



Code of Conduct

BERNSTEIN Ltd

Dear employees,

As one of the world's leading suppliers of industrial safety and enclosure technology, BERNSTEIN has a social responsibility towards our business partners, employees, the society in general and the environment.

For this reason, it is imperative that we always comply with the applicable laws. It is equally important that we always comply with our internal regulations and observe basic ethical and moral values. It does not matter whether you are a member of the Executive Board, a manager or an employee of BERNSTEIN - each one of us is responsible for ensuring that BERNSTEIN as a company complies with the applicable laws and regulations.

The Code of Conduct outlines our principles of action and rules and is based on the principles of the UN Human Rights Charter and the core work standards of the ILO conventions. It is generally applicable to every BERNSTEIN employee and sets a standard for all of us. At the same time, it is a promise to the outside world, for responsible conduct towards business partners and the public, but also in our dealings with each other within the company.

We kindly ask you, dear employees, to read the Code of Conduct with care and to use it as a guideline for our daily behaviour.

Aldridge, Walsall, the 28.01.2022

The Executive Board of BERNSTEIN Ltd



Paul Sharp

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Preliminary remark:

Wherever the term "employee" is used in this Code of Conduct, it refers to all persons working for BERNSTEIN Ltd. For better readability, the masculine form (generic masculine) is used. This always refers to all genders in the sense of equal treatment. The abbreviated form of language has editorial reasons and is value-free.

1. Scope

The Code of Conduct applies to the sites of BERNSTEIN Ltd within the UK.

2. Honest and faithful conduct of the business

BERNSTEIN employees must ensure that they comply with all relevant laws and official regulations in their working environment, as well as with internal rules and guidelines.

Employees have the responsibility to work in a fair and honest manner and must avoid any conflict between the private and business interests of BERNSTEIN or the interests of our customers.

All employees are encouraged to contact the Managing Director or their supervisor if they notice that someone behaves in a non-compliant manner. No employee who makes a report in good faith need fear any disadvantages - even if the report turns out to be unfounded.

Managers have a role model function. They have a responsibility for their own behaviour and the behaviour of the employees in their scope of responsibility and must ensure compliance with all procedures required there to avoid reputational and legal risks.

3. Respectful interaction with each other - Prohibition of discrimination

Our success is also essentially based on respectful interaction with each other. We respect the personal dignity, privacy and personal rights of each individual.

For this reason, we cultivate a corporate culture that is characterized by respect, openness, honesty and appreciation, as well as respect for privacy, professionalism and loyalty.

BERNSTEIN does not tolerate any discrimination, harassment, or insult in the work environment, whether based on age, disability, origin, gender, ideology, political or trade union activity, race, religion or sexual orientation.

4. Protection of personal data and confidential information

We strictly observe the regulations on the protection of personal data. Confidential information and documents about customers, BERNSTEIN or employees must be protected in an appropriate manner from the insight of third parties.

Personal data will only be collected, processed, or used if this is necessary and there is a corresponding legal basis or the consent of the data subject. The use of data must be transparent for the data subjects. Their rights to information and correction and, if applicable, to objection, blocking and deletion must be safeguarded.

In the case of technical protection against unauthorized access to data and information, an appropriate standard must be maintained which corresponds to the state of the art.

5. Requests for information from public authorities

BERNSTEIN will cooperate with all relevant public bodies and regulatory authorities. Any communication by employees in this regard is only allowed to be communicated by the employees appointed for this purpose.

6. Communication with customers, business partners and the public

All announcements and reports by BERNSTEIN must be complete, honest, accurate, timely and understandable, whether to business partners, customers or the public. This applies to information and advertising material about our products.

Information to business partners, customers or the public about our company or our products must only be provided by authorized employees.

7. Social networks

Anyone who speaks out in a public discussion or on social media about issues that affect BERNSTEIN should state clearly that they are acting as a private individual.

Please consider that statements in e-mails or social networks can be made informally and spontaneously but are then recorded and can be viewed by the recipient or the Internet public for a long time.

8. No conflicts of interest with customers and business partners

BERNSTEIN strives for sustainable business relationships with its customers and business partners for mutual benefit. Every employee must therefore ensure that the interests of our customers and business partners are considered in a fair manner.

9. Customer complaints

Customer complaints provide valuable information about opportunities for improvement in our business and - if handled properly - offer an opportunity to strengthen or regain customer relationships. BERNSTEIN ensures that all significant customer complaints are handled in a fair and understandable manner.

10. Personal conflicts of interest

All employees must avoid situations in which their personal or financial interests' conflict with those of BERNSTEIN. It is forbidden to participate in companies of competitors, suppliers or customers or

to enter into business relationships with them in private if this could lead to a conflict of interest.

11. No tolerance of corruption

BERNSTEIN does not tolerate any form of corruption, bribery or venality, acceptance or granting of advantages. No employee is allowed to provide or attempt to provide improper benefits in connection with business activities, business partners, their employees or other third parties.

No employee is allowed to accept benefits - in all forms, especially personal gifts or benefits resulting from business relationships of BERNSTEIN - which must reasonably be assumed to be able to influence business decisions or transactions.

12. Donations and sponsoring

The management decides on donations and sponsoring. They are not allowed to be used to indirectly obtain unfair advantages with business partners.

13. Prevention of money laundering and terrorist financing

BERNSTEIN has established risk-appropriate precautions to prevent money laundering and the financing of international terrorism in accordance with the law and the requirements of the regulatory authorities.

14. Protection of competition

BERNSTEIN does not participate in illegal restrictive agreements and practices. Employees are strictly prohibited from entering into such agreements or arrangements.

In contacts with competitors and business partners, BERNSTEIN employees do not discuss internal matters, such as prices and terms of sale or financing, costs, market overviews, organizational procedures or other confidential information from which competitors or business partners could derive competitive advantages.

15. Property and assets of the company

All employees must handle the company's property and assets expediently, sparingly and responsibly in every respect. BERNSTEIN's property and company equipment, business documents and working materials must not be used for private purposes under any circumstances.

16. Safety and health protection

BERNSTEIN strives to ensure a safe and healthy working environment to prevent accidents and injuries. Processes, facilities and equipment must comply with applicable legal and internal requirements for occupational safety and health, fire and environmental protection.

17. Prohibition of child and forced labour

Child labour, i.e. the employment of persons younger than 15 years of age, unless local legislation sets higher age limits and unless exceptions are permitted, is not tolerated at BERNSTEIN. BERNSTEIN rejects any kind of forced labour.

18. Employee rights

BERNSTEIN respects the right of employees to freedom of association, freedom of assembly and collective bargaining, if this is legally permissible and achievable in the respective country.

19. Remuneration and working hours

BERNSTEIN complies with labour standards about remuneration and the maximum permissible working hours in accordance with the applicable laws and regulations.

20. Environmental protection

BERNSTEIN complies with the regulations and standards on environmental protection and acts in an environmentally conscious manner at all sites. Employees should strive to protect natural resources during their work and ensure that BERNSTEIN's business activities have the least possible impact on the environment by conserving materials, saving energy and reducing and recycling waste.

When selecting suppliers, advertising materials or other external services, every employee should consider ecological and social criteria in addition to economic aspects.

21. Consequences of non-compliance

The consequences of a breach can lead to considerable reputational damage and legal disadvantages for employees and BERNSTEIN. The consequences can be significant, from fines to criminal proceedings or restrictions on official permits. In addition, the infringement of the duties resulting out of the employment contract may lead to measures under employment law by BERNSTEIN.

22. Implementation and enforcement

BERNSTEIN will make every appropriate and reasonable effort to continuously implement and apply the principles and values described in this Code of Conduct.