

The background of the cover is a photograph of two men shaking hands in a business setting. The man on the left is wearing a dark suit, a light blue striped shirt, and a silver wristwatch with a white face and black leather strap. The man on the right is wearing a dark suit. They are shaking hands over a desk with papers and a pen. The image is framed by large, curved, overlapping bands of blue, orange, and grey.

# BTC Engineering GmbH Code of Conduct

BTC is a leading developer and manufacturer of solution-oriented bearing products and components. We offer a wide range of bearing solutions tailored to the technical and operational needs of our customers.

In order to meet these needs, it is a matter of course for us to commit ourselves both internally and with our business partners to healthy and sustainable business conduct and corresponding corporate ethics.

BTC corporate values are fundamental values and the basis for identity and stability to ensure future sustainability. Therefore, this Code of Conduct is our foundation in everything we do and who we are. Together we commit to it, with no exceptions!

The following 10 basic points do not cover exclusively - rather fundamentally and essentially - our behavioural requirements internally as well as externally.



## Contents

1. Data Protection
2. Prevention of Money Laundering
3. Fair Competition, Antitrust Law
4. Prohibition of Corruption
5. Respect for Labour and Human Rights
6. Equality and Equal Opportunities
7. Health and Work Safety
8. Product Compliance, Sustainability, Environmental and Climate Protection
9. Export Control
10. Reporting

# 1. Data Protection



The protection of personal data, especially of employees, customers and suppliers, is a very high priority for BTC. Therefore, we collect and process personal data only when required by law. Personal data may only be collected or processed with the consent of the person concerned and within the framework of legal regulations.

This also and in particular applies to our customer data, with regard to sensitive business content in terms of confidentiality, availability and completeness, so that these may be adequately protected and only distributed after mutual agreement. BTC will therefore make appropriate efforts within the framework of its Information Security Management System.

## 2. Prevention of Money Laundering

BTC complies with its legal obligations to prevent money laundering and does not engage in activities relating to money laundering. BTC is committed to anti-money laundering and communicates this

expectation to its business partners to encourage them to take appropriate measures with respect to national and international standards and laws.

## 3. Fair Competition, Antitrust Law



BTC is committed to complying with relevant antitrust and competition laws. Therefore, BTC prohibits any conduct that is intended to or has the effect of hindering, restricting or distorting free and fair competition. Our competitive position is based solely on our business success factors, in particular our innovative strength, quality, reliability and fairness. Therefore, we always comply with the relevant rules of antitrust law in our dealings with competitors, business partners and end customers.

In particular, BTC does not tolerate:

- Anti-competitive contracts, agreements or arrangements with competitors.
- Abuse of a leading position in a defined market.
- Restrictions or contracts at the vertical level (suppliers, customers) that intend to or have the effect of preventing or restricting free and fair competition contrary to applicable laws.

## 4. Prohibition of Corruption

We prohibit any form of corruption. BTC does not tolerate any form of bribery of employees, business partners or business practices that could create the impression of undue influence. Therefore, BTC employees are prohibited from directly or indirectly promoting, accepting, offering or granting advantages in business transactions if they are aimed at dishonestly influencing business processes,

or even if they merely give the impression of doing so. This includes both material and immaterial benefits (such as gifts, invitations or other benefits). We ensure that our employees act with integrity, especially in their business dealings with authorities at home and abroad.

## 5. Respect for Labour and Human Rights

“Human dignity is inviolable.” What is anchored in Article 1 of the Basic Law is also the first priority for BTC as the basis for sustainable satisfaction and company success, as our employees are our most important success factor.

We at BTC respect internationally recognised human rights and support their observance. We reject all forms of human trafficking, forced labour and child labour. We recognise the right of all employees to form trade unions and employee representatives on a democratic basis within the frame of national legislation. All work performed by BTC employees

and their suppliers must be voluntary. The right to adequate remuneration is recognised for all employees. Payments and other benefits must at least comply with the respective national or local legal standards or the standards in the economic sectors, industries and regions.

BTC business partners are encouraged to actively seek to improve and develop human rights in their locations of operation, to avoid and remedy negative human rights impacts by reporting and improving them as necessary.

## 6. Equality and Equal Opportunities

For us at BTC, a culture of equal opportunities, mutual trust and respect is fundamental. We therefore promote equal opportunities and prevent discrimination in the recruitment, promotion, training and development of our employees. All employees are treated equally, regardless of gender, age, colour, nationality, culture, ethnic origin, sexual orientation, disability, religion or belief, or any other characteristic protected by applicable law. These principles apply to all employees of BTC at all levels and in all areas. The decisive factors

are exclusively performance, personality, abilities, skills and qualifications as well as social competences.

Business partners must comply with and implement all applicable legal requirements for a safe and healthy working environment. BTC encourages all business partners to ensure that they and their employees take steps to ensure compliance with these laws. BTC is committed to the health and safety of its employees and to the prevention of occupational accidents and expects its business partners to do the same.

## 7. Health and Work Safety



The health and safety of our employees is very important to us. Occupational health and work safety of our employees are elementary corporate goals, which are at least equal to the quality of our products and our economic success. Occupational safety and health protection is therefore an essential part of all business processes and is incorporated into all technical, economic and social considerations

from the very beginning. In addition, we observe the applicable legal requirements and standards for a safe and healthy working environment and take appropriate measures to ensure this. Our employees must follow and implement the legal and internal health, safety and occupational safety requirements in their work.

## 8. Product Compliance, Sustainability, Environmental and Climate Protection.

Our BTC products comply with the highest quality standards. Therefore, our high quality products also aim to meet safety requirements as well as comply with all applicable laws and standards. Zero customer incidents due to our products is our goal, therefore we manufacture fully compliant products at a consistent level.

We respect the natural habitat of our planet and are committed to conserving resources and reducing pollution. To this end, our environmentally friendly product design plays an essential business role.

We are proud to contribute to "the future of mobility" with products for environmentally friendly conservation and the sustainability of our planet. That is why we are proud of our commitment to the e-bike business. All BTC employees are encouraged to take care to produce less waste, even "on a small scale" and in their own processes, and to make a contribution to waste recycling by separating waste. This commitment to sustainable environmental protection forms the basis of our work.

## 9. Export Control

BTC expects its business partners, without exception, to strictly comply with all applicable international trade regulations and to follow import and export

control rules and regulations, including applicable economic embargoes.

## 10. Reporting

BTC Engineering's sustainable success is based on robust values. We place great emphasis on reliability, honesty, credibility and integrity. As a result, we take great care to be open and honest. This applies in particular to our reporting and communication about the company's business transactions to all interested parties such as: Investors, employees, customers, business partners, the public and government institutions.





BTC asks all of its business partners to report any violations of these requirements. For these purposes, the following email address and BTC's central mailing address will serve as the point of contact for direct or anonymous reports:

BTC Engineering GmbH  
Grafentalstrasse 5  
72800 Eningen unter Achalm



Email: [compliance@btc-engineering.de](mailto:compliance@btc-engineering.de)

Cooperation and trust are the basis of the relationship between BTC and its business partners. In order to ensure these contents, BTC asks its employees and business partners to support them appropriately and in a target-oriented manner as well as with concrete information in order to ensure a demanding behaviour by means of effective sustainable solutions and measures.