

BOGE AIR. THE AIR TO WORK.



Code of conduct



Our duty and commitment

Dear sir/madam,

Our family-owned enterprise has been combining dynamic growth with the virtues of a medium-sized company since it was founded in 1907.

This code of conduct summarises the principles and values that form the basis for the way we do business around the world. They affirm our commitment to reliability in our statements and the mutual trust in all our relationships. They describe how we should behave towards each other, our business partners and all BOGE stakeholders. They include all the key principles that form the basis for legal and ethical behavior as well as for the personal responsibility of each individual.

Our code of conduct applies to all business activities of the BOGE group, be it internal collaboration or cooperation with our busi-

ness partners, national institutions and in society. Each employee* is therefore responsible for ensuring that his/her conduct complies with these principles, whereby, in addition to their function as role models, managers must ensure that employees are familiar with the code of conduct in their area of responsibility and that it is being followed.

Any violation of these principles will not be tolerated and may lead to disciplinary consequences in addition to possible legal sanctions. In cases of doubt, each employee is expected to consult the relevant internal departments responsible.

Bielefeld, June 2017

BOGE KOMPRESSOREN Otto Boge GmbH & Co. KG
Managing Directors



Wolf D. Meier Scheuven

Thorsten Meier

* In this document, "employee" is used as a neutral term for the male and female form and any other gender-specific expressions. This includes all members of the management team and other employees, e.g. trainees.



Contents

Our self-concept 4

- Our vision
- Our mission
- Our primary corporate objective
- Our values

External regulation and communication 5

- Compliance with laws
- Communication

Conduct in the external business environment 6–7

- Equality and mutual respect
- Health, safety and conduct towards employees
- Environmental and energy policy

Conduct in the external business environment 8–9

- Fair competition
- Combating corruption
- Personal conflicts of interest
- Gifts and entertainment
- Combating money laundering
- International business and export control
- Relationship with the business environment

Protection of company assets 10

- Protection of assets and our expertise
- Proper documentation and reporting
- Data protection and information security

Social responsibility 11

Contact and support 12



Our self-concept

Our mission, our vision, our corporate objective, and our values form the basis for our conduct. Our vision and our mission define what we hope to achieve in our business. Our primary corporate objective describes our strategy for making this vision a reality. Our values are the guiding principle that governs our daily business activities and our relationship with our business partners, employees, and shareholders. Our principles of conduct are based on these core elements of our corporate culture.

Our vision

BOGE is a medium-sized, owner-managed company that is successful all over the world. We are one of the leading global suppliers of, and a renowned specialist in, high-quality products and system solutions in the field of compressed air for selected industries.

Our mission

At BOGE we plan, develop, produce, distribute, and service compressed air supplies for customers with high standards in terms of quality, reliability, and efficiency.

Our primary corporate objective

We want to remain an independent and economically successful family owned business in the future.

Our values

Expertise

We recognise problems and resolve them efficiently.

Customer focus

We aim to sell, but we are not just a seller.

Responsibility

We manufacture compressors, but deliver safety.

Commitment

We share common goals.

Willingness to learn

We are open to change.

Collaboration

We ensure fair and respectful conduct.



External regulations and communication

Compliance with laws

We conduct ourselves in a manner that conforms with the law, and we respect the generally accepted customs and applicable international agreements and national laws of the countries in which we are active. The minimum standard is set by our own regulations, guidelines, and commitments (“BOGE Standards“), which govern our conduct with our employees, business partners, and social environment.

We support all internationally recognised human rights, in particular the rights of children, and we respect these rights and the personal dignity and privacy of every individual with whom we do business around the world.

Communication

Communication forms the basis of constructive collaboration. The goal here is the strengthening of trust and the promotion of mutual understanding.

For this reason, we encourage regular exchanges of information within the company and ensure that all our employees are provided with the same information.

We maintain respectful and professional communication with business partners and employees.



Conduct towards employees and the environment

Equality and mutual respect

We promote a working environment that is characterised by tolerance, respect, and fairness and in which all our employees are courteous and considerate of one another. We strengthen the team spirit within the company by keeping an open mind, demonstrating a willingness to help, and providing praise and constructive criticism.

We recognise the applicable global labor and social standards of the International Labour Organization (ILO). We are committed to providing equal opportunities and promoting fair working conditions, and we respect the freedom of association and the right to collective bargaining. We do not allow any personal discrimination based on nationality, skin colour, gender, age, religion, disability, private lifestyle, sexual orientation, or political or trade union activities. We take action against disrespectful and degrading behavior.

Health, safety, and conduct towards employees

We endeavour to ensure a healthy and safe working environment for our employees. We guarantee occupational safety and health protection in compliance with the applicable national regulations and support further developments to improve the BOGE working world.

All employees are remunerated for their services appropriately and fairly. We reject all forms of child labour and forced labour. We pay our employees a living wage. As a minimum standard, we comply with the applicable laws regarding payment and working hours on a global basis.

Our expectations of BOGE managers and employees have been formulated as principles, and these apply accordingly.

Based on these principles, we expect all employees to identify with BOGE and their primary objectives and to remain open to and supportive of changes. Our employees must be ready to acquire new knowledge and skills on a permanent basis through active learning, and they must fulfil their duties in a targeted, reliable, and competent manner and engage in trustworthy, helpful, and honest cooperation with others.



Conduct towards employees and the environment

Our employees are expected to take responsibility. Moreover, they should be aware of their actions and the possible consequences and know that they must accept liability for them.

We encourage the development of our employees with regard to their talents and offer realistic prospects.

Environmental and energy policy

The careful use of finite resources is not only an economic necessity, but also the responsibility of society as a whole. For this reason, we observe all applicable statutory and regulatory requirements, and internationally recognised environmental standards at our sites. When using production resources, it is important that we consume as few raw materials and other resources as possible, and that we ensure that our products contribute towards environmental and climate protection.

In our energy policy, we are committed to the resource-saving and economic use of energy at our sites, with the goal of reducing our energy consumption and the associated CO₂ emissions sustainably and in compliance with the relevant energy provisions. We will provide the necessary resources for achieving our strategic and operational energy goals.



Conduct in the external business environment

Fair competition

The principle of fairness also applies to competition from companies. All employees must adhere to the applicable competition and antitrust rules.

Combating corruption

We support national and international efforts to prevent competition being influenced or distorted by bribery. We reject all forms of corruption and commercial practices that may be viewed as inappropriate conduct, regardless of whether or not the recipients are representatives of government bodies, organizations, or commercial entities.

Personal conflicts of interest

Employees may not engage in activities either in their private or working life that conflict with the interests of our company ("Personal conflicts of interest"). Personal relationships for business purposes should not be misused to influence decision-making to an unjustifiably inappropriate extent. Situations that could lead to a personal conflict of interest between customers, suppliers or other business partners, employees, and our company are to be avoided. However, should these occur, they are to be disclosed and resolved in a responsible manner.

Gifts and entertainment

Accepting and giving gifts and other benefits is only permitted if the value is insignificant and neither the giver nor the receiver enters into a relationship of dependence. The internal directive on "Gifts from business partners" also applies here. In the event of doubt, written consent is to be obtained from the relevant manager.

Combating money laundering

We adhere to all national and international laws and regulations regarding the prevention of money laundering and the financing of terrorism. We only wish to maintain relationships with business partners whose business activities comply with the law and whose funds are derived from legal sources.



Conduct in the external business environment

International business and export control

We are a company with a global presence and we are active in numerous international markets. For this reason, we naturally observe international agreements and national laws and regulations regarding the control of international trade and finance activities. In particular, we comply with the applicable international and national import and export laws. This includes strict compliance with all sanctions and embargoes as well as all other laws, provisions, and official directives. In addition to BOGE's internal guidelines, all employees are also subject to the respective laws and provisions of the legal system of the country in which they work.

Relationships with business partners

As an international company, we are part of a dense network of business partners such as customers, suppliers, service providers, and dealers. Our business relationships are based on mutual trust and the relevant applicable legal system. Suppliers and service providers are selected according to purely objective and economic criteria, provided that another decision is not justified for different reasons (long-term business relationship, credit rating, long-standing mutual trust, etc.). We consider our values

and principles of conduct to be important criteria for long-term, successful collaboration. Therefore, we encourage our business partners to introduce and implement similar principles.



Protection of company assets

Protection of assets and our expertise

Honesty and respect for our company assets and the property of third parties are essential to our business. We take good care of company property and protect it against loss, damage, unlawful use, and destruction. We all take suitable measures to avoid and minimise risks. We protect the excellent reputation of our company and the image and value of the BOGE brand.

The protection of our expertise and know-how (including innovations and processes) is our top priority, as these factors secure our competitive advantage. All employees undertake to ensure that confidential information, including our specialist knowledge, business data, and trade secrets, are not disclosed – in any manner whatsoever – either internally or externally to unauthorised parties and misused.

Proper documentation and reporting

Our reporting system forms the basis of decision-making by our management team and the fulfilment of our obligations towards our different stakeholders. Correct, complete, and appropriate accounting is mandatory for all our business activities. All business transactions, important documents (e.g. contracts), data

sets, and other information, must be saved and stored in accordance with the legal provisions and our international guidelines and procedures.

Data protection and information security

A highly responsible approach to the handling of data and the effective protection of privacy are of great importance to us. When using the personal data of employees, customers, and other business partners, we respect the right to privacy and the security of business data and trade secrets in accordance with the respective data protection regulations. We only collect and process personal data if this is necessary for business activities, if prescribed by law, or if the individual concerned agrees. In doing so we also consider the relevant legal and contractual requirements.



Social responsibility

As active citizens, we also support the wellbeing of our society through our business activities. We assume social responsibility on a voluntary basis with social, ecological, and economic contributions.

We want to encourage our employees to become involved in voluntary work; however, the personal activities of individual employees may not take place at the company or during working hours, or have negative consequences for BOGE.



Contact and support

Should you have any questions concerning the implementation of these rules or specific circumstances, please talk to your manager at any time or contact the BOGE compliance officer directly.

Compliance officer

Email: compliance@boge.de