Our Code of Conduct

Version: August 20, 2024

Dear colleagues at Bacher Systems,

each of us is unique and an essential part of our company. Every day, we live out our core values (partnership, initiative, flexibility, competence, reliability) and make Bacher Systems a place of mutual respect by creating added value for our customers. This is what we understand as living accountability.

This Code of Conduct outlines how we, as members of Bacher Systems, behave towards our stakeholders—including employees ("co-responsible persons"), business partners, representatives of authorities, banks and insurance companies, and society at large.

Please remember: of course, we must always comply with the laws and regulations of the countries in which we represent Bacher Systems. Beyond these legal requirements, this Code defines standards for responsible, ethical, and moral conduct expected of all of us.

Regardless of our roles, we are all obligated to act according to these principles and to promptly report any deviations from the behavior described here.

Elvira Cejna, Managing Director   Nicolai Czink, Managing Director

Table of Contents

The Code of Conduct cannot provide specific guidance for every situation.
If you can answer "yes" to all of the following questions, your behavior is likely appropriate:

If you're unsure, ask yourself:

- Is my behavior legal?
- Does it comply with Bacher Systems' policies (e.g., protection of trade secrets, user guidelines)?
- Does it maintain the trust of our stakeholders?
- Would my friends or family see this as ethical?
- Have I considered the consequences for those affected?
- Would I be okay being treated this way?
- Would I be comfortable if the media reported on my actions?

Points of Contact for Questions and Concerns

As co-responsible employees at Bacher Systems, we know that all doors are open and we communicate with one another as equals. If you're unsure who to approach with your concern, the table below will help you find the right contact.

Topic	Contact Person(s)
Discrimination, Ethics	Circle Lead, People Partner, People & Culture, Compliance Officers
Conflicts of Interest	Circle Lead, People Partner, Management, Compliance Officers
Bribery, Corruption	Circle Lead, People Partner, Compliance Officers
Confidential Info	Information Security Manager
Personal Data	Data Protection Coordinator
General Code of Conduct	Compliance Officers
Anonymous Reporting	Whistleblower-Tool on our website bacher.at

Company Overview

Key Facts and Figures about Bacher Systems

30+
Years of continuity

100%
owner-managed

115+
people, taking accountability

200+
Certifications of leading manufacturers

Our value contribution

Highest availability
of data and services

Scalable solutions
Great flexibility
Future-proof planning

Controllable
cyber risks

Holistic approach to cyber security
Perfectly protected digital identities
Secured compliance requirements

Business value
from data

Efficient, automated IT operations
Optimized application performance
Process transparency across silos

Head and hands free
for the core business

Managed service - around the clock
High degree of automation
Highest reliability in the industry

Our Core Values

We are
partners

We are
flexible

We are
proactive

We are
competent

We are
reliable

In our view, this means ...

We are partners

- We make work easier.
- We meet others with openness, trust, and respect.
- We communicate directly and constructively.
- We share knowledge and embrace learning.
- We work as a team, turning individuality into strength.
- We support work-life balance.
- Success is a shared achievement.

We are proactive

- We take responsibility, use our creative freedom, and deliver results.
- We achieve innovation by combining new ideas with sustainable implementation.
- By blending what works with what's new, we create added value.
- We actively seek opportunities to deliver top performance.
- We spot and seize chances early — for sustainable progress and a great work environment.

We are flexible

- We use every opportunity to create tailored solutions.
- We resolve conflicting expectations with creative both-and approaches.
- Our stable workflows give us the flexibility to deliver quality, even under time pressure.
- We support special family situations with quick, individual decisions.
- We set clear priorities and adapt them as conditions change.
- Each of us uses our decision-making power to achieve the best results together.

We are competent

- Our key strength is unlocking relevant knowledge quickly.
- We strengthen each individual through personal and professional development, keeping our team's performance high.
- With strong social skills, we build shared understanding.
- We clarify expectations and meet them with a focus on value.
- We tackle problems with a solution-driven mindset and keep evolving.
- We use our technical expertise to ensure the security of our customers' and partners' data.

We are reliable

- Consistency and long-term thinking shape our actions.
- A commitment for us means finding ways to deliver.
- We identify success and risk factors to ensure appropriate security.
- With an entrepreneurial mindset, we choose alternatives that drive long-term success.
- Even under tough conditions, we act toward agreed results, following our Code of Conduct and that of our partners.
- Data and information — both ours and our partners' — are safe with us.

Human Rights, Diversity, and Equal Opportunity

We value the contribution of each individual to our company and recognize that creativity and innovation require diverse teams. Bacher Systems therefore promotes an environment that is independent of gender, ethnicity, age, disability, religious beliefs, and sexual orientation. We fully acknowledge international human rights and adhere to all local legal requirements and regulations.

We strictly reject child labor and any form of exploitation both within Bacher Systems and in our areas of influence (see our collaboration with business partners and third parties).

We actively promote equal opportunities for all individuals currently working with us or interested in future employment, particularly regarding gender equality – this is reflected in our core values (see Our Core Values). We foster an atmosphere where everyone can freely and openly express their ideas, opinions, and beliefs. In internal selection processes for new roles, we treat all applicants equally, regardless of their background.

Therefore, we do not tolerate any actions that undermine an individual's dignity or are unwelcome, inappropriate, humiliating, insulting, or offensive to the affected person. Since each of us is a part of Bacher Systems, we not only have the right but also the responsibility to address and highlight inappropriate behavior.

A Healthy and Respectful Work Environment

At Bacher Systems, we believe in fostering a culture of respect and collaboration, where mutual appreciation and understanding are at the heart of our work environment.

- We are committed to creating a positive and inclusive atmosphere that encourages open communication and the sharing of ideas.
- We actively promote a respectful approach in all interactions, ensuring that everyone feels valued and heard.
- Our work culture is based on trust, where each individual is empowered to contribute their unique skills and perspectives.
- We foster team spirit through collaborative efforts and a strong sense of shared responsibility for our goals.
- Conflicts are addressed constructively, with a focus on solutions that benefit all parties involved.
- We encourage continuous feedback and the exchange of ideas, making sure everyone has the opportunity to grow and develop within the company.
- By maintaining these principles, we create an environment where everyone can thrive and work together harmoniously.

Confidential Data and Information

Information is a key—if not the most important—component of our business processes and is critical to the success of our company. That is why each of us is obligated to handle it responsibly.

- We protect confidential data and information, trade and business secrets, as well as intellectual property.
  - This includes all facts, circumstances, and processes that are not public and are accessible only to a limited group of people and where a person or organization has a legitimate interest in their non-disclosure. We consider information to be confidential even if it is not explicitly marked as such, as long as its nature implies confidentiality.

- We do not disclose confidential company information, such as:
  - Personnel data, financial data, product and service information, software, business plans, customer lists
  - Information relating to current and future business plans and strategies, divestments, mergers, marketing and sales plans and data

- Customer information is safe with us.
  - Non-public information from or about suppliers, clients, consultants, etc., is treated confidentially
  - In addition to complying with legal frameworks, we apply established information security standards to protect the data and information entrusted to us as effectively as possible
  - If, in the course of our work for publicly listed clients, we come into contact with insider information (i.e. information not publicly known that could influence the share price of a listed company), we treat it with at least the same level of confidentiality as our own internal information

- Even though we may have the technical means and capabilities, we do not access networks or data of other organizations or companies without obtaining prior written consent

- We raise internal awareness and build the necessary security mindset through targeted communication and training, enabling us to recognize and respond appropriately to emerging security risks in our day-to-day work

- We classify information according to its level of confidentiality and sensitivity. All data processed by us—whether internal or external—that is not explicitly marked as [publicly released] must be protected in line with the applicable classification level.

- In cases of uncertainty, the Information Security Manager can advise which data qualifies as confidential and must not be shared with third parties.

- When an employee leaves the company, we have procedures in place to ensure that all confidential information owned by Bacher Systems is returned.

Protection of Personal Data

Your data has always been in safe hands with us. That's why we also handle personal data—whether internal or external—with particular care and in compliance with all applicable laws and the principles of the General Data Protection Regulation (GDPR).

In doing so, we ensure that fundamental rights remain protected. Relevant information can always be found in our internal wiki or obtained directly from our Data Protection Coordinator.

Responsibility for Tools and Resources

Tools and resources include all office equipment—from desks to pens—as well as all technical assets such as laptops, phones, servers, the test lab, and also, for example, our internet connection, printers, and company vehicles. All these resources are primarily intended for business use.

Procurement of Tools and Resources

Just as we embrace our social responsibility, we are also aware of our environmental responsibility. When procuring tools and resources, we ensure that the products we purchase are as environmentally friendly as possible in both their production and operation.

Use of Tools and Resources

All co-responsible employees are permitted to use company resources under the following conditions:

- In accordance with our security requirements
- Without jeopardizing business operations or the safety and performance of our infrastructure
- With care and consideration for Bacher Systems' property and financial interests, ensuring appropriate and purposeful use
- Private use is permitted within reasonable limits

Company resources must never be used to store or distribute pornographic, racist, violent, politically extremist, or otherwise offensive content.

When an employee leaves the company, we have procedures in place to ensure that all company property is returned to Bacher Systems.

Recycling of Tools and Resources

We practice resource conservation and efficiency through the following measures:

- Unused office materials are returned to reception for reuse or redistribution
- Laptops and monitors that are no longer needed are made available to employees for personal use if needed
- All waste generated in our offices is sorted and disposed of in the designated bins

Identifying and Reporting Conflicts of Interest

A conflict of interest arises when different interests of co-responsible employees at Bacher Systems compete with or contradict one another, impairing objective judgment and potentially leading us to act in a way that is not in the best interest of Bacher Systems.

A conflict of interest particularly exists when actions or decisions taken in the course of our work result—either immediately or at a later time—in personal benefit for ourselves, our families, or other individuals with whom we have a close personal or business relationship, whether that benefit is financial or not.

The following are examples of conflicts of interest that must always be disclosed by employees at Bacher Systems::

- Business relationships with Bacher Systems' partners that take place outside of official company activities
- Personal or family relationships with Bacher Systems' business partners (especially customers and manufacturers/suppliers)
- Use of Bacher Systems' assets for purposes other than those aligned with the company's business objectives
- Competing with or preparing to compete with Bacher Systems while still employed by the company

We ask all new employees to disclose any existing or potential conflicts of interest before joining the company.

All actual or potential conflicts of interest must be reported without delay to your Circle Lead, People Partner, Management, or a Compliance Officer.

Zero Tolerance for Bribery, Corruption, and Money Laundering

We comply with all applicable legal regulations and do not tolerate any form of bribery—we neither offer nor accept bribes.

Furthermore, we handle gifts—whether given or received—with great care to ensure they do not result in inappropriate preferential treatment.

> We only accept gifts of low value (approx. €60) or promotional items bearing a company logo

- We accept reasonable hospitality in the context of business meetings or relationship building
- We do not offer hospitality or invitations that may create a sense of obligation or are intended to unduly influence a decision

If in doubt about the appropriateness of a gift or invitation, we consult with our Circle Lead, People Partner, or Compliance Officer.

We apply a strict zero-tolerance policy regarding money laundering. We neither make nor accept cash payments for services rendered under any circumstances.

In addition, we never use company property, company information, or our professional position for personal gain, bribery, or embezzlement.

Participation in Events

Our business success is closely linked to our ability to identify relevant technology trends at an early stage and leverage them effectively. To this end, we maintain ongoing dialogue with manufacturers and distributors.

Manufacturer trainings and distributor partner meetings are therefore essential to our business activities.

- As employees of Bacher Systems, we only attend events that serve a clearly defined business purpose
- We cover our own travel and accommodation expenses for manufacturer events that are primarily promotional in nature (e.g., events involving customer participation)

Responsible Sponsoring and Donations

We are committed to transparency and social responsibility in all sponsorship and donation activities, in alignment with our company values.

No one is permitted to make donations to political parties, groups, or organizations on behalf of Bacher Systems or using Bacher Systems funds.

Collaboration with Business Partners and Third Parties

We are reliable in our business relationships and expect the same from our business partners.

We reject any business partners whose conduct contradicts the values outlined in this Code of Conduct—for example, those involved in illegal activities or those who tolerate child labor, exploitation, or similar unethical practices.

We also expect our business partners to comply with all laws and act ethically. We do not engage with partners who are suspected of failing to do so; such entities are included in our internal watchlist, which is accessible to all co-responsible employees.

We pass on the requirements of this Code of Conduct to our suppliers through a dedicated Supplier Code of Conduct..

Offline Rules Apply Online Too

Legal obligations and the confidentiality agreements arising from our employment contracts also apply in the digital space. That's why we take care—especially in private social media activity—to avoid anything that could damage the reputation of Bacher Systems, its customers, manufacturers/suppliers, or other business partners. In the worst case, careless comments could jeopardize not only our own position but also that of others.

We also pay particular attention to the proper use of logos and copyrighted material. When in doubt, please contact MarCom..

Reporting Potential Ethical Misconduct

ach of us is obligated to report any potential violations of this Code of Conduct or other relevant policies. Reports are treated as confidential as far as possible in accordance with the EU Whistleblower Protection Directive, and co-responsible employees are protected from retaliation.

The following internal contacts are available for reporting:

- Circle Lead
- People Partner
- People & Culture Management
- Compliance Officer
- Management
- Digital whistleblower system at bacher.integrityline.com

If employees of customers or other business partners have concerns or questions about the behavior of Bacher Systems employees, we encourage them to speak up. To this end, we have established a whistleblower system (bacher.integrityline.com), which can be accessed via our website bacher.at. Reports may be submitted anonymously or with contact details.

Code of Conduct Training

All employees receive Code of Conduct training when they join the company, and annual refresher sessions are held thereafter.

Consequences of Violations

If we identify violations of the principles outlined in this Code of Conduct, it may damage the reputation and competitiveness of our company and may result in disciplinary or legal consequences for the individual concerned.