

CODE OF CONDUCT

for suppliers and business partners
of botek Präzisionsbohrtechnik GmbH



Preamble

botek Präzisionsbohrtechnik GmbH (hereinafter "botek") is committed to ecologically and socially responsible corporate governance. We also expect our suppliers, service providers and other interested parties, as well as their employees, to act responsibly and to adhere to the principles listed below in this code of conduct. We also expect our employees to observe the principles of ecological, social and ethical conduct and to integrate them into our corporate culture. Furthermore, we strive to continuously optimize our business activities and our products in terms of sustainability and ask our suppliers to contribute to this in terms of a holistic approach.

The content of the principles contained herein reflects the minimum requirements that we expect from our suppliers and business partners. Open, honest and ethical behavior is taken for granted.

This Code of Conduct (hereinafter referred to as "CoC") applies in its current version to all suppliers and business partners of botek.

If the suppliers and business partners commission third parties (e.g. subcontractors or agents) within the scope of their business relations with botek, these third parties /participants in the supply chain shall also be bound to the contents of this CoC within the scope of commercially reasonable efforts.

The Code of Conduct is based on national laws and regulations as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on Children's Rights and Business Conduct, the United Nations Guiding Principles on Business and Human Rights, the International Labor Standards of the International Labor Organization, and the United Nations Global Compact.

1. Corporate responsibility

The entrepreneurial responsibility results in the obligation to comply with the law and all applicable (national and international) laws as well as applicable official requirements. In this context, those regulations are to be applied which impose the strictest requirements. botek expects suppliers and business partners to comply in particular with the basic principles listed below.

1.1 Respect for and protection of human rights

The suppliers and business partners of botek respect and protect the globally applicable regulations for the protection of human rights as fundamental and generally applicable requirements. This includes in particular that botek's suppliers and business partners do not use forced labor, slavery or child labor.

1.2 Prohibition of any discrimination

Suppliers and business partners of botek commit themselves to refrain from any discrimination in hiring and employment. In particular, any differentiation, exclusion or preference on the basis of ethnic, national or social origin, skin color, gender, religion, ideology, age, disability, sexual orientation or political views is prohibited.

1.3 Respect for the freedom of association

Suppliers and business partners respect the freedom of association and the right to form interest groups. They grant their employees the right to safeguard their interests on the basis of national legislation.

1.4 Product safety

Suppliers and business partners commit to comply with all applicable product safety regulations and specifications, in particular the legal requirements regarding safety, labeling and packaging of products as well as the use of hazardous substances and materials.

1.5 Ensuring adequate remuneration and fair working hours

The suppliers and business partners of botek guarantee an adequate remuneration of their employees, which at the very least corresponds to the legally valid and to be guaranteed minimum. If there are no legal or collectively agreed regulations, the remuneration is based on the industry-specific, local collectively agreed local remuneration and benefits, which ensure an adequate standard of living for the employees and their families.

Working hours shall at the very least comply with the respective legal requirements in the country in which the supplier or business partner produces or provides its services.

1.6 Ensuring occupational safety and health protection

The suppliers and business partners of botek shall respect and comply with the applicable legal requirements for health and safety at work in the country in which the supplier or business partner produces or provides its services. They shall support the improvement of working conditions, ensure a safe and healthy working environment and provide a hygienic working place.

In order to be able to identify, assess and prevent potential hazards to the health and safety of employees, suppliers and business partners take necessary, appropriate and verifiable measures and/or implement appropriate systems. They ensure that employees are regularly informed and trained about applicable health and safety standards and safety measures.

2. Ecological responsibility

2.1 Compliance with legal requirements

Suppliers and business partners take responsibility in environmental protection issues and comply with all legal requirements.

2.2 Climate protection

botek's suppliers and business partners use natural resources wisely and avoid unnecessary environmental pollution in their production processes. They contribute to the reduction of CO₂ emissions.

3. Basic principles for the mutual business relationship

botek expects openness, transparency and trust from its suppliers and business partners as well as compliance with the following basic principles:

3.1 Prohibition of corruption

Suppliers and business partners do not accept corruption. They shall ensure compliance with the respective applicable anti-corruption laws. In particular, they shall ensure that their employees, subcontractors or representatives do not grant, offer or accept bribes, improper donations, payments or benefits to customers, public officials or other third parties.

3.2 Inappropriate gifts, entertainment and invitations

The suppliers and business partners of botek shall neither directly nor indirectly offer inappropriate advantages to employees of botek or third parties in the form of gifts, hospitality or invitations for unauthorized influence. The suppliers and business partners also do not solicit or accept such inappropriate advantages.

3.3 Remuneration for consulting services

Suppliers and business partners shall only use consultants in accordance with applicable laws. In particular, they shall ensure that remuneration paid to consultants is only paid for consulting and mediation services actually rendered.

4. No unfair market behavior

botek is a fair market participant and adheres to contractual obligations. botek expects its suppliers and business partners to behave in the same way and, in particular, to comply with the following basic principles:

4.1 Ensuring free competition

The suppliers and business partners of botek shall behave fairly in competition and comply with the respective applicable legal regulations protecting free competition. In particular, they shall not enter into any agreements or concerted practices with other companies which have the purpose or effect of preventing, restricting or distorting competition in accordance with the respective applicable legal provisions in the relevant market and shall not unlawfully exploit any dominant market position.

4.2 Export control – compliance with export restrictions

botek's suppliers and business partners shall ensure compliance with all applicable laws governing the import and export of goods, services and information.

4.3 Prevention of money laundering

The suppliers and business partners of botek shall only maintain business relations with those business partners of whose integrity they are convinced. They shall ensure that the respective applicable legal provisions for the prevention of money laundering are not violated.

5. Data protection – protection of trade and business secrets

5.1 Compliance with data protection regulations

botek's suppliers and business partners comply with all applicable laws concerning the protection of personal data of employees, customers, suppliers and third parties.

5.2 Protection of trade and business secrets

The suppliers and business partners of botek shall respect the know-how, patents, trade and business secrets of botek and third parties. They shall not disclose such (confidential) information to third parties without the prior, written authorization of botek and shall not use it in any other impermissible manner or for any other purpose beyond the direct cooperation with botek.

6. Monitoring compliance with this Code of Conduct

botek reserves the right, in individual cases, to check compliance with the above principles/requirements at the supplier's or business partner's premises after prior notice and in the presence of representatives of the business partner, during regular business hours and in accordance with the respective applicable law.

7. Consequences of violations of this Code of Conduct

If violations of this Code of Conduct are detected, the supplier/business partner is obliged to inform botek immediately and to initiate appropriate countermeasures. In order to remedy the violation, botek shall grant the supplier/business partner a reasonable period of time.

In the event of non-compliance with the rules set out in this Code of Conduct by the supplier or business partner, botek reserves the right, depending on the severity of the violation and the individual case, to terminate the business relationship for good cause without notice.

8. Complaints procedure

Complaints or notifications of violations of this Code of Conduct Policy can be sent to our general Compliance Contact Point:

Compliance-officer@botek.de

At the request of the reporting party, his /her identity will be treated confidentially and anonymously. The complaint procedure may not be used to deliberately communicate false, untrue indications and information.

9. Validity of this Code of Conduct

This Code of Conduct contains all relevant regulations relating to compliance with the above principles. There are no ancillary agreements to this. Insofar as ancillary agreements weaken, relativize, circumvent or annul the obligations arising from this Code of Conduct, these ancillary agreements are invalid.

10. Recognition and implementation by the supplier and business partner also in the supply chain

The supplier undertakes to comply with and implement the above principles.

The supplier shall use commercially reasonable efforts to require its subcontractors and service providers in the supply chain to also comply with the principles of this Code of Conduct Policy and to support the implementation of these principles.

Riederich, January, 26 2021

Management of botek Präzisionsbohrtechnik GmbH



Sabine Schur



Jürgen Wenzelburger



Michael Vöhringer

Acknowledgement and agreement

By signing this document, the supplier/business partner undertakes to act responsibly and to comply with the principles / requirements listed. The supplier/business partner confirms that it effectively communicates the contents of this Code to employees, agents, subcontractors and suppliers and assures that all necessary precautions are properly implemented.

Place, Date _____

Company _____

Signature _____