



BÄNNINGER CODE OF CONDUCT



Reliability



Responsibility



Fairness



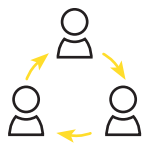
Legality



Teamwork



Optimization



Customer orientation



Sustainability



Quality



- Bänninger Group of Companies
- Worldwide
- Made in Germany



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FOREWORD

Dear employees,

Reliability, credibility, responsibility, fairness and, in particular, legality are essential building blocks of our business success. This clear commitment unites us as managing directors as well as all employees and companies worldwide across national borders and cultures. It is of paramount importance to us.

To underline the importance of this commitment, we have formulated our stance on legal requirements and ethical issues in this „Code of Conduct“. The Code of Conduct serves as a guideline for our behavior in business dealings and provides an excellent foundation for creating the trust that is so important for our business success.

PREAMBLE

Compliance with the principle of legality and responsible and fair business practices have always been a top priority for our company and an integral part of the Bänninger values. Numerous guidelines and instructions contain requirements for our activities as employees. We always familiarize ourselves with these and act in accordance with them. The main contents of these regulations are summarized in a simplified form in this Code of Conduct to make it easier for us to comply with the regulations. For some activities, laws or regulations from other or even several legal systems may also apply.

If more specific guidelines or central instructions exist for topics covered by this Code of Conduct, these must be observed. The special regulations must not contradict the principles of the Code of Conduct.

THE PRINCIPLES WHICH GUIDE US

1. GENERAL PRINCIPLES

Scope of application

The Code of Conduct sets out binding rules that must be observed by every employee of the company. In particular, the members of the Management Board and all managers are responsible for the active implementation of this Code of Conduct. They must act as role models in every respect. The Code is the basis and guideline for overcoming ethical and legal challenges in day-to-day work.

Guiding principles

As a reliable, professional supplier, Bänninger offers everything from pipes and prefabricated assemblies to technologically optimized injection moulded parts from a single source.

The Bänninger Group is a family business. Customers appreciate the exceptional flexibility and fast response times of this flat hierarchy.

Our long-lasting success is the result of a simple recipe: For us, people are at the center of all considerations. Our culture is characterized by trust and mutual appreciation. The requirements of our customers are as varied as the possible applications of our products. We therefore produce pipes and fittings that are real „problem solvers“ for the people who process and use them.

Bänninger is represented in almost all branches of industry. Areas of application include the water and gas industry, the energy industry, the chemical process industry and the pharmaceutical industry.

Conservation of resources and respect for the environment are at the forefront of all our business ventures.

Uncompromising quality, outstanding customer benefits and high operational reliability are at the forefront.

We realize tailor-made customer solutions and application-oriented new developments with maximum flexibility, precision and cost-effectiveness.

The know-how of our employees in plastics processing makes Bänninger a successful global player.

Law-abiding, compliant, responsible and fair behavior

We comply with the principle of legality in all actions, measures, contracts and other processes. In particular, we do not deceive customers, authorities or the public and do not participate in such deception by third parties.

The company observes the laws and other legal provisions of the countries in which it operates. This also expressly applies to the provisions of national, European and inter-



national chemicals legislation and to embargo, customs and export control regulations.

Indications of possible irregularities

We are called upon to inform our managers of possible violations of the regulations contained in this Code of Conduct. We can also contact the management or the ombudsman's office at any time.

What is the ombudsman's office?

The ombudsman's office is an independent, neutral body, so we ensure the confidential treatment of reports at all times. In addition, an external service provider never has a conflict of interest with colleagues or managers in the company.

We have the option of reporting information via various communication channels. We prefer to submit reports stating our name, but they can also be submitted anonymously. The information will be treated confidentially. Any form of discrimination against Bänninger employees or contractual partners due to a report made in good faith is excluded. This also applies if the report subsequently proves to be unfounded.

Who can we report violations to?

In addition to our managing directors or the responsible department heads, we can also report violations to the ombudsman's office:

Law firm Greilich Hirschmann Benedum & Coll
Bismarckstrasse 5
D-35390 Gießen
Phone: 0641 / 9 75 65- 0
Fax: 0641 / 9 75 65-99
E-Mail: info@ghb-partner.de

HOW WE PROTECT RELATIONSHIPS OF TRUST

2. CONDUCT TOWARDS COMPETITORS, BUSINESS PARTNERS AND THIRD PARTIES

Supply chain

We comply with the Supply Chain Due Diligence Act and work against human rights violations in the supply chain; we expect the same from our suppliers.

Competition and antitrust law

The company respects the rules of fair and open competition and does not enter into any agreements that influence competition in an impermissible manner.

Employees of the company are obliged to comply with the rules of fair competition. In particular, any agreement, but also any coordinated behavior with competitors on the following topics.

- Prices and price components
- conditions
- customers
- Delivery areas
- Quotas and capacities
- Agreed market exits
- Coordination on planned innovations
- boycotts

Invitations to tender

If a contract is awarded on the basis of a formal invitation to tender, the company will not discuss or coordinate offers with other bidders. This applies to both public and restricted invitations to tender and regardless of whether it is a public or private procurement procedure.

Corruption

The company expressly opposes all forms of corruption in Germany and abroad and avoids even the appearance of attempting to influence business decisions through unfair business practices. No employee may exploit the company's business connections for their own benefit or that of others or to the detriment of the company. In particular, this means that no employee may grant or accept unauthorized private benefits (e.g. money, material assets, services) in business dealings that are likely to influence a proper decision. Every employee of the company is obliged to seek advice or assistance in the event of suspicions or legal doubts regarding the existence of corruption or white-collar crime. The managing directors offer advice and assistance.

Granting and accepting benefits, invitations and gifts

Invitations, such as to business meals or events that are in line with recognized business practices and are appropriate, may be extended or accepted if they do not serve the purpose of undue preferential treatment. The same applies to the acceptance or granting of gifts. If there is any doubt as to the existence of an objective reason or the customary nature of a gift, the employee must ask



the Compliance Officer or a managing director in advance. This point is regulated internally in a comprehensive and informative manner.

Donations and sponsoring

The commissioning of consultants, agents and other intermediaries must not be used to circumvent the ban on bribery. Donations are only made on a voluntary basis and without any expectation of consideration. Donations and sponsoring activities must not be designed to covertly promote decisions in the interests of the company.

The donation must be transparent. The recipient of the donation and the specific use by the recipient must be known. It must be possible to account for the reason for the donation and the intended use at any time. Remuneration similar to donations must be avoided. Remuneration similar to donations are benefits that only appear to be granted as remuneration for a service, but whose value significantly exceeds the value of the service.

Money laundering

The company does not tolerate money laundering. All employees are obliged to strictly comply with anti-money laundering laws. Furthermore, they must immediately report suspicious forms of payment or other transactions that indicate money laundering to the compliance officer or a managing director.

Tax law / customs law / foreign trade law

The company prepares tax returns and declarations truthfully. All dutiable goods are properly cleared through customs by the company. The company consistently complies with the legal requirements for export control and customs in the areas of foreign trade and customs law and ensures their proper implementation.

The company expects its suppliers to provide export control and foreign trade data in a qualified and timely manner and to implement sufficient standards for security in the supply chain as part of global customs security programs.

3. AVOIDING CONFLICTS OF INTEREST

Employee loyalty

The company expects loyalty from its employees. It ensures that its employees do not find themselves in situations in which their personal or financial interests conflict with those of the company or its business partners. The company's employees must immediately report any personal interest that may exist in connection with their work to their superiors.

Employees of the company are prohibited from managing a company or working for a company that is in competition with the company. This also applies to the involvement of a close relative or partner.



4. HANDLING OF INFORMATION

Company and business secrets

The company's employees are obliged to maintain confidentiality regarding company and business secrets and other internal matters. This applies accordingly to information about contractual partners and customers that is not publicly accessible. The confidentiality obligation continues to apply after termination of the employment relationship.

Data protection

In addition to the general confidentiality regulations (e.g. Section 17 UWG), data secrecy in accordance with the GDPR must be observed. In particular, it is prohibited to process, disclose, make accessible or otherwise use protected personal data without authorization for any purpose other than the respective lawful performance of tasks. This obligation to maintain data secrecy continues to apply even after leaving the company.

Duty of truthfulness

All reports and other written documentation must be correct and truthful. This applies regardless of whether the reports are internal or external.

Data entries and other records must be based on the principles of proper accounting and must always be complete and correct.

5. PRINCIPLES OF SOCIAL AND ECOLOGICAL RESPONSIBILITY

Social responsibility

Social responsibility is an indispensable component of value-oriented corporate management and a key factor for sustainable corporate success.

Human rights

The company respects and supports internationally recognized human rights. In this context, we are also in constant dialog with our suppliers to ensure that our products do not contain raw materials from conflict regions.

Child labor

The prohibition of child labor and forced labor in any form is observed.

Prohibition of discrimination

Discrimination against employees and third parties is not tolerated. The company firmly opposes unacceptable treatment of employees, in particular sexual or verbal harassment.

Equal opportunities

The company promotes equal opportunities for its employees.

Employee's rights

Employees' freedom of assembly and freedom of association are recognized to the extent legally permissible under national law. The company observes the applicable national laws and labor standards with regard to appropriate remuneration and maximum working hours. This naturally also includes compliance with all provisions of the law regulating a general minimum wage in Germany. The company ensures fair working conditions overall.

Occupational health and safety

Occupational health and safety in the workplace is guaranteed in accordance with national regulations.

Environmental and climate protection

Sustainable environmental and climate protection and resource efficiency are important corporate goals for us. Both in the development of new products and services and in the operation of production facilities, we ensure that all resulting effects on the environment and climate are kept to a minimum and that our products make a positive contribution to environmental and climate protection for our customers.

Every employee has a responsibility to treat natural resources with care and to contribute to the protection of the environment and climate through their individual behavior.

Consumer interests

Where consumer interests are affected, the company complies with the regulations for the protection of consumers.

Social commitment

The company contributes to the social and economic development of the country and region in which it operates.

6. COMPLIANCE WITH THE CODE OF CONDUCT

Communication

The company shall familiarize its employees with the contents of this Code of Conduct and explain the obligations arising from it. The company communicates the principles of the Code of Conduct to its business partners.

Guidelines and processes

The behavioral requirements set out in this Code of Conduct are binding for the company's employees as part of their employment contract and must therefore be complied with.

The company takes all necessary steps to implement the basic values and requirements contained in this Code of Conduct through suitable organizational measures as well as appropriate guidelines and processes in all business areas.

**"WE KEEP CONFIDENTIAL INFORMATION SECRET
AND HANDLE SENSITIVE DATA RESPONSIBLY."**



Regular checks

The company commits to regularly monitoring compliance with the Code.

Notification of violations

Every employee of the company is required to report any (potential, including imminent) violations of laws, internal regulations and this Code of Conduct that they observe to a managing director without delay.

Reports of a violation of this Code will be treated in strict confidence and will not have any negative consequences for the reporting employee, unless a deliberately false allegation has been made.

Consequences of violations

Depending on their severity, violations of the Code of Conduct and statutory provisions may result in consequences under labor and liability law and may also lead to criminal sanctions.





■ RELIABLE PARTNER WORLDWIDE...



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