



# Code of Conduct for Our Suppliers

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## Our Core Values

we are  
**partners**

we are  
**flexible**

we are  
**proactive**

we are  
**competent**

we are  
**reliable**



At Bacher Systems, people are at the heart of everything we do. We are committed to socially responsible corporate governance in compliance with all relevant laws and environmental standards. We also expect our employees—who all assume responsibility for our company within the scope of their roles (i.e., co-responsible parties)—to adhere to applicable laws and, beyond that, to act in a socially, ethically, and environmentally responsible manner.

We expect our suppliers to likewise commit to the values of social, environmental, and ethical conduct, and we reject business partners who contradict these values.

We have set forth our expectations for our co-responsible parties in our Code of Conduct. In this document, we have extended these expectations to our suppliers.

For our future collaboration, we agree to this joint Code of Conduct for Suppliers. The supplier undertakes to comply with the principles and requirements of this Code of Conduct and to endeavor to contractually oblige its subcontractors to comply with the requirements set forth in this document.



Elisabeth Müller, Lead Compliance



Elvira Cejna, Managing Director

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

### If in doubt, ask yourself the following questions

- Is my behavior lawful?
- Does my behavior maintain the trust of all 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 with my behavior being reported in the media?

## **Social Responsibility**

### **Equality and Fair Compensation**

The supplier creates conditions that are independent of gender, ethnic origin, age, disability, religious beliefs, and sexual orientation and that respect the personal dignity, privacy, and personal rights of every individual .

The supplier compensates regular working hours and overtime with a wage that meets the national statutory minimum wage or the minimum standards customary in the industry. Employees must be granted all benefits required by law. Wage deductions as punitive measures are not permitted.

### **Prohibition of Child Labor and Forced Labor**

Child labor must not be used at any stage of production. The age of a worker must not be lower than the age at which compulsory schooling ends under the law of the place of employment and, in any case, must not be under 15 years of age.

The supplier rejects any form of exploitation, such as forced labor or slave labor. All work performed must be voluntary and carried out without the threat of punishment. All employees must be able to terminate their employment or work relationship at any time.

### **Fair Working Hours and Workplace Safety**

The supplier ensures that working hours comply with applicable laws or industry standards. Overtime is permitted only if performed on a voluntary basis.

The supplier ensures a safe and healthy work environment to protect all employees. Appropriate occupational safety systems and preventive measures against accidents and health hazards are in place. Furthermore, employees are regularly informed and trained on applicable health and safety measures.

### **Freedom of Association**

The supplier respects the right of employees to form organizations of their choice, to join them, and to engage in collective bargaining or strike. Employees must not be discriminated against on the basis of forming, joining, or being a member of such an organization.

### **Preservation of Natural Resources**

The supplier respects legitimate rights to land, forests, or water bodies whose use ensures people's livelihoods. The supplier refrains from causing harmful soil changes, water and air pollution, noise emissions, and excessive water consumption in such areas if this harms people's health, significantly impairs the natural resources necessary for food production, or prevents people's access to safe drinking water or sanitation facilities.

### **Handling of Conflict Minerals**

If the supplier uses conflict minerals such as tin, tungsten, tantalum, and gold, as well as other raw materials such as cobalt, it shall establish processes in accordance with the guidelines of the Organization for Economic Cooperation and Development (OECD) to fulfill its due diligence obligations and promote responsible supply chains for minerals from conflict-affected and high-risk areas.

## **Environmental Responsibility**

### **Energy Consumption and Efficiency**

To improve energy efficiency, the supplier monitors and documents its energy consumption. It implements appropriate measures to improve energy efficiency and minimize energy consumption.

### **Management of Waste and Hazardous Substances**

The supplier follows a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste. Hazardous substances that pose a risk if released into the environment are transported, stored, used, reused, disposed of, or recycled in accordance with legal requirements.

### **Reducing the consumption of raw materials and natural resources**

The supplier implements appropriate measures to reduce or avoid the use and consumption of resources during production and the generation of waste of any kind, including water and energy.

### **Emissions**

The supplier complies with all legal requirements regarding its emissions (air and noise emissions) and is required to find cost-effective solutions to minimize its emissions.

## **Ethical Conduct and Compliance**

### **Confidentiality/Data Protection/IT Security**

The supplier undertakes to exercise particular care when processing personal data—whether internal or external—and to comply with applicable laws and the principles of the European Union’s General Data Protection Regulation (GDPR). If the supplier acts as a data processor for Bacher Systems, the business partners shall enter into a data processing agreement in accordance with Article 28 of the GDPR.

The supplier shall respect all intellectual property rights; technology and know-how transfers must be conducted in such a way that intellectual property rights and customer information are protected. Furthermore, the supplier must ensure the security of the data entrusted to it by implementing appropriate technical and organizational measures. If a supplier becomes the victim of a cyberattack, it shall immediately inform Bacher Systems if data belonging to Bacher Systems EDV GmbH could be affected.

### **Disclose Conflicts of Interest**

The supplier shall voluntarily and immediately inform Bacher Systems of any private or family relationships between employees of its company and employees of Bacher Systems.

### **Zero tolerance for bribery and corruption**

The supplier prohibits all forms of bribery, corruption, extortion, and embezzlement and upholds the highest standards of integrity in all business activities.

### **Fair Competition**

The supplier shall comply with all standards of fair business conduct, fair advertising, and fair competition. Furthermore, the supplier shall comply with applicable antitrust laws, which prohibit agreements and other activities with competitors that influence prices or terms.

### **Complaint Procedures**

The supplier has established an effective complaint system for all stakeholders who may be affected by negative impacts. Reports must be treated confidentially to the extent possible, and whistleblowers must be protected from retaliation. For reports concerning Bacher Systems EDV GmbH, the whistleblower system at <https://bacher.integrityline.com/> may be used.

### **Inspections and Audits**

Bacher Systems will verify the implementation of the requirements defined herein at regular intervals, either through a supplier self-assessment or through on-site audits at the supplier's premises. Should a deviation be identified, concrete corrective actions will be defined jointly, their implementation deadlines monitored, and their effectiveness verified through appropriate measures.

### **Embargoes and Sanctions**

By signing this document, the supplier confirms that no economic or financial sanctions have been imposed against them at the national, European, or international level, and that no embargoes—in any country—have been imposed against them or against individuals (employees, executives, owners) of the company.

### **Acknowledgment and Consent of the Supplier**

By signing this document, the supplier undertakes to act responsibly and to comply with the principles and requirements set forth herein. The supplier undertakes to communicate the contents of this Code to its employees, agents, and subcontractors in a form that is understandable to them, and to take all necessary measures to ensure compliance with these requirements. This agreement shall enter into force on the date of signature.

### **Consequences of Violations**

Bacher Systems expects its suppliers to comply with this Code. In the event of violations, we will take appropriate measures, including

1. Agreeing on necessary specific corrective actions, including implementation deadlines
2. Monitoring of implementation deadlines (follow-up)
3. Verifying effectiveness by obtaining and filing the relevant evidence (e.g., supplier audit)

Should this not result in satisfactory improvement, Bacher Systems reserves the right to terminate the business relationship.

Place, Date:

Signature of an authorized signatory/ Position:

Position:

Company seal