

**BECOM GROUP Code of Conduct**  
**for suppliers and business partners with intermediary**  
**function**

---

This Code of Conduct defines the principles and requirements laid out by the BECOM GROUP for its suppliers and business partners with an intermediary function regarding their responsibility for people and the environment. The BECOM GROUP reserves the right to change the requirements of this Code of Conduct in the event of reasonable changes in the BECOM compliance programme. In this case the BECOM GROUP expects its suppliers to accept such reasonable changes.

**The supplier and/or business partner with intermediary function hereby declares:**

- **Adherence to the law**
  - To comply with the laws and regulations of the applicable jurisdictions.
- **Work practices and human rights**
  - To ensure that all internationally proclaimed human rights are respected by avoiding the causation of human rights abuses and not participating in them. Increased attention should be paid to respecting the human rights of particularly vulnerable rights-holders or groups of rights-holders, such as children, women, migrant workers or (indigenous) communities.
- **Prohibition of corruption and bribery**
  - Not to tolerate or participate in any form of corruption or bribery, directly or indirectly, and not to offer, give or promise any benefit to government officials or private sector counterparties to influence official actions or gain an unfair advantage. This includes refraining from giving or accepting improper facilitation or preferential treatment payments.
- **Fair competition, antitrust and intellectual property rights**
  - To act in accordance with national and international competition laws and not to engage in price fixing, sharing of markets or customers, market collusion or bid rigging;
  - To respect the intellectual property rights of others.
- **Conflicts of interest**
  - To avoid all conflicts of interest that may adversely affect business relationships.
- **Terrorist financing and money laundering**
  - Not to promote terrorist financing or money laundering in any way, whether directly or indirectly.
- **Customs and export control**
  - To comply with the applicable customs and export control regulations.
- **Data protection**
  - To process personal data responsibly and confidentially, ensuring the privacy of all and respecting that personal data must be effectively protected and used only for legitimate purposes.
- **Prohibition of child labour**
  - Not to employ workers who cannot provide proof that they are at least 15 years of age. In countries that fall under the exception for developing countries pursuant to ILO Convention 138, the minimum age may be reduced to 14 years;

Created by:	Isabell Wiesinger	C:\Users\IWiesinger\AppData\Local\Microsoft\Windows\INetCache\Content.Outlook\UB5CFSID\GL-FO-005_Code of Conduct - englisch.docx	Printed on: 11.03.2024
Created on:	21.02.2017		Page 1 of 3
Revised	17.07.2023		
Approved	Johannes Bock		

**BECOM GROUP Code of Conduct**  
for suppliers and business partners with intermediary  
function



- Not to employ workers for hazardous work who cannot provide proof that they are at least 18 years of age pursuant to ILO Convention 182.
- **Prohibition of forced labour**
  - Not to use or contribute to servitude, slavery, forced or compulsory labour or people trafficking.
- **Non-discrimination and respect for employees**
  - To promote equal opportunities and equal treatment of employees regardless of their race, nationality, colour, ethnicity, political affiliation, social origin, sexual identity and orientation, disability (where applicable), religious belief, gender or age;
  - Not to tolerate inappropriate treatment of workers, such as psychological hardship, sexual harassment or discrimination, including gestures, language and physical contact that are sexual, coercive, threatening, abusive or exploitative.
- **Health and safety of employees**
  - To take responsibility for the health and safety of employees;
  - To mitigate risks and ensure the best possible precautions against accidents and work-related illness;
  - To provide training and ensure that all employees are competent in occupational safety;
  - To establish and implement an appropriate occupational health and safety management system.
- **Working hours, remuneration & employee benefits**
  - To recognise the right of employees to form and join existing trade unions and to engage in collective bargaining; to neither favour nor discriminate against members of employee organisations or trade unions;
  - To comply with applicable working time regulations worldwide;
  - To pay appropriate remuneration and comply with all applicable pay and remuneration regulations worldwide;
  - In the case of cross-border deployment of personnel, to comply with all applicable legal provisions, in particular with regard to minimum wages.
- **Grievance mechanism**
  - To provide employees with access to a protected procedure for reporting potential violations of the fundamental principles of this Code of Conduct.
- **Environmental protection**
  - To respect the environment with regard to applicable legal norms and international standards;
  - To minimise environmental impacts and continuously improve environmental protection;
  - To establish and apply an appropriate environmental management system.
- **Supply chain**
  - To appropriately promote compliance with the contents of the Code of Conduct among suppliers;
  - To comply with the principles of non-discrimination in the selection of suppliers and in dealing with them.

**BECOM GROUP Code of Conduct**  
for suppliers and business partners with intermediary  
function



• **Conflict materials**

- To take reasonable steps to ensure that the company's products do not use raw materials that originate from conflict and high-risk areas and contribute to human rights abuses, corruption, the financing of armed groups or similar negative impacts.

**Supplier/business partner statement:**

We hereby confirm:

We have received the "BECOM Group Code of Conduct for Suppliers and Business Partners with Intermediary Function" (hereinafter "Code of Conduct") and undertake, in addition to our obligations under our supply contracts with the BECOM Group, to comply with the principles and requirements of this Code of Conduct for BECOM GmbH and all its affiliates.

-----  
Company name

-----  
Name/Department (block letters)

-----  
Company stamp, legally binding signature

-----  
Place, date