



# BURGER GROUP Code of Conduct

---

Principles of Legality



# The Focus is always on the Person.

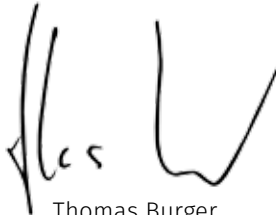
---

## DEAR COLLEAGUES,

Responsible and lawful action is one of the prerequisites for our entrepreneurial success. The management places high expectations on itself and on each individual employee. This is an integral part of our corporate culture and forms the basis for the trust placed in us by our customers, business partners, and the public. The reputation of the BURGER GROUP, which we develop every day with great commitment, can be damaged by individual legal violations. Therefore, each one of you is committed to responsible behavior and compliance with existing laws. We are aware that the internationalization of business activity and the multiplicity and complexity of legal regulations increase the risk of legal infringements. This is why we have jointly approved the following Code of Conduct (Legal Compliance Code).

This code is valid for all locations of the BURGER GROUP worldwide. It should help you to recognize legal risks and to avoid legal violations. The directors and on-site managers expect you to carefully read this Code of Conduct and regard it as a binding standard for your actions.

Each of you makes an indispensable contribution to the success of the BURGER GROUP, today and in the future. Because every single person counts.



Thomas Burger



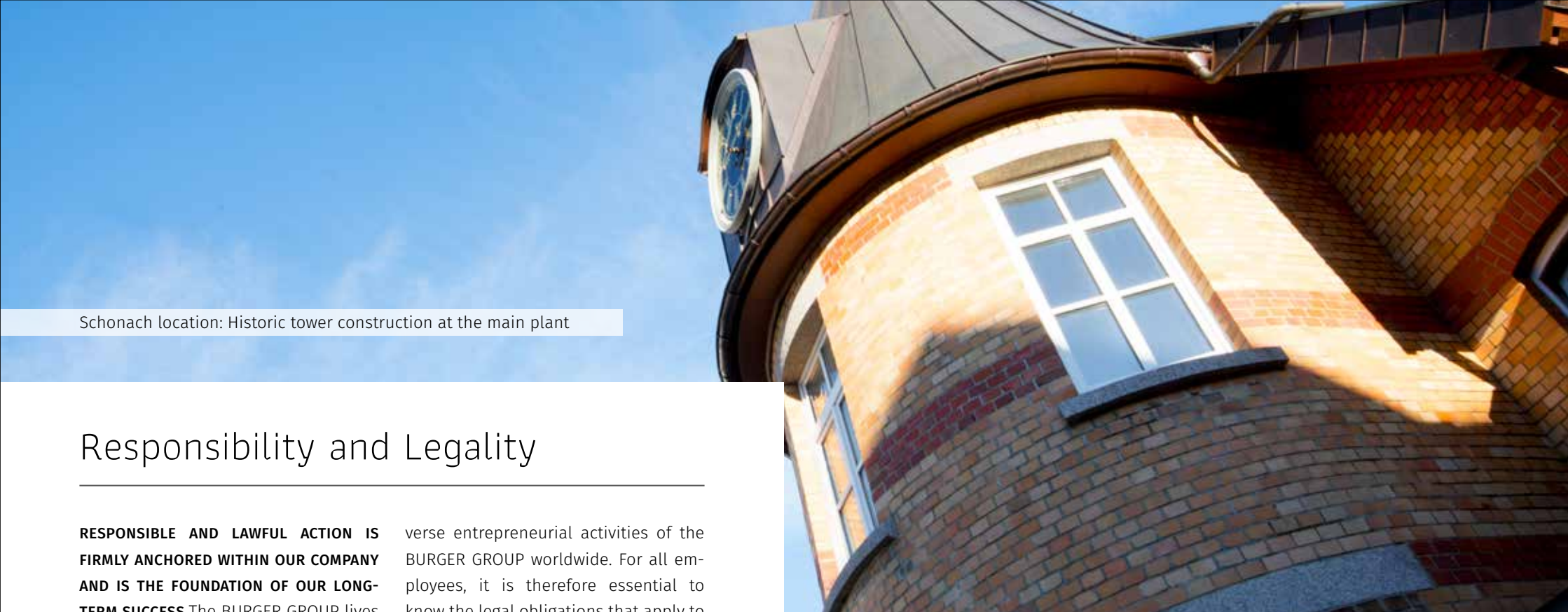
Silke Burger



Fabian Burger



Manuel Burger



Schonach location: Historic tower construction at the main plant

## Responsibility and Legality

---

**RESPONSIBLE AND LAWFUL ACTION IS FIRMLY ANCHORED WITHIN OUR COMPANY AND IS THE FOUNDATION OF OUR LONG-TERM SUCCESS.** The BURGER GROUP lives up to its ecological and social responsibility: With its values and fundamental convictions, the BURGER GROUP builds its corporate culture on a foundation of trust, mutual appreciation, and tolerance.

These guidelines are concerned with compliance with currently applicable legislation. The BURGER GROUP takes all necessary measures to ensure lawful operation (legal compliance) by its executive bodies, its executives, and its employees. The entirety of these measures is regulated through the practices of the company. The applicable laws form the binding framework for the di-

verse entrepreneurial activities of the BURGER GROUP worldwide. For all employees, it is therefore essential to know the legal obligations that apply to them, and to convincingly commit themselves to compliance. This characterizes the public image of the BURGER GROUP and creates trust in its products and brands. This trust is the basis for our corporate success.

By contrast, legal violations lead to serious disadvantages for the company, for example in the form of fines or claims for damages. Possible reputational damage also comes into play.

The BURGER GROUP is represented worldwide, with locations in 4 countries. Our global activities are subject to a

wide range of country-specific and international legislation. By adhering to applicable laws, every employee acts in the interests of the BURGER GROUP. Legal prohibitions and obligations must be observed, even if this may be inappropriate or economically unfavorable from the point of view of the individual or the company. Lawful action always takes precedence when in doubt. Every employee can rely on this principle. This Code of Conduct shows each and every employee the range and focus of the legal framework in relation to the

BURGER GROUP, and clarifies their unconditional liability. The principles outlined in this document apply to all colleagues, customers, suppliers, business partners, and public bodies.

The Code of Conduct applies internationally for all locations and for all divisions of the BURGER GROUP. For additional business-specific or country-specific requirements, it can be supplemented by local compliance programs.





Schonach, Schönwald, and Triberg locations: Black Forest Landscape

## The Legal Framework

---

### **PRODUCTS, SERVICES, CUSTOMERS, AND MARKETS OF THE BURGER GROUP**

Our customers can rest assured that the products of the BURGER GROUP meet all legal requirements, such as personal safety and environmental laws. For this purpose, we monitor all relevant legal information worldwide and integrate the resulting technical specifications into product and process development. We have established ap-

propriate frameworks and processes to fulfill our responsibility for product compliance. Product safety is the foundation of our comprehensive product responsibility. The products of the BURGER GROUP are developed and manufactured under strict application of our quality management systems.

We monitor our products on the market and review all safety information. If

necessary, we will immediately inform the responsible customers and competent authorities and take all measures necessary to protect our customers. Our international activities are subject to foreign trade, tax, and customs laws. In our transnational activities and in the development of new markets, a wide variety of foreign trade, tax, and customs rules must be observed. We

take our social responsibility seriously in the fulfillment of tax and customs duties.

Fundamental to a trusting customer relationship is the careful handling of the information and data of our customers in accordance with legal and contractual requirements, such as data protection laws.





St. Antoni, Switzerland location: Gantrisch Nature Park

## Avoidance of Corruption

---

**THE BURGER GROUP STANDS FIRMLY AGAINST BRIBERY AND CORRUPTION.**

Corruption leads to immense economic damage, and is a worldwide problem. It jeopardizes fair competition, as the best provider is not usually the one that comes out on top. As a responsible company, we take a clear stand against corruption. We expect the same from our business partners. Donations to business partners and journalists are only permitted to a reasonable extent.

**COMPULSORY BEHAVIOR MEANS THAT FOR EACH INDIVIDUAL, PRIVATE AND CORPORATE INTERESTS MUST BE CLEARLY SEPARATED.**

Corruption often arises as a result of conflicts of interest; that is, when professional decisions are affected by private interests. The BURGER GROUP therefore demands that its employees avoid situations that could lead to personal conflicts of interest. If there is a possibility of a conflict of interest, the respective manager must be consulted.

**THE BEST VENDOR IS AWARDED THE CONTRACT—THE ESTABLISHMENT OF BUSINESS RELATIONSHIPS TAKES PLACE EXCLUSIVELY ACCORDING TO FACTUAL CRITERIA.**

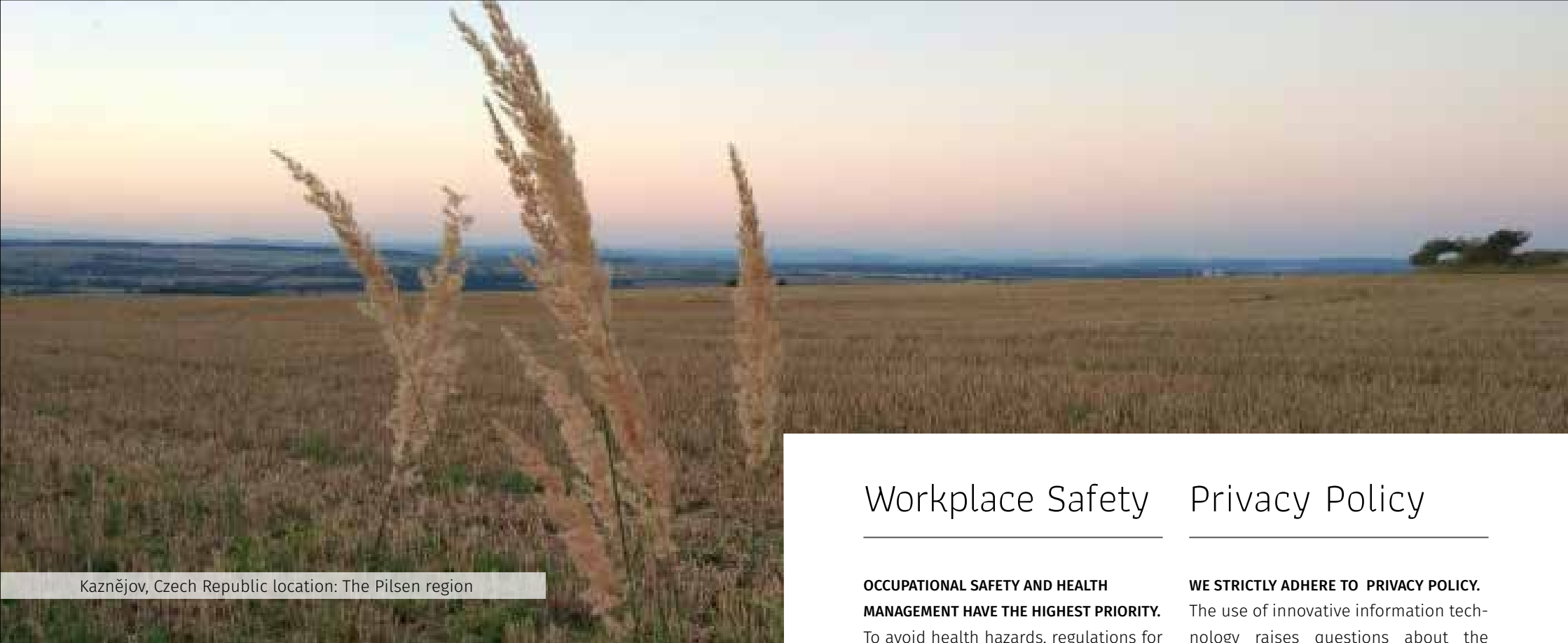
Business relations may only be initiated or maintained according to factual criteria, such as, quality, price, technological standard, and reliability of the business partner. Commercial and personnel decisions, consultancy services, or recommendations from BURGER GROUP employees must not be influenced by private interests and relationships, or be motivated by material or immaterial benefits.

Even the appearance of personally motivated judgements should be avoided. The same applies vice versa: as the

BURGER GROUP, we win our business partners over with our products and services—not through inappropriate benefits.

**EMPLOYEES OF THE BURGER GROUP MAY NOT ACCEPT, DEMAND, OFFER, OR GRANT ANY PERSONAL BENEFITS IN CONNECTION WITH THEIR OFFICIAL DUTIES.**

The prohibition on accepting or granting benefits not only applies to direct financial benefits, but also to other benefits that could jeopardize official objectivity, such as invitations and gifts. Therefore, financial and other benefits that exceed the scope of reasonable and customary business practice should be rejected. The same applies to



Kaznějov, Czech Republic location: The Pilsen region

benefits to related parties, such as family members or close friends. A violation of these principles can not be justified by the behavior of others or the motto: "Everyone does it."

To assess appropriateness and customariness, the BURGER GROUP supports its employees with the help of value limits and other criteria. For example, these benchmarks apply to benefits such as gifts, business lunches, and events, both in accepting and granting.

When it comes to higher-quality benefits, management approval must first be obtained.

**A KEY FACTOR IN PREVENTING CORRUPTION IS TRANSPARENT AND RELIABLE BUSINESS RELATIONS**

Accordingly, we expect our external providers to commit themselves to avoiding corruption as well. On this basis, the BURGER GROUP carries out a structured process for compliance risk assessment.

## Workplace Safety

---

**OCCUPATIONAL SAFETY AND HEALTH MANAGEMENT HAVE THE HIGHEST PRIORITY.**

To avoid health hazards, regulations for health and safety must be strictly observed. Occupational health and safety are not a minor matter, but a mandatory task for every individual. Executives play an important part as role models. We plan and operate our facilities in strict compliance with safety regulations. This reduces the risk of accidents and ensures trouble-free plant operation.

Executives take their responsibility and authority seriously. They ensure that the employees at the plants are carefully selected and trained.

## Privacy Policy

---

**WE STRICTLY ADHERE TO PRIVACY POLICY.**

The use of innovative information technology raises questions about the self-determination of private information, which we greatly value. The BURGER GROUP places high importance on data protection when dealing with the personal data of its customers, employees, and business partners. Personal details are only collected, processed, or used, if this is legally permitted or the party concerned agrees. We are committed to the principles of protecting personal data, and to the transparency of data processing. With this claim, we ensure a uniform and adequate level of data protection throughout the Group.





Barrie, Canada location: Georgian Bay

## Environmental Protection

---

### **THE BURGER GROUP TAKES RESPONSIBILITY IN CARING FOR THE ENVIRONMENT.**

Only those who work sustainably can be successful in the long term. Environmental law provides the BURGER GROUP with binding standards for this purpose. The employees responsible for environmentally relevant facilities and activities are aware of their particular responsibility for compliance with environmental law. We avoid wasting energy and resources and are supported by our internal energy representatives.

## Cooperation with Authorities

---

### **COOPERATION WITH PUBLIC AUTHORITIES IS FOUNDED ON MUTUAL TRUST AND APPRECIATION ON THE BASIS OF APPLICABLE RULES AND REGULATIONS.**

We strive for a cooperative and transparent relationship with all relevant authorities, as well as with public authorities. In doing so, we place importance on observing the legally prescribed procedures for investigations and other official activities. Observing procedural rights is a key component in the interaction of the BURGER GROUP with authorities.

## Competitive Behavior

---

### **FAIR COMPETITION IS THE PREREQUISITE FOR SUCCESS THROUGH PERFORMANCE. POLICIES RESTRICTING FAIR COMPETITION ARE FORBIDDEN WITHIN THE BURGER GROUP.**

The BURGER GROUP is fully committed to the principles of the market economy and fair competition. We pursue our corporate goals exclusively in accordance with the performance principle and in compliance with the applicable rules of competition. We also expect this from our competitors on the market

and our business partners. We compete with other manufacturers not only in sales, but also in the development of our products, and in the procurement of primary materials— regardless of whether this is a formal agreement or an informal conversation, even outside of official occasions. Any kind of conscious behavioral management is prohibited if it leads to a restriction of fair competition. Avoid even the mere appearance of a violation.





Deißlingen location: The Neckar source

## Protection of Company Values

---

### **INNOVATIONS AND BRANDS MUST BE PROTECTED AGAINST IMITATION.**

Innovations as well as our knowledge and experience form the basis for the development and production of attractive products and services from the BURGER GROUP. In order to secure our lead in the face of competition, these innovations and skills are the best way to protect against imitation. In the field of technology, we call upon legal actions as a means of innovation protection.

When working with suppliers, development partners, customers, or other business partners, the protection of confidential information, know-how, and trade secrets is essential. Special

caution is also required when exchanging information in electronic networks. Each employee is required to use data and information that comes to their knowledge only on an operational basis, and only within the permitted scope, and, if disclosed within or outside the company, to check whether the recipient receiving the data and information is authorized to do so. Depending on the importance of the information, additional security measures such as confidentiality agreements or audits are to be agreed upon.

## Respect and Non-Discrimination

---

### **THE DIVERSITY AND UNIQUENESS OF OUR EMPLOYEES CONSTITUTE THE DRIVING FORCE BEHIND THE PERFORMANCE AND INNOVATIVE POWER OF THE BURGER GROUP.**

Each individual employee is respected as an individual. Accordingly, professional interactions within the company are characterized by appreciation and mutual understanding, as well as openness and fairness.

### **DISCRIMINATION AND HARASSMENT WILL NOT BE TOLERATED.**

No one shall be discriminated against, favored, or harassed on grounds of race, ethnic origin, color, nationality, sex, religion or belief, disability, age,

veteran status, sexual orientation, or other legally protected characteristics. Sexual harassment, as well as all other forms of workplace harassment, is prohibited. Everyone has a right to be protected against sexual harassment. It does not matter if an offender considers his or her own behavior acceptable, or if the victim has the opportunity to escape the harassment.

### **MANAGERS ARE ROLE MODELS**

Every leader is a role model with their behavior, and has to ensure a work environment that is free of discrimination and harassment.





## Implementation of the Code of Conduct

---

### **COMPLIANCE WITH APPLICABLE LAW IS THE PERSONAL RESPONSIBILITY OF EACH INDIVIDUAL.**

Every employee of the BURGER GROUP is obliged to adhere to this Code of Conduct and to make its principles a binding benchmark in the fulfillment of daily tasks. For this, it is necessary to actively stay up to date on the existing requirements.

All managers must ensure compliance with this Code in their area of responsibility. Every manager is obliged to instruct their employees about the content and meaning of this Code of Conduct. They encourage their employees, to the best of their ability, to act lawfully. If there are indications of legal violations, these must be consequently

investigated. Managers are obliged by the law to check for violations regularly, and to discuss these with employees. This is the only way to ensure that the principles set out in this Code are lived by all of us on a daily basis.

### **THE EXECUTIVES OF THE BURGER GROUP ACT AS ROLE MODELS IN TERMS OF VALUES, INTEGRITY, AND COMPLIANCE.**

In particular, they avoid personal conflicts of interest. In dealing with their employees, the executives are open to discussions and differing opinions. The internal rules of the BURGER GROUP are binding for everyone in the company. Everyone is obliged to stay up to date on the rules applicable to their area of responsibility.

### **THE BURGER GROUP DOES NOT TOLERATE ANY LEGAL VIOLATIONS BY ITS EMPLOYEES.**

Violations of the law may result in labor law sanctions, up to and including the termination of employment for the guilty party. Of particular importance to the Compliance Organization of the BURGER GROUP are the department managers, such as the sales managers and finance managers, who together form a network of compliance officers. In this role, they are responsible for the implementation and enforcement of

compliance requirements in their area of responsibility and report to HR and the Chief Quality Officer. In addition, the BURGER GROUP offers its employees the opportunity to anonymously and confidentially provide information on potential legal violations in the company via the comment boxes set up for this purpose. The same applies to risks and weaknesses that can lead to legal violations. Compliance with and implementation of this Code is reviewed on a regular basis.





