

75 FASTENER FORWARD



FOREWORD

Dear employees,

We are BERRANG. We have clear ethical principles and bindingly defined values that guide our actions.

We live a concept of quality that is fundamentally different from others. Because our quality encompasses everything – from the first contact to the solution. And because of that the people who create this quality are something very special. Their skills, professional experience and enthusiastic passion are what make BERRANG a valued partner for our customers.

Toll Jeoferon Benedist Berrang

Mannheim, January 30th 2024

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HBM A Our Code of Conduct

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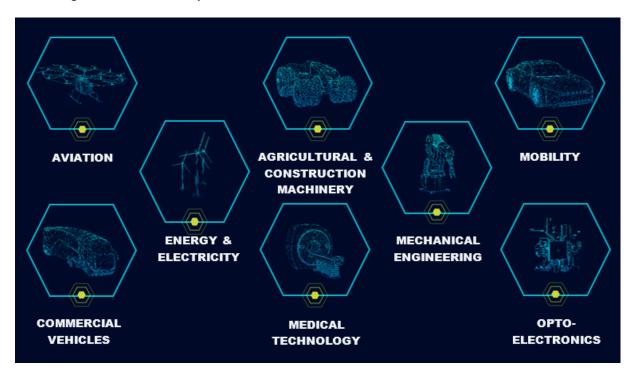
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1. INTRODUCTION

As a globally active, manufacturer- and technology-independent solution partner, we deliver high-end fastening solutions and engineering services. In this way, we support industries with high technological challenges in fully exploiting their potential.

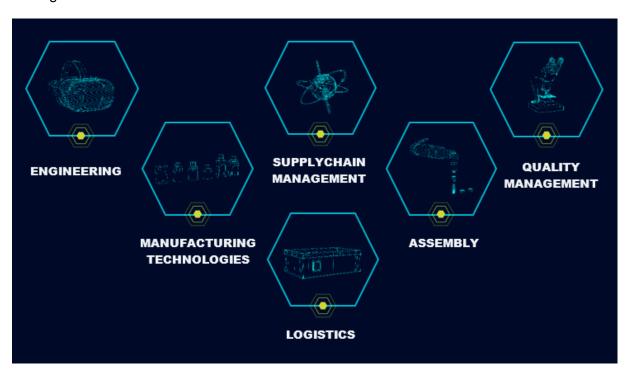
We help to ensure smooth production, reduce the complexity of processes and supplier relationships, as well as optimize processes and costs and achieve savings on a total cost basis. In addition, we enable our customers to make noticeable improvements in their efforts to achieve greater sustainability.



Our focus is on the markets of medical technology, energy technology, (special) mechanical engineering, aerospace technology, semiconductors, agricultural technology and mobility & transportation. We serve the technological market leaders in these segments. Through continuous further development, BERRANG also regularly qualifies as a partner to new and future-oriented industries such as lightweight construction or semiconductors.



Our services range from standard and drawing parts, C-parts management and the assembly of complete assemblies to complex engineering services as well as supply chain and quality management.





2. WHAT WE STAND FOR: OUR UNDERSTANDING OF INTEGRITY AND OUR CORPORATE PRINCIPLES

Integrity is of central importance to BERRANG and shapes our self-image. This code of conduct cannot anticipate every situation in which we have to make decisions. Especially in situations for which there are no clear rules or in which they can be interpreted differently, it is important to act with integrity.

Integrity means doing the right thing. This means that we adhere to internal and external rules, align our own actions with our corporate principles and also listen to our inner compass. The following five corporate principles are jointly supported and lived by us:

2.1. WE ARE PROFITABLE AND COMMITTED TO PEOPLE AND THE ENVIRONMENT.

We deliver manufacturer- and technology-independent high-end fastening solutions and engineering services to be successful and profitable. Because only if we are economically successful can we offer prospects for the future. The most important asset of our company is the people who work for BERRANG and the passion with which they do it. That is why we invest in the personal development of our employees. A sustainable approach to the environment is important to us, which is why we protect it and use our resources responsibly. Our aim is to reconcile profitability, people and the environment.

2.2. WE ACT RESPONSIBLY AND RESPECT THE RULES.

At BERRANG, we take responsibility for our actions and decisions and follow the rules. This means that we comply with laws, internal and external rules, agreements with employee representatives and all other parties, voluntary commitments and this Code of Conduct. We make our decisions consciously. Everyone is encouraged to question their actions.

2.3. WE ADDRESS ISSUES OPENLY AND STAND FOR TRANS-PARENCY.

The foundation for our actions – both internally and externally – is honesty, openness and transparency. This is how we create trust. We learn from the past and face new challenges. We encourage each and every one of us to speak our minds when something isn't right or doesn't feel right (speak-up culture). To do this, we create an atmosphere in which things can be called by their names without the threat of negative consequences. Other opinions are appreciated, questioning is encouraged.



2.4. FAIRNESS AND RESPECT ARE THE BASIS FOR OUR COOPERATION.

At BERRANG, we treat each other fairly and respectfully. Team spirit, mutual trust and appreciative interaction are important to us. This applies not only to our employees, but also to our customers, business partners and everyone else.

2.5. WE LIVE DIVERSITY.

The people who work at BERRANG are our strength and a key factor in our success. The different competencies, perspectives and experiences form the basis for innovation and help us to understand the needs of our customers all over the world. Respect, appreciation, integrity and cohesion are the hallmarks of our corporate culture.

3. HOW WE WORK: OUR CODE OF CONDUCT

3.1. PRINCIPLES OF COOPERATION

3.1.1. Diversity and equal opportunities

At BERRANG, we appreciate the diversity of our employees. That's why diversity and inclusion are important building blocks of our success as a global company.

In accordance with our corporate principles, we treat each other openly and with an attitude that is characterized by mutual respect, appreciation and fairness. Equal opportunities for all is our goal. Discrimination will not be tolerated in any form, in particular with regard to:

- · Gender or gender identity
- Ancestry, origin or nationality
- Social background, Religion or belief
- Sexual orientation
- Physical or mental abilities
- Handicap
- Age
- Political, social or trade union activity provided that it is within the scope of the applicable laws.

At BERRANG, we respect the personal rights of our employees. We create a culture of appreciation and respect in which we can develop individually in order to reach our full potential in the workplace. Any form of discrimination, harassment, unfair behavior or bullying contradicts our self-image and has no place at BERRANG. It is our common task to create a fair, appreciative and collegial working environment.



3.1.2. HEALTH AND SAFETY

The safety and well-being of our employees is a high priority at BERRANG. We create a working environment where everyone can perform at their best while maintaining their physical and mental health.

High technical and operational safety standards are the basis for our work. The aim is to prevent accidents at work and work-related illnesses. To this end, we expect the active participation of our employees.

At BERRANG, we adhere to the rules and other requirements for occupational safety. For example, we use the prescribed protective equipment, independently ensure safe working conditions and report suspected safety and health risks. We do not work under the influence of alcohol and drugs. We are careful not to jeopardize our own safety and the safety and integrity of others.

BERRANG offers site-specific health-promoting and prevention-oriented programs and relies on the active participation of employees - in the following areas, among others:

- Occupational health and safety
- Workplace health promotion
- Ergonomics
- Reintegration

3.1.3. CHILD LABOUR

We are committed to employing only employees who have reached the minimum age required to perform work in accordance with the applicable national legislation and not to tolerate child labor. ILO Conventions No. 138 on the Minimum Age of Employment and No. 182 on the Elimination of the Worst Forms of Child Labour must be complied with. In addition, we are committed to observing and respecting the dignity and rights of children.

3.1.4. FORCED LABOR

We strictly reject forced labor, torture, human trafficking, and any form of slavery or compulsory labor. We also respect the principle of freely chosen employment.

3.1.5. COMPATIBILITY OF PROFESSIONAL AND PRIVATE LIFE PLANNING

Our work culture is based on trust and respect. BERRANG creates framework conditions that support employees in their individual life situations to give their best and remain productive. In this way, we enable all employees to make the best possible contribution to our success. To this end, we offer a wide range of country-specific options for reconciling work and private life on the basis of company agreements.



3.1.6. CONFLICTS

BERRANG respects the personal interests and private lives of its employees. However, personal or personal financial interests must not influence business decisions.

Therefore, we avoid situations in which personal or own financial interests collide with the interests of our company or our business partners. If such conflicts of interest exist, they will be disclosed. Together with the management, a solution is developed in which the interests of our company are not affected.

Conflicts of interest may arise, for example, when transactions occur between the company and suppliers or customers of the company in which financial, material or tax advantages arise for employees or their dependents, or when employees

- · accepting, offering, or giving gifts and invitations
- are members of the committee of another company
- pursue a secondary activity, or
- are involved in competing companies.

3.1.7. COOPERATION WITH EMPLOYEE REPRESENTATIVES

We stand by our social responsibility. Workers have the right, but not the obligation, to join a trade union, to appoint a representative and to be elected to such a union, if permitted by the relevant legal system.

Membership of trade unions or employee representatives must not constitute a reason for unjustified unequal treatment. Within the framework of the legal regulations and in accordance with ILO Convention No. 98, we respect the right to collective bargaining to regulate working conditions and the right to strike. We work together with all employees, employee representatives and trade unions in a respectful and trusting manner. In doing so, we strive for a fair balance between the economic interests of the company and the interests of the employees. Even in the event of contentious disputes, it remains our goal to jointly create and maintain a sustainable basis for constructive cooperation.

3.1.8. HANDLING OF COMPANY RESOURCES

We use company resources carefully and sustainably. We do this because of our social and environmental responsibility and because it is in our own interest to work in a company that operates sustainably.

As a matter of principle, we use tangible and intellectual property, assets and other company resources only for official purposes. Exceptions apply if company regulations allow the private use of company resources. Waste of resources reduces the company's assets and can cause additional reputational damage. Therefore, we make sure that we use company resources responsibly and economically.

We handle information responsibly, because it is one of our most important assets. Therefore, their protection and safeguarding are of great importance to BERRANG. We make sure that we do not disclose information about BERRANG in our dealings with business partners or at private events that allows outsiders to gain inadmissible insights into our business processes.



We are also aware that a deliberate disclosure of information about internal processes to external third parties can harm BERRANG and result in legal consequences. By applying and using the internal information security framework, we take responsibility for the information we handle.

Trade secrets, such as inventions, new products or solutions, give us an edge over our competitors. Therefore, we protect this information to a special degree. We comply with laws and internal regulations for the protection of trade secrets and respect the trade secrets of competitors, business partners and customers.

3.1.9. PROTECTION OF INTELLECTUAL PROPERTY AND AGAINST PLAGIA-RISM

BERRANG owns patents and other intellectual property rights, such as trademarks. They are one of the company's most important resources and ensure BERRANG's competitiveness, ability to act and innovate. Therefore, we ensure that they are not misused by third parties. It is also important to avoid the unauthorized use of third-party intellectual property and to protect ourselves from plagiarism.

3.1.10. PRESENTATION IN PUBLIC

The responsible handling of company information is everyone's business. For this reason, BERRANG pursues a policy to ensure a coordinated and uniform appearance (One Voice Policy).

Statements made by the company and its employees to the media (online, print, TV, radio and social media) are controlled by the management or executive board and must be coordinated with the management or executive board. Enquiries from external media representatives are handled exclusively by the management or executive board. External publications that are carried out within the scope of the specialist function and are aimed at external target groups, such as scientific articles, lectures or statements at panel discussions for a specialist audience, are the responsibility of the departments, but must be coordinated with the management or management.

The right to freedom of expression applies to statements made by employees. When expressing opinions in public, at events, in public online forums or in social media networks where we can be recognized as BERRANG employees, we take care to identify personal views as such.



3.2. COMPLIANCE WITH LAWS

3.2.1. COMPLIANCE WITH PRODUCT REQUIREMENTS

For us at BERRANG, the safety and quality of our products is a basic requirement. At a time when technologies and regulations are changing rapidly, we are committed to ensuring that our products offer outstanding benefits for our customers.

Through the continuous development of our processes, we also strive to continuously reduce greenhouse gas emissions in order to make our contribution to climate protection.

Throughout our company's history, we have repeatedly set new standards with our solutions.

It is our declared goal to ensure the legal and regulatory conformity of our processes and products over the entire life cycle. In doing so, we take into account both the relevant laws and regulations, as well as the specifications of the customer.

As employees, we have a central role: from the initial idea to the disposal of our products, we contribute as experts to taking into account the legal and internal requirements as well as the expectations of our customers and society and strengthening their trust in our products.

We are familiar with the regulations that affect our field of work and ensure that our level of knowledge is always up to date. In all phases of the life cycle of our products, we consider the possible effects of our actions. We openly address potential risks in our work environment (speak-up culture).

3.2.2. TAX AND CUSTOMS REGULATIONS

At BERRANG, we comply with the provisions of tax and customs law, which include, among other things, the regulations on corporate income tax, payroll tax and sales tax, as well as the customs duties and excise duties payable on the import of goods.

A correct and timely declaration and payment of the taxes and customs duties to be paid is a matter of course for BERRANG.

3.2.3. CARTEL LAW

Functioning and unhindered competition is one of the cornerstones of our social and economic system. It creates growth and jobs and ensures that all of us as consumers receive modern products and services at reasonable prices.

BERRANG also benefits from functioning competition, because the laws also protect us from inadmissible agreements and inflated prices. We are committed to ensuring fair competition in the markets and comply with applicable antitrust and competition laws.



Competition law risks arise in very different fields of application, for example:

- in the exchange of information and benchmarking with competitors
- in the context of participations and cooperations
- in connection with distribution
- in the work of the association

Each and every one of us plays an important role in complying with laws and internal regulations. The prerequisite for this is that every employee knows which regulations are relevant for his or her area. With regular training, we ensure that potential antitrust violations are prevented, detected and punished.

3.2.4. EXPORT CONTROL

Strict adherence to export controls in accordance with foreign trade regulations is elementary for globally active companies such as BERRANG. Foreign trade regulations must generally be observed when exporting goods, intangible goods – such as software – and services. In principle, there are restrictions on military goods and civilian products that can also be used for military purposes (dual use).

In addition, certain goods and countries are subject to special restrictions, such as arms embargoes and sanctions. Every employee observes strict compliance with the regulations of foreign trade law within the scope of his or her responsibility.

We also expect our business partners and their suppliers to strictly comply with these regulations.

3.2.5. ECONOMIC SANCTIONS AND MONEY LAUNDERING PREVENTION

As a globally active company, we comply with national and international economic sanctions and support the international community in the fight against money laundering and terrorist financing. BERRANG observes all requirements in this regard. Sanctions lists are kept up to date at all times. The employees responsible for the business processes are required to design them in such a way that any form of white-collar crime is prevented.

3.2.6. CORRUPTION PREVENTION

At BERRANG, we don't do business at any price. We do not bribe and do not allow ourselves to be bribed. We convince our business partners and customers with our products and services and not through undue influence. Nor do we allow ourselves to be unduly influenced, but decide for objective and comprehensible reasons.

BERRANG does not tolerate corrupt behavior by its employees, business partners and customers. Decisions based on corruption distort competition, harm our company and the common good. In order to avert possible damage to BERRANG, we already avoid the mere appearance of undue influence.

In particular, we act in accordance with our corporate principles in contact with employees of public authorities and companies as well as public officials and politicians. We already avoid



the mere appearance of undue influence, for example through payments, gratuities or other benefits. We also adhere to this if such services are expected or allegedly customary for official acts or for the acceleration of official acts ("facilitation payments").

With regular training and inspections, we ensure that corrupt behavior is prevented, uncovered and punished.

3.3. DEALING WITH BUSINESS PARTNERS

3.3.1. GIFTS AND INVITATIONS

When dealing with business partners and customers, gifts and invitations (gratuities) are customary and permissible within reasonable limits. In order to avert reputational damage and financial losses to BERRANG, our decisions are based on objective and comprehensible reasons and are not influenced by inappropriate donations.

As employees, we may not suggest, solicit or demand gifts, invitations, personal services or favors from business partners for ourselves or for others. We reject donations if the mere appearance of undue influence can arise. We also pay attention to the appropriateness of discounts and perks.

We can accept voluntarily granted promotional and occasional gifts of reasonable value. We only accept an invitation from business partners to dinners or events if it is issued unsolicited, serves a business occasion, is not repeated unreasonably often and the invitation is in proportion to the occasion.

As an order of magnitude of what can be considered appropriate, we are guided by a value of 50 euros for gifts from third parties and a value of 100 euros for invitations from third parties. In case of doubt about the appropriateness of gifts or invitations, we coordinate with our manager.

If we receive donations that exceed our benchmarks, we disclose this and document the receipt. Reporting obligations due to statutory provisions, such as tax law, remain unaffected.

When it comes to gifts and invitations to our business partners and customers, we also adhere to the principle that even the mere appearance of undue influence must be avoided. Donations are only permitted in an appropriate amount and within the scope of ordinary business activities. In doing so, we comply with the regulations of our business partners known to us.



3.3.2. SELECTION OF BUSINESS PARTNERS

BERRANG expects compliance with our Code of Conduct and compliance with the law not only from its employees, but also from business partners, such as suppliers.

On a risk-based basis, we subject them to an integrity check before concluding the contract. The employees responsible for the selection of business partners are obliged to review them within the legally permissible framework in a transparent selection process. In this way, we ensure that the potential business partner complies with this Code of Conduct.

Even after the contract has been signed, we expect our business partners to adhere to these requirements. They commit themselves to aligning their actions with these values and to continuously reflecting on them.

Our business partners are required to communicate the Code of Conduct and the obligations arising from it to their employees and suppliers.

In the event of potential violations by business partners of the requirements of this Code of Conduct, the responsible employees must work to ensure that clarification is brought about together with the business partner.

3.3.3. SECONDARY ACTIVITIES AND MANDATES

Part-time employment of our employees must be reported to the responsible manager before they take office. In consultation with the management, it examines whether the secondary activity impairs the employee's duty to work or whether there could be conflicts of interest. If there is such a conflict of interest, or an impairment of the obligation to work, the secondary activity may be prohibited. A non-prohibited secondary activity must be reported to the Human Resources Department.

The assumption of a mandate in a management body, supervisory board, advisory board or other body of another commercial enterprise could also lead to conflicts of interest. Therefore, employees may only take on such tasks if they have been approved in advance by the management.

3.3.4. PARTICIPATIONS

As employees, we may only acquire and hold shares and shareholdings in business partners or competitors if this is done on a small scale or has been approved by the management and the possibility of a conflict of interest or its appearance is excluded. This regulation may also not be circumvented by the fact that the participation is held by third parties on behalf of the employee.

Before joining our company, existing, more than negligible shares in business partners or competitors must be disclosed to the management. This also applies to shares that come into the possession of an employee through inheritance. The management examines whether such participations stand in the way of the commencement of activity at BERRANG.



3.4. SUSTAINABILITY AND SOCIAL RESPONSIBILITY

3.4.1. RESPECT FOR HUMAN RIGHTS

At BERRANG, we respect internationally recognized human rights and are committed to the International Charter of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the Declaration on Fundamental Principles and Rights at Work of the International Labor Organization (ILO).

In our management system manual, we make it clear what special value we attach to the protection of human rights and good working conditions at BERRANG. Our management system complements and substantiates our Code of Conduct with its procedural and work instructions and is binding for all managers and employees of BERRANG worldwide.

We are committed to preventing, minimizing and eliminating the negative impact on human rights within our business activities worldwide. Beyond the BERRANG Group, we work to ensure that business partners, especially direct suppliers, also respect human rights, and we are committed to ensuring that this is also the case with indirect suppliers, and we take appropriate measures.

3.4.2. ANIMAL WELFARE

We adhere to national and international legal standards on animal protection and welfare, as well as recognized frameworks that define ethical principles for this. We also expect our business partners to follow these regulations.

3.4.3. ENVIRONMENTAL PROTECTION

We do our best not only in the manufacture of our products, but also in our efforts to protect the environment. We strive for an exemplary environmental and energy balance worldwide, meet the increasing demands of our customers and the current and future ecological challenges.

Our aim is to develop products and services that are particularly environmentally friendly and energy-efficient in their respective market segments. The measures for environmentally sound and energy-efficient design encompass BERRANG's entire range of services and take into account all upstream and downstream phases of the life cycle – from the supply chain and inhouse assembly to the use and disposal of the products.

We design all stages of the service to be as environmentally friendly and energetically optimized as possible in order to reduce our environmental impact and energy consumption. We make our environmental impact transparent both internally and externally.

One of our most important corporate goals in terms of protecting the environment is CO2e neutrality. We have anchored this in our sustainable business strategy.



Our ambition is to make our Scope 1 & 2 footprint CO2e-neutral by 2039. Furthermore, we want to increasingly decouple the consumption of resources from the growth of our delivery performance: In order to reduce the consumption of energy, water and waste, we are continuously working to make our processes more efficient and environmentally friendly.

3.4.4. POLITICAL ADVOCACY

As a globally active company, we are part of the global political and social environment and contribute to political and public opinion-forming processes as a credible and reliable interlocutor. We communicate reliably and fact-based with authorities, associations and organizations as well as social interest groups and take up their suggestions in our actions. In doing so, we take into account society's interest in transparency and openness.

3.4.5. DONATIONS AND SPONSORSHIP

As a global company, we are aware of our responsibility to society. With our social commitment, we want to make tangible contributions to the common good beyond our core business – worldwide.

With donations, we pay particular attention to the institutions recognized as non-profit. With our donations, we do not pursue economic self-interest; consideration is neither demanded nor expected. On the other hand, we use our sponsorship to positively shape the reputation and perception of our company through public advertising.

We comply with the laws for donation, sponsorship and charity activities.

3.4.6. VOLUNTEER WORK

Volunteer work holds society together. As a company that takes its responsibility towards the community seriously, we welcome and support the voluntary work of our employees. It does not matter whether it is social-charitable, societal and political-democratic activities.

3.5. DIGITISATION

3.5.1. HANDLING OF DATA

Digitalization is creating new work processes. Data enables innovative services that add value to our customers and employees. In order to take advantage of these future opportunities and to meet the needs of our customers and employees, we have adopted comprehensive guidelines on data protection and data security. In particular, we take into account the following principles.



- Business potential
- Added value for customers and employees
- Quality
- Transparency
- Choice
- Data security and
- Data Ethics
- Privacy.

We create trust among our employees, business partners and customers by respecting data protection as a personal right. Therefore, we process and use personal data only to the extent permitted by laws, regulations, our internal data protection guidelines and the data subjects.

Our information security regulations describe the responsible and legally compliant handling of data as a whole, even if it is not personal. We want to take the protection of data into account from the very beginning, intelligently analyze, store, share and use the data responsibly. We provide our employees, business partners and customers with transparency about the handling of their data and the choice of what we use their data for.

Anyone who provides us with data should be able to rely on the fact that it is safe with us. All employees are responsible for ensuring that data provided to us is protected against unauthorized access by third parties and that the necessary precautions are taken to prevent unauthorized use.

3.5.2. SOCIAL MEDIA

Social networks are playing an increasingly important role in public discourse. We may also use social networks and our own social media channels to communicate with our employees, business partners, customers and the public.

We are a cosmopolitan and globally active company. As described in our corporate guidelines, integrity, appreciation and respect are fundamental to us. We do not tolerate inflammatory, insulting or discriminatory posts on our social media channels.

Among other things, unacceptable are contributions that:

- reproduce anti-constitutional content
- violate the dignity of others
- jeopardize corporate peace
- discredit our reputation and the reputation of our employees, or
- put a strain on the relationship with important stakeholders, such as organizations, customers or suppliers.



3.5.3. ARTIFICIAL INTELLIGENCE

Artificial intelligence (AI) includes various methods that are used to try to automate intelligent skills. The broad term "AI" is now often used in a narrow sense for the current advances in machine learning. AI is already part of our processes and will have an ever-increasing impact on our processes and ways of working in the future.

In order to use the possibilities of artificial intelligence sustainably for us. we take ethical and legal principles into account. In doing so, we rely on the responsible use of artificial intelligence, protection of privacy as well as security and reliability.

4. COMPLIANCE WITH THE CODE OF CONDUCT

4.1. SCOPE

This Code of Conduct applies to all employees of the BERRANG Group. All employees must familiarize themselves with the content of this Code of Conduct, be aware of it and act accordingly. If specific guidelines or other regulations exist, they are binding.

We also expect our business partners to be aware of this policy and to adhere to it. Anyone who does not share the principles of this Code of Conduct cannot be a business partner for us.

4.2. EXPECTATIONS OF OUR MANAGERS

To act responsibly, we need responsible leaders. For this reason, BERRANG expects managers at all levels to live up to their role model function through their integrity and thus provide orientation for employees. Our managers are committed to excellent work results. In doing so, they shall at all times comply with our corporate principles and conduct and the provisions of this policy. They are an inspiring role model for their team.

Our managers behave appreciatively towards their employees and promote their team's sense of belonging. They create a suitable knowledge base for their employees and empower them to take responsibility. Managers explain to their team members the background of decisions in order to achieve goals together. They promote a culture of respectful cooperation.

4.3. DEALING WITH ERRORS

It is part of our self-image that we learn from mistakes as individuals and as an organization. Therefore, we maintain a transparent and open approach to mistakes and share our experience to enable further development and innovation.

The prerequisite for this is to shape our corporate culture in such a way that wrong decisions are recognized, discussed and corrected. It is up to each of us to take responsibility and create – or demand – a working environment in which employees have no inhibitions about addressing possible mistakes. We treat employees who report mistakes fairly and responsibly.



4.4. DEALING WITH RULE VIOLATIONS

Violations of laws, guidelines and other regulations can lead to massive economic damage, criminal and fine risks for BERRANG and its employees as well as damage to its image and reputation. Therefore, violations must be detected in good time in order to avert damage to BERRANG and its employees and business partners and to ensure fair cooperation. If we, as employees, observe a violation of the rules or if we have reason to suspect that a violation could have occurred at BERRANG or at our business partners, we do not hesitate to address this.

Our complaints office is open to all employees, business partners and third parties who wish to address violations of the rules with a high risk for the company and its employees. High-risk breaches include, for example, corruption, antitrust and money laundering offences, human rights violations, technical specifications or environmental regulations. You can contact the complaints office at compliance@berrang.de.

If employees want to address low-risk violations, other points of contact, such as your managers, are available to them.

The Complaints Office accompanies the processing of information until the conclusion of the procedure. In doing so, the complaints office ensures the highest level of confidentiality. In addition, we attach great importance to fairness in our whistleblower system – both in dealing with whistleblowers and with employees who are affected by an allegation. In doing so, the principle of proportionality is always respected and the appropriate, necessary and proportionate consequences are examined on a case-by-case basis.

4.5. SUPPORT AND ASSISTANCE

This Code of Conduct cannot provide concrete answers to all questions and situations. If you are unsure and need orientation in your day-to-day work, as well as you have a question about integrity or this policy, our compliance team will be happy to advise you on compliance@berrang.de.