





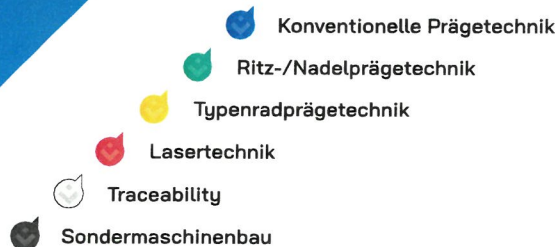


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-  Konventionelle Prägetechnik
  -  Ritz-/Nadelprägetechnik
  -  Typenradprägetechnik
  -  Lasertechnik
  -  Traceability
  -  Sondermaschinenbau



# Code of Conduct

## of BORRIES Markier-Systeme GmbH



## Preface

Ladies and gentlemen,

Our mission statement describes which values we share and how we want to work together – today and in the future. It provides us with a clear picture of the goal to be achieved in order to secure our corporate success in the long term.

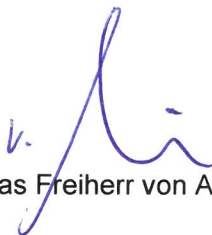
Starting from the central idea "WE are Borries", we can only achieve this goal together. Especially our values – such as personal responsibility, openness and transparency as well as ethically correct conduct in compliance with the law – play an important role here.

For the first time, this Code of Conduct brings together our important basic rules and principles in one document, which are already binding for us today and in the future. It provides a framework for orientation and applies equally to all of us – for managers and for each individual employee.

It sets a standard for ourselves and, at the same time, it's a promise to the outside world for responsible conduct towards business partners and the public as well as in dealing with one another inside the company.

Together, we are responsible for the reputation of our company. The inappropriate behaviour of individuals can cause enormous damage to all of us.

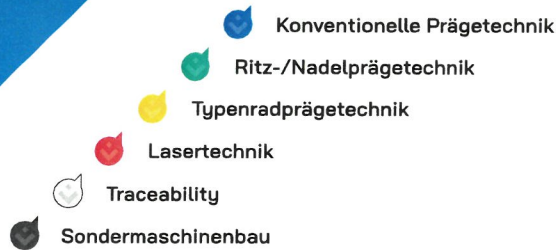
Therefore, ladies and gentlemen, we would ask you to carefully read through this Code of Conduct and to use it together with us as a guideline for our daily conduct.



Tobias Freiherr von Arnim



Hartmut Geier



## Preamble

The employees of Borries Markier-Systeme GmbH have developed a mission statement together. The mission statement expresses what our company stands for today and in the future:

***We are Borries – a technology company with high core competence.***

Competence and diversity, global networking and tradition are the basis of our performance and make us a leader in our markets. We create added value for customers, employees and owners.

***We will solve the challenges of the future together with our customers.***

The requirements of our customers determine our thinking and actions. We are breaking new ground and developing innovative products and services for sustainable infrastructure and resource efficiency.

***We all set ourselves the highest standards.***

We are entrepreneurial, confident, courageous and performance-oriented – with the aim of being the best. The commitment and skills of each individual are the basis for this. The development of our employees is particularly important to us. Health and safety at work have the highest priority.

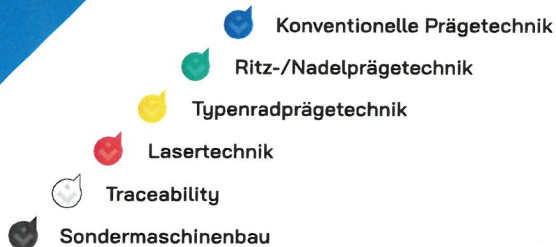
***We live common values.***

We act in the overall interest of the company. Openness and mutual appreciation characterise our togetherness. We build on strong values: Reliability and honesty, credibility and integrity. Compliance is a matter of course for us. We take responsibility for society. The responsibility for society expressed in the mission statement also includes active commitment to sustainable development.

We are also committed to the United Nations Universal Declaration of Human Rights. Specific rules and regulations for individual situations and issues in the professional environment are clearly formulated in the relevant guidelines and agreements. These are valid and binding for all employees of Borries.

Any of our employees who do not act in accordance with company guidelines and agreements must expect appropriate consequences within the framework of company and statutory regulations. Based on this, this Code of Conduct summarises the essential principles and rules for our actions and also sets out our expectations of our business partners and owners.





## Behaviour in the business environment

### ***Compliance with laws and regulations***

The observance of laws and regulations is an essential basic principle of economically responsible action for us. We observe the applicable legal prohibitions and obligations at all times, even if they are associated with short-term economic disadvantages or difficulties for the company or individual persons. If national laws have restrictive regulations than those applicable to Borries, national law takes precedence.

### ***Avoidance of conflicts of interest***

At Borries, business decisions are made in the best interests of the company only. Conflicts of interest with private interests or other economic or other activities – including those of relatives or other related persons or organisations – should be avoided from the outset. Nevertheless, if they do occur, they must be resolved in compliance with the laws and regulations as well as the applicable company guidelines. This requires transparent disclosure of the conflict.

### ***Fair competition***

The guidelines/compliance commitment issued by the management is the requirement for our actions in competition: Borries stands for technological competence, innovation, customer orientation and motivated, responsible employees. This is the basis of our high reputation and the sustained economic success of our company in global competition. Corruption and antitrust violations threaten these guarantees of success and are not tolerated (zero tolerance). Bribes and antitrust agreements are no means for us to win a contract. We would rather refrain from doing business and achieving internal goals than violating our guidelines and laws. With our compliance program, Borries has taken far-reaching measures to ensure compliance with corruption and antitrust regulations and the guidelines based on them.

Violations will not be tolerated and will result in sanctions against the persons concerned. The directors, all senior executives and all other employees must be aware of the extraordinary risks that a corruption or antitrust case can pose to Borries, but also to them personally. Every employee is encouraged to play an active role in the implementation of the Borries Compliance Program in his or her area of responsibility.



## Behaviour towards colleagues and employees

### ***Equal treatment and non-discrimination***

A culture of equal opportunity, mutual trust and respect is very important to us. We promote equal opportunity and prevent discrimination in the recruitment of employees and in the promotion or provision of education and training.

We treat all employees equally, regardless of gender, age, skin colour, culture, ethnic origin, sexual identity, disability, religion or belief.

### ***Human rights and workers' rights***

We respect internationally recognised human rights and support their observance. We strictly reject all forms of forced and child labour. We recognise the right of all employees to establish employee representatives on a democratic basis within the framework of national regulations.

The right to appropriate remuneration is recognised for all employees. Remuneration and other services comply with the respective national and local legal standards at least, or the level of national economic sectors/industries and regions.

### ***Occupational health and safety***

The safety and health of our employees is an equally high corporate goal alongside the quality of our products and economic success. Occupational safety and health protection are an integral part of all operational processes and are included in technical, economic and social considerations from the start – right from the planning phase. All of our employees promote safety and health protection in their working environment and comply with occupational health and safety regulations. Every manager is obliged to instruct and support his employees in fulfilling this responsibility. Employees of subcontractors on behalf of Borries are subject to the same safety standards as our employees. This is taken into account in the selection and cooperation processes.





## Behaviour within society

### ***Sustainable environmental and climate protection***

Sustainable environmental and climate protection as well as resource efficiency are important corporate goals for us. Both in the development of new products and services and in the operation of production facilities, we make sure that all environmental and climate impacts are kept as low as possible and that our products make a positive contribution to environmental and climate protection at our customers. Each employee has a responsibility to treat natural resources sparingly and to contribute to the protection of the environment and climate through his or her individual behaviour.

### ***Donations***

We see ourselves as an active member of society and are therefore involved in various ways. We make donations and other forms of social commitment solely in the interests of the company. We do not make financial contributions, in particular donations and sponsorship measures, to political parties at home or abroad, party-related or similar organisations, individual mandate holders or candidates for political office.

### ***Political representation of interests***

We do not represent any political interest. We comply with the legal requirements for lobbying and avoid any unfair influence on politics and legislation in all circumstances. We observe the EU Code of Conduct.

### ***Public appearance and communication***

We respect the right to freedom of expression and the protection of personal rights and privacy. All employees should be aware that they can also be perceived as part of and representative of Borries in their private lives and are therefore also called upon to maintain the image and reputation of the company through their conduct and appearance in public, especially vis-à-vis the media. When expressing private opinions, we take care not to place the respective function or activity at Borries in connection with the private statement.



## Handling of information

### ***Reporting***

Borries builds on strong values: Reliability and honesty, credibility and integrity. This means we attach great importance to open and truthful reporting and communication of the company's business processes to investors, employees, customers, business partners, the public in general and government institutions.

Each employee ensures that both internal and external reports, records and other documents of the company are in accordance with the applicable legal rules and standards and are therefore always complete and correct as well as timely and system-compliant.

### ***Confidential company information/Insider information***

We take the necessary steps to protect confidential information and business documents in an appropriate manner from access and viewing by colleagues who are not involved and other third parties.

### ***Data protection and information security***

The protection of personal data – especially of employees, customers and suppliers – is of particular importance to Borries. We collect or process personal data only if this is absolutely necessary for fulfilling the respective work task and/or legally ordered. No personal data may be collected or processed without the consent of the data subject or without legal admissibility.

## Protection of company property

We use the property and resources of the company appropriately and sparingly and protect them from loss, theft or misuse. The intellectual property of our company represents a competitive advantage for Borries – and thus an asset worth protecting – which we defend against any unauthorised access by third parties. We use tangible and intangible property of the company exclusively for corporate purposes and not for personal purposes, unless expressly permitted.

Together with their superiors, our employees are responsible for ensuring that the type and scope of business trips are always appropriate for the respective purpose of the trip and are planned and carried out economically, taking into account time and cost aspects.