

## Code of Conduct

# BUSCHHOFF STANZTECHNIK GMBH & CO. KG

Status: 05.08.2021

We, the management of Buschhoff Stanztechnik GmbH & Co. KG, are convinced that adherence to ethical values is necessary for long-term economic success.

This includes dealing fairly with each other as well as acting within the framework of the given standards in everyday business. We regard the success of our customers as the key to achieving long-term and sustainable business success and continuous growth, and we see it as a matter of course to meet the requirements of all stakeholders in the process.

As the management of Buschhoff Stanztechnik GmbH & Co. KG, we stand by our responsibility for a sustainable corporate strategy and its corresponding implementation.

Implementation. Integrity as well as compliance with laws and ethical principles are essential elements in

essential elements to maintain the authenticity of our company.

This **"BUSCHHOFF STANZTECHNIK Code of Conduct"** defines how we conduct our business in an ethical and socially responsible manner.

In combination with the **"BUSCHHOFF STANZTECHNIK Management Manual"**, standards and instructions are laid down to ensure respectful and dignified treatment of our employees, safe working conditions and a sustainable approach to the environment.

### **This Code contains the following:**

- how our management fulfills its responsibilities,
- how we interact with our employees and colleagues,
- what behavior customers can expect from us
- how we treat our suppliers, and
- how we treat our communities and the environment.

Each manager, as well as each individual employee, is responsible for behaving in accordance with this Code. The behavior of our managers serves as role models, because they live out the principles of conduct and stand up for them in every situation.

### **Human rights**

We respect and promote the dignity of every human being and are committed to the protection and observance of international human rights. It is a matter of course for us not to use child labor of any kind and to reject all forms of forced labor.

We do not tolerate any working conditions that conflict with international or local laws and practices.

### **Discrimination**

We do not discriminate in hiring, compensation, training opportunities, promotion, termination or retirement on the basis of race, ethnicity, gender, age, marital status, religion or belief, disability, pregnancy, sexual orientation, trade union membership or political party affiliation of our employees and, of course, we require our employees to strongly oppose such discrimination.

### **Freedom of association & right to collective bargaining**

As Buschhoff Stanztechnik GmbH & Co. KG we respect the right of all employees to join or join associations or organizations of their choice for the purpose of promoting and protecting of the interests of our employees, to join or leave, to act on behalf of, and to form such associations or organizations, and in doing so, we will abide by the appropriate agreements with collective representatives of our employees in accordance with locally applicable laws and regulations.

### **Disciplinary Measures**

We strongly oppose the use of corporal punishment, mental or physical coercion and verbal abuse.

### **Employee Motivation & Training**

We regard motivated employees and their identification with the goals of our company as a key success factor. Therefore, we place special emphasis on the advancement of our employees. We focus on job-related training that can be applied within the company as well as on the development and promotion of future management potential.

### **Quality strategy**

Quality in the supply chain is the focus.

The quality strategy is adopted with the aim of establishing long-term supply partnerships of mutual benefit. This applies to our suppliers as well as to our customers.

Quality is of paramount importance to Buschhoff in all phases of the product life cycle.

In the development phase, we apply suitable preventive methods of quality planning, such as manufacturability testing, QFD, DOE, FMEA, etc.

We take into account experience gained from similar projects.

For prototypes and pre-series parts, Buschhoff agrees on the manufacturing and testing conditions with its customers and documents them. The aim is to manufacture the prototypes and pre-series parts under near-series conditions.

Buschhoff feels obliged to use the findings of the development phase and the observation of the existing production as well as customer complaints of comparable products for the assurance and continuous improvement of its quality level.

During the current series production, we coordinate the test parameters and the test strategies with our customers as part of the quality planning of the series production process.

In the interest of all parties, we strive for immediate processing of complaints. At Buschhoff, the processing of defect notifications includes a systematic analysis of the cause of the defect. Over the last few years, we have optimized the use of the 8D report system for the purpose of sustainable defect elimination and avoidance. The measures implemented are re-evaluated in an FMEA.

### **Health & Safety**

The health and safety of our employees is protected to the highest degree by providing a healthy and safe working environment. By complying with the safety regulations in force in our company, each individual ensures a safe and healthy working environment. We also offer our employees a voluntary health program, as well as training in all health and safety-related areas. Doctors are available to employees during working hours.

### **Compliance with antitrust & competition rules**

With our high-quality products, innovative solutions and reliability, we compete openly and fairly on the world markets. In doing so, we do not engage in any illegal and/or criminal practices, such as bid rigging, which exclude, distort or restrict competition.

### **Conflicts of Interest & Bribery/Corruption**

All our employees avoid situations in which their personal or financial interests conflict with those of the company. In particular, they are prohibited from participating in companies of competitors, customers or suppliers or from entering into business relationships with them in a private capacity if this would cause a conflict of interest.

Such a conflict always exists when the nature and extent of a participation is likely to influence actions in the performance of our company's activities in any way.

Our employees unequivocally refrain from requesting, accepting or receiving unjustified or unlawful benefits that could influence business decisions or transactions. Likewise, none of our employees will offer, provide or attempt to provide improper advantages to business partners, their employees or other third parties in business activities of any kind or enter into agreements to do so. make any agreements in this regard.

**Protection of assets & confidentiality**

Each individual is expected to protect the company's tangible and intangible assets, to treat trade and business secrets and customer-related business information confidentially, and to comply with applicable data protection principles.

**Suppliers**

We have high expectations of our suppliers and require them to adhere to the same strict principles in the conduct of their business, especially in the treatment of employees, that we ourselves apply. As an importer, we ensure that goods and raw materials are accurately labeled and classified, and that their value and country of origin are accurately stated. Local customs and import laws, regulations and procedures of governmental authorities are explicitly followed.

**Environment & Recycling**

As a metal processing company, we are committed to nature. We protect our environment by using state-of-the-art equipment. Every employee contributes to the production of high quality products in environmentally friendly processes. We conserve environmental resources by recovering energy and metal from secondary raw materials.

**Corporate citizenship**

We expressly acknowledge our responsibility as a citizen of the community in which we maintain our operations and are committed to open communication with all authorities, as well as social and public interest groups.

**Compliance**

This "**BUSCHHOFF STANZTECHNIK Code of Conduct**" has been approved by the shareholders and brought to the attention of all employees. Our employees comply with this Code in the performance of their duties without exception. Stricter or more detailed guidelines may apply to certain regions, countries or functions, but these are generally in line with these corporate principles. Questions regarding application or interpretation, as well as reports of potential violations, will be directed to the appropriate supervisor. Every employee has the right to point out to his or her manager any circumstances that indicate a violation of the regulations contained in this Code of Conduct. This can also be done anonymously. In our work environment, employees must feel free to report known or suspected misconduct. Any retaliation against a person who in good faith reports an actual or suspected violation is strictly prohibited. Identity preservation must be ensured.

Translated with [www.DeepL.com/Translator](http://www.DeepL.com/Translator) (free version) Procedures, practices or actions that are inconsistent with this Code shall be corrected and will result in disciplinary action.

Cologne, Aug. 5, 2021

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