

A photograph of two business professionals in a meeting. On the left, a man with a beard, wearing a light grey suit jacket, a dark red vest, and a patterned tie, is smiling and looking towards the right. On the right, a woman with dark curly hair, wearing a teal blazer over a dark top, is also smiling and looking towards the left. They are seated at a table with a laptop, a coffee cup, and some papers. The background is a bright window with a view of trees. There are large, semi-transparent circular overlays in orange and teal colors on the right side of the image.

# Code of **Conduct**

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**Calvin Grieder**  
Chairman of the Board Böhler Group



**Stefan Scheiber**  
Chief Executive Officer Böhler Group

## Code of Conduct.

As a globally operating Swiss family enterprise, Böhler is notably committed to sustainability. Our vision is “Innovations for a better world,” and with our business, we contribute to worldwide nutrition and climate-friendly mobility.

In this context, our Code of Conduct sets out the important guidelines for our performance and behavior in the relationships with our customers, employees, suppliers, business partners, governments and other stakeholders. We set our internal standards in order to fully respect and obey local laws and rules as well as recognized international standards.

The Code of Conduct is binding upon all Böhler employees worldwide without exception, and establishes a non-negotiable standard of behavior. Every employee is required to comply with it, irrespective of national boundaries and cultural diversity. Together we bear the responsibility for preserving the reputation of our company.

We are committed to living by these principles with dedication and passion in everything we do, day in, day out – only then will we win trust, recognition, and respect.

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## Business partnerships.

### Customers

Customers are at the center of our business. We treat all our customers with respect. We promise to “Engineer Customer Success” and to follow this aim with passion. We strive to achieve these benefits sustainably and in a fair way for both parties.

### Product quality and safety

We are committed to delivering products and services that satisfy the requirements of quality, operator safety, and food safety and fulfill the applicable international standards. We promise to continuously optimize our products in these respects through technology innovation and improvements in our production processes.

### Suppliers

We select our suppliers with care and ask our suppliers and their sub-tier suppliers to respect and adhere to this Code and our Supplier Code of Conduct worldwide.

### Integrity

Bribery and corruption are strictly prohibited. We neither accept nor offer any form of gifts or services that are illegal.

### Confidentiality

We value and protect our confidential information and respect the confidential information of our business partners. Only “need-to-know” data shall be exchanged and non-relevant data shall be refused.

## External regulations and communications.

### Compliance with laws and regulations

Bühler and its employees must comply with laws and regulations on an international and national level as well as with internal directives. Every employee is personally accountable for legal compliance.

### Competition and anti-trust laws

Bühler is committed to a fair and competitive market system. All applicable provisions of competition and anti-trust laws shall be complied with.

### Communications

Our communications are open and transparent and provide the basis for constructive collaboration. Their goal is to strengthen trust and promote mutual understanding.



## Employees.

### Equal rights and fair treatment

Bühler is a global technology group. The cultural diversity of our workforce is one of our greatest strengths. We respect the rights and dignity of all employees and are committed to creating a work atmosphere that is characterized by mutual trust, respect, and is free from harassment, particularly concerning race, age, gender, nationality and religion. We recruit, employ and promote employees on the sole consideration of their qualifications and abilities needed for their performance.

### Child labor

We are against any form of exploitation of children and do not provide employment to children below the minimum age agreed in the international standards.

### Forced labor

We reject forced labor of any kind and respect the principle of freely chosen employment.

### Data privacy and confidentiality

Personal and legal entity related data are treated with care. Personal information about employees is only gathered and retained if required for effective business purposes or if it is required to comply with legal regulations.

### Conflicts of interest

All employees must avoid situations in which their private interests are in conflict or could come into conflict with the interests of Bühler. In case of a potential conflict, employees shall inform their line manager or the Regional Compliance Officer. If a conflict arises, Bühler will resolve the situation in a responsible manner.

## Health, safety and environmental protection.

### Health and safety

Bühler aims at offering all employees a safe and healthy state-of-the-art working environment. While we are already among the leaders in safety and health in our industry, our aim is to strive for true excellence, with the ultimate goal of zero injuries and work-related illnesses. All employees shall strictly observe safety regulations established for their working location. This also applies to third-party staff employed at Bühler sites.

### Environmental protection

We conduct our operations according to the recognized international environmental standards, by taking into consideration the efficient use of resources and materials, the minimization of adverse environmental impact and the responsible disposal of residual waste. As part of our commitment to sustainable development, we proactively develop and apply new, environmentally friendly technologies and processes.

## Assets, intellectual property and financial integrity.

### Assets

We treat the property of Bühler with care and protect it against loss, damage, misappropriation and destruction. This obligation covers both tangible and intangible assets.

We all take appropriate action to avoid and minimize risks: Our in-house Corporate Risk Management function regularly reviews the existing risks and reports them to the Board of Directors at least annually.

### Intellectual property

The innovation power of our organization offers us a substantial competitive advantage and we foster an open environment of innovation in research, development, application and creation.

The safeguarding of our intellectual property is, therefore, crucial. We handle confidential information with care and refrain from forwarding it to any unauthorized persons either inside or outside our organization.

### Financial integrity

Our reporting provides the basis for our management to make decisions and to fulfill our obligations toward different stakeholders. The data that we create, whether of a financial or any other nature, must provide an accurate picture of its related business and be in line with the applicable accounting standards.

## Implementation and monitoring.

Managers on every level are charged with implementing the Code of Conduct within their area of responsibility. They will induce and monitor regular training sessions throughout the Bühler Group. The Internal Audit function will check compliance and regularly report to the Board of Directors as the final authority.

### Violation of the Code of Conduct

The Code of Conduct is binding upon all Bühler employees, regardless of their specific function and their location worldwide.

Any infringements will be prosecuted. It is the responsibility of every employee to comply with the Code of Conduct. Violations are subject to disciplinary actions.

### Reporting of violations

Anything that may infringe the rules set out in the Code of Conduct must be reported to the Compliance Board.

No employee who reports such an observation will be subjected to sanctions, discrimination and/or retaliation by Bühler Group or its employees, the Executive Board or supervisors.

The members of the Compliance Board will treat the identity of employees and others who disclose the known or presumed violations as confidential and only disclose such information as necessary to the investigation body. If Bühler is obliged to disclose the name of the reporting employee to a court or investigator, confidentiality may not be upheld.

Please contact your line manager or a member of the Compliance Board in case of uncertainty. The contact data for the Compliance Board members can be found in the compliance sections of the Bühler website. The Compliance Board can be contacted by email under

[complianceboard@buhlergroup.com](mailto:complianceboard@buhlergroup.com).

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