

bedra

Corporate policy and code

Our customers are at the heart of our work.

We always start by thinking of our customers' requirements and work towards a solution.

Our wire products and services increase our customers' efficiency.

We differentiate ourselves from our competitors by offering better wire products and services.

For this we need skills, structures, methods and principles:

Skills

Creativity and innovative spirit

Team spirit

Willingness to perform

Assuming responsibility

Leadership strength and leading by example

Rationality (factuality)

Desire for continuous improvement

Structures

Management system according to DIN EN ISO 9001, 14001, 50001 based on IATF 16949

Organizational structure

Business models

System orientation

Methods

PDCA cycle (Plan-Do-Check-Act)

Risk and opportunity assessment

Emergency management

Process orientation

Human resources development

Principles

Laws and regulations

Code of Conduct

Focus on quality

Environmental protection and resource conservation
Sustainability

Involvement of all parties

Positive error culture

Sharing success

Through the combination of these skills, structures, methods and principles, we have achieved a level of professional and strategic excellence that preserves the added value of our products and services and the success of the company.

STRENGTH THROUGH DIFFERENTIATION
SUCCESS THROUGH PERFORMANCE
INDEPENDENCE THROUGH PROFITABILITY

Our Corporate Policy and Code of Conduct are explained in more detail below.

bedra Corporate Policy

An intact environment is an essential prerequisite for economic success. We strive for the sustainable development of our company in harmony with our employees, suppliers, customers and other interested parties. Within this context, our Corporate Policy and our Code of Conduct are both core corporate values. They form the basis for a consistent approach to quality, for the careful consideration of risks and opportunities, and for the achievement of corporate goals.

We are continuously committed to ensuring and improving the quality of our products and services and therefore the underlying processes to meet the requirements placed on quality, the environment and energy efficiency. These requirements are shaped among others by the legislator, our customers, other stakeholders and the corporate goals.

In order to live up to this claim in the long term, we undertake to operate a management system in accordance with the international standards **DIN EN ISO 9001**, **DIN EN ISO 14001** and **DIN EN ISO 50001**, to aim to meet the requirements of **IATF 16949**, to integrate the interests of occupational safety, and to continuously develop the system further.

Over and above the required environmental protection standard, we are constantly examining further options for exceeding its requirements while maintaining our economic efficiency.

We strive to produce high quality products with the minimum resource requirements. In the process, we continuously review our energy efficiency to identify further improvement potential. We provide appropriate means to achieve the operational and strategic energy, environmental and quality targets.

As an integral part of the corporate policy, the quality policy is intended to contribute to the systematic fulfillment of the defined requirements.

Ensuring that all employees are qualified and committed, and providing the necessary resources while giving due consideration to the financial and structural preconditions, represent great challenges for a company. We work continuously to ensure that these needs and requirements are successfully met.

We expect our suppliers and contract partners to support us in complying with, implementing and developing our policy and aims.

The executive management undertakes to comply with all legal and self-imposed requirements. Furthermore, the executive management undertakes to analyze opportunities and risks on a regular basis. They plan and initiate the necessary activities for the integration of the management system, and ensure that these are implemented. Planning includes how to evaluate the effectiveness of these measures.

1. Customer orientation

The requirements of our customers are at the center of our business activities. The success of our company is measured by the quality of our products. We want to understand the current and future requirements of customers and fulfill them with innovative and optimal solutions. We endeavor to fulfill our customers' requirements at all times. This is how we will achieve market success in the long term.

2. Leadership

Our management personnel are responsible for the internal and external orientation of our company. They create the preconditions for employees to be fully committed to achieving the goals of the organization. Leadership involves target orientation, motivation, empowerment, encouragement, leading by example, target monitoring, management and accountability. This ensures the continuous further development of our company in terms of **quality**, **environmental protection**, **efficiency** and respectful use of the necessary **resources**.

3. Involving individuals

The involvement of all employees at all organizational levels is an essential prerequisite for economic success and the continuous development of the company. This requires employees at all levels to act responsibly and to actively cooperate and participate in adherence to all principles. All employees have specific qualifications for their tasks, and are supported in their further professional development. Open communication both externally and internally promotes a quality-conscious and environmentally aware approach, as well as efficient cooperation.

4. Process-oriented approach

Our **quality** and **environmental management system** is geared towards designing efficient and traceable processes. The orientation of processes to customer requirements, legal obligations and minimizing environmental impact while simultaneously conserving resources in production represents an essential basis for opera-

tional success. We promote our employees' awareness of process orientation through training and information.

5. System-oriented management approach

Recognizing, understanding, and managing interrelated processes within an overall system contributes to organizational effectiveness and efficiency.

6. Continuous improvement

The continuous improvement of processes and ultimately of the overall performance of the organization is a permanent goal of the organization. We pursue a zero-defect strategy, i.e. we systematically analyze the causes of errors and eliminate them on a sustainable basis. We stand for a positive error culture, which is based on the fact that errors occur in any development and are always the starting point for improvements. We promote approaches for the continuous improvement of our quality, environmental and energy management system

7. Fact-based approach to decision-making

Effective decisions are based on objective analysis of information and data.

8. Mutually beneficial supplier relationships

An organization and its suppliers are dependent on one another. Mutually beneficial relationships increase the added value on both sides.

9. Responsibility of management

The executive management ensures the effectiveness of the quality, environmental and **energy management system**. Unintended effects are minimized. Errors in the system are systematically investigated and replaced with effective solutions.

10. Preventive environmental protection

The environmental impact of individual decisions is recorded in the planning stage where possible, and taken into account during the overall assessment. This applies in particular to the investment, process and development planning. Avoiding waste takes priority over waste disposal. Waste that is unavoidable for technical and economic reasons is recycled where economically justifiable, and otherwise disposed of in accordance with legal regulations.

11. Continuous reduction of environmental impact

We endeavor to continuously improve operational environmental protection. We continuously review our production processes to identify potential savings in terms of waste, emissions and energy consumption. We therefore measure the success of the measures we have introduced and motivate our employees to use natural resources, waste and emissions responsibly.

12. Resources

In delivering our products and services, we strive to use the least amount of resources possible while using production processes consisting of efficient solutions. We integrate our suppliers and contract partners into this objective.

13. Conflict resources and substance bans

We pursue responsible raw material sourcing. We therefore exclude conflict resources affected by embargoes or other import restrictions. We meet the requirements of numerous substance bans, such as REACH-SVHC and RoHS.

14. Laws and regulations

All official requirements, laws and regulations as well as binding obligations must always be complied with. We base all measures, as a minimum, on state-of-the-art technology.

15. Reducing energy consumption

We are reducing our energy consumption in the long term, use energy sparingly, and are increasing our energy efficiency through a continuous improvement process. We include resource efficiency here.

16. Principles of conduct

Our corporate principles are set out in a separate document (bedra code).

bedra code: Code of Conduct, anti-corruption and ethical escalation policy

This code defines principles of conduct and requirements for our employees, customers and suppliers with regard to their responsibility for people and the environment, and their compliance with the laws of the respectively applicable jurisdiction. It applies to all locations of the company.

All employees and managers bear responsibility in implementing customer requirements and corporate objectives:

- in interactions with suppliers and customers
- in relation to the environment
- in relation to our locations and their respective communities and regions
- in relation to our society
- in relation to public authorities and volunteers (e.g. volunteer fire department)
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- with regard to the effect on the company's image

Everyone is called upon to live up to this responsibility, including acting as a role model (as a representative of the company externally and as a superior and colleague internally).

The following corporate principles should serve as guidelines here:

1. Prohibition of corruption, bribery and child labor

We do not tolerate any form of corruption or bribery. We reject any granting and acceptance of benefits with the purpose of gaining an unlawful advantage. Our employees are encouraged to decline any promotional gifts or other forms of favoritism.

We do not tolerate forced or child labor. No person will be hired who cannot demonstrate a minimum age of 15 years or the minimum age applicable in the relevant country.

2. Respect for the fundamental rights of employees

We promote equal opportunities and equal treatment of our employees, regardless of their skin color, race, nationality, social origin, any disability, sexual orientation, political or religious conviction, or gender or age.

The personal dignity, privacy and personal rights of each individual must be respected.

Any form of physical and psychological punishment such as sexual and personal harassment or discrimination is prohibited.

No employee must be employed against their will or forced to work.

We do not tolerate behavior (including gesture, language, and physical contact) that is intended to be sexually coercive or otherwise abusive.

We ensure appropriate pay and guarantee the legally established national minimum wage.

In addition, we comply with the maximum working hours stipulated by law in the respective state.

We respect employees' freedom of association to the extent permitted by law. Members of employee organizations or unions shall be neither treated preferentially nor discriminated against.

3. Health and safety of employees and customers

It is our responsibility to care for the health and safety of employees and visitors at our sites.

Risks must be contained and the greatest possible precautions taken against accidents and occupational illnesses.

We promote continuing education through training measures and ensure that all employees have sufficient expertise in occupational safety.

Our products and services do not endanger people or the environment. Substances that pose a risk to humans and the environment or make recycling difficult are to be avoided. Hazardous substances are subject to controlled hazardous substance management.

4. Environmental protection

We comply with applicable environmental laws and strive to continuously reduce waste and emissions and improve energy efficiency.

5. Data privacy

We comply with the requirements of the General Data Protection Regulation (GDPR). We respect and protect everyone's privacy.

6. Supply chain

We comply with applicable trade laws and import and export restrictions and controls. We are required to exert appropriate influence on our suppliers' compliance with this Code of Conduct and to use it as an essential factor in the selection of suppliers.

7. Corporate loyalty

We are responsible for representing our own company convincingly both internally and externally and for promoting the company's image through our own actions and conduct.

8. Confidentiality

We protect the Company's intellectual property and respect the intellectual property of others. Each employee is obligated to treat confidential information entrusted to them as trade secrets, regardless of its nature and content, and to keep it secret from third parties. The duty of confidentiality does not extend to knowledge that is publicly available and the disclosure of which clearly does not disadvantage the employer. If in doubt, however, any technical, commercial or personnel-related processes and circumstances that become known to the employee in connection with their work must be treated as business secrets.

9. Fair competition

We comply with national and international laws to maintain fair competition. These include antitrust laws and unfair competition provisions.

10. Escalation policy

Violations of these principles must be reported to the line manager, the human resources department, or the local works council. Confidentiality, anonymity and the protection of whistleblowers must be ensured.

The undermining of corporate principles or engagement in illegal activities can result in remedial or disciplinary action, up to and including termination of employment.

If the principles are not complied with by a business partner, termination of the business relationship should be expected.

Berkenhoff GmbH
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