

Behringer GmbH

Code of Conduct

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1. Foreword

This Code of Conduct contains a set of standards and principles of behaviour. In implementing our corporate mission statement, it additionally serves as a guide for employees when making decisions in their daily work. Corporate responsibility and integrity are integral parts of our corporate culture. It is our aspiration to be successful in business in compliance with all internal and external rules. The principles laid down in this Code of Conduct are binding for every employee of Behringer GmbH.

Kirchardt, dated 05.30.2023



Christian Behringer
Managing Director



Andreas Behringer
Managing Director



Thomas Großkopf
Managing Director

2. Basic understanding

This Code of Conduct is based on a common basic understanding of socially responsible corporate management in the sense of the following guidelines. We, Behringer GmbH, assume responsibility within the framework of our respective possibilities and scope for action by taking into account the consequences of our entrepreneurial decisions and actions in legal, economic, technological as well as social and ecological terms.

Our actions are in accordance with the relevant legal regulations. We are guided by ethical values and principles, in particular integrity and probity as well as respect for human dignity. This Code of Conduct sets out the basic principles of our actions, the observance of which we actively demand from all employees in all parts of the company. We expect the same basic understanding from our business partners. Rights in favour of third parties are not to be established thereby.

3. Compliance with the law

Compliance with the applicable laws and other legal provisions of the countries in which we operate as a company is mandatory. If local laws and regulations are less restrictive, our actions are guided by the principles of this Code of Conduct. In cases where there is a direct conflict between mandatory local law and the principles contained in this Code of Conduct, local law shall prevail. However, we will endeavour to comply with the contents of this Code of Conduct.

4. Integrity and Compliance

4.1 Corruption

We do not tolerate corruption, bribery or extortion. They prevent fair conditions of competition. Benefits that are connected with the intention or could give the appearance of influencing business decisions or procuring any other improper advantage are neither promised, offered, granted, demanded or accepted in our business relationships, nor do we allow ourselves to be promised such benefits. A particularly strict standard must be applied in dealings with persons to whom special criminal and liability regulations apply (e.g. public officials).

4.2 Fair competition

We act in accordance with national and international competition and antitrust law and do not participate in price fixing, market sharing or customer, market or bid rigging.

4.3 Prevention of money laundering

Money laundering refers to the process of smuggling illegally generated money or illegally acquired assets into the legal financial and economic cycle. We comply with our legal obligations to prevent money laundering and do not participate in transactions that serve to conceal or integrate criminal or illegally acquired assets.

4.4 Protection of information and intellectual property

We protect confidential information and respect intellectual property; technology and know-how transfers shall be made in a manner that protects intellectual property rights and customer information, trade secrets and non-public information. We comply with applicable trade secret laws and treat confidential information of our business partners accordingly.

4.5 Data protection

We process, store and protect personal data in compliance with legal regulations. Personal data is collected confidentially, only for legitimate, previously defined purposes and in a transparent manner. We only process personal data if it is protected against loss, modification and unauthorised use or disclosure by appropriate technical and organisational measures.

4.6 Export control

We undertake to comply with the legal standards relevant to export control - in particular licensing requirements, export and support prohibitions - in the context of the transfer and export of our goods.

4.7 Avoidance of conflicts of interest

We avoid internal and external conflicts of interest that could illegitimately influence business relationships. If this does not succeed, we disclose these conflicts.

5. Health and safety

The health of our employees and the preservation of the working ability of the company's employees, as well as the employees of our partners and service providers working for our company, is important to us, in that we take appropriate health and occupational safety measures in compliance with the applicable laws and in orientation towards international standards with regard to health and occupational safety.

6. Remuneration and working hours

Remuneration is based on the applicable laws as well as any existing, binding collective agreements and is supplemented by the relevant, national minimum wage laws. Employees receive clear and detailed information on the composition of their remuneration. We comply with applicable laws and (international) labour standards with regard to maximum permissible working hours and specified holiday and rest periods.

7. Respect for human rights

We respect and support the observance of internationally recognised human rights and

- respect the personal dignity, privacy and personal rights of each individual;
- protect and grant the right to freedom of opinion and expression;
- do not tolerate unacceptable treatment of employees, such as physical and psychological hardship, sexual and personal harassment, or discrimination.

We do not tolerate child labour, forced labour or comparable measures that deprive people of their freedom. We reject forms of modern slavery and human trafficking. All work must be voluntary and there must be the possibility to terminate the employment relationship.

7.1 Freedom of association

Open communication and direct interaction between employees and management are an effective way of solving problems in the workplace as well as remuneration issues. Furthermore, we act in accordance with the applicable legal framework.

7.2 Promoting Diversity and Equal Opportunities

We promote equal opportunities and do not tolerate discrimination. We treat all people equally, regardless of gender, age, skin colour, ethnic origin, sexual identity and orientation, disability, religious affiliation, ideology or other personal characteristics.

8. Environment, energy and climate protection

We act in accordance with applicable laws and follow international standards according to ISO 14001 in order to minimise negative impacts on the environment and to continuously improve our activities for environmental and climate protection. We pay attention to environmental aspects such as reducing CO2 emissions, increasing energy efficiency as well as using renewable energy, ensuring water quality and reducing water consumption, ensuring air quality, promoting resource efficiency, reducing waste and disposing of it properly, and handling hazardous substances responsibly for people and the environment, and take the necessary measures to do so. In order to keep our energy consumption and the associated CO2 emissions in line with requirements and yet low, Behringer GmbH operates an energy management system in accordance with ISO 50001.

9. Supply chain

We expect our suppliers to comply with the principles of this Code of Conduct or to apply equivalent codes of conduct. We also encourage them to enforce the contents of this Code of Conduct in their supply chains.

We reserve the right to check the application of this Code of Conduct by our suppliers systematically and on an ad hoc basis. This may take the form of questionnaires, assessments or audits. If there are still doubts regarding compliance with this Code of Conduct, the supplier will be requested to take appropriate countermeasures and to report the matter to the responsible contact in our company. If necessary, the cooperation will be terminated.

10. Implementation and enforcement

We make appropriate and reasonable efforts to continuously implement, document and apply the principles and values described in this Code of Conduct. All employees are sensitised to the contents of the Code of Conduct and trained on relevant topics as required. Violations of the Code of Conduct will not be tolerated and may lead to consequences under labour law.

10.1 Communication

We communicate openly and in a dialogue-oriented manner about the requirements of this Code of Conduct and its implementation to employees, customers, suppliers and other interest and stakeholder groups.

10.2 Complaints and indications of violations

Grievances relating to the rules of conduct described in this Code of Conduct and complaints about misconduct in the sense of these rules of conduct or about violations of applicable laws, regulations and also our own company rules can be reported by those affected via our established complaints channel.

Our complaint channel by e-mail:

E-Mail: complaints-office@behringer.net