



BUSINESS PARTNER POLICY – October 2022

OBJECTIVE AND SCOPE

Baerlocher GmbH and its subsidiaries (collectively “Baerlocher” or “Baerlocher Group”) have developed and adopted a Code of Conduct (“CoC”). The regulations incorporated therein require every Baerlocher director, officer and employee of Baerlocher (“employees”) to observe the applicable laws and our high standards of business and personal ethics as they carry out their duties and responsibilities. Baerlocher expects all employees to adhere to the CoC and all policies set out therein, including this Business Partner Policy, and to assist Baerlocher in ensuring group-wide adherence to the highest standards of ethical behavior and to immediately report any suspected legal violations and any other breaches of compliance.

This Business Partner Policy is referred to in the CoC and establishes regulations that we expect our business partners to observe in order to continue conforming to our standards and high ethical values as well as the applicable standards and laws under which we conduct business with our partners worldwide. It applies to distributors, agents, suppliers and all other business partners (hereinafter referred to collectively as “Business Partners”). Our Business Partners are responsible for instructing their employees, representatives, officers and (sub)contractors accordingly and for actively ensuring compliance with the provisions of this Business Partner Policy.

This Business Partner Policy explains what Baerlocher expects from you as our Business Partner with regard to business ethics, human rights, business practices, employee relations, health and safety and other topics related to sustainable and responsible business practices. It forms part of Baerlocher’s compliance management system. We believe it is important to choose responsible Business Partners. We work closely with our Business Partners to make improvements with respect to our social and ethical performance.

REGULATIONS

We consider the following regulations to be essential requirements for conducting business with Baerlocher.

BUSINESS PARTNER PRACTICES

Integrity

Our Business Partners are expected to conduct their business in a professional manner at all times in accordance with the standards set forth in all applicable national and international laws and regulations, recognizing that Baerlocher’s requirements may sometimes exceed those standards. Our Business Partners and all persons acting on their behalf must act with integrity and fairness in all aspects of their business.

Fair competition

Our Business Partners and all persons acting on their behalf must comply with national and supranational antitrust and competition laws. They must not enter directly or indirectly into any illegal agreements with their competitors nor exchange sensitive information, e. g.



regarding markets, customers, strategies, prices and the like. Our Business Partners and all persons acting on their behalf must strictly follow the applicable laws and regulations when participating in public tenders and private sector bidding procedures.

Conflicts of interest

Our Business Partners must inform Baerlocher if any Baerlocher employee has, to the best of the Business Partner's knowledge, an



As part of this effort, our Business Partners must regularly monitor and improve their working





