As a global manufacturer of high-quality household appliances, BSH is committed to the guiding principle of responsible and law-abiding conduct. Compliance with this principle forms the basis for the excellent reputation BSH and its brands have achieved in the minds of employees, customers, business partners and the public at large.

Improper conduct – even if only by isolated individuals – is capable of harming the public trust we work so hard to maintain. BSH’s Business Conduct Guidelines thus prescribe binding rules for responsible business conduct by group employees worldwide both internally and in dealing with third parties, notably customers and business partners.
These rules help us in our day-to-day work, particularly in dealing with legal challenges; they offer orientation and further strengthen public confidence in the performance and integrity of BSH and its employees.

BSH has a clear position: We refuse to engage in any business that infringes applicable law, internal guidelines or the standards to which BSH subscribes – and this applies to our entire organization worldwide.
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We adhere to all laws and regulations as well as internal guidelines and policies. Without exception.
A. Scope

These Business Conduct Guidelines apply to all employees1 of the BSH Group2 worldwide. These Business Conduct Guidelines constitute the globally uniform internal basis for our conduct and our business activities. Third parties do not derive any rights from these Business Conduct Guidelines.

B. Basic Standards of Conduct

B 1. Compliance with Law and Standards
Full compliance with the letter and the spirit of the law is of utmost importance for the company.

Every employee is required to comply with the laws and regulations of the legal system within which he/she is operating. In the event of a violation, each employee faces disciplinary consequences for a violation of their obligations under their employment agreements in addition to the sanctions provided by law.

Moreover, the company expects the actions of every employee to be compliant with:
- BSH's Corporate Principles,
- the principles of the UN Global Compact,
- the CECED Code of Conduct,
- the ZVEI Code of Conduct
- and the internal rules and work regulations.

1) Within the meaning of these Business Conduct Guidelines, “employees” are all BSH employees and BSH members of corporate bodies of the BSH Group around the world. In the text which follows, the term “employee” is intended to be gender-neutral.

2) “Company” or “BSH” means the BSH Group.

The image of BSH and of the trademarks (as well as the image of its parent company Robert Bosch GmbH) is largely determined by the demeanor, actions and conduct of every employee. Inappropriate behavior on the part of any individual employee may cause significant harm to BSH and its parent company.

Thus, in the performance of his/her duties, every employee is required to protect the reputation of the company in the eyes of the public.

B 3. Mutual Respect, Honesty and Integrity

We respect the personal dignity, privacy and personal rights of every individual. We work together with employees and business partners of different nationalities, ethnic backgrounds, skin colors, cultures, religions and world views. We do not tolerate any discrimination, whether on the basis of one of the foregoing characteristics or on the basis of gender, sexual identity, age or disability.

We are open and honest and stand by our responsibilities. We are reliable partners and only make promises to colleagues or external partners which we know we can keep.
We are open-minded, respectful and are reliable partners.
B 4. Leadership, Responsibility and Supervision

Integrity and compliance with laws and regulations and BSH’s internal rules begin with the management of the company. Every manager bears responsibility for the employees entrusted to him/her. He/she must earn their respect by setting an example in terms of personal conduct, performance, openness and social competence. This includes the obligation on the part of the manager at all times to address and emphasize the significance of proper conduct in the workplace and to set an example himself/herself by behaving with integrity and in compliance with law and company rules and policies.

Every manager is responsible for ensuring that no violation of laws, internal guidelines or these Business Conduct Guidelines occurs within his/her area of responsibility which proper supervision could have prevented or made more difficult. The manager likewise remains responsible for actions delegated to others.

Every manager bears duties of organization and supervision. These include, in particular, the following:

1. Each manager must exercise due care in selecting employees, and such selection must be based on their personal and professional aptitude (duty to select).

2. Each manager must formulate task assignments in a precise, complete and binding manner, particularly with respect to compliance with law and BSH policies and rules (e.g. BSH internal guidelines, work instructions) (duty to instruct).
3. Each manager must ensure that compliance with laws and regulations and the BSH policies and rules is monitored on a continuous basis (duty to monitor).

4. Each manager must clearly demonstrate to employees the importance of acting with integrity and complying with laws and regulations and the BSH policies and rules in day-to-day business and must clearly communicate that violations of laws and rules will not be tolerated and will trigger consequences under employment law (duty to communicate and to express disapproval).

B 5. Quality of Products and Services
The market success of our products and services is intrinsically linked to their consistently high quality. The goal of BSH’s quality policies is to supply products of outstanding quality comporting with our high demands in terms of functionality, ease of handling, product safety, reliability, energy savings, environmental protection and cost-effectiveness. Every employee (i.e. not only employees involved in production) bears an obligation to strive after these goals on the job. Managers bear a continuous obligation to promote employee awareness of quality.
C. Interaction with Business Partners and Third Parties

C 1. Fair Trading and Competition Law
Fair trading and competition laws protect fair competition. Violations of these rules are subject to severe fines.

Thus, in the competitive arena, employees must not participate in arrangements or agreements on prices, terms and conditions or capacities. Even mere conversations with competitors on these topics are impermissible. It is likewise fundamentally impermissible to enter into any agreement or arrangement with competitors to divide up the customer base, market territories or production programs.

The market position of the company may not be exploited contrary to law. Moreover, employees must apply the rules set out in the Guideline on Avoiding Antitrust Risks.

Employees are not permitted to illegally procure competition-relevant information or to knowingly disseminate false information about a competitor or its products or services.
We act in compliance with the rules of fair competition.
We compete in the market through performance and quality.
C 2. Anti-Corruption

C 2.1 Offering and Granting of Gifts and Benefits
Our company secures its orders through the quality and price of our innovative products and services.

No employee may directly or indirectly offer or grant illegal gifts and benefits in the course of his or her business dealings, either in monetary form or in the form of any other benefit. This applies especially to public officials. Every gift or benefit granted must be in line with applicable law and the BSH guidelines on gifts and benefits.

BSH likewise does not tolerate that our consultants, intermediaries, distributors or comparable third parties acting on behalf of BSH offer or grant unjustified gifts and benefits. Thus, employees entering into contracts with such third parties must appropriately

- verify the qualifications and integrity of such third parties and
- proactively ensure that such third parties conduct themselves in accordance with the BSH Business Conduct Guidelines.
C 2.2 Demanding and Accepting of Gifts and Benefits

No employee may misuse his/her position to demand, accept, procure or be promised personal gifts and benefits for him/herself or family members or for third parties which he/she would not have received if not in that position. This does not include accepting customary occasional gifts of low value or invitations to meals/events of a reasonable scope if applicable law and the BSH guidelines on gifts and benefits are respected in this context. Beyond this, employees may not accept any gifts or invitations. Where, in an individual case, there are substantial business arguments against explicitly refusing a gift or benefit, BSH’s compliance organization will decide on further action appropriate in terms of compliance with corporate policy and law.

Suppliers must be selected exclusively on a competitive basis, after comparing them as to price, quality, performance and suitability of the products or services offered.
We evaluate offers only regarding competitive criteria such as price, quality and performance.
C 3. Donations

As a responsible member of society, BSH makes financial and non-financial donations to education and science, the arts, culture and social welfare causes. The following rules apply to the grant of donations:

- Requests for donations submitted by individuals must generally be rejected.
- Payments to private accounts are impermissible.
- Under no circumstance may a donation be made to any person or organization capable of harming our reputation.
- The donation must be transparent. The recipient of the donation and the recipient’s actual use thereof must be known. Accountability with respect to the reason for the donation and its actual use for the specified purpose must be assured at all times.
- Every donation should be tax-deductible.
- BSH’s internal guidelines on donations must be complied with.

Quasi-donations, i.e. donations which are intended to look like compensation for a specific service but which actually substantially exceed the value of that service, violate the principle of transparency and are prohibited.
C 4. Combating Money Laundering

It is a declared goal of BSH to only maintain relationships with customers, consultants and business partners if their business activities are in line with what is prescribed by law and their financial assets stem from legitimate sources. All employees bear an obligation to strictly comply with the legal rules on combating money laundering. Suspicious conduct by customers, consultants or business partners must be reported. All of the applicable rules with respect to recording and accounting for cash and other transactions and contracts must be complied with. The internal guidelines on avoidance of money laundering risks must be respected.
C 5. Trade Controls

BSH complies with all export control and customs laws and regulations applicable in the individual countries in which BSH undertakes transactions. Rules of this kind may be applicable in connection with direct or indirect exports or imports from or to sanctioned countries or in connection with third parties as to whom there might, for example, be suspicions in respect of national security or of participation in criminal activity. Violations of these laws and regulations may give rise to drastic penalties, up to exclusion from simplified procedures for importation and exportation, potentially resulting in the interruption of the seamless supply chain.

All employees involved in importing and exporting goods and services are obligated to comply with all of the applicable trade sanction, export control and import laws and regulations and with all corporate guidelines and procedures applicable to their business activities.
D. Avoiding Conflicts of Interest

All BSH employees bear an obligation to make their business decisions in the best interest of BSH, not on the basis of their own personal interests. To avoid conflicts of interest or loyalty, the following rules apply:

D 1. Duty of Disclosure
Every employee must notify his supervisor of each personal interest (including personal interests of family members or close personal friends) he or she might have in connection with the performance of his employment obligations. Attempts by business partners to influence the employee by granting gifts and benefits to BSH employees, their family members or close personal friends must be reported immediately.

D 2. Transparency in Awarding Contracts
No employee may award a contract or cause a contract to be awarded to family members or close personal friends without the prior written consent of the responsible supervisor.
D 3. Private Engagement of BSH Business Partners
No employee may have private contracts performed by companies with whom the employee deals in a business capacity for BSH if the employee might as a result derive advantages which are uncustomary in the market. This applies in particular where the employee directly or indirectly influences or is able to influence the engagement of the company by BSH or by one of its affiliates or where the employee, in the context of his or her job, is charged with handling orders or contracts performed by that company.

D 4. Prohibition on Competition
No employee may manage a company or work for a company that competes in whole or in part with BSH (BSH-D or one of its direct or indirect subsidiaries).

D 5. Interests Held in Third Parties
Where employees hold interests in third companies, conflicts may arise between BSH’s interests and the interests of the third company affecting the employee in question. In order to avoid conflicts of interest of this kind, the following rules apply:

Employees who hold or acquire a direct or indirect interest in a company that competes in whole or in part with BSH or one of its direct or indirect subsidiaries must report this to the HR department responsible for the employee if, as a result of the interest held, the employee has the ability to influence the management of such company. The employee will generally be deemed to have the ability to influence the management of the
company if the employee's interest exceeds 5% of that company’s total share capital.

Any such interest held by members of an employee’s immediate family in a competing company must be notified to the HR department in writing as soon as the employee becomes aware of it and must be documented in his/her personnel file.

Employees who acquire or hold a direct or indirect interest in any business partner of BSH or in any company in which BSH holds an interest must likewise report this to the HR department responsible for them if the employee deals with the company in question as a part of his/her job or if the employee will be assuming an executive role in such company. In the case of interests held in exchange-listed companies, the foregoing only applies where the interest held exceeds 5% of the company’s total share capital.

Where appropriate, BSH will take steps to eliminate any potential conflict of interest.

**D 6. Secondary Paid Employment**

Any employee who intends to take on secondary paid employment is required to report such intention prior to acceptance and in writing. Permission will not be granted if it is detrimental to the interests of BSH. Permission may be refused if employees have dealings in the course of their official BSH duties with the company in question. Previously granted permission may be revoked on these grounds as well. Exceptions to this rule are, for example, occasional writing activities or lecturing.
E. Handling of Company Assets and Company Property

All BSH employees have to make their decisions always in the best interest of BSH and not based on their own personal interests.

The facilities and equipment located in offices, factories and workshops (e.g. telephones, copying machines, PCs including software and Internet/intranet, machinery and tools) may only be used for the company's business unless employees have been given explicit permission to use them for private purposes.

Under no circumstances may employees retrieve or forward information which incites racial hatred, glorifies acts of violence or encourages the perpetration of criminal acts or which is deemed to be sexually offensive within the local culture.

F. Handling of Information

F 1. Documenting and Reporting
All records and reports produced internally or distributed externally must be accurate and truthful. In accordance with generally accepted accounting principles, data and other records must always be complete, correct, timely and system-compatible.
F 2. Confidentiality
Confidentiality must be observed with regard to all in-
ternal corporate matters which have not been made
known to the public. Such matters include, for example,
information on the company’s and its facilities’ organi-
zational structure, its business, manufacturing, research
and development processes, its projects, and statistical
material from its internal reporting.

Non-public information from or regarding suppliers,
customers, employees, consultants, agents and other
third parties must likewise be protected in accordance
with legal and contractual requirements. In particular,
no employee is permitted to create records, files, video
and audio documents or reproductions without the
consent of his or her supervisor, unless this is directly
required by his or her job.

The obligation to observe confidentiality shall survive
the termination of employment.

F 3. Data Protection and Information Security
Access to the intranet and the Internet, the worldwide
exchange of electronic data, and electronic communi-
cation and business transactions are all essential to the
performance and efficiency of each individual employee
and to the success of the company as a whole.
Electronic communication, however, not only offers
advantages but also harbors risks in terms of personal
privacy and data security. Effectively guarding against
these risks is an important task incumbent on the IT
staff, the management and each individual employee.
Personal data may be collected, processed and used only insofar as this is necessary for predetermined and clearly defined legitimate purposes. In addition, personal data must be securely stored and may only be transmitted if the required precautionary measures are observed. With respect to data quality and technical protection against unauthorized access, high standards must be complied with. The use made of data must be transparent to the persons concerned, and provisions must be made to protect the rights of the latter to receive information on their personal data stored, to have such data corrected and, where appropriate, to raise objection to their use or to request blocking or deletion.

**F 4. Insider Information**

Insider information is concrete information regarding facts and circumstances which are not publicly known relating to the issuance of securities or to the securities themselves and which are apt, in the event they enter the public sphere, to have a material effect on the stock exchange or market price of the securities.

BSH Group employees who gain insider information with respect to another company as a result of their job (e.g. parent companies, customers, suppliers) are prohibited from trading in securities of that company, whether listed on the stock exchange or traded in free trade. They may likewise not give third parties any investment tips in this respect.
We protect business secrets and personal data.
We acknowledge our responsibility for the protection of our environment and health.
G. Environmental Protection, Safety and Health

G 1. Environmental Protection
Protecting the environment and minimizing consumption of natural resources are high-priority corporate aims which are documented in BSH’s environmental policy statement. The company’s worldwide environmental management system lays down exacting standards in this respect and ensures compliance with laws and regulations. Already at the development stage, environment-friendly design with regard to the entire lifecycle of the product is a consistent target of our product design.

Environmentally sensitive conduct is the responsibility of every individual employee. Awareness of our responsibility for the environment is an ongoing managerial task and must be heightened and promoted at all levels.

Preventing accidents and taking precautions with regard to work-related health hazards is one element of the duty of care which the company holds vis-à-vis its employees. At the same time, every employee bears a duty and personal responsibility to do everything in their power to help ensure that health and safety standards are upheld. This applies as much to the technical aspects of workplace design, equipment and processes as it does to safety management as a whole and every employee’s conduct at work.
H. Reporting of Compliance Violations

Employees may report evidence of potential violations of law, of these Business Conduct Guidelines or of internal rules to their manager, to the HR organization or the BSH Compliance Organization.

In addition, employees may contact the BSH Trust and Tell system or the lawyer of trust in the event of suspicions of serious professional misconduct from which BSH, an employee or a third party might incur serious loss or damage.

Pursuant to the requirements of law, every report shall be handled confidentially. Whistle-blowers may not suffer any unjustified disadvantages as a result of their reporting.
We openly address possible risks and compliance violations.
I. Implementation and Monitoring

The management of BSH and all persons holding managerial positions in Product Areas, Sales Areas, Corporate Functions and Departments, Service Provider Functions, Customer Service and BSH-D’s direct and indirect subsidiaries worldwide are to ensure that the Business Conduct Guidelines are actively published and systematically implemented.

Compliance with laws and regulations, the Business Conduct Guidelines and internal regulations is to be regularly monitored by senior and line managers. The monitoring system used to this end must reflect the national procedures and legal requirements under local law.
The official versions of the Business Conduct Guidelines of the BSH Group are German and English. In addition, convenience translations of the Business Conduct Guidelines in various languages are available. These are solely intended to assist you where necessary when reading the official versions.

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A mark of commitment:
BSH promotes climate protection.

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