

# Code of Conduct



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## Preamble

At BRAUNFORM, we are committed to offering our customers maximum benefit - through our expertise, the commitment of our employees and our passion for innovation and technology.

As a family-run, globally operating company, we combine entrepreneurial behavior with ethical principles, integrity and fairness in our processes. BRAUNFORM is committed to ecologically sustainable and socially responsible corporate governance and respect for human rights. We are responsible for conserving our planet's resources and preserving an intact environment for future generations.

We take responsibility for our company and the reputation of our brand. Through our behavior in accordance with these principles, we all ensure that BRAUNFORM is successful in business and enjoys an excellent reputation thanks to integrity, discipline and honesty. In this way, BRAUNFORM GmbH can safeguard jobs and also the living conditions of its employees and their families.

This Code of Conduct serves as a guideline for living our values and commitments throughout the company. **It summarizes the key principles and rules for our actions and formulates our expectations of ourselves and our business partners.**

## Scope of Application

The BRAUNFORM Code of Conduct represents the binding framework for all our employees. Our Supervisory Board, owners, management and all executives have a particular role model function to protect employees and the company. The Code of Conduct is supplemented by internal guidelines and regulations as well as contractual employment agreements. All employees are responsible for ensuring that their behavior complies with the principles of our Code of Conduct and the laws of the Federal Republic of Germany.

We do not tolerate any violations of the Code of Conduct. Anyone who violates the Code of Conduct must expect appropriate consequences, which - depending on the severity of the violation - can range from labor law measures to civil law claims for damages and criminal sanctions.

In the context of cooperation, BRAUNFORM GmbH expects its partners, in particular its suppliers and service providers, to commit to the same principles and comply with the same standards of conduct, unless they have an equivalent code of conduct.

## 1. BRAUNFORM: Social Responsibility, Human Rights, Working Conditions

### 1.1 No Discrimination

We treat people with respect and expressly safeguard human rights. BRAUNFORM acts in accordance with nationally and internationally recognized human rights as well as labor and social standards.

We stand for fair working conditions. Neither we nor our business partners or their suppliers may use forced labor, slave labor or comparable work. All work must be voluntary and without

threat of punishment. Furthermore, no direct or indirect unacceptable treatment of workers, such as psychological violence, as well as verbal, sexual, psychological and personal harassment, intimidation and humiliation may take place. BRAUNFORM does not accept, participate in or support child and forced labor, including prison labor, slavery and any other form of labor that poses a risk to adults and children. Special protective regulations for young workers must be observed.

BRAUNFORM stands for gender-sensitive equal opportunities and equal treatment in recruitment and employment.

Our employees should always feel valued and respected. We oppose discrimination and harassment of any kind, both within our own organization and with our business partners. We do not treat our employees differently unless this is justified by the requirements of the job. We do not tolerate discrimination on the basis of gender, ethnic origin, national or social origin, skin color, disability, health status, political opinion, membership in trade unions or other legitimate organizations, origin, ideology, religion, age, pregnancy or sexual orientation. All employees are expected to treat and work with each other respectfully.

Even in the event of disciplinary measures, all company employees must be treated with dignity and respect. These measures may only be taken in accordance with applicable national and international standards and internationally recognized human rights.

## **1.2 Mobbing**

BRAUNFORM pursues a zero-tolerance policy towards mobbing. We are an attractive employer and offer a welcoming work environment. We treat all employees, customers, business partners and other stakeholders fairly and with dignity and respect at all times.

Mobbing can appear in many different forms and creates an intimidating, humiliating or offensive working environment. We are all responsible for avoiding actions or behaviours that are or could be interpreted as mobbing. For this reason, we take all mobbing incidents very seriously and encourage our employees to report any incident to their manager, the HR department or the Employees' Council.

## **1.3 Remuneration**

We remunerate our employees fairly and competitively.

Employees are paid fair wages that are at least equal to the minimum wage in accordance with applicable laws.

We also expect our business partners to pay regular and overtime wages in line with the national legal minimum wage or the industry minimum standards. Employees must be granted all legally specified benefits.

## **1.4 Health and Safety**

We ensure a safe and healthy working environment and expect the same from our business partners. By establishing and applying appropriate occupational safety systems, we take the necessary precautions against accidents and damage to health that may arise in connection with our work. All employees are obliged to report violations of these guidelines to their manager immediately. Any irregularities must be remedied immediately.

### **1.5 Right of association / right to collective bargaining**

We respect the rights of employees to form and join organizations of their choice and to engage in collective negotiations within the framework of the relevant legislation and expect the same from our business partners. Employees must be protected against discrimination when they are involved in such organizations.

### **1.6 Protection and Proper Use of Company Assets**

We respect the property of the company and the property of third parties such as our customers and business partners. For this reason, we treat all property with care. It should be noted that the protection of property refers not only to material assets, but also to intellectual property such as copyrights and trade secrets, which we also use in accordance with applicable law and within the scope of permitted use. In principle, we only use the company's property for business purposes.

## **2. BRAUNFORM: Environment and Sustainability**

We develop and produce injection molds with which our customers manufacture their final products and for which - according to the current state of the art - plastic as a raw material has no alternative or is more resource-efficient than the possible alternative. Our goal is to continuously reduce our CO2 footprint in order to preserve an intact environment for present and future generations. Compliance with the relevant legal regulations is self-evident for us. In addition, we are actively developing our corporate policy in the area of the environment. We attach great importance to the optimal use of raw materials as well as energy-, water-saving, low-emission and low-waste production techniques.

We expect our business partners to comply with the laws and regulations applicable in their country as well as with valid international standards. Our business partners should have systems in place to prevent environmental damage. We also expect our business partners to pursue a corporate policy that conserves resources and saves energy as much as possible.

## **3. BRAUNFORM and External Partners**

### **3.1 No corruption and fair competition**

BRAUNFORM stands against all forms of bribery, fraud and corruption. This also applies to accepting or granting advantages or money laundering. No employee may demand, accept, offer or grant personal advantages in connection with their professional activities. Our employees may not accept or receive gifts from business partners or other third parties if this constitutes or could be construed as inappropriate influence on business decisions. In case of doubt, the manager or the management must be consulted. We also respect the corresponding regulations in countries in which our business partners are based. BRAUNFORM investigates any suspicion of corruption and bribery and takes disciplinary and other appropriate measures.

We expect our business partners to prohibit such behavior in a comparable manner and in particular to comply with local regulations.

### **3.2 Dealing with conflicts of interest**

It is of great importance to avoid and disclose potential or actual conflicts of interest. Personal or financial interests must never influence business decisions. Conflicts of interest can arise through personal relationships with business partners, financial interests in competitors or customers and, for example, sideline jobs. Employees are obliged to disclose potential or actual conflicts of interest immediately. The manager or management will take appropriate measures to ensure that the integrity of business decisions is maintained.

### **3.3 Compliance with Antitrust Rules**

Braunform complies with the rules of fair competition and expects the same from its business partners. The applicable national, European and, where applicable, international antitrust regulations must be observed. Agreements with competitors concerning prices or other conditions are strictly prohibited. Furthermore, agreements or arrangements between customers and suppliers that restrict customers in their freedom to determine their own prices and other conditions for resale must be refrained from within the framework of legal requirements.

### **3.4 Supply Chain Act**

As a medium-sized company, we are not directly subject to the Supply Chain Duty of Care Act. However, we support the basic values expressed therein. In particular, we support our customers in implementing the resulting obligations for them and expect the same from our suppliers.

## **4. Data Protection**

BRAUNFORM is committed to treating personal data confidentially and to collecting, processing, and storing it exclusively in accordance with applicable data protection regulations. Insofar as the company provides access to and use of electronic media for business purposes, such electronic media may not be used for purposes that conflict with laws, regulations, directives, guidelines, or other provisions of the company. We expect our business partners to comply in the same way with the legal requirements and to actively support us in complying with the regulations that apply to us, especially if they are subject to other regulations, for example in other countries.

## **5. Whistleblowing**

BRAUNFORM has a reporting system in accordance with the Whistleblower Protection Act, which enables employees and partners to report information they have obtained about possible violations of the law within the company. Whistleblowers enjoy the protection provided by law. We expect our business partners to guarantee comparable protection for whistleblowers in accordance with the applicable legislation.

## **6. Compliance, Control and Misconduct**

The Code of Conduct is available in the HR department and can be viewed or requested there. New employees are made familiar with our values and principles when they join the company and confirm that they have read and understood the Code of Conduct. The digital version of the Code of Conduct is available on our website [www.braunform.com](http://www.braunform.com) and on our intranet. We

expect all employees to comply with legal requirements and internal regulations. All references to persons, unless already explicitly stated, always refer to women and men equally. All reported suspected cases and potential violations of the Code of Conduct are taken seriously and treated confidentially and anonymously if requested. The facts are investigated objectively and with due diligence. In the event of violations, the necessary corrective and/or disciplinary measures will be initiated.

Compliance with and the effectiveness of our guidelines and measures is ensured by an annual review of the KPIs by the HR and sustainability department. This involves collecting and evaluating key figures on reported incidents, training and sensitivity programs carried out as well as checking understanding of and access to our reporting systems.

## **7. Contact Person**

In the event of uncertainty in the application of these rules, non-compliance or complaints, every employee can contact either their direct manager or the HR department. The management is responsible for taking any further measures.

If violations of the Code of Conduct become known, every employee is obliged to inform their manager or the HR department immediately.

Bahlingen dated 28.02.2025

Pamela Braun  
Managing Director

Emmanuel Foyer  
General Manager

Joachim Stiller  
General Manager

Christian Ganter  
Works Council Chairman