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# ebmpapst

engineering a better life

## ebm-papst Code of Conduct

*Principles governing responsible and lawful conduct and action*

# ebmpapst

engineering a better life

ebm-papst Code of Conduct

ebmpapst

2022





# Risk & Compliance

**ebm-papst Group**  
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## Corporate Governance: *Principles of Company Management.*

**Dear members of the ebm-papst family,** ebm-papst is a special company – primarily thanks to the fundamental values, which have guided us for more than 50 years. An important aspect of our company philosophy is that we do not base our actions solely on legal requirements but are also committed to ethical standards. We treat people and the environment with respect and esteem. The principles outlined here are binding for every single employee and are intended to help everyone adhere to our rules and act in accordance with our values. ebm-papst also fulfills the code of conduct of the Responsible Business Alliance® (RBA®).

This code of conduct sets down standards designed to ensure safe working conditions in the electronics industry supply chain and respectful treatment of workers, as well as environmentally sound and ethically acceptable business practices. Please contact your superior if you have any questions or doubts about how to act in a particular situation.

Group Management of the ebm-papst Group

*We always abide by the law.*

## Overriding Principle

We think it only fair to act in accordance with the laws and we believe in honesty. We always abide by the laws of the countries in which we work. Illegal action is not an option and not in the interests of our company, as it is unethical, seriously damaging to our reputation and can lead to prosecution, claims for damages and loss of business.

Any employees breaching the law must be aware that they themselves will be at risk of prosecution. Acting in conformity with the law is in the best interests of each employee.

All employees are required to familiarize themselves with the regulations applicable to their area of responsibility and to abide by these. In cases of doubt, the council of a senior employee should be sought.

## Responsible Business Alliance® (RBA®)

We have committed to comply with the Responsible Business Alliance® (RBA®) Code of Conduct, whose content enhances our own Code of Conduct.

The RBA® Code of Conduct is a key component of our supply chain and we expect all of our business partners to give their commitment to uphold its values.

Its core concerns are safe working conditions, treating employees with respect and dignity, and environmentally compatible, ethically tenable business processes.

*We apply the RBA® Code of Conduct.*

*We are committed to social responsibility and sustainability.*

## Social Responsibility and Sustainability

ebm-papst is completely aware of its social responsibility. Above and beyond our compliance with the legal stipulations, we make a voluntary contribution to the sustainable development of the ebm-papst Group and our surroundings.

Besides efficiency and enthusiasm, humanity is at the center of our actions. We are never inconsiderate in our drive for success. We understand ourselves to be open and reliable, loyal to our customers and employees. We behave with integrity. As a company, we know that we also have an obligation to society. We create the space that each and every one of us requires to develop – and we reward performance.

In everything we do, we also consider the long-term effects. Resource preservation, energy efficiency, environmental protection and employee development safeguard the future for us. By endorsing such behavior, we would like to send out a signal, also internationally, and help to promote greater fairness in our world based on the division of labor.

# Human rights

Human rights are universal, inalienable and indivisible rights to which everyone is equally entitled. Respect for these fundamental rights is an integral part of our corporate culture.

We are committed to respecting internationally recognized human rights throughout our business operations and expect our business partners in the supply chain to also commit to these values and implement them in their value chains.

We conduct appropriate due diligence checks in particular when selecting suppliers and in our dealings with existing suppliers. We demand and promote fair working conditions.

Respect for human rights is an assessment criterion in our supplier selection process.

We do not tolerate conduct that contributes to or supports human rights abuses. We take appropriate corrective action in the event of human rights violations.

*We respect human rights in our value creation process.*



## Bribery, Corruption, Gifts, Gratuities

*We reject bribery and corruption.*

Bribery and corruption are illegal and unethical. Both constitute considerable risks for our employees and our company. Bribery and corruption represent a threat to the existence of any company. They are therefore neither an option nor an acceptable practice — even if this means a loss of revenue.

We neither offer impermissible benefits to our trading partners nor do we accept any such benefits ourselves.

We consider corrupt behavior as being constituted by, e.g. facilitation payments, kickbacks and financial incentives as well as by having recourse to third parties/agents.

We exercise restraint with regard to both accepting and offering gifts and other gratuities (including invitations to dine or other activities for example). Any such action must never take a form which exceeds normal business hospitality, manners and courtesy.

## Taxes and subsidies

The tax laws of every country are binding for us and must therefore be strictly observed. Every employee must be aware that tax offenses are liable to prosecution. This applies equally to both the company and the individual employee. On account of regular and thorough inspections by the tax authorities, there is a high risk of tax offences being discovered.

Suspicious circumstances very quickly lead to criminal investigations. If customers and suppliers are involved, cross-checks will be made with their tax authorities and vice versa.

The legal situation with regard to taxation and subsidies is often very difficult to assess. In cases of doubt, a senior employee should be consulted and/or clarification must be requested from the Managing Director Finance & Administration.

*We do not practice tax evasion.*

*We believe in fair competition.*

## Principle of Fair Competition

Competition can only work if it is free and fair. Agreeing with competitors on coordinated market action is detrimental to competition. That is why we do not come to any arrangements with competitors regarding our business practices. We abide by the laws on the protection of competition. We specifically prohibit any agreements on prices and terms, the apportionment of markets and regions, the allotment of customers and the coordination of quotation, development and production strategies. Even exchanging information with competitors which could form the basis for coordinated behavior (in particular with regard to prices, costs, margins, terms, customers, quotations, product developments and manufacturing capacity) cannot be tolerated and is strictly forbidden.

Any violation of these bans is rigorously pursued by the cartel authority and can lead to sanctions which may endanger the existence of our company.

## International Trade

International trade is of vital benefit to ebm-papst. So supporting it and abiding by the pertinent rules is very much in our own interest. Consequently, we observe the existing import and export regulations, obtain the necessary permits and pay the applicable customs duties and taxes.

The authorities regularly check compliance with these regulations. Severe sanctions may be imposed in the event of any violation.

*We respect the rules of international trading.*

*We respect physical property.*

## We protect third party ownership rights

Property belonging to our or other companies is handled, treated and used carefully and responsibly. This also means taking into account the integrity of our trading partners.

## Concepts, ideas and designs are all forms of *property and therefore protected by the law.*

We respect third party intellectual property. Being a technology supplier investing a lot of effort in research and development, the protection of inventions and expertise is vitally important to ebmpapst. That is why we treat business secrets with the utmost care. It must be ensured that confidential information is not passed on to unauthorized third parties.

The same also applies to confidential information we receive from our trading partners. If special circumstances (e.g. customers' sensitive development projects or company take-overs) require strict confidentiality, this must also be maintained, even with and towards colleagues.

*We safeguard and respect  
intellectual property.*

## Data Privacy

*We observe the confidentiality of personal data.*

We only use the personal data of our employees and contractual partners for the express purposes for which they have been provided and always treat such data confidentially. ebm-papst strictly observes all laws on personal data privacy.

## Business Records

Both internal and external reports must be accurate and complete to provide the recipient with the appropriate information. We concentrate on the representation of facts and use an objective reporting style.

Documents required for ongoing or anticipated internal enquiries or official investigations must never be destroyed, removed or altered.

*We report correctly and promptly on all business activities.*



*We ensure the safety of our people  
and environment.*

## **Product safety, work safety and protection of the environment.**

We demand the highest standards of quality and safety for our products and services. We monitor the quality of our products on the market and help customers avoid potential hazards.

We make sure the working environment is safe. Safety regulations must be strictly observed and checked with regard to their effectiveness. Any non-compliance is to be reported and rectified immediately.

We work economically with natural resources and design our products the same way (in keeping with our GreenTech company philosophy). We avoid anything which is harmful to the environment. Compliance with all environmental protection laws is a matter of course for our company.

## Avoidance of Conflicts of Interest

We make a clear distinction between business and private interests. Any sideline activities require the prior consent of ebm-papst. A superior must always be asked. This applies in particular to sideline work for any rival companies, customers or suppliers of ebm-papst or financial involvement in these. Notification should be given if any close family members are involved in such activities or participations.

Working for ebm-papst should also never be used to gain any private advantage. The placing of orders with business partners for private purposes is to be avoided. Trading partners are not to be given preference for private reasons.

*We act in the interests of ebm-papst.*

*We respect other cultures and attitudes.*

## We are Part of a Global Society.

Consequently, respect for other cultures and values is a matter of course for us. We treat other people fairly, openly and with esteem. We reject all forms of discrimination. We remain politically neutral in the company.

# Corporate Communications

Official statements on behalf of ebm-papst are only to be made by persons authorized to do so. Statements concerning the Group are to be coordinated with the Corporate Communications department in Mulfingen prior to publication.

**Contact Person:**

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*We practice coordinated communication.*

## *Addendum.*

# This Code of Conduct is Binding for all Members *of the ebm-papst Group.*

It can be substantiated and supplemented by regulations and training sessions on particular topics or for specific countries.

Our senior management has particular responsibility. They are expected to set a good example with regard to the ebm-papst rules and values set out in this code of conduct. They are the first point of contact for our employees on correct behaviour. Within their area of responsibility, it is their task to ensure compliance with the code of conduct.

Specific questions concerning the code of conduct or correct behaviour can be addressed to immediate superiors, the plant or branch management, or directly to the Managing Director Finance & Administration.

Any violation of the code of conduct will not be tolerated and may lead to dismissal or prosecution.

# Contact

## **ebm-papst Group Risk & Compliance**

If you have any questions or suggestions regarding compliance, please contact:  
[compliance@de.ebmpapst.com](mailto:compliance@de.ebmpapst.com)

Our whistleblower system is available around the clock and regardless of location so that compliance violations of legal requirements or internal organizational rules can be reported either anonymously or by name. All incoming information is treated confidentially:  
<https://www.bkms-system.com/ebm-papst>

More information: [ebmpapst.com/compliance](https://www.ebmpapst.com/compliance)