


Purchasing Policy					QSE-Doc. No.	DB-LPZ-8	
Guidelines for suppliers, service providers and contractors					Version No.	2	
Created	Riegler, Thomas, 14.10.2016	Amended	Riegler, Thomas, 24.01.2022	Checked	Sulzbacher, Gerald, 05.03.2025	Approved	Huber, Manfred, 05.03.2025

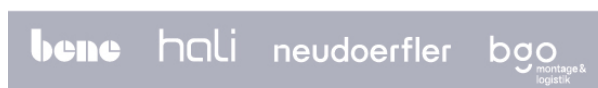
(1) Purchasing Policy / Code of Conduct

This purchasing policy applies to all companies of the BGO Group. We expect our partners, i.e. suppliers, service providers, contractors, etc., and their employees and agents, to observe this policy at all times and demand, monitor and warrant compliance with BGO's standards along their entire supply chain.

The companies of the BGO Group are:

BGO HOLDING GmbH	Neutorgasse 4- 8	1010 Vienna
Bene GmbH	Schwarzwiesenstrasse 3	3340 Waidhofen/ Y.
hali GmbH	K.—Schachinger-Str. 1	4070 Eferding
Neudoerfler Office Systems GmbH	Kom.-Rat Karl Markon-Strasse 530	7201 Neudörf/ L.
BGO Montage und Logistik GmbH	Schwarzwiesenstrasse 3	3340 Waidhofen/ Y.

and their affiliated entities, branches and establishments.



The companies of the BGO Group are manufacturers of high-quality products that significantly influence workplaces of the present and the future. For us to meet the expectations of the market this policy defines fundamental principles, guidelines and expectations for establishing and maintaining business relationships. We see our commitment not only as a business responsibility but also as an opportunity to improve the living conditions of people around the world.

We act within the scope of the statutory provisions and the provisions and standards customary in the industry as applicable from time to time, and have set ourselves goals beyond the same, in particular in the area of sustainability. To reach those goals we commit ourselves to cooperating with suppliers who share the BGO Group's self-commitment to do business in a legal, sustainable and ethical manner.

We promote Diversity, Equity & Inclusion (DE&I) and recognise the cultural differences and challenges involved in the interpretation and global implementation of these fundamental principles. We are convinced that these fundamental principles are universal, however we understand that the methods for meeting those expectations may be different. They must, however, be in line with the law, values and cultural expectations of different societies around the world.

We expect that all partners not only acknowledge this purchasing policy and the following "Guideline for Suppliers, Service Providers and Contractors" but also comply with its values at all times and actively demand them along the entire supply chain.

Bases for this policy:

SGDs - Principles of the UN Global Compact¹

Labour Standards of the International Labour Organisation (ILO)²

The companies of the BGO Group reserve the right to check compliance with this policy along the supply chain. If it becomes known that specific processes or conditions do not comply with the policy, the company shall reserve the right to take measures.

BGO Purchasing is responsible for managing relationships with suppliers and service providers. Suppliers are requested to contact the competent representatives of BGO Purchasing if they have any questions. In

¹ UN Global Compact and the SDGs, <http://www.unglobalcompact.com>

² ILO, <http://www.ilo.org>

addition, those representatives may be contacted in the case of questions regarding the admissibility of certain practices, processes or contracts. The Purchasing staff are able to provide an overview of and additional advice on the relevant policies.

Information on misconduct or for improvements may be submitted anonymously at any time via the following page: <https://bgoholding.integrityline.com/frontpage>

The companies of the BGO Group are grateful for the contribution of its partners to the success of its business and hope to be able, also in future, to maintain relationships with their suppliers that are oriented towards a business relationship that is equally satisfying for both sides.



Karl Holubovsky
(SQD - Sustainable Supply Chains)



Thomas Riegler
(QSE Management)



Sulzbacher, Gerald
(Head of Procurement)



Huber, Manfred
(CEO Operations & Finance)

(2) Guideline for suppliers, service providers and contractors

The following guideline is intended to explain the BGO Purchasing Policy in more detail, facilitate its interpretation and support its implementation. Any contracts concluded between the companies of the BGO Group and the partner shall in any case prevail over this policy, which applies to the entire supply chain, including indirect suppliers.

The United Nations Sustainable Development Goals (SDGs) may provide further assistance with implementation.



SDGs provide a framework for governments, enterprises, organisations and individuals to promote sustainable business practices and fulfil their responsibility vis-à-vis the environment and society. This reinforces positive contributions to society and, at the same time, minimises risks that result from environmental and social issues. Any commitment in this area helps to ensure long-term commercial success.

The specific requirements from the BGO Purchasing Policy are explained below in the context of the SDGs. The symbol for the relevant goal is briefly explained opposite the depiction in connection with the supply chain; specific requirements are found in the paragraphs below. This is intended to serve as a common guideline for our actions.



No Poverty

Partners pay fair wages and provide decent working conditions.

Working conditions

All partners must advocate fair treatment of their employees and undertake to treat them with dignity and respect. Compliance with all legal and official requirements and safeguarding the human rights of employees is expected.

Wages, fringe benefits and working hours

Suppliers shall pay all employees in accordance with applicable collective bargaining laws, including minimum wages, overtime and fringe benefits prescribed by law as customary in the relevant country.

Suppliers shall inform their employees of the basis of their payment as early as possible. In addition, we expect suppliers to inform their employees of whether working overtime will be required and how they will be remunerated for the same.

Suppliers shall keep correct records on working hours and annual leave of their employees.



Zero Hunger

Promote sustainable agriculture and fair trade relations in the procurement of agricultural products



Good Health and Well-Being

Promote safety at work and health-enhancing measures along the supply chain

Safety and Health

Suppliers shall protect all staff in the workplace and in accommodation provided by them by ensuring a safe and healthy environment.

Safety and Health at Work

Suppliers shall protect all employees in the workplace and at other facilities provided by them, including accommodation and transport vehicles, etc., against contact with chemical, biological or physical hazards and physically demanding tasks or avoid the same to the greatest extent possible. The supplier's management is therefore responsible for providing their employees with adequate personal protective equipment such as ear protection, protective gloves, masks, etc., depending on the type of work done by them.

Physically Demanding Work

Where employees are required to perform physically demanding work, including manual handling of materials, heavy or constant lifting, prolonged standing work and repetitive or forceful assembly work, such work shall be identified, assessed and monitored by suppliers.



Quality Education

Support for educational programmes for employees and their families

Education and Training

Employees must be trained for the work to be done by them before they start working and on an ongoing basis. Comprehensible training plans must be drawn up for this purpose.



Gender Equality

Promote equality in enterprises

No Discrimination

Partners must prevent harassment and discrimination in the workplace. Discrimination on the grounds of race, skin colour, age, gender, sexual orientation, ethnic origin, disability, religion, political affiliation, membership of a trade union, civil status, etc., is inadmissible.

Fair Treatment

Suppliers must ensure that there is no harsh or inhumane treatment in the workplace, including, without limitation, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, verbal abuse or intimidation of employees.



Clean Water and Sanitation

All enterprises in the supply chain must use water resources responsibly.

Avoid Hazardous Substances

We kindly ask our suppliers to protect natural resources, to avoid the use of hazardous substances to the extent possible and to promote measures regarding reuse and recycling.

Information on Hazards

Suppliers must provide safety information on hazardous substances in the workplace.

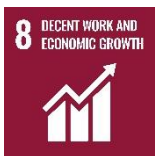


Affordable and Clean Energy

Promote the use of renewable energies in the suppliers' production processes.

Suppliers shall act responsibly and efficiently. Wherever economically possible, use of energy should be reduced, inter alia through technical improvements.

Sustainable energy sources must be given preference and minimisation of negative effects on the environment is required. Energy management systems should be introduced to ensure a structured approach.



Decent Work and Economic Growth

Combat child labour, forced labour and exploitation in the supply chain.

Free Choice of Workplace

No enterprise in the supply chain may support forced labour or compulsory labour, involuntary prison labour or human trafficking.

Child Labour and Young Workers

Suppliers must not make use of child labour. Young workers below 18 years of age may only be employed for non-dangerous work after they have reached the statutory minimum age for employment relationships or the age prescribed for completion of compulsory school attendance of the relevant country. Staff files must contain sufficient data for verifying the age of employees.

Freedom of Association

Partners are encouraged to openly communicate and directly discuss with their employees when resolving issues regarding the workplace and wages. Suppliers shall respect their employees' right to freedom of association. Employees must be able to openly communicate with management without the threat of reprisals, intimidation or harassment in accordance with local legislation.



Industry, Innovation and Infrastructure

Support sustainable technologies and ongoing development of the organisation

Management Systems

Suppliers shall use management systems to facilitate continuous improvement and ensure compliance with applicable fundamental principles. Elements of management systems include:

- **Competences and Responsibilities**

Suppliers shall allocate financial, human and technical resources that are sufficient to fulfil the agreed services.

- **Legal Requirements and Customer Requirements**

Suppliers shall record all applicable laws, provisions, rules, regulations, permits, licences, approvals, orders, standards and relevant customer requirements and ensure compliance with the same.

- **Risk Management**

Suppliers shall provide for mechanisms to record and monitor risks in all areas described in this document. Suppliers must possess financial resources that are sufficient to guarantee continuation of their business activities and their solvency.

- **Documentation**

Suppliers shall keep the required documentation to prove compliance with the present fundamental principles and applicable laws, provisions, rules, regulations, permits, licences, approvals and orders.

- **Continuous Improvement**

We expect our partners to constantly improve by setting performance targets, carrying out implementation plans and taking the measures necessary to remedy defects identified in the course of internal or external audits, inspections or management reviews.



Reduced Inequalities

Promote social and commercial justice

Diversity, Equity and Inclusion (DE&I)

Diverse teams bring different perspectives and ideas to the table and thus make an important contribution to strengthening competitiveness.

Employees of different genders, backgrounds and other characteristics shall be treated equally, thus creating a working environment in which everyone can realise their full potential. This also includes the protection of the rights and well-being of minorities and indigenous peoples along the entire value chain.



Sustainable Cities and Communities

Consider suppliers that respect local communities and follow sustainable practices

Local Value Added

Local and long-term partners maintaining regional supply chains will be given special consideration when awarding contracts.



Responsible Consumption and Production

Promote recycling, waste avoidance and environmentally-friendly production methods

Environmental Permits

Partners shall obtain all necessary environmental permits, licences and approvals and meet all applicable requirements regarding operation and reporting.

Waste and Emissions

Suppliers must have systems in place that ensure safe handling of waste, air emissions and sewage as well as transportation, storage, recycling, reuse and management of waste, air emissions and sewage. Waste, sewage or emissions that may have negative effects on human health or the environment shall be managed, checked and treated appropriately before they are released into the environment.

Substances Regulated by Law

Suppliers must comply with laws and regulations applicable to and customer requirements regarding substances regulated by law (e.g. REACH). This includes immediately answering enquiries with regard to the

substances of which materials/components are composed, the ban or restriction on certain substances, including labelling for recycling and disposal.

Circular Economy

The companies of the BGO Group promote the circular economy and are guided by the "10 Rs of the Austrian Circular Economy Strategy"³. New products are designed to be recyclable. Suppliers are requested to actively support those endeavours and actively demonstrate possibilities for the products supplied by them.



Climate Action

Ensure that suppliers reduce their carbon emissions and implement climate-friendly technologies

Process Stability

Suppliers must have programmes in place that prevent the release of chemicals in catastrophic quantities or to react to the same.

Preparation for Emergencies and Emergency Relief

Suppliers must identify and assess emergency situations which may occur in the workplace or in accommodation provided by the company. Suppliers must minimise potentially negative effects by implementing and maintaining effective emergency plans and emergency relief procedures. For example, the supplier's management is responsible for providing awareness-raising trainings, emergency trainings and other safety exercises as part of safety trainings as required by the relevant industry and based on fire and other safety regulations.



Life Below Water

Avoid environmental pollution, in particular near the sea



Life on Land

Ensure that our actions cause no environmental damage to sensitive ecosystems, in particular through deforestation

Promote Biodiversity

The BGO Group and its partners are committed to promoting and protecting biological diversity in all areas of their business activities. This commitment includes the conservation of ecosystems as well as the support of projects aimed at the restoration and renaturation of habitats. All companies within the value chain undertake to minimize the negative impact of their business activities on biodiversity.

Prevent Illegal Logging

Our partners undertake to fully implement all national and international regulations for preventing illegal logging along their entire supply chain and to provide complete proof of origin.

Both commercial and sustainability criteria will be taken into account when selecting suppliers.

Chain of Custody certification, preferably PEFC or ISO 38200, is strongly recommended to ensure sustainable forest management, fair working conditions, protection of biodiversity and compliance with all relevant environmental standards. The relevant certificates for all components made of wood materials must be submitted regularly to the BGO purchaser in charge upon request.

If irregularities or suspected irregularities occur along the supply chain, the competent Strategic Purchaser of the BGO Group must be informed in writing promptly within 2 working days. Prompt information must be provided also in the event of changes to or loss of Chain of Custody certifications.

In cases of suspicion the whistleblower system mentioned at the beginning may be used as well. The supplier undertakes to provide the data required under Regulation (EU) 2023/1115 (EUDR) in full and in an electronically processable form.

³ Circular Economy Strategy, <https://www.bmk.gv.at/en/topics/climate-environment/waste-resource-management/ces.html>

Conflict Minerals

The BGO Group undertakes not to use tin, tantalum, tungsten or gold that is mined in conflict-affected or high-risk areas as defined in Regulation (EU) 2017/821 of the European Parliament and of the Council ⁴⁴.

If use of such minerals is unavoidable, they shall be obtained from recycled sources wherever possible in order to promote sustainable and responsible procurement practices. Materials from conflict-affected regions or without appropriate proof of origin are not permitted.

All international laws, restrictions, trade sanctions and the like must be complied with and a system to ensure compliance must be established.

For all products delivered to the BGO Group that contain the above-mentioned minerals or their derivatives the appropriate proofs and declarations must be submitted to the BGO purchaser in charge before the first serial delivery.



Peace, Justice and Strong Institutions

Promote transparency and avoid corruption

Ethics and Laws

Partners shall operate their business ethically and act honestly.

Honest Business Practices and Fair Competition

Partners shall operate their business in a competitive way, complying with all applicable laws, rules and regulations without restriction. Partners must not pay or accept any bribes or other illegal incentives in their relationships with other enterprises or public authorities. Partners shall use fair business practices, including correct and true advertising.

BGO employees are required to comply with all applicable provisions, such as, e.g. the internal Codes of Conduct, including the following concepts regarding relationships with all business partners:

- Employees shall treat all suppliers, customers and other persons maintaining business relationships with BGO fairly and objectively without restriction and without granting any benefits or advantages based on personal financial considerations or personal relationships.
- Employees shall not be allowed to (directly or indirectly) request, grant or accept disadvantageous discounts, payments, charges, credits or services from persons or companies that are aimed at influencing a purchase decision or purport to do so.
- Employees shall not carry out transactions on behalf of BGO with direct family members or with suppliers in which they hold a financial interest, where the employee appears to have or actually has influence on the supplier's relationship with the partner. Such relationships must be disclosed in accordance with the current policies.

External staff and representatives of the companies, such as, e.g. advisors or external sales staff, shall also comply with applicable provisions. We expect employees and suppliers to report violations or potential violations of the present Supplier Policy to BGO Purchasing without delay.

Data Protection

Partners may use or disclose confidential information on the business relationship only upon express authorisation by the disclosing party and for the benefit of the BGO company. In particular, partners must not exchange confidential information with other competitors or suppliers or otherwise disclose the same. All information or data relating to the business activities of BGO companies shall be treated as confidential at all times, unless such information or data is in the public domain.

BGO Group companies may require suppliers to confirm those obligations by entering into additional non-disclosure agreements regarding the above-mentioned confidential information.

Intellectual Property and Combating Counterfeit Products

Partners must respect intellectual property rights; technology transfer and any transfer of know-how must be done in such a way that intellectual property rights are protected.

⁴ Conflict minerals, <https://www.cahraslist.net/>

As part of ongoing efforts to jointly protect the supply chain against risks such as counterfeits, illegal re-imports and product piracy, BGO companies expect their partners to inform them immediately if and when they are given an opportunity to purchase counterfeit, illegally re-imported or stolen products, or if and when they learn of such products in any other way

Distribution Techniques

All partners shall act in an open and honest manner. The following distribution techniques are strictly prohibited:

- Backdoor selling, i.e. circumvention of correct purchasing channels in order to convince an individual to purchase a certain product or service.
- Promising unrealistic delivery periods or dates, i.e. knowingly promising unrealistic delivery periods or dates with the objective of being awarded a contract.
- Making a promise in spite of lack of capacity, i.e. promising to provide a product or service and not having the capacities for fulfilling the commitment.
- Requesting information on competitors, i.e. requesting information on products, pricing, delivery terms, distribution or other information regarding competitors.
- Offering gifts that exceed a reasonable value.
- Offering prices that are disadvantageous to the purchaser where the supplier is the only provider of the relevant goods or services.
- Requests to accept an offer after the period for submitting offers has ended.



Partnerships for the Goals

Cooperation with suppliers and other stakeholders to achieve common sustainability goals.

Reporting Problems

Employees along the entire supply chain are encouraged to report problems or illegal activities occurring in connection with their relationship with the BGO Group to the competent BGO Purchasing or BGO Head of Purchasing without the threat of reprisals, intimidation or harassment. The whistleblowing platform mentioned at the beginning of this Policy may be used for this purpose as well. Partners shall timely check reported problems and respond to them appropriately.

Conduct during Supplier Visits

Suppliers have limited access to BGO's premises. The following procedures must be followed by all suppliers.

- Partners may only be present on the premises after proper registration and must comply with the visitor rules applicable from time to time.
- Partners may only enter offices and, in particular workplaces in offices, when accompanied by employees of the respective company and visibly wearing a visitor badge.
- Suppliers must hand in their visitor ID when leaving the premises.

(3) Confirmation by the Partner

We as a supplier or service provider confirm that we have received the **BGO Purchasing Policy** and the **"Guideline for Suppliers, Service Providers and Contractors"**.

We have read and understood the same. We will comply with the same, train our employees accordingly and enforce compliance along the supply chain that is relevant to BGO products. In any case for as long as we are a BGO supplier.

Name and address of the company:

(company stamp)

Representative:

Title of the representative:

Signature:

Date:

Version No.	Description of amendments
2	Changes to use this document for the whole BGO Holding
3	Translation from completely reworked German Version