please contact your manager.



Karsten Schüßler-Bilstein
Group Managing Director



Jan Siekermann
Group Managing Director

It's the **We** That Counts

All of our employees see themselves as representatives of the company and take responsibility for the reputation of the bilstein group. Senior employees act as role models and form the basis for an open and responsible corporate culture through trust, appreciation and reliability. They ensure that the code of conduct of the bilstein group is adhered to.

01 Basic Principles

We think and act entrepreneurially. Our actions are always oriented towards customer satisfaction as well as the satisfaction of our employees.

We solve our tasks collaboratively and reliably. We also expect this from our business partners, whom we always treat as equals and with mutual respect. We always strive for long-term business relationships that meet the needs of our business partners as well as our own. When dealing with business partners and customers, all employees are aware of their responsibility as representatives of the bilstein group.

We are aware of our responsibility for sustainable development and create trust in our company through honesty, respect and tolerance. We achieve the best results through goal-oriented, open and fair cooperation with business partners and customers.

02 Equal Treatment and Tolerance

Fair treatment, equal opportunities, respect and tolerance are a matter of course for us among ourselves and in our dealings with business partners and customers.

We do not tolerate any discrimination or harassing behaviour, be it based on gender, religious belief, sexual orientation, age, skin colour or origin. We see our diversity as a strength and ensure that all employees - building on individual skills and qualifications - have equal opportunities to progress in their careers.

Employees who witness or experience harassment or discriminatory behaviour are encouraged to report such incidents to their manager or the HR department. The bilstein group will take appropriate measures to punish discriminatory behaviour.

03 Community

As a medium-sized family business, we are rooted locally - but also internationally. The well-being of the bilstein group is therefore also dependent on the social environment. We make our contribution to the fulfilment of public tasks, are socially committed and act in unison with our stakeholders.

04 Human Rights

Respect for and protection of human rights are of the highest priority for the bilstein group. We consider ourselves committed to the principles formulated by the United Nations Universal Declaration of Human Rights and the European Convention on Human Rights.

We ensure that human rights are respected throughout the supply chain and expect our suppliers to commit to respecting human rights and to counteracting violations. We scrutinise the working conditions of business partners and make the establishment of supplier relation-

ships contingent on the (potential) supplier's assurance and comprehensible documentation of compliance with human rights. This means that the bilstein group aligns its working attitude and supplier selection with the requirements of the Supply Chain Due Diligence Act.

If there are any indications of human rights violations among suppliers, we follow up on these immediately. If a corresponding suspicion cannot be dispelled, we will terminate the business relationship and inform the authorities responsible for the prosecution of violations at home and abroad.

We categorically reject the use of forced labour and child labour. We do not accept the employment of persons under the age of 15 years of age, unless it is a matter of vocational training.

05 Employee Representation

The bilstein group respects the right of its employees to organise themselves to form employee representatives. We recognise an open and cooperative dialogue and constructive collaboration with employee representatives as essential for a fair balance of interests.

06 Health and Occupational Safety

Employees are the pillars of the bilstein group's success. Ensuring and promoting their health is a top priority. We therefore comply with all applicable regulations on occupational health and safety and we continuously strive to improve working conditions.



Employees are prohibited from using drugs or alcohol on company premises or from working under the influence of such drugs or alcohol. This also includes the use of medicines with impairing effects.

If employees recognise possible dangers to their health or that of their colleagues in the course of their work, they must immediately interrupt their work if necessary, make the danger apparent to others and inform their respective manager and the occupational safety specialist.

07 Environmental and Climate Protection

Environmental and climate protection is a central concern for us. The bilstein group reduces emissions along the supply chain and, to this effect, relies, for example, on energy-efficient technologies, renewable energies, resource-saving production processes and building standards, as well as comprehensive energy management at the German and English sites.

Employees are conscious of their responsibility for sustainable action and take into account defined environmental and energy targets in their decisions.

Our employees commit to planning and carrying out business trips with due regard for ecological aspects. We therefore refrain from short-haul flights of less than 500 km, provided they can be made by rail in less than 12 hours. Shuttle flights are excluded from this, but should also be avoided if possible.

We prevent waste. We also communicate our environmental and energy policy to customers, suppliers and interested parties. Ecological criteria are part of our supplier assessment. In terms of sustainability, we expect suppliers to comply with legal requirements, avoid packaging waste and use recyclable materials such as corrugated cardboard, air-filled pads and paper.

08 Free and Fair Competition

The bilstein group is dedicated to fair and free competition and pledges to comply with the applicable competition and antitrust laws. In particular, we do not enter into any agreements with competitors or business partners that are likely to influence competitive behaviour, such as price agreements, agreements on contractual conditions, or territorial or customer divisions.

Employees shall ensure that there is no exchange or unilateral disclosure of competitively sensitive data in contact with third parties. Discussions with competitors must always be conducted with particular caution and, if necessary, terminated.

We do not obtain information from questionable sources and do not procure unjustified and unfair advantages over business partners and market companions.

09 Responsible Conduct and Avoidance of Conflicts of Interest

Our decisions are logical, transparent and comprehensible at all times. We do not exploit our position for personal gain. We always make decisions in the interests of the bilstein group and ensure that our own interests or the interests of third parties cannot influence these decisions. In doing so, we avoid even giving the impression that this is the case. If employees are of the opinion that a conflict of interest exists or could even be imminent, they must inform their manager immediately.

As a matter of principle, employees do not accept any gifts or benefits from business partners or other third parties that could impair the objectivity of their decisions or even give the appearance of doing so.

In line with this requirement, the reception for employees shall be limited to

- gifts or gratuities on special occasions (e.g. Christmas, anniversaries, etc.) with a maximum value of EUR 35.00*;
- promotional items with a maximum value of EUR 35.00*;
- an invitation to a business dinner or an event with a company or product reference with a maximum value of EUR 45.00* and
- invitations to a business dinner or a company or product-related event with a value exceeding EUR 45.00* as well as to other events (e.g. invitation to a box at football matches or to racing events), provided that the participation has been approved in writing following prior notification by the manager.

Employees shall immediately notify their manager in writing of accepted gifts and other benefits as soon as they exceed a value of EUR 35.00*.

The acceptance of gifts of money or money-like gifts (e.g. loans, securities) is always prohibited.

When dealing with persons holding office or mandates in Germany or abroad, especially with regard to regular contact with political parties and interest groups, we observe the respective special legal requirements. In this context, we generally refrain from accepting gifts and benefits of any kind from persons holding office or mandates.

Any attempts at gifts and gratuities by third parties, in particular those that contradict the principles set out above, shall be immediately reported by employees to their manager in writing.

10 Money Laundering Prevention

Money laundering occurs when money or assets obtained illegally from illegal activities are brought into the legal economic cycle and the origin is concealed.

The bilstein group ensures that money laundering is prevented and that the bilstein group is not misused for illegal activities through appropriate measures and processes in accordance with the applicable legal and regulatory requirements. Corresponding risks are analysed and assessed on an ongoing basis.

If employees suspect that business partners, customers or third parties may be involved in money laundering, they shall report this immediately.

11 Prohibition of Corruption

The bilstein group does not tolerate corruption. We strictly reject the procurement of unjustified advantages through bribery of business partners or office holders. Any such activities by business partners towards us will - depending on the individual case - prompt us to terminate the business relationship immediately.

We do not make any donations or promises to third parties that could appear to be capable of exerting influence. Therefore, the provisions and value limits set out under point 09 (Responsible conduct and avoidance of conflicts of interest) also apply accordingly to any gifts and other benefits given by our employees to our business partners.

Employees must promptly follow up on indications of corruption and report suspicious circumstances via the bilstein group's whistleblowing system: **bilsteingroup.iwhistle.de/en**

* German law applies in this version of the code of conduct. When applying the document in other countries, the local guidelines on generally accepted gift values apply.

12 Handling Assets

Employees are obliged to handle the tangible and intangible assets of the bilstein group responsibly and not to use them for non-business purposes. This means, for example, that company equipment and furniture must be treated with care and company vehicles may only be used for private purposes after prior approval.

13 Quality

The quality of our operations and our products is the foundation of the bilstein group's success. We see quality and its continuous improvement as a constant challenge. We regard the high expectations of our customers as a driving force.

Quality is the result of efficient and effective cooperation between all areas involved and the ability of all employees to fully engage with their tasks and our products. All employees understand that ensuring the highest quality is the benchmark for their own professional activities and contribute to the success and development of the bilstein group through their professional expertise.

14 Product Safety

As the world's leading specialist in the Independent Aftermarket, the quality of our products is essential to our success. For us, it goes without saying that our products meet all legal requirements and do not pose any risks to health, the environment or the like. We therefore set the highest quality and safety standards internally and continuously monitor compliance with them.

If we recognise potential hazards in the course of product development or if we become aware that products already on the market could pose a safety risk, we immediately take all necessary measures. Employees shall immediately inform their respective manager or another contact person in the company responsible for product safety issues about any such matters of which they become aware.

15 Intellectual Property and Know-How

Intellectual property and technical know-how are essential for the success of the bilstein group. Protecting these is a top priority for the employees of the bilstein group and is ensured through appropriate measures.

Company and business secrets may not be disclosed or passed on without authorisation and may not be used for own purposes. Employees must also ensure that these cannot fall into the hands of third parties.

The naming of new products and the handling of matters relating to intellectual property rights shall not take place without the involvement of the persons responsible for the relevant issues within the bilstein group. Technical information of any kind whatsoever will not be used if no required licence is available.

Based on the awareness of the importance of intellectual property, it is a matter of course for the bilstein group to respect the protected rights of competitors, business partners and third parties.

16 Data Protection

Personal data is specially protected by legal regulations - such as the European General Data Protection Regulation. The bilstein group is aware of the importance of complying with these requirements. It respects the privacy of third parties and treats their personal data confidentially.

Employees of the bilstein group ensure that personal data is not processed without the consent of the person concerned or another legal basis. The protection of personal data is ensured by appropriate measures. If employees have any questions or doubts regarding the handling of personal data, they should contact their respective manager or the office responsible for data protection.

Information provided to authorities on the basis of legal obligations is exclusively provided by the employees responsible for this at the respective bilstein group locations.

17 Reporting and Accounting

The bilstein group maintains properly organized accounting and ensures that financial reports are complete and correct and that legal requirements are strictly adhered to. For these purposes, it maintains an internal control system.

Transparency is essential to us. We therefore take great care to ensure that transactions are correctly recorded, bookings and payments are clearly entered and all processes are documented in a comprehensible manner.

18 Public Communication and Dealing with the Media

The bilstein group values a transparent external presentation and an open approach to the media. In order to meet this requirement, public statements and marketing measures are only made in consultation with or via the department responsible for this.



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