



Our Code of Conduct

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Bacher Systems EDV GmbH
Wienerbergstraße 11/B9, 1100 Vienna
Tel: +43 1 60 126-0
Email: info@bacher.at
Commercial Register Number: FN 54202 i
VAT ID: ATU15176501

Bacher Systems Deutschland GmbH
Mühlendorfstraße 8, 81671 Munich
Phone: +49 89 37799385-0
Email: info@bacher.eu
Registration number: HRB 305431
VAT ID: DE457504947



BACHER
SYSTEMS

Dear Colleagues at Bacher Systems,

Each and every one of us is unique and an essential part of our company. We all actively contribute to ensuring that our core values—collaborative, proactive, flexible, competent, and reliable—are lived out in our daily interactions, making Bacher Systems a place where we meet as equals and where everyone takes shared responsibility.

In this Code of Conduct, we have summarized how we, as part of Bacher Systems, conduct ourselves toward our stakeholders—including employees (our fellow stakeholders), business partners, representatives of government agencies and testing service providers, as well as society at large. It outlines the guidelines that govern our actions and provide us with direction in complex or challenging situations.

Please note: Of course, we must always comply with all applicable laws and regulations of the respective country in which we represent Bacher Systems. Furthermore, with this Code of Conduct, we establish clear standards for responsible, ethical, and principled behavior that go beyond mere legal compliance and reflect our own standards.

Regardless of our roles within the company, we are all obligated to live by these principles, implement them, and report any potential deviations. In this way, we collectively take responsibility for ensuring that our values are evident in our daily work.

As a company, we are expressly committed to acting responsibly, ethically, and in compliance with the law. This Code of Conduct forms the binding foundation of our leadership and management culture and sets the framework for our daily actions—for every single person at Bacher Systems.



Elvira Cejna, Managing Director



Nicolai Czink, Managing Director

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The Code of Conduct cannot provide specific recommendations for every situation. If you can answer “yes” to all of these questions, your behavior is appropriate:

If in doubt, ask yourself the following questions

- Is my behavior lawful?
- Does my behavior comply with Bacher Systems’ guidelines (e.g., protection of trade and business secrets, user policy, etc.)?
- Does my behavior maintain the trust of all Bacher Systems stakeholders?
- Would my family and friends consider my behavior ethical?
- Have I considered the consequences for those affected by my behavior?
- Would I be okay if someone treated me that way?
- Would I be okay if my behavior were reported in the media?



If you have questions or concerns, here are our points of contact

As co-responsible members of Bacher Systems, we know that all doors are open here and that we speak to one another as equals. If you're unsure who to contact with your concern, this table will help you.

We want to make it clear: No one who raises a concern in good faith needs to fear negative consequences. All reports are treated confidentially and protect the person making the report.

Topic	Contact
Discrimination, harassment, ethical conduct	Compliance Officers, Team Lead, Division Lead, People & Culture Management
Conflicts of interest	Compliance Officers, Team Leads, Division Leads, Executive Management
Bribery, corruption, and money laundering	Compliance Officers, Team Leads, Division Leads
Confidential Data and Information	Information Security Manager
Personal Data (GDPR)	Data Protection Coordinator
Cybersecurity and Digital Responsibility	Information Security Manager, inIT
Remote Work and Digital Collaboration	People & Culture Management (organizational), inIT (technical)
Use of AI and Technology Ethics	AI Officer, Compliance Officers, MarCom, Data Protection Coordinator
Communication & Social Media	MarCom, Compliance
Sponsorship, Donations & Political Influence	Management, Compliance Officers
Competition	Team Lead, Division Lead, Compliance Officers
Business Partners & Supply Chain	Partner Managers, Management, Compliance Officers
Environment, Sustainability & E-Waste	CSR Coordinator, Waste Management Officer
Code of Conduct in General	Compliance Officers
Would you like to remain anonymous?	Whistleblower tool on our website bacher.at

Key figures

Facts and figures about Bacher Systems



100%

Owner-managed company



110

Co-responsible



30+

Years of continuity



200+

Certifications
Leading manufacturer

We take shared responsibility for the added value of your IT



Infrastructure & Platforms

Maximum availability of
data and services for
future-proof planning



Cybersecurity

Manageable Cyber Risks
Through a Holistic Approach
to Cybersecurity



Digital Identities

Perfectly protected digital
identities through tailor-
made solutions



Data Analytics

Unlock the full potential of
your data

These are our core values

We live and breathe IT; we live and breathe shared responsibility—and this shared responsibility is most evident in how we interact with customers, colleagues, and partners. We are guided by five values: collaborative - proactive - competent - flexible - reliable



For us, this means ...

In partnership

- We make people’s work easier.
- We treat others with openness, trust, and respect, meeting them on equal footing.
- We communicate constructively and directly.
- We willingly share knowledge and gladly accept it from others.
- We work as a team and leverage individuality as a strength; when interests differ, we strive to achieve the best possible balance.
- We respect our employees’ family situations and thereby support the balance between family and work.
- We view achieved goals as shared successes.

flexible

- We make full use of every opportunity to create customized solutions.
- We resolve seemingly contradictory expectations through creative “both-and” approaches.
- Thanks to the flexibility built into our stable workflows, we deliver quality even when things need to move particularly fast.
- We support our employees’ unique family situations with swift and personalized decisions.
- We set clear priorities and adapt them to changing conditions.
- Each of us uses our decision-making authority to achieve the best results together.

Competent

- Our most important skill is the ability to quickly access relevant knowledge.
- We strengthen each individual’s strengths through personal and professional development, thereby maintaining our high level of performance as a team.
- With strong interpersonal skills, we foster a shared understanding.
- We clarify expectations and fulfill them in a results-oriented manner.
- We approach problems with a focus on solutions and use this to further our development.
- We also use our high level of technical expertise to ensure the security of our clients’ and partners’ data and information.

Proactive

- We exercise our creative freedom responsibly and thus achieve the agreed-upon results.
- We achieve innovation by combining new ideas with their sustainable implementation.
- By combining the tried-and-true with the new, we create added value.
- We monitor our environment and actively seek opportunities to consistently deliver new and leading services.
- We identify and seize opportunities for our sustainable development early on, both in service delivery and in the personal work environment of our employees.

Reliable

- Consistency and a long-term perspective guide our thinking and actions.
- For us, a commitment is an obligation to find ways to fulfill it.
- We identify both success and risk factors and, based on this, ensure appropriate safeguards.
- Based on our entrepreneurial mindset and approach, we choose the alternatives that will bring long-term economic success.
- Even under difficult conditions, we act in accordance with the agreed-upon outcomes, adhering to our Code of Conduct and that of our partners.
- Data and information—both our own and that of our partners—are in safe hands with us.

1. Human Rights, Diversity, and Equal Opportunity

We value the contribution of every single individual to our company and recognize that creativity and innovation require diverse teams. Bacher Systems is therefore committed to an inclusive work environment that is free from discrimination based on gender, ethnic origin, age, disability, religious beliefs, or sexual orientation. We are fully committed to international human rights, equality, and anti-discrimination, and we comply with all local legal requirements and regulations.

What We Expect

- We respect, protect, and promote the dignity of every person who comes into contact with Bacher Systems. We create an atmosphere in which everyone can freely and openly express their ideas, opinions, and beliefs.
- Equal treatment and respect are also reflected in our language, which is why we use respectful and gender-inclusive writing, expression, and forms of address.
- In internal selection processes and career development, objectivity, fairness, and transparency apply: decisions are made solely on the basis of professional aptitude and qualifications.
- In our business relationships with our external partners, too, we always act respectfully, fairly, and without discrimination. Decisions regarding collaboration are based exclusively on objective and professional criteria.
- Because each of us is a part of Bacher Systems, we all have not only the right but also the obligation to address and point out inappropriate behavior. We expect all colleagues to remain vigilant, observe their surroundings, and actively advocate for respectful interaction—and to support others if they are subjected to unfair treatment.

What is prohibited

- Any form of disadvantage, discrimination, or exclusion
- disrespectful, harassing, sexist, humiliating, insulting, offensive, or intimidating statements or behavior
- racist, xenophobic, or intolerant remarks or actions
- Bullying, manipulation, or exerting pressure on colleagues or external stakeholders
- Discrimination based on personal characteristics or life circumstances
- Retaliation against individuals who report misconduct or seek support

What to do if you have doubts

If you observe or experience a situation where you are unsure whether it violates our principles regarding human rights, diversity, or equal opportunity, the following applies:

- immediately seek a conversation—with your team lead, department lead, People & Culture Management, or the Compliance Officer
- Raise concerns confidentially—internally or anonymously via the whistleblower system
- Support those affected by offering help or referring them to a point of contact
- When in doubt, never look the other way; instead, actively investigate whether misconduct has occurred

2. Healthy Workplace Culture

Our company takes responsibility for the people who work here far beyond the usual standards. We ensure the physical and mental well-being of everyone through a wide range of initiatives.

What we expect

- We take responsibility for one another and create a work environment where everyone can feel physically and mentally at ease.
This includes:
 - respectful, appreciative communication in our daily interactions
 - meaningful work that fosters individual strengths
 - Taking personal responsibility and self-organizing within the scope of our roles
 - constructive collaboration across teams
 - supporting colleagues in stressful situations
- With flexible work schedules and remote work, we all have the opportunity—depending on our area of responsibility and the required form of collaboration—to achieve a healthy work-life balance.
- We actively promote physical and mental health—through benefits, ergonomic work environments, professional development opportunities, and a work culture based on supportive and collaborative leadership, among other things.
- Everyone contributes to a healthy work environment by staying attentive, recognizing stress early on, and addressing it openly.

What is prohibited

- Possession, distribution, or use of drugs or narcotics during working hours
- Consumption of alcoholic beverages during working hours (exceptions apply exclusively to clearly defined, officially approved occasions)
- Carrying any type of weapon
- Deliberately creating a stressful, hostile, or disrespectful work environment
- Behavior that endangers the health of others—physically or mentally

What to do if you're unsure

If you are unsure how to act in a stressful or health-related situation, the following applies:

- Regarding physical or mental well-being: People & Culture Management or Team Lead
- For health risks in the workplace: Report hazards immediately and work together to find solutions
- For violations of rules regarding alcohol, drugs, or weapons: Team Lead or Compliance Officer

3. Confidential data and information

Information is an essential—if not the most important—component of our business processes and is of the utmost importance to the success of our company. That is why each of us is obligated to handle it responsibly.

What we expect

- We protect all confidential data, information, and trade secrets of Bacher Systems as well as those of our customers and business partners with the utmost care.

This includes all facts, circumstances, and processes that are not public knowledge but are accessible only to a limited group of people, and in the non-disclosure of which the person or organization has a legitimate interest. We also consider information to be confidential if its nature indicates that it should be treated as such, regardless of whether it is marked with a confidentiality notice or not. This includes, in particular:

- internal company information such as financial data, trade and business secrets, strategies, plans, software, technical documentation, and customer lists
 - non-public information about our clients and business partners
 - insider information (information not publicly known that could influence the stock price of a publicly traded company) that we receive in the course of our work for publicly traded companies
 - information relating to current and future business plans and strategies, divestitures, mergers, and marketing and sales plans and data
 - Personal data in accordance with the provisions of the GDPR
- We use confidential information exclusively for legitimate business purposes and only when required by our role and responsibilities (“need-to-know principle”).
 - We ensure that data is always protected in accordance with its classification level, e.g., through secure passwords, encryption, physical security, access restrictions, and proven technical security measures.
 - We protect our systems and data with state-of-the-art security measures and adhere to international standards.
 - If an employee leaves the company, all confidential information, data storage media, and documents must be handed over to Bacher Systems in full and securely.

What is prohibited

- Disclosure of confidential information to unauthorized persons—internal or external
- Use of confidential information for private purposes or personal gain
- Storing company data in unauthorized tools, systems, cloud services, or on personal devices
- Unauthorized access to systems, files, or information
- Disclosure or use of insider information
- Accessing networks, systems, or data of other organizations without their express written consent
- Violation of data protection laws, in particular the GDPR
- Inadequate protection of confidential data (e.g., an open laptop, access by third parties, unsecured Wi-Fi connections)
- Unsecured, unsupervised, or unauthorized disposal of data storage media, documents, and devices.

What to do if in doubt

If it is unclear whether information is confidential or how it should be properly protected, the following applies:

- Contact the Information Security Manager
- For questions regarding the handling of personal data: Involve the Data Protection Coordinator
- Immediately report security incidents, misdirected emails, suspicious emails, or unauthorized access (to the Information Security Manager or Data Protection Coordinator)
- If you are unsure about tools, platforms, or cloud services, always ask IT Security first
- When in doubt, never share confidential information; always obtain approval first

4. Remote Work & Digital Collaboration

At Bacher Systems, remote work and digital collaboration are expressions of trust, personal responsibility, and a modern work culture—and they only work if we uphold the same high standards of security, professionalism, and collaborative partnership wherever we work.

What we expect

- We use digital tools responsibly and work at all company locations—and even outside of them—in a way that ensures the security of our information and systems at all times. We expect the following from all employees:
 - Access to company resources from home or on the go exclusively via a Bacher laptop, a Bacher smartphone, or the View environment
 - Promptly patching software in the event of security vulnerabilities, even from home
 - Protecting screens, documents, or confidential conversations from third parties. In this context, family members are also considered third parties.
 - Always keep end devices securely stored
 - Healthy work habits, breaks, and boundaries—for ourselves and for others. Remote work means flexibility, but also responsibility
 - Use stable internet connections and ensure a suitable work environment. We will notify you in advance if technical limitations arise

What is prohibited

- Sharing, storing, or accessing confidential information via unsecured personal devices or accounts
- Leaving documents or unsecured devices lying around in the home, in public places, or while traveling
- Behavior in online meetings that appears unprofessional or disrupts collaboration (e.g., inappropriate recording, sharing meeting links with unauthorized persons)

What to do if you have doubts

If you're unsure how to work remotely in the safest and most responsible way, follow these guidelines:

- For questions regarding IT security, tools, access, or permissions: Contact the Information Security Manager or inIT
- If you have questions about personal data or GDPR compliance: Contact the Data Protection Coordinator
- If you encounter technical issues or have concerns while working from home: Notify your team lead as soon as possible so that risks can be minimized
- If you feel that your remote work situation (environment, internet, privacy) is not sufficiently secure: Consult with your team lead immediately before processing any confidential data
- If you're feeling overwhelmed, stressed, or facing challenges with digital collaboration: Contact your team lead or People & Culture Management

When in doubt, always ask first, then act. Security comes before convenience.

5. Responsibility for work equipment and resources

By work equipment and resources, we mean all office furnishings—from desks to pens—as well as all technical equipment such as laptops, phones, servers, the test lab, etc., but also, for example, our internet connection, printers, and company cars. We use all these resources primarily for business purposes.

What we expect

- We use all work equipment and resources provided by Bacher Systems responsibly, economically, and in the best interests of the company. We ensure that:
 - Work equipment is used primarily for business purposes
 - the use of our devices and systems is always secure and in accordance with our security policies
 - personal use is limited to a reasonable extent and does not compromise security or operations
 - Equipment is handled with care and malfunctions or defects are reported promptly
 - Our core values are also reflected in how we handle resources
 - If an employee leaves the company, all work equipment must be returned in full and in proper condition.

What is prohibited

- Use of work equipment for private or external purposes that conflict with Bacher Systems' business objectives
- Storing, transmitting, or processing pornographic, racist, extremist, violence-glorifying, or otherwise offensive content
- Manipulation or circumvention of security, protection, or access systems
- Careless handling of equipment that could lead to loss, damage, or unauthorized access
- Sharing resources or access credentials with unauthorized persons

What to do if you have doubts

If you are unsure how a work tool may be used or how to secure it properly:

- For technical or security-related questions: Contact IT Security or the Information Security Manager
- For questions regarding permitted personal use: Consult with your team lead or department lead
- In case of loss, theft, or damage to a device: notify inIT immediately

When in doubt, always remember: Safety first—it's better to ask one more time.

6. Contribution to the Environment and Society

We are committed to sustainable practices in all areas. This includes reducing our carbon footprint and resource-efficient procurement. We take social and ethical aspects into account throughout the entire supply chain and support initiatives that strengthen climate protection and social responsibility.

What we expect

- We act sustainably and in a resource-efficient manner, making decisions that take ecological and social impacts into account. This includes:
 - Resource-efficient procurement: We prioritize energy-efficient, durable, and environmentally friendly products even when purchasing work equipment.
 - Conscious use of materials and energy: We avoid waste, use resources mindfully, and ensure the efficient use of electricity, heating, cooling, and office supplies.
 - Responsible e-waste management: Functional IT devices are preferably reused—through internal redistribution or donations to social institutions. Devices that are no longer usable are recycled through certified specialized companies or disposed of properly. Data is securely deleted beforehand.
 - Waste separation and recycling: We consistently separate waste and use the designated bins in our offices.
 - Social Engagement: We support initiatives and projects that promote the common good, climate protection, or social responsibility. Our actions are intended to make a positive contribution—both within and outside our company.
- For us, sustainability isn't just an afterthought—it's an integral part of the responsible approach we all embrace together.

What is prohibited

- Any form of behavior that harms the environment or society is contrary to our values. This includes, for example:
 - the careless or wasteful use of resources and materials
 - the improper disposal of IT equipment, data storage devices, or batteries
 - the transfer of devices to unauthorized third parties or without prior secure data erasure
 - the use of environmentally or socially questionable products when sustainable alternatives are available
 - Behavior that contradicts Bacher Systems' reputation as a responsible company

What to do if in doubt

If it is unclear how a piece of equipment should be used or disposed of in an environmentally responsible manner, the following applies:

- For questions regarding the disposal or reuse of equipment: Contact the reception desk
- If you have uncertainties regarding sustainable procurement or alternatives: Involve the CSR Coordinator

- For questions regarding data erasure prior to disposal: Contact inIT
- If you have ideas for improvements in the environmental or social areas: Actively submit your proposal to the CSR Coordinator or management

7. Identifying and Reporting Conflicts of Interest at Bacher Systems

A conflict of interest arises in situations where the interests of Bacher Systems employees compete with or contradict one another, where judgment is clouded by these other obligations, and where we consequently fail to act in the best interests of Bacher Systems.

We speak of a conflict of interest above all when a course of action or a decision made in the course of our work brings an immediate or delayed benefit—whether financial or non-financial—to us personally, our family, or other individuals with whom we have a close personal or business relationship.

What We Expect

- We avoid situations in which personal, financial, or family interests influence our decisions or could give the appearance that we are not acting objectively. We expect the following from all those with shared responsibility:
 - Transparency: Potential or actual conflicts of interest are disclosed early on.
 - Integrity: Decisions are made exclusively in the best interests of Bacher Systems—free from personal gain or dependencies.
 - Diligence: We critically review new business, personal, or financial relationships for potential conflicts with our duties.
- Examples of reportable conflicts of interest include, in particular:
 - Business relationships with Bacher Systems' partners that exist outside of one's own work for Bacher Systems
 - Side jobs or self-employment in the IT sector, especially if they compete with Bacher Systems or could cause overlaps with work hours, resources, or confidential information
 - Personal or family relationships with business partners (especially customers and manufacturers/suppliers) of Bacher Systems
 - Financial interests in companies with which Bacher Systems works or negotiates
 - Use of Bacher Systems' assets for private or external purposes
 - Competitive activities or preparations for such activities during employment with Bacher Systems
- New employees must disclose any existing or potential conflicts of interest before starting work.

What is prohibited

- Making decisions that create or favor personal advantages
- Entering into business relationships that prioritize private interests over corporate interests
- Using information, positions, resources, or access provided by Bacher Systems for personal or external purposes
- Engaging in activities that are in direct or indirect competition with Bacher Systems
- Concealing conflicts of interest or withholding relevant information
- Facilitating benefits for oneself or related parties
- Influencing negotiations or decisions in which one has a personal interest or in which a related party has a personal interest

What to do if you have doubts

If you are unsure whether a conflict of interest exists or should be reported, the following applies:

- Always consult with someone early on before taking any action
- If you have questions or uncertainties, speak with: your team lead, department lead, compliance officer, or management
- For new external activities (including volunteer or part-time work): clarify in advance whether a report or approval is required
- Disclose relationships or contacts as soon as they could become relevant to business decisions

Bacher Systems makes it clear: An unreported conflict of interest is always a violation of the Code of Conduct—even if no harm has been caused.

No one suffers any disadvantages because a potential conflict of interest is disclosed in good faith. Openness protects both the individual and the company.

8. Integrity and Fairness in Competition

Bacher Systems stands for fair, transparent, and ethical market conduct. We make our business decisions independently and based on quality, competence, and customer benefit. Unfair or unethical competitive behavior contradicts our values and can damage trust in our company.

Fair and objective statements also apply in competitive situations. All external communications—regardless of context—are additionally subject to the rules on responsible communication set forth in Chapter 11.

What We Expect

- We conduct ourselves professionally, fairly, and responsibly in competitive situations. This means, in particular:
 - We make decisions regarding offers, prices, and services independently
 - we respect other market participants and act fairly
 - we do not use information that is not publicly or legitimately available

What is prohibited

- The use of confidential or unlawfully obtained information
- Unfair influence on customers, partners, or decisions
- The misuse of information or functions for personal gain
- Tolerating or concealing clearly unfair market conduct

What to do if you have doubts

If you are unsure whether a behavior, statement, or situation is fair and correct, the following applies:

- Do not disclose any sensitive or competitively relevant information
- End conversations or change the subject if the content becomes problematic or inappropriate
- Do not assess critical situations on your own; instead, consult early on with your team or department lead or the Compliance Officer
- Openly address observations or concerns before a risk arises

When in doubt, always follow this rule: clarify first, then act.

No one will suffer any disadvantages for raising concerns in good faith—openness protects both you and Bacher Systems.

9. No to bribery, corruption, and money laundering

We comply with applicable legal regulations and do not tolerate any form of bribery or money laundering—we neither bribe others nor allow ourselves to be bribed. Any form of bribery, corruption, or improper influence undermines trust—which is why we pursue a clear zero-tolerance policy in this regard.

What We Expect

- We make business decisions exclusively in the best interests of Bacher Systems and based on objective criteria such as competence, quality, and integrity. Our conduct should always be transparent, fair, and free from personal gain. This includes:
 - Compliance with all legal requirements regarding anti-corruption, integrity, and anti-money laundering
 - Transparent handling of gifts and invitations
 - Small tokens of appreciation, such as promotional items or gifts of low value (approx. 60 euros), may be accepted if they are clearly not intended to influence
 - We accept hospitality if it is appropriate and serves a legitimate business purpose
 - Careful consideration of whether a gift or invitation could create an inappropriate expectation
 - Clear separation between professional decisions and personal relationships
 - When it comes to money laundering, we adhere to a zero-tolerance policy and, without exception, neither make nor accept cash payments for services we provide

For us, integrity also means: If an offer, gift, or behavior triggers a “bad feeling,” we address it early on.

What is prohibited

- Bribery in any form
 - Active: offering benefits to others to influence decisions
 - Passive: Accepting benefits to influence decisions
- Accepting or giving gifts or invitations that:
 - are unreasonably large
 - imply an obligation
 - occur during ongoing tenders or decision-making processes
 - could create the appearance of influence
- Using company property, information, or positions for personal gain
- Any form of money laundering or support for such activities
 - including the acceptance or making of cash payments
 - Use of opaque payment channels
 - Concealment of beneficial owners or transaction purposes
- Concealment of offers, gifts, or benefits that are likely to influence business decisions

Corrupt conduct—including attempts—is always a serious violation.

What to do if you have doubts

If you are unsure, follow these guidelines:

- For gifts, invitations, or benefits: Consult with your team lead or a compliance officer (especially in borderline cases, repeated invitations, or gifts from business partners)
- If you suspect bribery or improper influence: report it immediately to your team lead, a compliance officer, management, or via the whistleblower system
- If there is uncertainty regarding payments or suspicion of money laundering: contact management or a compliance officer
- If a behavior or offer seems inappropriate, the following applies:
 - When in doubt, it's better to decline and report it
 - Transparency protects both you and the company

10. Participation in events

Our company's success depends heavily on our ability to identify relevant technology trends early on and leverage them to our advantage. To this end, we are in constant communication with manufacturers and distributors.

Events and training sessions organized by manufacturers, as well as partner meetings with distributors, are therefore a business necessity for us.

What we expect

- We attend events only if they serve a clear and justifiable business purpose. These include, in particular:
 - Manufacturer and distributor events, trade conferences, training sessions, partner meetings
 - Events related to market development, professional development, or the maintenance of strategic partnerships

- We expect the following from all those involved:
 - Participation only when there is a clear business purpose
 - We cover travel and accommodation costs for manufacturer events ourselves if these primarily serve to promote our own offerings (e.g., events with customer participation)
 - A professional demeanor and responsible representation of Bacher Systems
 - Appropriate handling of invitations, hospitality, and perks

What is prohibited

- Participation without a business purpose or without internal approval
- Acceptance of inappropriate invitations, hospitality, or benefits
- Disclosure of confidential information
- Participation in events that are not compatible with our values or compliance rules

What to do if you have doubts

- For invitations or hospitality: Ask your team lead or compliance officer
- If the purpose is unclear: Consult with the team lead or department lead
- For sensitive topics: Involve the Information Security Manager
- Principle: When in doubt, clarify first—transparency protects

11. Responsible Communication & Social Media

Our external communication is always truthful, respectful, and responsible—both offline and online. We protect confidentiality, uphold the rights of third parties, and represent Bacher Systems consistently and professionally.

This chapter applies to all external statements about Bacher Systems—regardless of the channel and also in the context of competitive, sales, or partner situations.

What we expect

- Truthful, clear, and respectful communication: Statements about Bacher Systems, our services, and partners are accurate, transparent, and free of exaggeration.
- Confidential information, internal assessments, or project details are not made public—neither directly nor indirectly. (NDAs also apply online)
- We make it clear when we are speaking in a private capacity and avoid representations that give the impression we are communicating on behalf of Bacher Systems (unless we are authorized to do so).
- We pay particular attention to the proper use of logos and copyrighted material
- AI-generated text, images, and audio/video are reviewed prior to publication (accuracy, rights, risks). When legally or factually necessary, we make the artificial generation/manipulation transparent.
- Media contacts handled exclusively by authorized personnel (MarCom)
Press, interview, or other media inquiries are answered exclusively by authorized personnel.

What is prohibited

- Internal data, assessments, or projects must not be used to support personal opinions in public debates.
- AI-generated content must not be shared without prior review for accuracy, legal compliance, security, and potential risks.
- Publishing content that discredits or casts Bacher Systems, its employees, or business partners in a negative light.
- Unauthorized use of logos/copyrighted material
- Pretending to speak on behalf of Bacher Systems without authorization

What to do if in doubt

- For media inquiries, brand/logo usage, or official statements: Contact MarCom (Authorized Corporate Communications)
- For questions regarding confidentiality, NDAs, or personal data: Involve the Information Security Manager or Data Protection Coordinator.
- If unsure about AI content (facts, rights, labeling requirements): Contact the AI Officer, Information Security Manager, or MarCom.
- For sensitive topics or potential conflicts: consult with MarCom or management before publication—if in doubt, do not post.

12. Sponsorship, Donations , and Political Influence

We are committed to transparency in our sponsorship and donation activities and to upholding social causes in line with our values, without exerting political influence.

What we expect

- Sponsorship and donation decisions are guided by our values and are documented in a transparent manner.
- Support is provided to initiatives that benefit society (e.g., education, social causes, the environment) and align with Bacher Systems.
- Decisions on these matters are made in accordance with the dual-control principle (CSR Coordinator + Management).

What is prohibited

- Political donations or contributions made in the name of Bacher Systems or using company funds (political parties, party-affiliated organizations, political campaigns).
- Unethical lobbying or improper influence on political decision-makers.
- Contributions that create dependencies or could be perceived as a quid pro quo for business advantages.

What to do if in doubt

- If you are unsure about the recipient, purpose, or consideration, and before making any commitments: involve Compliance or Management.
- Questions regarding external communications: Contact MarCom.

13. Responsibility in collaboration with business partners and throughout the supply chain

We are reliable in our business relationships and expect the same from our business partners—from the selection of our partners to accountability throughout the entire supply chain.

What we expect

- We only work with companies that comply with laws, human rights, and labor standards and act with fairness and integrity.
- Our partners must ensure that there is no child labor, forced labor, exploitation, or modern slavery throughout the entire supply chain.
The same applies to the rejection of conflict minerals as well as to environmental and social standards.
- We expect transparency regarding manufacturing conditions, the origin of materials, and the subcontractors used. Risks or violations must be reported promptly.
- We set out our requirements in our own Code of Conduct for Suppliers—which serves as the binding foundation for our collaboration.
- Business partners are selected based on objective criteria: quality, competence, reliability, sustainability, and alignment with our values.
- If risks are identified, we work together with our partners to implement appropriate preventive and corrective measures, or we terminate the partnership if improvement is not possible.

What is prohibited

- Collaboration with partners who violate human rights e.g., through child labor, forced labor, exploitation, or unsafe working conditions.
- Business relationships with companies that violate laws (e.g., corruption, illegal business practices, environmental violations).
- Ignoring known risks in the supply chain or knowingly accepting questionable sourcing practices.
- Use of conflict minerals or materials that finance violence, armed conflict, or human rights violations.
- Collaboration with business partners on our internal watchlist who have been blocked due to risks or violations.

What to do if you have doubts

- If there are uncertainties regarding the integrity of a business partner: involve the partner manager, compliance officer, or management.
- If there are indications of human rights or environmental violations in the supply chain: report immediately to the Compliance Officer and do not place any further orders until the situation has been investigated.
- If you have questions about evaluating or selecting new suppliers: Follow internal guidelines and the Supplier Code; if necessary, consult the procurement team, the Compliance Officer, or management.
- If the basis for risk assessment or decision-making is unclear: ensure transparency and resume cooperation only after clarification.

14. Reporting Potential Ethical Violations

Integrity thrives when we pay attention, take responsibility, and openly address concerns. In doing so, we protect ourselves, our colleagues, and Bacher Systems.

What we expect

- Openness and courage to address misconduct: Every employee is obligated to report potential violations of the Code of Conduct or other internal guidelines—promptly and in good faith.
- Acting responsibly to protect the company: Reports help us reduce risks, prevent harm, and live up to our values in a credible way.
- Confidential and respectful handling: All reports are taken seriously, treated confidentially, and professionally investigated. Reports are handled confidentially to the greatest extent possible in accordance with the EU Directive on the protection of whistleblowers, and reporters are protected from retaliation.

What is prohibited

- Retaliation or discrimination against individuals who submit a report
- Concealing or deliberately ignoring potentially critical situations
- False reports made with malicious intent
- Blocking, obstructing, or manipulating a reporting or investigation process

The protection of whistleblowers is a core value for us and a legal obligation.

What to do if you have doubts

- If you're unsure whether a certain behavior might be a violation: It's better to report it once too often than once too little.
- If you're unsure which channel to use: Contact your team lead, People & Culture Management, or the Compliance Officer. Or use the whistleblower system anonymously.
- If you're affected or have observed something but aren't sure how to phrase it: seek support (e.g., People & Culture Management)—no one has to file a report alone.
- Principle: A report made in good faith will not result in any negative consequences. Transparency protects us all.

15. Training for those responsible for the Code of Conduct

We train all employees upon joining the company and conduct annual refresher courses.

16. Consequences of Violations

If we identify violations of the principles outlined in the Code of Conduct, this can damage the reputation and competitiveness of our company and result in consequences for the individual under employment law.