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1. Aim and purpose

This Code of Conduct applies to BBC Cellpack Technology AG as well as to all its business partners.

With this guideline, BBC Cellpack Technology AG aims to,

- a) to create a uniform understanding of compliance and integrity with its business partners,
- b) to prevent breaches of integrity with its business partners by bindingly defining unacceptable or unethical behavior in business life and not tolerating it under any circumstances.
- c) to send a clear signal to the relevant stakeholders.

If the legislation of a country has lower requirements than those set out in this Code, the business partners undertake to comply with the highest standards set out here. In the event of direct conflict, mandatory local law shall prevail. Business partners should endeavor to make every effort to comply with the principles of this Code

2. Scope of application

In all the markets in which it operates, BBC Cellpack Technology AG conducts its business activities in such a way that they comply with local, national and international laws and standards as well as ethical principles and internal core values.

This expectation also applies to our business partners.

The conditions that determine appropriate and ethical conduct in business dealings must be assessed in each individual case, considering the specific local circumstances and a reference standard.

This guideline cannot comprehensively and exhaustively list and specify all requirements for expected behavior. If there are no clear requirements arising from legal provisions or internal rules, you should act in good faith, using your best judgment and common sense. The following questions can help:

1. is the behavior in accordance with the legal provisions as well as the ethical guidelines?
2. are there no negative consequences for BBC Cellpack Technology AG, for the business partner itself, or for its respective bodies, employees or third parties?

If the above two questions cannot be answered with a clear yes, the intended cooperation / measure / initiative should be abandoned in any form.

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3. Terms / abbreviations / definitions

Business partner

In this context, business partners are all partners who enter into a business relationship with BBC Cellpack Technology AG. This can be as a supplier, service provider or consultant.

Gifts

Gifts include not only products (goods or services), but also all types of non-cash benefits, including cash.

Intermediaries

Intermediaries are representatives, agents, consultants, lobbyists or other persons who provide services for the business partner.

Bribes

These are benefits intended to influence the initiation of a business relationship or the awarding of contracts. Minor gifts, customary tips or the acceptance of invitations within reasonable limits are not considered bribes. At BBC Cellpack Technology AG, the appropriate limit for minor gifts, meals or entertainment has been set at a maximum of CHF 200. Other locally specific circumstances may deviate from this and must be considered.

Social media

z. e.g. Facebook, Instagram, YouTube, Pinterest, LinkedIn, XING, Twitter, Vimeo, Snapchat, TikTok and other platforms used for the unguided dissemination of information.

4. Principles of conduct and ethics

4.1 General

When carrying out business activities, the legal and contractual obligations applicable to one's own activities, the internal management and conduct principles and other guidelines, processes or specifications of BBC Cellpack Technology AG must be complied with.

4.2 Bribery / granting of advantages

4.2.1 Principle

BBC Cellpack Technology AG rejects any form of bribery and the granting or acceptance of advantages to public officials and private individuals as absolutely unacceptable behavior.

4.2.2 Active bribery

Active bribery is the act of offering a person an undue advantage in connection with their activities. This person may be a public official or a private decision-maker. The undue advantage is offered for a specific act or omission in breach of duty or at the discretion of the person in favor of the person, a third party directly or indirectly via intermediaries.

4.2.3 Passive bribery

Passive bribery is committed by anyone who, as a decision-maker, demands, allows himself to be promised or accepts an undue advantage for himself or a third party, either directly or indirectly via an intermediary, for a specific act or omission that is contrary to his duties or is at his discretion.

4.2.4 Permitted practices

Any unsolicited gifts or entertainment may be accepted or offered to employees of a private company provided that they:

- a. do not go beyond the usual scope of a courtesy and recognized business practices,
- b. are infrequent,
- c. do not create the appearance of an obligation,
- d. are properly disclosed/accounted for and
- e. Do not exceed the amount of CHF 200 in monetary terms or the equivalent value of benefits in kind.

4.2.5 Unacceptable practices

No gifts may be offered on a private basis for the purpose of circumventing their proper accounting. Unless otherwise expressly stipulated by law, no gift or offer of entertainment in any form whatsoever may be offered to a public official.

No gifts or offers of entertainment may be demanded from third parties.

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4.3 Competitive behavior

BBC Cellpack Technology AG and its business partners are committed to a free market economy and fair competition and comply with the applicable competition and antitrust regulations. In particular, there will be no unfair behavior and no agreements will be made with competitors on prices, territories or customers and no resale prices will be imposed on business partners.

Furthermore, BBC Cellpack Technology AG and its business partners recognize and comply with the relevant international trade restrictions and regulations of various countries and international organizations such as the USA, the EU and the United Nations. In case of doubt, planned actions or agreements that contain provisions that could hinder competition or violate international trade restrictions must be reported to BBC Cellpack Technology AG and, if necessary, examined by a specialist.

4.4 Confidentiality and data protection

Confidential information is only passed on internally to persons who need it to carry out their business activities and who are also authorized to receive it.

Confidential or proprietary information is subject to the requirement of confidentiality, which applies not only during the business relationship but also beyond its end.

Confidential or otherwise protected information from or about customers and other business partners of BBC Cellpack Technology AG shall be protected in accordance with the relevant statutory (data protection) provisions and any contractual agreements.

4.5 Conflicts of interest

Situations in which personal interests or the interests of third parties actually or even apparently conflict with the interests of BBC Cell-pack Technology AG must be avoided.

Recognized or suspected conflicts of interest (e.g. entering into business relationships with friends or family members) must be disclosed and reported immediately to the line manager. If necessary, the CEO or Quality Manager of BBC Cellpack Technology AG will determine how to proceed in such a case.

4.6 Protection of assets

The tangible and intangible assets and financial resources of BBC Cellpack Technology AG are protected as best as possible against theft, loss, misuse and waste, and are handled with care.

Their use, and in particular that of the Internet, e-mails and electronic tools, must be fundamentally and primarily restricted to business purposes.

Business and private expenses are strictly separated. In addition to the applicable expense regulations, the principles of clarity, transparency and verifiability (receipts) apply to business expenses.

4.7 Accuracy of accounting and reporting

The records and reports must be correct, complete and true to the best of our knowledge. The principles of proper accounting are observed. In particular, each accounting entry is based on documentary evidence and all assets and transactions are recorded.

4.8 Communication

Open and effective communication at all levels includes correct, timely, complete and truthful communication. This applies regardless of whether the communication is internal or external.

Social media make it possible to communicate immediately to a large target group. When using them, it must be ensured that applicable labor and data protection regulations or other internal guidelines are not violated.

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4.9 Cooperation

Selection of business partners

- BBC Cellpack Technology AG selects its business partners on the basis of objective and economic criteria and examines all offers from its suppliers fairly and impartially. Unprofessional preference or discrimination of suppliers, especially for private reasons, is strictly prohibited.
- In the case of invitations to tender, the contract is to be awarded to the most cost-effective offer in the long term, unless other reasons (quality, performance, long-term business relationship, creditworthiness, etc.) justify a different decision.
- If the most cost-effective long-term tender is not accepted, the relevant considerations must be documented without third parties being able to derive any claims from this.

To ensure that daily work can be carried out successfully and with commitment in a good business climate, people must treat each other with decency, openness and mutual respect. Tensions and conflicts must be openly addressed, explored and resolved. We also take full responsibility for the tasks assigned to us.

4.10 Equal opportunities

BBC Cellpack Technology AG and its business partners are committed to remunerating employees appropriately for their performance, ensuring equal opportunities - regardless of their origin, gender or other non-professional characteristics - and supporting them in their personal and professional development.

4.11 No harassment

Bullying, discrimination, sexual harassment or other harassment of any kind will not be tolerated and will be consistently sanctioned in proven cases.

4.12 Health, safety

BBC Cellpack Technology AG and its business partners act sustainably and responsibly and create safe working environments. They regard it as an ongoing task to continuously improve their warehouses, workplaces, processes, services and products and comply with the applicable health and safety regulations.

4.13 Environmental and material compliance

We have a responsibility to the international community to protect the environment in all our activities and along the entire value chain. In addition, we must comply with the relevant environmental laws and regulations at all our sites and - where possible and appropriate - exceed them. For this reason, we promote eco-efficiency in all our business activities and work to improve our overall environmental performance, particularly with regard to the use of hazardous substances and the reduction of CO2 emissions.

We expect our suppliers to adopt and adhere to our environmental sustainability principles and to commit their own employees, suppliers and other stakeholders to them.

This includes the following points:


4.13.1 Co2 footprint / decarbonization

BBC Cellpack Technology AG encourages its business partners to support decarbonization efforts and targets throughout their supply chain and throughout the life cycle of their products.

Greenhouse gas (GHG) emissions and energy use

- Business partners shall:
 - o Define targets, plans and measures to continuously reduce greenhouse gas emissions from their activities.
 - o Implement continuous energy efficiency programs whenever possible to minimize energy consumption and use renewable energy for the production of materials, components and services.
 - o Use water resources responsibly.
 - o Monitor progress regularly and provide BBC Cellpack Technology AG with the relevant emissions data on request.

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4.13.2 Waste management

Business partners must implement a systematic approach to waste management that focuses on the following

- o Identify, control, reduce and responsibly dispose of or recycle non-hazardous waste.
- o Minimize water, natural resources and raw materials. Innovation plays a key role in achieving
- o Wherever possible, business partners are encouraged to pursue strategies that are compatible with the principles of the circular economy, circular economy principles such as eco-design and eco-efficiency in the design of their products, packaging and services.

4.13.3 Material compliance / Handling hazardous substances

Hazardous substances are chemicals, materials or other substances which, if present or released, pose a risk to people and/or the environment. BBC Cellpack Technology AG requires its business partners to

- o Identify and avoid potentially hazardous substances to ensure safe handling of products;
- o ensure safe transportation, storage and disposal of these substances;
- o ensure the recycling of these substances as far as practicable.
- o whenever possible, replace the use of hazardous substances with new processes and materials;
- o comply with all applicable laws, regulations and standards regarding critical, prohibited or hazardous substances contained in the final product or used in the production process;
- o comply with regulations and directives that specify rules for the use and/or disclosure of certain chemicals. This includes the raw materials in products, including but not limited to the Dodd-Frank Act on Conflict Minerals, the EU RoHS1 Directive and the EU REACH2 Regulation;
- o complying at all times with all locally applicable laws and regulations and industry standards in the markets to which the goods or services are supplied.

4.14 Protection from child or forced labor

We and our business partners strictly reject child or forced labor without exception.

4.15 Information and reporting

Any observations or perceptions that others are obviously not complying with the provisions of this guideline must be reported immediately to BBC Cellpack Technology AG, stating their own identity, the relevant information (e.g. who, what, when, where, with whom, how) and any evidence.

4.16 Protection

Any person who makes a report in good faith and in the best interests of the company is protected and need not fear any disadvantages. In particular, confidentiality will be fully respected to the extent permitted by law. No retaliatory measures may be taken against them.

However, this protection does not apply to those who make abusive or deliberately false reports.

4.17 Consequences

In the event that the provisions of this guideline are not complied with, BBC Cellpack Technology may suffer damage and / or loss of reputation. BBC Cellpack Technology reserves the right to take legal action to cover the damage. In any case, failure to comply with the Code of Conduct may lead to the termination of the business relationship.

5. severability clause

Should individual provisions of this contract be invalid or unenforceable or become invalid or unenforceable after conclusion of the contract, this shall not affect the validity of the remaining provisions of this contract.

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6. Applicable documents

Document title	Document number
Various agreements with business partners and documents of the QM system of BBC Cellpack Technology AG	Miscellaneous

7. Document history

Version	Change / Chapter	Author / Date
01	New creation of the document CoC of the BBC Group updated to BBC Cellpack Technology AG	THA / 09/10/2024

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