

B/S/H/

Business Conduct Guidelines

of the BSH Group (BCGs)

- | Our Values
- | Our Commitments
- | Our Way of Doing Business



B/S/H/



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Dear colleagues,

We view the way that we manage ourselves, others, and our business as the foundation of our success. It's not only results that count for us, it's also how we achieve them. Therefore, our actions should always be determined by our values and principles, which are the foundation for our BSH Business Conduct Guidelines (BCGs).

The BCGs reflect our strategy – We.Shape.Markets. – our responsibilities, and legal requirements. Working at BSH means that we act fairly and respectfully in accordance with all applicable laws and internal rules in everything we do – towards our colleagues, consumers, and business partners. Our goal is to make consumers happy and customers successful. These core intentions are also reflected in the BCGs. We make these commitments not just because we're legally obliged to do so, but also because it's the right thing to do.

It's our primary goal to offer all employees an up-to-date guide to making responsible and informed decisions, especially in difficult situations.

The BCGs build a bridge between our values and the specific requirements of laws, our policies and regulations. In addition, our BCGs describe how we want to do business as a company: reliably, sustainably, and with integrity.

The BCGs are binding for all of us. Therefore, we encourage you to read the BCGs carefully and use them to guide you when you are unsure about how to make a decision or behave in a certain situation in business environment.

As a globally renowned manufacturer of home appliances, we always strive to act in the best interest of the company, consumers, and society. Based on our strategy, we put consumer happiness and customer success at the heart of our business in order to live up to our ambition of shaping markets. Following the BCGs will help us properly fulfill our common goal: To improve the quality of life at home around the globe.

Thank you for your commitment.

The BSH Board of Management

About Our Business Conduct Guidelines

The BCGs apply to all employees¹ of BSH² worldwide. They constitute the global standard internal guide for our conduct and our business activities. More specific or stricter rules may apply locally. Third parties don't derive any rights from these BCGs.

What to expect from our BCGs?

We, BSH management and all employees, always respect applicable laws and comply with internal rules (**compliance principle**). The BCGs help us translate the most important regulatory topics, our values, and our principles into daily actions. They provide guidance on what's right and what's wrong. They set boundaries and formulate how we want to work at BSH in order to be successful together.

The BCGs were developed based on our BSH values and are divided into chapters that describe each subject in more detail. They formulate our goals with regard to these subjects, and describe specific actions for how we intend to achieve them.

Some chapters contain examples of how a particular issue can become relevant in our daily work and how we can act correctly in such a situation.

Did you know?



In some chapters you'll find the category "Did you know ...". Here you'll find useful tips on specific subjects.



The BCGs also refer to other sources of information.

¹ In the Business Conduct Guidelines, "employees" are defined as all BSH employees and members of corporate bodies of the BSH Group around the world. In the text that follows, the terms "employee" and "we" are intended to be gender-neutral. ² "BSH" or "Company" means the BSH Group.

We are all responsible – our actions matter!

The rules contained in the BCGs apply to every one of us working for BSH, in all positions and countries. They may also be relevant for our business partners: for example, because some of the guidelines refer to the correct way to deal with suppliers, customers, and consumers.

The reputation of our company and brands – our own and licensed – as well as the reputation of our parent company Robert Bosch GmbH is largely determined by our appearance, actions, and behavior. Non-compliant behavior may cause severe harm to BSH and to the employees involved, including substantial damage to our reputation and steep fines. For individuals, it may also lead to disciplinary measures (including warnings, termination of employment contract, or freezing of salaries or professional development) or criminal liability (e.g. fines, imprisonment).

We're all responsible for acting according to our BCGs and for enabling and supporting others to do so. We commit to obtaining further guidance in areas that are important for our work and to participating in all trainings assigned to us.

Any questions?

Because not every situation is easy to assess, we ask the appropriate department for more guidance if we have questions.

If you're not sure who the right contact person is for a subject discussed in the BCGs, just write an e-mail to:



compliance@bshg.com



- OrgDoku
- Group Policies
- Global Legal, Compliance Intranet



If you see something,
say something!

»

We value an open company culture and encourage all employees to raise concerns about known or suspected compliance violations.

«

Dr. Adriane Winter
Chief Compliance Officer

We trust that the majority of employees act in a compliant manner and in the best interest of the company. At the same time, it's only natural that mistakes happen. Sometimes it's simply not that easy to do the right thing, even if we're acting with the best intentions.

However, if there are situations where BSH employees deliberately break internal rules or laws, we'll deal with these compliance violations consistently to ensure enforcement and adherence to laws and internal rules. This is in BSH's best interest, and it's also for the benefit of all colleagues who follow the rules every day.

In order to constantly improve and change for the better, we speak up and share our concerns. This is especially true when it comes to potential non-compliant activities, because they can cause severe harm to BSH and to the employees involved.

Employees of BSH and employees of direct or indirect business partners of BSH may report potential compliance violations directly to the BSH Compliance organization by contacting the respective Local Compliance Officer (LCO); or they can – also anonymously – contact the Compliance organization via BSH's

whistleblowing system (Trust and Tell); or they can approach BSH's lawyer of trust. We handle all reports received via these BSH reporting channels confidentially.

Non-retaliation

We take all reports of potential compliance violations seriously. They'll be followed up in a fair, independent, consistent, and confidential manner by designated professionals, and may include dialog with the reporter. Whistleblowers³ are protected. Discrimination or other adverse treatment of a person who reports a concern in good faith is prohibited. We'll use all reasonable means to protect individuals who've reported a concern from retaliation, discrimination, and all other forms of adverse treatment.



- BSH Group Regulation "Compliance Investigations"
- Trust and Tell

³ Individuals who disclose information about perceived misconduct in an organization, or the risk of such conduct, to people or entities who can be reasonably expected to take corrective action or otherwise respond appropriately.



We Live By Our Values

At BSH, the foundation for everything we do are our strong BSH values and our work culture. Our BSH values constitute our joint inner compass. They give us direction and help us act according to a shared understanding, whatever our role is at BSH. In addition to our values, we create and live a work culture that puts people at the center of everything we do.

We've developed principles for how we want to work together – our We LEAD BSH principles. We encourage each other to collaborate and lead across functions and hierarchies with trust, respect, and empathy. We're open to change and embrace it as an opportunity, and we learn from mistakes and see them as part of our innovation culture.

We aim to create an environment where we can all grow and perform at our best – in order to remain strong in the market and fulfil our purpose to “Improve the quality of life at home.”



- BSH Values
- We Lead BSH Principles

Our Values




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We Value Diversity 46

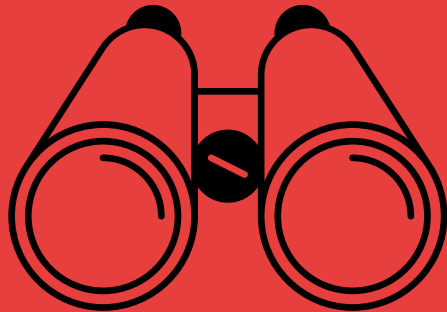
- Diversity, Equity, and Inclusion
- Protection from Discrimination, Sexual Harassment, and Bullying



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Internal and External Communication Channels

We Work for a Better Future by Always Focusing on Results



In this chapter

Consumer Happiness and
Customer Success

Our actions are result-focused. This allows us to secure our future. It also creates a strong foundation for the company's social initiatives.

We secure the future success of our company by focusing on consumers and customers.



Consumer Happiness and Customer Success

"We improve quality of life at home" – this is our common purpose toward which we direct our actions. To achieve this, we always focus on the needs and desires of our consumers. We strive for consumer happiness and customer success with the best possible products, services, brands, and experiences. While doing this, legality and the BSH values always take priority.

We aim to stay connected with our consumers through added-value services throughout the appliance life. We strive to engage in promotional and marketing activities that are helpful to our consumers. We handle content responsibly by being clear and unambiguous and not misleading consumers.

**We care for our consumers and customers:
They're at the center of our business.**



How we contribute

- ✓ We shift perspective and put ourselves in the shoes of our consumers.
- ✓ We keep our consumers' and customers' interests in mind in all decisions related to the provision of products, services, and experiences.
- ✓ We act on consumer and customer feedback.
- ✓ We develop consumer-inspired innovations.



BSH Group Regulation "Marketing @ BSH"



We Act With Initiative and Determination



In this chapter

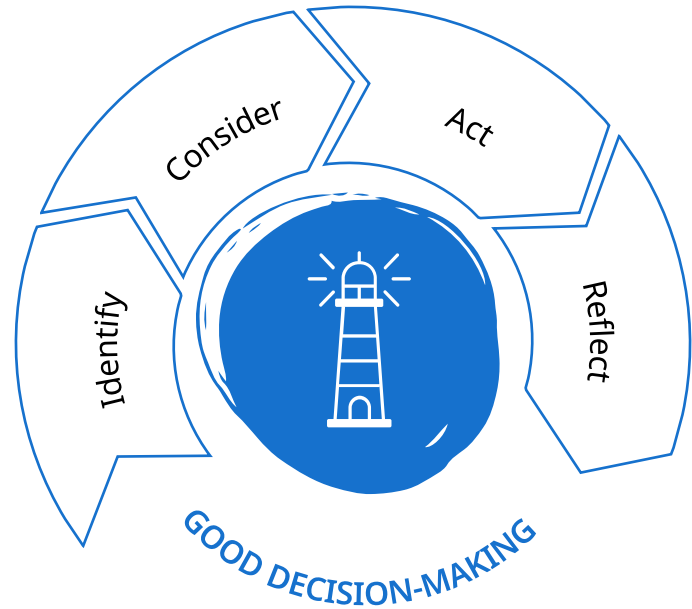
Good Decision-Making

We act on our own initiative, take entrepreneurial responsibility, and pursue our goals with determination. This means that we make well-considered decisions and actively challenge each other in the process.



Good Decision-Making Helps Us Master Complex Situations

We've all experienced situations where it's difficult to make a decision. For those situations where the answer isn't simply "right" or "wrong," our decision-making framework provides guidance. It helps us get more clarity about the inner motives and external factors that influence a decision. It makes options for action transparent, and it supports reflection in order to learn for the future.



Identify

- **Principles based on our values:** What boundaries do I have to observe if I want to behave according to our values?
- **Duties to others:** Do I owe a favor to someone who plays a role in the decision?
- **Important facts:** What facts or appropriate information do I need to make an informed decision?
- **Conflicts of interest:** Are there any incentives or relationships with BSH externals influencing my actions?

Consider

- **Situational influences:** Do external pressures or internal biases influence my decision making?
- **Alternative actions:** Have I considered alternative solutions?
- **Company perspective:** Do I have the best interest of BSH and the BSH values in mind?
- **Additional guidance:** Have I asked for the objective assessment of others to gain additional perspective?

Act

- **By making a decision:** Choose the most appropriate alternative and implement your decision.
- **By elevating the issue to a higher authority:** Sometimes it is best to make your concerns transparent to your manager or a subject matter expert.
- **By documenting your decision:** Don't forget to document your decision and why you have chosen this option.

Reflect

- **On what you've learned:** Once you've made a decision, take the time to review the path you've taken. The lessons learned will help your future decisions.
- **On strengths and weaknesses:** Regardless of a possible result, understand strengths and weaknesses of your decision for better future decisions.
- **On what you could share:** What insights might be valuable to others and how might you share them?

We Act With Reliability, Credibility and Legality



In this chapter

- Data Protection
- Information Security
- Confidentiality
- Anti-Money Laundering
- Conflicts of Interest, and Proper Handling of Company Assets

We promise only what we can deliver, accept agreements as binding, and respect and observe the law in all our business transactions. We're a reliable business partner that others can trust and who play by the rules.



Data Protection

As a trustworthy business partner and employer, BSH treats personal data from its consumers, customers, business partners, and employees carefully and in a legally compliant way.

Protection of personal data from our consumers, customers, business partners, and employees is a critical success factor for BSH. We understand that the increasing digitalization of BSH's products and services and its connected collections of all kinds of personal data is essential for our business, but it also brings data protection risks. Because we also consider consumer happiness and customer success as BSH's main path to success, this means that consumer data protection is one of our top priorities in building reliability, credibility, and legality. Consumers rightfully expect BSH to treat their personal data with the utmost care.

Complying with data protection laws and avoiding data protection breaches and infringements is in our hands; every one of us should consider that a top priority in our respective area of responsibility.



How we contribute

- ✓ We only collect and use personal data for specific purposes, and we limit the amount of data and recipients to what's necessary for those purposes.
- ✓ We only keep personal data as long as the purpose and/or the law requires. We delete personal data if it's no longer needed.
- ✓ We inform the people whose data we collect about the specific uses we'll make of that data up front in our data protection information, which is based on the applicable laws and internal rules.
- ✓ We answer requests for information, correction or deletion of personal data in a timely manner.
- ✓ We immediately make a report internally if we experience a data breach or loss; even if they're small incidents like losing a company laptop or flash drive with personal and/or confidential data on it, or sending an e-mail to the wrong business partner.
- ✓ We ensure that the personal data that's collected is only accessible by employees on a "need to know" basis for the relevant purposes, and we know the systems and countries where the data is stored.
- ✓ We take into account data protection risks from the very beginning when designing BSH products, services, and processes.
- ✓ We don't pass personal data to people outside of BSH without a data protection agreement where required.



- BSH Group Policy "Data Protection Framework"
- BSH Regional Regulations for REU in OrgDoku
- Local Data Protection Information available on the Legal and Compliance Intranet Pages



We can only achieve data protection compliance with every employee's support.

Information Security

We ensure information security in our business processes, products, and services.



How we contribute

- ✓ We use access to information only in accordance with our business duties and our assigned roles and responsibilities.
- ✓ We only use hardware and software products and IT services for business purposes that are approved for company use.
- ✓ We ensure that requirements for information security are contractually defined and adhered to in our business relations with external partners.
- ✓ We follow the data classification guidelines to define public, internal, confidential, and strictly confidential information and ensure the appropriate protection levels.
- ✓ We take our digital responsibility seriously.



- BSH Group Policy "Information Security Framework"
- BSH Group Regulation "Information Security Management"
- BSH Group Regulation "Secure Handling of BSH Information"

We want to take full advantage of the opportunities offered by the digital world and at the same time live up to the trust of our consumers, business partners and employees. We do that by carefully managing information and cybersecurity.

Information security encompasses everything that protects information assets with regards to their confidentiality, integrity, and availability. Deficiencies in information security can lead to negative consequences, including failure or manipulation of business processes and data, reputational damage, loss of competitive advantages, and legal consequences.

We promote awareness of information security at all levels. We manage information security risks over the entire lifecycle of our products and services, and we promote internal transparency of security risks in order to enable risk-based and business-driven decisions.



Did you know?

Information security and data protection are different but closely connected.

Information security focuses on protecting information from unauthorized access, manipulation, or disruption. Information is anything we know about something or someone. This refers, for example, to information about companies, people, things, activities, strategies, patents, and trade secrets.

As we can see information security is all about securing the confidentiality, integrity, and availability of physical and digital information.

Data protection focuses on protecting information that helps directly or indirectly identify a natural person (this is the legal term for a human being). This kind of information is called personal data. Different laws around the globe regulate data protection, for example, the General Data Protection Regulation (“GDPR”) in the EU.

So data protection refers to protecting the personal data of human beings.

Example: Supporting a colleague or an attacker?

You receive a call from an unknown number on your company phone. The caller explains that he’s a foreign BSH employee and appears surprised that his call found you instead of the colleague he actually meant to reach. However, because he’s on his way to an important management meeting and doesn’t have access to the BSH intranet, he asks you to collect some organizational information for him, including the names and e-mail addresses of BSH colleagues in specific positions as well as information on their managers. You want to help out a friendly colleague, but you’re confused about the situation, **and you wonder whether to hand over the requested information or not.**



The call is likely a “social engineering” activity. Information about BSH employees in specific positions collected this way can be used to launch a targeted cyber attack on them: for example, by capturing their logon credentials via phishing e-mails and then exploiting their privileged authorizations. Organizational information is classified as “internal” and must not be shared with external people who are not associated with BSH. You therefore refuse to share the requested information due to information security concerns, because you can’t verify the caller’s identity on this communication channel. Instead, you report the suspicious call to the BSH IT Service Desk.

Confidentiality

We don't disclose BSH information to the public, unless the information is explicitly declared as public or is publicly available. Internal BSH information includes information on BSH's organization and its facilities, manufacturing processes, research and development processes, projects, data from its internal reporting, etc. This information has the potential to harm BSH if it falls into the hands of competitors or fraudsters.

If information is deemed to be confidential or strictly confidential, we only share it with those people within BSH who are authorized to receive or access this information on a "need to know" basis, which means that they need it as input for their work. The same applies to non-public information from or about business partners, customers, employees, consultants, agents, and other third parties. We observe these obligations even after our employment with BSH has ended.

We ensure confidentiality whenever required and handle BSH information and non-public information from or about third parties responsibly.



How we contribute

- ✓ We're trustworthy and don't distribute internal information to the public.
- ✓ We treat information about business partners as confidential and don't disclose it to external individuals or the public.
- ✓ We don't use information that we receive or otherwise become aware of in the course of our work for BSH in order to gain an economic advantage for ourselves or others.



- BSH Group Policy "Information Security Framework"
- BSH Group Regulation "Information Security Management"
- BSH Group Regulation "Secure Handling of BSH Information"
- BSH Group Policy "Finance Framework"

Example: A friendly warning

Through your position at BSH, you hear that one of BSH's stock-listed logistics suppliers is suffering from financial issues. This information will only be published in their next quarterly report. Your friend invested in this company, so you're worried that he'll lose money – and he's already had such a tough year! You'd really like to help your friend out by warning him. After all, that's what friends are for... Before sending him a message, you hesitate and ask yourself: **Is this information confidential?**



As you suspected, the logistics supplier's financial issues are confidential or even strictly confidential information. You can't tell your friend about the supplier's problems, because non-public information from or regarding suppliers needs to be protected in accordance with legal and contractual requirements.



Anti-Money Laundering

We only engage in or maintain commercial relationships with business partners whose financial resources are of legitimate origin.

Therefore, we don't participate in transactions that serve to hide the origin of assets. Rather, we try to identify situations that attempt to misuse business relationships or transactions for money laundering purposes.

We report suspicious conduct that may involve money laundering to the appropriate BSH reporting channels (LCO or Anti-Money Laundering (AML) contact).

We support the worldwide fight against money laundering ⁵.

How we contribute

- ✓ We remain aware and pay attention to any unusual elements in a business relationship or transaction: If we have a "feeling of unease," we follow up by checking the relationship or transaction carefully.
 - ✓ For instance, we critically evaluate multiple changes of payment modalities (like frequent changes of bank accounts).
 - ✓ If third parties (intermediaries) are involved in a payment transaction when it doesn't make economic sense, we investigate the reason for it.
- ✓ We report suspicious conduct by customers and other business partners via the appropriate reporting channels if our "feeling of unease" persists.
- ✓ We obey the cash transaction limits imposed by BSH and comply with all accounting obligations for cash and other transactions.



[BSH Group Policy "Anti-Money Laundering"](#)

⁵ Money laundering can be described as the concealment of illegal money, i.e., money that derives from criminal offences or illegal funds.



Example: The Cayman Islands suspicion

You're eager to enter into a business relationship with a new supplier. The contract negotiations took a long time, and you're finally ready to sign. The supplier asks you if it's possible to make all payments to his bank account located on the Cayman Islands. You have a feeling of unease, because you don't see a link between the supplier's ordinary place of business and the Cayman Islands, nor is there a plausible reason for the supplier to have a bank account in a tax haven like the Cayman Islands. However, so much time and effort went into negotiating the contract, and the contract is important for BSH and your team. **What should you do?**



Because there's no link between the supplier's ordinary place of business and the location of his bank account, nor is there a plausible reason for the supplier to have a bank account in a tax haven, you have to strictly follow the BSH AML processes by contacting your LCO or AML contact. They'll advise you how to proceed in this kind of situation.

Conflicts of Interest, and Handling of Company Assets

We make our business decisions in the best interests of BSH and not based on our own personal interests.

We utilize the company resources responsibly and make sure that company expenses are reasonable.

We deal with (potential) conflicts of interest in an open and transparent manner in order to enable BSH to resolve these conflicts.

Example: Proud partner

You work in Development at BSH. Yesterday evening, your life partner Alex excitedly told you about an opportunity he came across. Alex found out that a home appliances store in your neighborhood has been put up for sale. Alex tells you with a beaming smile that he put in an offer. You're of course excited for Alex taking this big step, but you're also wondering whether you'll need to disclose Alex's plan to your manager.



Because you work in BSH's development department, it's unlikely that your partner's plan to open an appliance store will result in a conflict of interest. You should still notify your manager in writing in advance or as soon as possible. You also can't offer Alex any benefits or advantages.

Would your answer be different if...

... you worked in Sales? If you were working in Sales, the risk of conflicts of interest arising in the course of your work would be much higher. For example, you may be tempted to offer Alex special discounts. That's why it would be essential that you disclose Alex's new profession to your manager. To avoid a situation where conflicts of interest might arise, your manager may delegate Alex's account to someone who isn't close with either you or Alex.

How we contribute

- ✓ We use company property and assets only for BSH business purposes, unless it's explicitly permitted to use them for private purposes by internal rules.
- ✓ We report the acquisition and/or holding of interests in BSH competitors or business partners to our manager if we have the ability to influence the management of these companies.
- ✓ We notify our manager within reasonable time of all personal interests that we (or family members or close personal friends) might have in connection with our work at BSH that might result in a conflict of interest. This includes interests of companies that we, a family member, or a close personal friend are involved with.
- ✓ We don't undertake secondary paid (self-) employment without our manager's (and in some countries, the Human Resources department's) prior written approval. Approval may be refused if the secondary employment could create disadvantages for BSH.
- ✓ We only introduce and award contracts to family members or close personal friends with the prior written consent of our manager.
- ✓ We don't work for BSH competitors.
- ✓ As managers, we follow up on (potential) conflicts of interest disclosed to us and resolve them in the best interests of BSH.
- ✓ We don't engage business partners for private purposes if we might derive advantages that aren't customary in the market (for example, lower prices) due to our business activities for BSH.



Quick Guide Conflicts of Interest



Did you know?

When organizing an internal business meeting or teambuilding event, the expenses have to be adequate and made in the best interests of BSH. This means that the cost of an event – including potential tax implications (like wage taxability and tax deduction restrictions) – needs to be proportionate to the benefits for BSH. Events that could damage BSH's reputation aren't permitted.

We Act With Fairness



In this chapter

- Antitrust
- Anti-Corruption

We treat our colleagues and business partners in a fair manner and consider fairness to be a cornerstone of our corporate success.



Antitrust

We succeed in the market by offering consumers attractive products, services, and features that meet their needs and improve their quality of life at home. In doing so, we strive for excellence as fair business partners. Antitrust laws provide the legal framework for successful competition. They apply to all aspects of our business activities, from our relationship with other home appliance manufacturers to our relationship with dealers, suppliers, and end-consumers – and even us as employees, since it also protects the free competition in the employment market.

We don't enter into agreements with our competitors that limit competition or exchange competition-sensitive information with them. When collaborating with competitors or contacting a competitor to set up a joint project, we abide by the existing rules for such collaborations and contacts. A competitor in this context is any company competing with us in the relevant product or service market as a buyer or seller.

We also let our trade partners (for example, retailers, wholesalers, distributors) freely set their resale prices.

We're especially careful not to take unfair advantage of our size and/or scale in markets where we're particularly successful and might be considered to enjoy a very high degree of market power: a so-called dominant position.

Example: A meaningless chat, or an expensive mistake?

A former colleague now working for a competitor calls you and suggests aligning on sale prices for top-end dishwashers. No one overheard the conversation, and from a purely commercial perspective, you think both companies would increase their profits and you'd exceed your annual target. At the same time, you believe that no harm would be done to consumers, because they could easily buy cheaper alternatives from other competitors.

What should you do?



Aligning with a competitor in this kind of informal conversation is already considered to be an illegal anti-competitive agreement, and it could have very serious consequences, including substantial fines. The actual or believed implications for the competitive market and consumers are irrelevant, as is the form of the agreement. Clearly distance yourself from the proposal immediately, document the event, and inform the Legal and Compliance organization without delay.

How we contribute

- ✓ We don't enter into any agreements with competitors on price-fixing, customer allocation, territory allocation, or any other anti-competitive purpose, or by fixing the winner when bidding for business contracts (bid-rigging).
- ✓ We don't exchange competition-sensitive information with competitors: for example, information on prices, margins, sales volumes, sales strategies, capacities, production costs, sustainability strategies, or bonuses and/or non-public salary structures.
- ✓ We're vigilant when assessing information for its competition-sensitivity: Any information that's not public and relevant to our business and market strategy is competition-sensitive. This includes any innovative product features or sustainability targets that could influence the consumer in his/her choice – and this extends to employment conditions.
- ✓ We follow the relevant antitrust guidance when participating in industry association activities or when collaborating with competitors: for example, in the areas of joint purchasing, joint production, joint research and development, or joint sustainability initiatives, or in the context of license agreements.
- ✓ We don't fix resale prices with our trade partners or otherwise unduly influence their resale prices contrary to applicable laws.
- ✓ We don't abuse a dominant position in the market.
- ✓ We don't implement mergers, acquisitions, joint ventures, or other types of corporate transactions that are contrary to any applicable merger-control legislation.
- ✓ We keep in mind that we sometimes compete with other companies outside the home appliance market: for example, in the context of human resources, we compete with other employers who are hiring the same kind of employees as BSH.



- [BSH Group Policy "Antitrust"](#)
- [Quick Guides and all resources on Antitrust Law available on the BSH Intranet](#)



We're committed to free and unrestricted competition.

Anti-Corruption

We refuse to engage in any business that violates anti-corruption laws (laws that prevent corruption⁴) or related internal rules.

We strive to secure our orders through the quality and price of our products and services and not by improperly influencing public officials, business partners, agents, or employees of business partners. Gifts and benefits must be given or received according to the applicable laws and our internal rules. We also don't tolerate our consultants, intermediaries, distributors, or comparable third parties acting on our behalf offering or granting unjustified gifts and benefits. On the contrary, we select our suppliers exclusively on a competitive basis, after comparing them in terms of price, quality, performance, and suitability of the offered products or services.

We don't offer bribes, and we don't accept bribes.

How we contribute

- ✓ We inform our manager or local Legal and Compliance department of any attempts by our business partners to unlawfully influence our decisions.
- ✓ We don't give or receive gifts and benefits if they're not socially adequate, or if they're given/received with the intention to improperly influence or induce business decisions and could therefore be seen as a bribery payment.
- ✓ We're transparent when giving and receiving gifts and benefits.
- ✓ We don't use intermediaries and agents to cover up illegal payments or corrupt practices.
- ✓ We don't use our position at BSH to demand or accept personal gifts and benefits for ourselves, our family members, or our close friends.



- BSH Group Policy "Anti-Corruption - Gifts & other Benefits"
- BSH Group Regulation "Customer And Supplier Approval Process (CASA)"

⁴ Corruption can be described as giving/offering/promising (or asking for/accepting from) an inappropriate advantage to a third party (public officials, employees, and agents of companies) in exchange for the undue preference of the advantage-giver or a person related to the giver.

**Example: Just a birthday gift?**

You work in purchasing at BSH. One of the aspects of your work you enjoy most is the relationships you've built with BSH's suppliers. You get along with them extremely well, which makes working together very pleasant and productive. This morning, one of your suppliers brought you a signed soccer jersey from one of the top league players, because he heard that it was your birthday last week and that you're a big soccer fan. The supplier tells you proudly that he has a good relationship with the player and asked him to sign the jersey for you. You're grateful, but you know that the cost of the jersey definitely exceeds the local value limit for gifts. Although rejecting this gift would be awkward and could even offend the supplier, you see no way to share this gift with the rest of your office.

What should you do?

Because the value limit is exceeded, to accept this gift you need to involve your manager, obtain approval, and provide an objective justification as well as a tax evaluation. Even if there doesn't appear to be a corruption risk, accepting this kind of gift may result in a higher tax burden for BSH. Considering all this, it might be best to politely decline the jersey. As an explanation towards the business partner you can refer to the strict BSH's policies that don't allow you to accept gifts.

We Act Responsibly and Sustainably



In this chapter

- Sustainability
- Environmental Protection
- Human Rights
- Product Safety and Product Compliance
- Occupational Health and Safety
- Taxes and Customs
- Donations




We act prudently and responsibly for the benefit of society and the environment.



Sustainability

How we contribute

- ✓ We consider sustainability in our day-to-day decision-making. Even small changes add up if we all contribute by saving energy, using less water, and producing less waste.
- ✓ We join forces, think outside the box, come up with innovative solutions, and question the status quo – because sustainability means teamwork across geographical and departmental boundaries that we can only achieve in a joint effort.



We believe that it's our responsibility as a company to be socially responsible and environmentally friendly. We've been a member of the United Nations Global Compact since 2004 and are committed to its principles on human rights, labor, environment, and anti-corruption. We also adhere to the United Nations Sustainable Development Goals (SDGs).

Protecting the planet, enabling a sustainable life, and increasing resilience.

We take steps to incorporate sustainable practices and adopt circular business models. This includes using resources responsibly, reducing our environmental impact, and considering the long-term implications of our decisions.

We contribute to a socially sustainable future by caring about the well-being, health, and safety of our employees and local communities. We encourage sustainable consumption and support our consumers in pursuing a sustainable lifestyle.



Did you know?

Saving energy and resources is in all our hands. Here are some ideas we can contribute:

- We can turn off lights, screens, laptops, and other devices when not in use to save energy.
- We can turn down the heat a few degrees and use less air-conditioning.
- If possible, we print less, and when we do we print on both sides and use black and white instead of color to save resources.
- To avoid waste whenever we can, reuse instead of single-use, and separate paper, plastic, and residual waste.
- If possible, we fly less, use car-sharing options and public transportation, or we cycle and walk instead of using a car.

Environmental Protection

How we contribute

- ✓ We're aware of our impact on the environment.
- ✓ We promote awareness of our responsibility for the environment at all levels.
- ✓ We support climate protection and save precious resources in our operations as well as in our value streams.



- BSH Group Policy "Health, Safety and Environment Framework"
- BSH Group Regulation "Environment- and Energy-Managementsystem in BSH Group"



Protecting the environment and minimizing consumption of natural resources are high-priority corporate goals.

Reducing our environmental footprint in all areas of our value chain.

We aim to reduce our environmental footprint in all areas of our value stream. That includes both improving the material mix of our products and reducing emissions and energy consumption. Whether it's sourcing or manufacturing, product use or returns, refurbishment, recycling, or the reuse of our appliances – we review every aspect of our business in terms of its environmental compatibility and potential for improvement on our path to reaching new climate goals.

Our worldwide environmental management system lays down standards in these areas to ensure compliance with laws and internal rules.

Human Rights

How we contribute

- ✓ We're mindful of potential human rights impacts in our role and activities.
- ✓ We keep in mind that human rights are universal.
- ✓ We're aware that human rights risks may not be obvious, because some groups of people who are most at risk may lack the opportunity to speak up.



- BSH Suppliers Code of Conduct
- BSH Group Regulation "Management system for the implementation of human rights and environmental due diligence"

Respect for human rights is at the center of BSH values.

People are at the heart of what we do. We respect and adhere to international human rights principles.

We ensure respect and fairness toward people in our everyday business practices. These behaviors are the building blocks of human rights. Our ambition extends to employees at all levels of our organization as well as to people working in our wider value chains.

We follow the leading guidelines established by the United Nations Guiding Principles on Business and Human Rights on how business can best support human rights. We've been building a successful risk management system to ensure respect for human rights in all our activities. This includes analyses, policies, and processes and extends to activities that may occur on the upstream levels of global value chains.

Our Supplier Code of Conduct formalizes our aims, and the principles it contains are binding for all our suppliers. We're determined to continuously develop our human rights due diligence. It's the key to fulfilling our commitment.



How we contribute

- ✓ We report any perceived and potential risk of an unsafe product to the Product Safety Organization.
- ✓ We report potential violations of product compliance via the appropriate BSH reporting channels.⁶



BSH Group Policy "Product Safety and Product Compliance Framework"

Product Safety and Product Compliance

Product safety and product compliance are the foundation for any product or service we design, develop, manufacture, and bring to the market.

We aim for safe products during their development, production, and market placement.

We strive to ensure that our products are safe when used in all intended and foreseeable ways throughout each product's lifecycle. Therefore, any product has to comply with the applicable laws, standards, and all BSH internal rules throughout the entire product lifecycle, especially with regard to safety.

We react quickly and appropriately in response to product safety and product compliance concerns and/or incidents.

⁶ Please see page 7

Occupational Health and Safety

We at BSH aim to ensure long-term health and safety excellence and to promote the well-being of every employee. We're committed to taking care of health and safety at all BSH workplaces.


Occupational health and safety include fire protection, emergency response, and radiation protection.

At BSH we actively engage in preventing accidents and take precautions with work-related health hazards.

At the same time, we fulfill our duty and personal responsibility to ensure that health and safety standards are upheld.

This applies to the technical aspects of workplace design, equipment, and processes as well as to safety management as a whole and every employee's conduct at work.

**Health and safety
of our employees
comes first.**



How we contribute

- ✓ We follow safety instructions.
- ✓ We only use work equipment as intended.
- ✓ We keep our workplace clean.
- ✓ We report safety risks immediately or eliminate them if this can be done safely.
- ✓ We take care of our health and safety.



BSH Group Policy "Health, Safety and Environment Framework"

Taxes and Customs

We take our tax obligations seriously and are committed to global tax and customs compliance.

Taxes are the primary financial foundation for economies and societies. They provide countries with money so they can fulfill their wide range of responsibilities: for example, research, education, and infrastructure. Because BSH is a “good corporate citizen,” we consider tax compliance very important and don’t apply aggressive tax avoidance strategies. This is one of the ways we contribute to positive social developments and secure the financial means to shape the future.



How we contribute

- ✓ We make accurate tax and customs declarations.
- ✓ We make sure that transfer pricing is accurate and defensible standard business models are followed.
- ✓ We closely monitor the issue of permanent establishments, which is why things like cross-border sales activities and sales structures need to be approved by the responsible tax department before signing contracts or hiring people.
- ✓ We don’t do business with embargoed parties, countries, people, or organizations.
- ✓ We make sure that the country of origin is determined correctly.
- ✓ We make correct tax calculations based on tax filings, including deductions for the donations, sponsorships, and memberships that we’ve been informed about.



BSH Group Policy “Tax and Foreign Trade Framework”

Did you know?

Everyone likes to receive gifts, but only if there’s no nasty (tax) surprise afterwards. Giving a present from the BSH company to our employees for a special occasion – like a work anniversary – could have tax implications. It’s possible that the employee receiving the gift will have to pay a wage tax, depending on the relevant thresholds and local laws.

Therefore, before choosing a gift please read in your local tax regulations about benefits in kind and report potential wage tax implications to Human Resources (for example, to determine if the tax value will need to be deducted from the employee’s next paycheck, or if it can be taken on by the company).



Donations

We're committed to our social and ecological responsibilities. Within this framework, we voluntarily support institutions and projects to promote specific charitable purposes without demanding anything in return.

We make financial donations and donations in kind, such as home appliances, to education/trainees, research/science, and charities in the event of a natural disaster or to social and environmental organizations and projects. By assuming this responsibility, we want to increase our visibility and reputation and support our employer branding. In individual cases, other causes can be supported if there's a special topical reference to BSH or one of its brands. When making donations, we must ensure that all the requirements for tax deductibility are met, we observe all legal requirements, and we ensure that the objectives of the recipient of the donation don't conflict with the interests of BSH.

How we contribute

- ✓ We reject requests for donations submitted by individuals or political parties, and we don't pay out donations to private accounts.
- ✓ We don't make donations to any person or organization capable of harming BSH's reputation.
- ✓ We're transparent when making a donation: in other words, we obtain information about the recipient of the donation and the recipient's intended use of it.
- ✓ We document the reason for a donation and its use for the specified purpose at all times.
- ✓ We ensure that a donation is tax-deductible.
- ✓ We don't (ab-)use donations for corrupt purposes: in other words, we don't give a donation in return for preferred treatment.
- ✓ We don't make donations that resemble compensation for a specific service but that actually substantially exceed the value of that service (so called "quasi-donations").
- ✓ We make independent decisions about donations and ensure the segregation of duties to eliminate the risk of self-interest due to personal links to the recipient.
- ✓ We approve donations according to our BSH Group Policy "Governance".

- [How to: Donations & Charitable Activities - Social Commitment - BSH Intranet \(bsh-group.com\)](#)
- [BSH Group Policy "Anti-Corruption - Gifts & other Benefits"](#)
- [BSH Group Policy "Governance"](#)

Donations need to be aligned with the applicable laws and BSH's interests.

We Value Diversity



In this chapter

- Diversity, Equity, and Inclusion
- Protection from Discrimination, Sexual Harassment, and Bullying



We appreciate and encourage diversity for the enrichment it brings, and we see it as essential for our success. We respect the personal integrity and dignity of each individual and contribute to maintaining a work environment where discrimination, sexual harassment, and bullying aren't tolerated.



Diversity, Equity and Inclusion

How we contribute

- ✓ We're open to other opinions and new perspectives in our daily business.
- ✓ We collaborate in a respectful manner.
- ✓ We challenge our own biases and stereotypes.
- ✓ We're objective in recruiting processes and apply the team staffing approach to relevant positions.
- ✓ We promote a diverse mindset.
- ✓ We're supportive and acknowledge individual needs and life situations.



- BSH Group Policy "Human Resources Framework"
- DEI strategy



We promote collaboration in diverse teams where we can learn from each other to be innovative and productive in order to achieve our business goals.

We're committed to a culture of diversity that supports collaboration, flexibility, and fairness so that all employees can unleash their full potential.

We support a diverse workforce, because it brings along a wider range of backgrounds, experiences, and views that boost creativity and improve problem-solving. This helps us develop innovative products. As a diverse company, we're more profitable, productive, and innovative, and we strive to become the employer of choice for all our employees.

We consciously promote diversity, equity, and inclusion regardless of race, age, religious beliefs, disability, gender, gender identity, or sexual orientation. We appreciate everyone's uniqueness.

Protection from Discrimination, Sexual Harassment and Bullying

We support a work environment where everyone feels valued, included, and respected regardless of their background.

Everyone is entitled to fair and equal treatment regardless of their immutable characteristics, including gender, age, race, sexual orientation and gender identity, religious beliefs, or disability. Openness, trust, and mutual respect among all employees are an important part of our corporate culture. All employees should feel welcomed, appreciated, and safe at work regardless of their background.

We condemn any form of discrimination, sexual harassment, or bullying and will take action against such behavior.

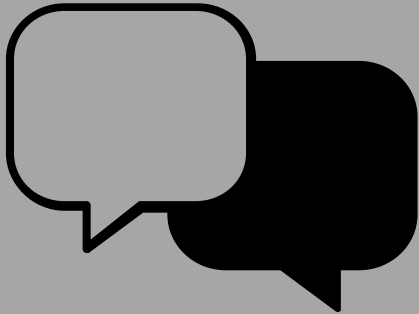
How we contribute

- ✓ We treat every employee and business partner fairly and with respect.
- ✓ We act in ways that don't degrade, threaten, harass, intimidate, or humiliate others.
- ✓ We don't discriminate against anyone based on amongst others gender, age, race, sexual orientation and gender identity, religious beliefs, or disability.
- ✓ We refrain from sexually oriented remarks, jokes, and remarks with ambiguous meanings and don't send e-mails, text messages, photos, or videos containing sexual content.
- ✓ We don't hesitate to address discriminatory, sexually harassing, or bullying behavior.



BSH Group Regulation "Prevention of discrimination, sexual harassment and bullying"

We Act With Openness and Trust



In this chapter

Internal and External
Communication Channels

We communicate important company matters in a timely and open manner. This is the best foundation for a relationship built on trust.



Internal and External Communication Channels

Did you know?



Your BSH-related communication, including e-mails, chats, and text messages, could be subject to discovery in legal disputes in certain countries: in other words, they may need to be provided to opposing parties for potential use against BSH in legal disputes. This includes communications about colleagues, business partners, consumers, or anyone or anything else. A good rule is to avoid sending any communication that you wouldn't want to be a headline in the News. Preserving BSH's interests, values, and reputation is in our hands.

We're aware that the way each and every one of us communicates with colleagues, potential employees, consumers, business partners, or the press plays an important role in how BSH is perceived as a company.

We express appreciation for our fellow human beings with consistent, sincere, respectful, and transparent communication. We also strengthen trust in BSH and contribute to the company's positive reputation and success.

The increased use of digital communication allows for more transparency, dialog, and participation, but it also carries reputational risks for BSH. Corporate and private messages as well as personal opinions and internal e-mail exchanges can be published and circulated more rapidly, directly, and extensively than ever before. It's therefore the duty of all of us to communicate responsibly internally, in public, and especially in social media.

Agencies and other business partners may support us, but we're still responsible for what we communicate and how we communicate it.

Example:

You have a great new product that you want to get your external target groups excited about. Your marketing agency presents you with a great campaign with surprising claims and photos. Because time is short, you like the proposal a lot, and since you're working with a professional agency, you release everything without checking the content or rights. **Right?**



Wrong: Even if you're working with a professional marketing agency, you're ultimately responsible for what's communicated. An agency often doesn't know all the details or the pitfalls. It's your responsibility to ensure that the communication measures comply with all relevant laws and internal rules, and in particular with the requirements of copyright, intellectual property, privacy, and data protection. If necessary, cross-check with the relevant departments.

Here are some of the ways we endeavour to contribute:

- ✓ We always speak with respect about our consumers and business partners (in both internal and external communication), as "Consumer Happiness and Customer Success" is our overarching goal.
- ✓ We always forward media inquiries to official BSH spokespersons and press contacts in the responsible country or organizational unit who are authorized to respond.
- ✓ We're personally responsible for our posts and comments on social media platforms. Only officially appointed Social Media Officers may communicate on behalf of BSH and its own and licensed brands.
- ✓ We'll contact the Reputation Management department if we're concerned that a specific issue on social media could damage BSH's reputation.
- ✓ We handle sensitive information carefully and don't publish internal information on external channels.
- ✓ We select the correct information security class (public, internal, confidential, strictly confidential) on all channels.



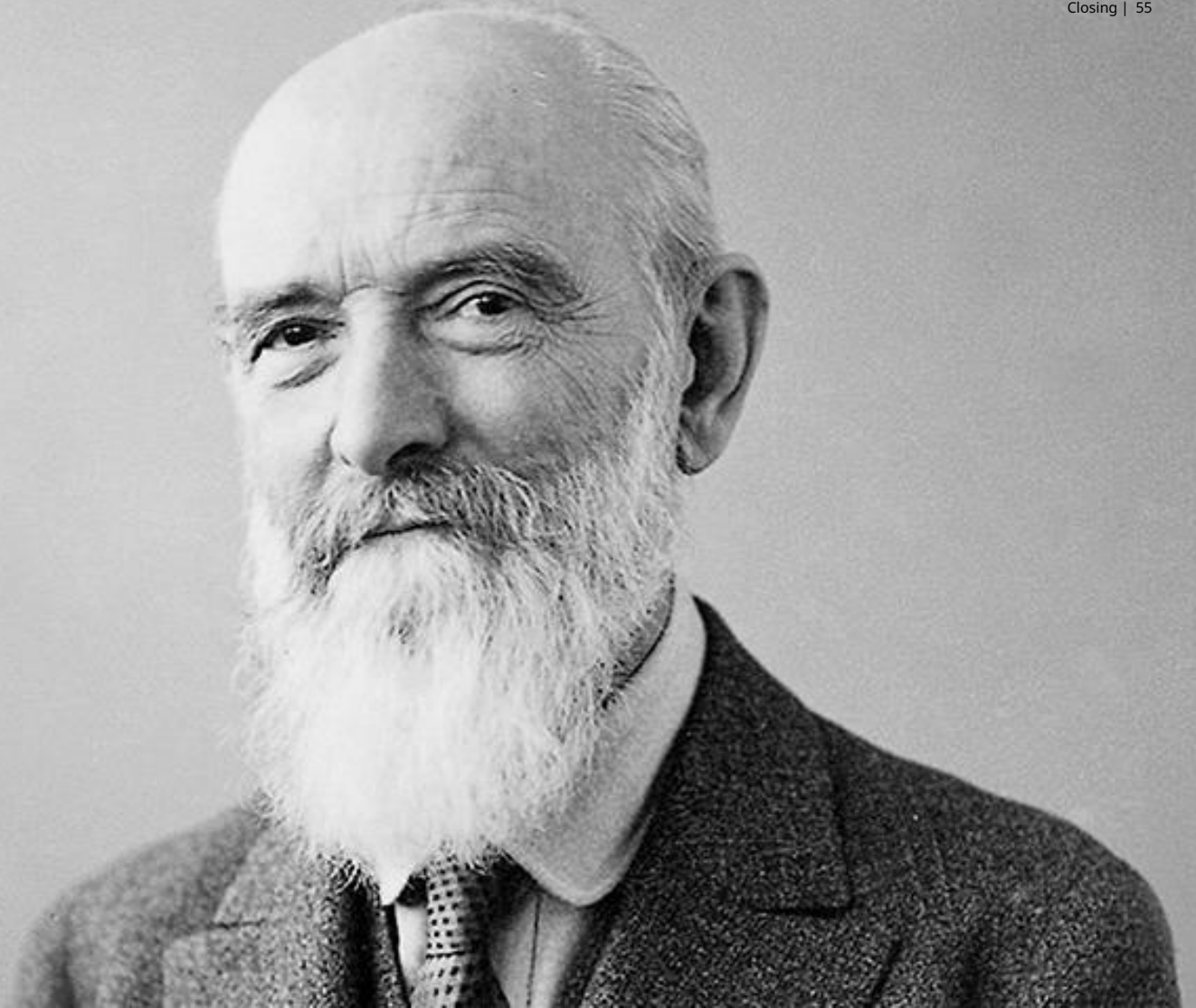
- BSH Communication Netiquette for Internal and External BSH Channels and Media Platforms
- BSH Group Policy "Corporate Communication"
- Customer Service Regulations
- BSH Group Regulation "Information Security Management"

»

I have always acted according to the principle that 'I would rather lose money than trust.' The integrity of my promises, the belief in the value of my products and in my word of honor have always had a higher priority to me than a transitory profit.

«

Robert Bosch



Meta Data

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BSH-Public

For all BSH legal entities and all BSH employees

BSH Hausgeräte GmbH

Global Legal, Compliance (GLE)

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B/S/H/

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