

CODE  
— OF —  
CONDUCT

**Barthelme**  
LED Solutions



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# PREFACE

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This Code of Conduct is based on a common basic understanding of socially responsible corporate governance in the sense of the following guidelines.

We, the undersigned company Barthelme, assume responsibility within the framework of our respective possibilities and scope of action by taking into account the consequences of our entrepreneurial decisions and actions in legal, economic, technological as well as social and ecological respects. In this way, we contribute to the social and economic development of the countries and regions in which we operate.

Our actions comply with the relevant statutory regulations. We are guided by ethical values and principles, in particular integrity and righteousness as well as respect for human dignity, as set out in the principles of the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the core labor standards of the International Labor Organization (ILO), as well as the United Nations Guiding Principles on Business and Human Rights.

This Code of Conduct sets out the basic principles of our actions, which we actively expect our employees worldwide to observe. The contents apply in all of our company's subsidiaries and business units.

We expect the same basic understanding from our business partners. Rights in favor of third parties shall not be thereby established.



**CHIEF EXECUTIVE OFFICER  
NICOLA BARTHELME**

For descriptive reasons, the use of masculine, feminine and diverse gender forms of speech is not included. Wherever the masculine form is used, the feminine or diverse form is also meant in each case. In the following, Josef Barthelme GmbH & Co. KG is referred to as Barthelme.



1

## CORPORATE RESPONSIBILITY

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Compliance with applicable laws and other regulations of the countries in which we operate is a matter of principle for us.

If local laws and regulations are less restrictive, our actions are guided by the principles of this Code of Conduct. In cases where there is a direct contradiction between mandatory local law and the principles contained in this Code of Conduct, local law shall prevail.

However, we will endeavor to comply with the contents of this Code of Conduct.

## 1.1 FAIR WORKING CONDITIONS

Remuneration is based on the applicable laws and, where applicable, existing, binding collective agreements and is supplemented by the relevant, national minimum wage laws. The employees are informed regularly, in detail and in a clear manner, about the composition of their wages and salaries. We comply with the applicable laws and (international) labor standards regarding with regard to the maximum permissible working hours and ensure that

- » working hours, including overtime, do not exceed the respective maximum limits permitted by law;
- » the weekly working time, including overtime, does not exceed, even in exceptional cases, a maximum of 48 hours, in the absence of such provisions;
- » employees have at least one full day off per calendar week.

## 1.2 DIVERSITY AND EQUAL OPPORTUNITIES ELIMINATION OF ALL FORMS OF DISCRIMINATION

We promote equal opportunity and do not tolerate discrimination.

We treat all people equally, regardless of gender, age, skin color, ethnic origin, sexual identity and orientation, disability, religious affiliation, world view or other personal characteristics.

## 1.3 RESPECT FOR HUMAN RIGHTS

We respect and support the observance of internationally recognized human rights.

We respect personal dignity, privacy and personal rights of each individual.

We protect and grant the right to freedom of opinion and expression.

We do not tolerate any unacceptable treatment of employees, such as physical and psychological hardship, sexual and personal harassment or discrimination.

We do not tolerate bullying and verbal attacks and intimidating and dismissive behavior.

## 1.4 PROHIBITION OF FORCED LABOR

We do not tolerate child labor. We do not hire any employees who are not at least 15 years of age and require proof of age.

In countries that fall under the exception for developing countries according to ILO Convention No. 138, the minimum age may be reduced to 14 years.

We do not hire employees for hazardous work who, in accordance with ILO Convention No. 182, cannot prove a minimum age of 18 years.

## 1.5 PROHIBITION OF FORCED LABOR

Forced labor, modern slave labor or comparable measures that deprive people of their freedom are prohibited. Any kind of work must be performed voluntarily and it must be possible to terminate the employment relationship at any time.

## 1.6 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We respect the rights of employees to freedom of association, freedom of assembly, and collective and collective bargaining to the extent permitted and possible by law in the country in which we operate.

If this is not permissible, we seek appropriate compromises for our employees.

## 1.7 OCCUPATIONAL HEALTH AND SAFETY

We safeguard the health of our employees by taking appropriate health and occupational safety measures:

- » implementing an occupational health and safety management system.
- » compliance with applicable laws and orientation towards international standards regarding health and occupational safety
- » appropriate workplace design, safety regulations and provision of suitable personal protective equipment
- » implementation of preventive controls, emergency measures, and accident reporting system and other appropriate measures for continuous improvement;
- » access to drinking water in sufficient quantity and to clean sanitary facilities.

**We ensure that all our employees receive appropriate training.**



## 1.8 ENVIRONMENTAL AND CLIMATE PROTECTION | REDUCTION OF CO<sub>2</sub> EMISSIONS

We act in accordance with applicable laws and follow international standards to minimize negative impacts on the environment and continuously improve our activities for environmental and climate protection.

All employees are sensitized to the topic of environmental protection and are offered necessary training measures and training modules.

We have taken appropriate environmental protection measures (e.g. the implementation of a corporate environmental protection management system) to adequately cover the following topics: goal setting, definition and implementation of measures, as well as their continuous improvement.

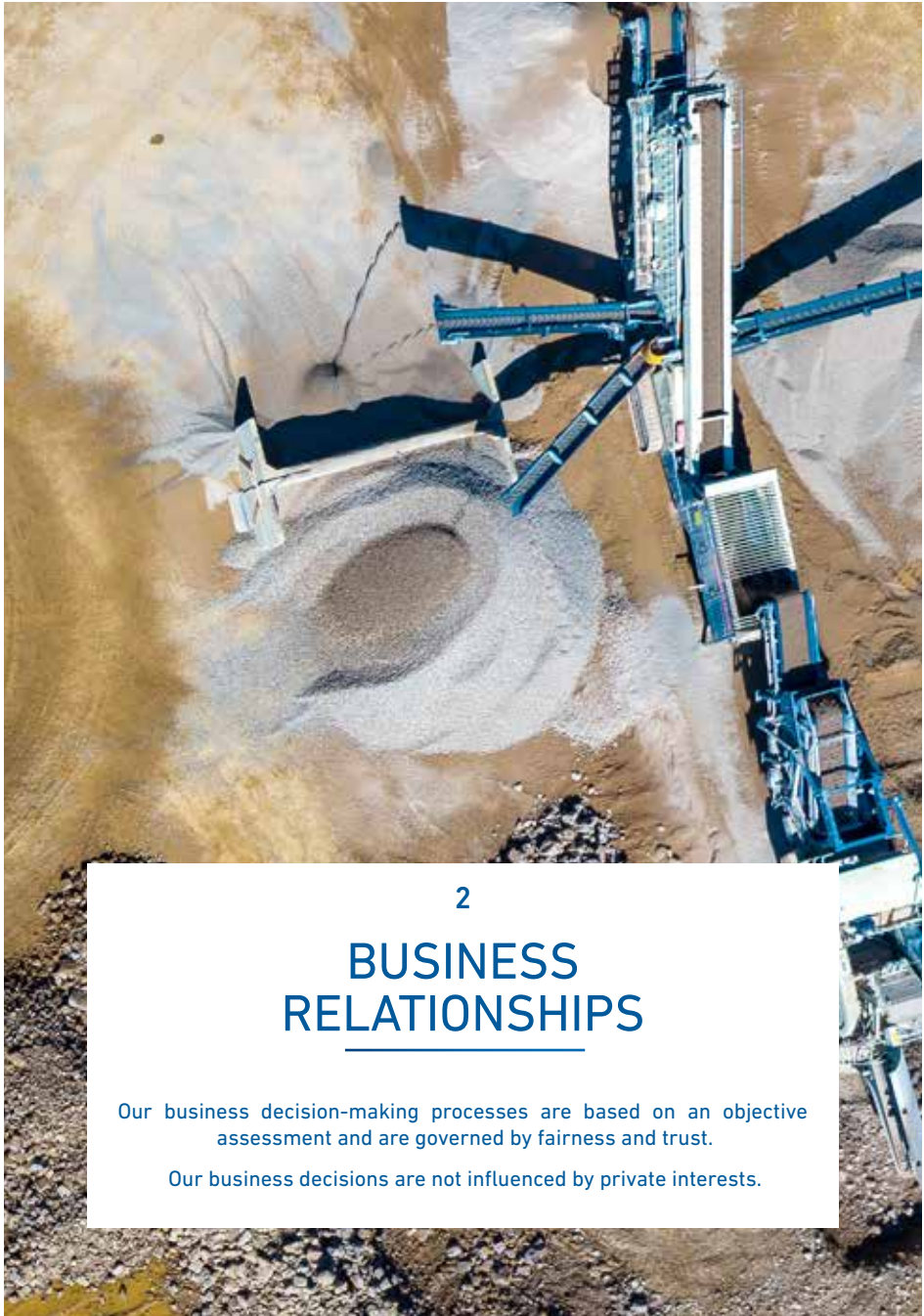
Environmental aspects such as reducing CO<sub>2</sub> emissions, increasing energy efficiency and the use of renewable energies, ensuring water quality and reducing water consumption, ensuring air quality, and the use of renewable energies. water consumption, ensuring air quality, promoting resource efficiency, reducing waste and its proper disposal, as well as the responsible handling of hazardous substances for people and the environment.

## 1.9 COMMUNICATION AND SOCIAL MEDIA

We trust our employees with regard to the use of social media and adopt an open-minded approach.

However, we expect every employee to comply not only with legal requirements but also the limits of freedom of opinion must be respected.

Statements that are damaging to the company's reputation or business, insults, threats and false factual statements will not be tolerated by Barthelme and may lead to employment law consequences.



2

## BUSINESS RELATIONSHIPS

Our business decision-making processes are based on an objective assessment and are governed by fairness and trust.

Our business decisions are not influenced by private interests.

## 2.1 FAIR AND FREE COMPETITION

We act in accordance with national and international competition and antitrust law and do not participate in price-fixing, market partitioning, or customer, market and bid collusion.

## 2.2 PREVENTION OF MONEY LAUNDERING

Money laundering refers to the process of smuggling illegally generated money or illegally acquired assets into the legal financial and economic cycle.

We comply with our legal obligations to prevent money laundering and do not participate in transactions designed to conceal or integrate criminal or illegally acquired assets.

## 2.3 COMBATING CORRUPTION

We do not tolerate corruption, bribery or extortion; they prevent fair competitive conditions. In our business relationships, we do not promise, offer, grant, demand or accept benefits that are connected with the intention or could give the appearance of influencing business decisions or obtaining any other improper advantage, nor do we allow ourselves to be promised such benefits.

A particularly strict standard must be applied in dealings with persons to whom particular criminal and liability regulations apply (e.g. public officials).

## 2.4 HANDLING OF CONFLICT MINERALS

We take due diligence measures to avoid the use of conflict minerals in our products, in order to prevent human rights violations, corruption and the financing of armed groups or the like.

## 3

# MISCELLANEOUS CONFLICTS OF INTEREST

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We avoid internal and external conflicts of interest that could illegitimately influence business relationships.

If this does not succeed, we disclose these conflicts.

### 3.1 ANCILLARY ACTIVITIES

A prerequisite for the exercise of ancillary activities is that they do not conflict with the interests of Barthelme. Activities for competitors or self-employment in the same field are excluded.

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# PRIVATE USE OF COMPANY PROPERTY

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We handle the property of Barthelme with care and responsibility.

The private use of company property is generally not permitted, if there are no individual, collective or company regulations to the contrary.

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# SECURITY AND INFORMATION

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Our business decision-making processes are based on informed judgment and are governed by fairness and trust.

Our business decisions are not influenced by private interests.

### 5.1 DATA PROTECTION

We process, store and protect personal data in compliance with legal regulations. Thus, personal data is collected confidentially, only for legitimate, previously defined purposes and in a transparent manner.

We process personal data only if they are protected by appropriate technical and organizational measures against loss, alteration and unauthorized use or disclosure.

### 5.2 PROTECTION OF INFORMATION AND INTELLECTUAL PROPERTY

We protect confidential information and respect intellectual property. Technology and know-how must be transferred in such a way that intellectual property rights and customer information, trade secrets and non-public information are protected.

We comply with the applicable laws on the protection of trade secrets and treat the information of our business partners as confidential.



## 6

# USE OF THE BARTHELME CODEX

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The regulations of our Code of Conduct are the foundation of our corporate culture.

All Barthelme employees are expected to behave in accordance with the Code of Conduct and to know and comply with its principles.

Barthelme actively promotes communication based on our Code of Conduct we have formulated.

Violations of our Code of Conduct can have serious consequences not only for the individual personally, but also for the Barthelme company. Reproachable, intentional misconduct will therefore not be tolerated.

Barthelme sanctions misconduct as well as violations within the scope of legal regulations regardless of the position and role of the acting persons in the company.

Our goal is to create an awareness that allows our employees to recognize and name negative activities. To achieve this, we create a corporate culture that is free of fear and undesirable consequences.

Our management ensures that this Code is included in training programs and that compliance is monitored. Our managers occupy a special position in this regard: they are the first point of contact when it comes to the principles of the Code. They are responsible for ensuring that the principles of collegiality are adhered to and, through their leadership role, prevent possible breaches of the rules. They also promote honest and open communication.

Employees are called upon to report possible violations of the Code of Conduct either to their supervisor or anonymously at [www.barthelme.hinweisgeberportal.de/frontpage](http://www.barthelme.hinweisgeberportal.de/frontpage).

This whistleblower portal can also be used by external business partners to report any violations. If the reporting procedure is used, this does not have any negative consequences for the whistleblower.

Such reports can uncover grievances or misconduct, and protect employees and the company from damage or risk.

Each report will be investigated. In the event of actual violations, HR management will be involved. Depending on the severity, violations may result in disciplinary action, up to and including termination.

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