

Dokumenteneigner: AL HR

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Matzig Andreas, 08.01.2018

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Valenta Karoline 15.01.2022

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Seite
1 von 2

The Code of Conduct is designed to ensure consistency in how employees conduct themselves within the Company and in their dealings outside of the Company in order to provide a pleasant and safe working environment. We negotiate agreements about rules and values for tolerant social intercourse amongst each other and about desired and undesired behavior. It is the responsibility of every employee to comply and follow the Code and all applicable rules and regulations.

Employees with management responsibilities are in charge that the code of conduct is adhered to at all times. If you have a management role, you have additional responsibilities to serve as a positive role model in every respect and to help your employees' review, understand and apply the Code. In fact, also monitor the compliance of the code of conduct.

1. Law-abiding

All employees are required to comply with the Company policies and laws that govern our activities. It is the responsibility of every employee to know and follow these policies. The Code of Conduct helps us make the right decisions and take the right actions. By following the Code, you serve as role models for business partners, customers and others who see you in action every day. To fulfill responsibilities and maintain and enhance our culture and reputation, we rely that employees help enforce the Code. When employees express their private opinion in public, they must not create the impression that they are voicing the opinion of the company.

2. Product quality and Safety

All of our products are manufactured under strict observation to meet high quality specifications. Due to our quality-management system and our consistent zero error strategy; we ensure the highest level of product safety. Our legal and internal policies about the product safety are yet another example of our comprehensive product responsibility.

In order to protect our customers, employees are obliged to instantly inform a superior in case of any product safety concerns.

3. Anti-bribery

Suppliers, vendors and others who do business with us are vital to our Company's success. To keep our relationship with them fair, honest and objective, we avoid conflicts of interest.

Conflicts of interest can occur when an employee solicits or accepts gifts, payments, loans, services or any form of compensation from suppliers, customers, competitors or others seeking to do business with our company. Employees may only accept gifts, entertainment, hospitality, travel and other items of value from suppliers, vendors and other contractors when they are modest, do not exceed EUR 50 and do not influence business decisions.

We strictly prohibit bribes, kickbacks, illegal payments and any other offer of items of value that may inappropriately influence or reward a customer to order, purchase or use our products. Employees should work honestly and with integrity. You should not offer bribes, accept bribes or let others bribe for you. As a company, we are not only re-

sponsible for your actions, but also the actions of any third party.

We are responsible for dealing fairly with customers, suppliers, competitors and other third parties. This means our employees avoid taking unfair advantage through manipulation, concealment, sponsoring or misrepresentation of key facts, or other unfair practices. The granting of donations and sponsoring measures requires agreement of the managing director of Barta. Donations to individuals or private accounts are illegal and therefore prohibited.

4. Accurate reporting

All forms of corporate communication intended for publication have to be lawful and comply to international standards.

5. Confidentiality

Our intellectual property and confidential information are irreplaceable assets. We must secure and protect the use of these valuable assets. At all times, employees should take precautions to protect confidential business information. Employees should especially avoid talking about or sharing information about; suppliers, customers, employees, business partners or third parties.

The obligation of secrecy and non-disclosure shall also apply after termination of employment.

6. Data security

Barta is committed to collecting, handling and protecting Personal Information responsibly, and in compliance with applicable privacy and information security laws. For further information

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please have a look at the data privacy guidelines.

7. Conflict of Interest

A conflict of interest occurs when a personal relationship or activity could influence your judgment and ability to perform your job in an objective way and uphold your duties to your employer. Even the appearance or perception of a conflict of interest can place our Company at risk. As employees, we should never allow personal gain or benefit to prevent us from doing what is in the best interest of our Company.

Relationships with family members and close personal friends can influence our decisions. It is important to be careful about Company business decisions that involve close personal relationships. Employment-related decisions should be based on qualifications, performance, skills and experience.

You may not be employed by, or otherwise provide services for or receive payment from, any customer, supplier or competitor of the Company without prior written approval of Barta. For further information, please see your contract.

Significant transactions or actions that affect Barta require the consent of the managing board.

8. Company Assets

Our assets include everything that our company owns or uses to conduct business. Each of us is entrusted with the care of these assets, so be proactive in safeguarding them from loss, damage, theft, waste and improper use.

Protect the Company's assets, and use those assets in the manner intended.

Do not use Company assets for your personal benefit or the benefit of anyone other than the Company. The use of Company assets outside of your Company responsibilities requires prior approval from the managing board.

9. Health, occupational and environmental safety

We see it as our responsibility to promote technical progress and human future in harmony with the environment. We work systematically and assiduously in avoiding the hazards to people and the environment. It is the task of all employees to avoid dangers for people and the environment as well as comply with the laws and regulations.

10. Escalation process

If there are any uncertainties in law, legal disputes or questions about the code of conduct, concerns or observations do not hesitate to contact your supervisor and/or a representative. Please be reminded that supervisors and representatives are obliged to secrecy.

11. Supervision

If you manage other employees, you have a special and important responsibility to set an example and act in a manner consistent with our Code of Conduct. The management board has to secure that no infringements of legal provisions or internal guidelines and regulations are violated.

The Code of Conduct applies to all employees and every single individual is responsible to act accordingly. If you observe behavior that concerns you, or that may represent a violation of our Code, raise the issue promptly. Doing so will allow the Company an opportunity to deal with the issue and correct it, ideally before it becomes a violation of law or a risk to health, security or the Company's reputation.