

Bechtle Code of Conduct.

Commitment. Integrity. Trust.

Your strong IT partner.
Today and tomorrow.



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Integrity is part of Bechtle's identity.

———— All conduct and dealings of each Bechtle employee, both internal and external, are governed by the principles of honesty, fairness and trustworthiness. We know that our conduct has a significant impact on the credibility of our company and the trust of our customers, suppliers, investors, employees and the public. Therefore, we act in accordance with the values that shape our corporate culture and philosophy: integrity, determination, reliability and inspiration. At the same time, these values form the basis for our Code of Conduct and our compliance standards.

———— The Bechtle Code of Conduct formulates the guidelines for our actions. Bechtle is under the obligation to strictly comply with legal regulations and ethical principles and expects all employee to conduct themselves accordingly. It goes without saying that all Bechtle employees are expected to comply with the laws in the countries in which they operate in order to respect and observe generally accepted

customs. For example, this includes the laws that prohibit bribery and corruption in business dealings as well as internationally valid human rights that govern our social standards. The integrity principles formulated in the Bechtle Code of Conduct are intended to provide assistance when it comes to making the right decisions in business dealings.

———— The latest version of the Bechtle Code of Conduct is binding for all employees, regardless of their position. We expect all executives in our company to demonstrate the principle of integrity that is conveyed in our rules, to clearly communicate it and to make sure it is duly complied with.

Our company's integrity forms the basis for our business success. Our customers and business partners measure us by what we do. Therefore, let us jointly make a significant contribution to Bechtle's long-term success with our integrity.



Values and corporate culture:
Bechtle's corporate philosophy

Dr. Thomas Olemotz
Chairman of the
Executive Board

Michael Guschlbauer
Member of the
Executive Board

Jürgen Schäfer
Member of the
Executive Board

Conduct towards business partners.

When dealing with business partners (customers, suppliers, service providers etc.) and government representatives, a clear line must always be drawn between the normal scope of a business relationship and private interests.

We prohibit and combat all forms of corruption.

Bechtle sets highest standards for preventing and combating corruption and fully complies with applicable anti-corruption laws. Bechtle employees are categorically prohibited from offering, granting, requesting or accepting money in connection with all business activities.

Offering and presenting gifts or other benefits. Bechtle employees are prohibited from granting business partners, their employees or other third parties benefits in return for preferential treatment.

CASE EXAMPLE

In the tender process for a service agreement, I am responsible for evaluating the incoming bids. One of the participating companies has presented me with a bottle of champagne. Am I permitted to accepted this gift?

No, you need to reject the gift. An impartial observer could interpret the contractor's conduct as being solely motivated by the desire to exert inappropriate influence on your assessment of the offerings.

(In this connection, please also refer to the internal requirements on dealing with incentives and accepting/granting benefits.)



Incentive policy and
decision-making aid
Benefits

Benefits and refunds (e.g. discounts) may only be granted to contracting partners on the basis of existing contracts and to the business accounts of the respective business partners. Any courtesy gifts that are in line with business practices up to a certain limit must always be presented in a way that prevents the recipient from feeling the need to keep the receipt of this secret and from feeling pressured to take a certain course of action. The accepted threshold of €35 for operating expenses that can be offset against taxes may serve as a guideline. Gifts of a higher value are always subject to approval from management. Any tax disadvantages that such gifts may represent for Bechtle must also be taken into consideration. Invitations (e.g. in connection with entertainment and events) of business partners or their employees may only be extended as long as they do not exceed the customary scope.

Requesting or accepting gifts or other benefits. Gifts or invitations from business partners are, to a certain extent, standard business practice. Nevertheless, accepting these can lead to conflicts of interests and damage the company’s reputation. No employee may use their position or role in the company for the purpose of requesting, accepting or obtaining personal benefits. Accepting occasional gifts of low value is permitted. However, accepting gifts and benefits that exceed this scope for oneself or related persons is subject to notification of and approval from management (e.g. in the case of overriding company interests).

Government representatives. No personal benefits of any kind may be offered to domestic and foreign officials. Occasional gifts, entertainment or other benefits of a low, common and appropriate value, which do not influence business-relevant decisions, are exempted from this prohibition. Every such case is subject to approval from management. In this context, please remember that the administrative rules governing the conduct of government representatives may stipulate different and very low limits; therefore, the utmost caution needs to be exercised.

PLEASE NOTE

We neither offer economic benefits or other benefits nor do we accept such for the purpose of inappropriately accelerating, enabling or facilitating the performance of an activity.

We expressly prohibit the payment or acceptance of bribes.

We do not offer or accept any gifts or other benefits that an impartial third party could interpret as going beyond common business practice or professional courtesy and that aim to inappropriately influence a decision or action.

We avoid and prevent conflicts of interests.

The personal relationships or interests of our employees must not influence their work for Bechtle. For this reason, all employees need to avoid situations in which their personal or financial interests would conflict with company interests or with the interests of business partners.

CASE EXAMPLE

My daughter works for the company that offers Bechtle translation services. Can I be involved (without any authority to make decisions) in the tender process for the award of contracts for translation services in which my daughter’s company also participates?

Even if you do not have any authority to make decisions, your involvement in the tender process could impair the ability to make impartial decisions. For this reason, you need to promptly discontinue your involvement and report the conflict of interest to your manager.

Conflicts of interests can arise if an employee’s personal interests conflict with Bechtle’s business interests. Even the appearance of a conflict of interests is problematic if it causes the impression that a person’s impartiality or independence could be impaired.

Secondary occupation. Employees who would like to assume secondary occupation or an executive position in another organisation must first provide information about the respective activity and obtain permission. This also applies if the employee wants to assume a public or political office, regardless of whether the employee will receive compensation for the secondary occupation or will carry out the work on a voluntary basis. In these cases, the main aspect is whether there is any likelihood that the type and scope of the respective secondary occupation would impair Bechtle’s interests.

Shareholding in competitors, business partners or other companies with a link to Bechtle. Significant shareholdings of an employee in another company that could result in conflicts of interests shall be reported and are subject to approval. The reporting obligation shall apply even if the shareholding is held, not by the employee, but by a relative or another related party (as described below), provided that the employee is aware of this.

Business transactions or decisions with regard to relatives or other related parties. Employees shall without delay report any business or HR-related decisions that have a link to Bechtle with respect to the following relatives or other related parties:

- spouse
- partner/cohabitation
- parents, parents-in-law, step-parents
- children, children-in-law, step-children
- siblings, half-siblings, step siblings
- other persons living together in a household
- other individuals with whom a close personal and/or economic relationship exists

PLEASE NOTE

We refrain from intervening in investigations, decision processes or control processes if this could result in conflict situations.

We promptly report conflict situations to our manager. In particular, this includes activities or situations in which we, our family members or people with whom we have close personal or business relationships have economic and financial interests in connection with suppliers, customers, competitors or contracting partners or hold positions with such in the fields of company administration, control or management.

Financial integrity and money laundering.

All business transactions must be fully documented and executed in accordance with statutory provisions (e.g. retention obligations for annual financial statements, accounting documents, business correspondence pursuant to tax law and commercial law). Every violation of these rules can result in investigations due to balance sheet manipulation, falsification of documents, accusations of fraud, tax offences or accusations of money laundering. Money laundering refers to the process of obscuring the origin of money from illegal sources (e.g. from terrorism, drug trade, bribery and other crimes) in order to inject the money into the legal economy and make it look legitimate. We are determined to ensure that Bechtle will not get involved in any money laundering activities, neither directly nor indirectly.

PLEASE NOTE

We comply with applicable accounting regulations as well as statutory retention and archiving obligations.

We do not arbitrarily alter or destroy documents.

We carefully check the origin of funds to ensure that we are not instrumentalised for money laundering or other illegal purposes or contribute to such.

As a matter of principle, we do not engage in any transactions outside the normal processes.

Conduct towards competitors.

Only meritocratic, free and fair competition can create economic welfare, innovation and social balance. This provides the basis for our business activities and development. Hence we always pursue an autonomous business policy, apply the principle of integrity in the competition for market shares and observe the competition and antitrust laws that apply in the respective country. Under applicable antitrust laws, violations of competition can entail severe fines and claims for damages, not only for the company, but also for the individual employees.

CASE EXAMPLE

An employee of a vendor reveals that the vendor is collaborating with a competitor of Bechtle in a specific tender process. He indicates that if Bechtle were to refrain from cooperating with a competing vendor and from submitting a bid in this tender, Bechtle would be granted special conditions when purchasing for another customer. What should I do?

You should draw attention to antitrust requirements, tell the person that you cannot comment, discontinue the conversation and report the situation to your manager.

Restraints of competition.

We do not conclude any agreements with competitors regarding competition-relevant parameters in a way that impairs or aims at impairing free and open competition, such as agreements that influence prices or conditions or that apportions business territories or customers. This applies both to formal agreements and to informal conversations, gentlemen’s agreements and concerted actions. The interchange of information with competitors about market and company information that impacts the market, such as information on customers, pricing, market shares, quotations, strategies or other market behaviour, is prohibited. In connection with tender processes of public-sector clients or private companies that make use of a similar tender process, our employees are prohibited in particular from entering agreements with other

parties that are participating in the tender process for the purpose of restraining or obstructing competition. It is not permitted to enter into agreements with competitors under which a party agrees to withdraw from competition or to submit sham bids. Moreover, it is not permitted to enter agreements on exclusivity obligations, non-competition obligations or most-favoured party treatment, which could effectively shackle downstream companies (such as customer or suppliers) in the arrangement of their pricing or supply relationship with third parties or exclude them from competition. Any market-dominating position shall not be exploited for the purpose of harming others by means of unfair business practices (e.g. supply boycott).

Unfair competition.

We respect the legitimate competitive interests of our competitors and do not use any unfair means and commercial practices that are prohibited under competition law for the sale of our goods and services. In particular, disparaging remarks about competitors, criticism of competitor products, comparative advertising or attraction of customers through deceit and boycott calls can be unfair.

PLEASE NOTE

- We refrain from all kind of business behaviour that aims at obstructing, restricting or distorting competition or that results in such.
- We avoid even giving the impression of behaviour coordinated with market players.
- In our dealings with competitors, we demonstrate fairness and a sense of responsibility.

Conduct towards the company.

The obligation to maintain integrity is also reflected in our daily business. Our employees always treat the assets of the company and those of business partners responsibly and in accordance with laws and ensure due external communication.

Company property.

As Bechtle employees, we have access to Bechtle’s substantial tangible and intangible assets as well as those of customers and other business partners. Our employees are required to treat these assets responsibly, with due care and in accordance with their purpose. This shows integrity and honesty and is an essential element of trustworthy dealings in the context of the employment or the business relationship with our partners.

Our employees shall ensure the protection of the Bechtle Group’s property as well as any property of our customers and business partners that is entrusted to us against waste, loss, theft, misuse and abuse. Private use of company property, including labour, equipment, buildings and other assets is prohibited, unless such use is permitted under separate agreements. Moreover, company equipment and items must not be removed from the company premises without the express approval of the persons responsible in the company.

Intellectual property also represents a valuable asset that we protect from unauthorised use and disclosure. This includes company secrets, confidential information, copyrights, trademarks, logos, customer lists and company-specific expertise. The protection covers not only Bechtle’s own intellectual property, but also intellectual property entrusted to us by business partners.

Our employees respect valid third-party property rights and refrain from using such without permission. This also applies to the use of software and images for business purposes without sufficient licensing as well as to works and inventions that we have created in fulfilment of our work tasks for ourselves or for our customers.

PLEASE NOTE

We respect the physical and intellectual property of Bechtle and third parties.

We protect the confidential information to which we gain access as well as company-specific know-how, both within our organisation and vis-a-vis third parties. We show our commitment to this protection by reporting incidents in which this obligation is violated.

Regardless of who is concerned, we sanction all kinds of abuse, especially theft and other property offences.

Data protection.

Compliance with statutory and contractual data protection and data security requirements touches the core of Bechtle’s business activity as an IT service provider and is therefore of utmost important. When dealing with personal data entrusted to us by customers, business partners, employees and other stakeholders, we always remember their sensitivity and need for protection and respect the privacy and rights of the owners of the respective data.

CASE EXAMPLE

For a training course, a customer sends us a list of the participants’ names, business addresses and e-mail addresses. I would like to allow a colleague in another Bechtle company to use these contact details for the purpose of marketing other services. Am I permitted to do so?

No, you may only use the personal data transmitted to you for purposes associated with the respective training course. You are not permitted to share the data with other Bechtle companies without the consent of the data subjects.

Personal data. This term comprises all information that can be attributed to an identified or identifiable individual. All employees are required to handle personal data responsibly and with due care. In our fields of activity, we consistently observe applicable data protection rules, such as the rules of the European Union’s GDPR and statutory regulations issued in connection with this regulation. Breaches of statutory data protection requirements can have consequences for Bechtle as well as for each individual employee under administrative, civil and criminal law. For this reason, we only collect, store, use, transmit or process personal data in any other way to the extent that is permitted by law or that the data subject has consented to. At Bechtle, we take all required technical and organisational measures to protect the integrity of personal data that Bechtle receives from employees, business partners and customer from unauthorised access and misuse. The use of data must be transparent to the data subjects. Their rights to information and rectification and, where necessary, to objection, blocking and erasure must be protected.



The internal Bechtle guidelines that determine in detail how communication systems (IT systems, e-mail, Internet, Intranet and telephone/voice mail systems) may be used and that apply throughout the group represent a key element of data security. These rules are binding for all employees.

PLEASE NOTE

We only process personal data to the extent necessary and only if there is a legitimate business-related reason to do so. We only disclose such data to persons or organisations that are permitted to access it.

We comply with the requirements for the handling of personal data as specified in our contracts with business partners and relevant legal regulations under consideration of internal data protection requirements.

We always store personal data in a protected environment.

Every employee must read up on the internal data protection and data security guidelines and should approach the local data protection coordination or the data protection officers if they have any questions.

Confidentiality.

The protection of information from customers and other business partners that is entrusted to us as well as of our own internal information is an indispensable part of trusting collaboration and forms part of the “DNA” of our operations as a reliable IT company. Accordingly, every single employee must maintain the confidentiality of such information and take all necessary measures to protect the information.

CASE EXAMPLE

While travelling by train on the way back from a joint customer appointment, a colleague tells me about an upcoming deal with another customer, specifying the customer’s name, service scope, pricing and sales strategies, even though my activity has nothing to do with the respective deal. What should I do?

Tell your colleague that confidential information should not be discussed in public, as the information could be overheard by unauthorised third parties. Moreover, confidential information must not be shared even within the company unless this is necessary for business-related reasons.

Protection of information. In connection with our work, we often create and receive confidential information about Bechtle or our business partners. Apart from business and company secrets, this includes all sensitive technical, legal and administrative information, such as information on current or potential customer relationships, contracts, sales and marketing strategies, know-how, prices or financial results as well as all personal data.

We protect confidential information from disclosure to and access by unauthorised internal and external parties. Within the company, we only forward such information to employees who need it to perform their duties, and only to the extent required for this purpose. Beyond this, we keep internal and external information absolutely confidential. Only information that has already become publicly known or accessible to third parties or that is requested by the authorities is exempted from this rule. Where Bechtle discloses confidential information to a third party in a specific business context, this must be done on the basis of appropriate non-disclosure agreements.

We are not permitted to attempt to use any confidential information we receive in the context of our employment for our own benefit or for the benefit of a third party. Such information may only be used for business purposes. Upon termination of employment, all documents, records, files or lists that contain or have been derived from confidential data must be returned, and the information shall continue to be kept confidential. Moreover, new employees who received confidential information from a former employer should not use this for the benefit of Bechtle.

In the event of internal conflicts of interests, we prevent these from having a negative external effect. We maintain absolute confidentiality towards third parties, and we seek an internal solution. The business interests and the trusting business relationships with customers must not be impaired under any circumstances.

PLEASE NOTE

We only share confidential information with internal and external persons who actually need this and who are entitled to receive it (“need to know” principle).

We make sure that an appropriate non-disclosure agreement is signed before we forward confidential information.

When we leave our workplace, we keep confidential documents under lock and key and we dispose of confidential documents in secure containers or by shredding them.

Communication with the media and on the Internet.

As a listed company with an international reach, we are in the spotlight of public attention and are subject to strict statutory requirements with regard to the publication of company matters. Accurate, consistent and truthful communication gives the public a clear picture of our company and is thus a key aspect of integrity.

CASE EXAMPLE

At a trade show, a press representative wants to discuss the background to Bechtle’s business development abroad. What should I do?

Tell the person that you are not permitted to disclose information about company matters to media representatives. Kindly refer the person to the responsible media desk of Bechtle AG (Corporate Communications).

Company-related communication with the public, e.g. with media representatives, investors or financial analysts, is handled exclusively by the Executive Board and the Corporate Communications and Investor Relations departments. In particular, this includes the forwarding of financial data, information about accidents and crises, mergers and acquisitions or changes in the executive staffing. Before individual employees make any company-related statements to the press, the approval of the Corporate Communication department must always be obtained. This applies regardless of whether the statements could be interpreted as being positive or negative for Bechtle.

The presentation of the company on the Internet is also carried out in coordination with the Corporate Communications and Investor Relations departments. This applies in particular to communication about Bechtle in social media. When expressing their personal opinions in public, employees must clearly indicate that they are acting as private individuals. Further rules of conduct for the private communication of employees about Bechtle on the Internet are provided in the Bechtle Social Media Guidelines. As part of the Bechtle Code of Conduct, they are binding for all employees and are part of the onboarding process for newly recruited employees. Moreover, all employees can access the latest version of these guidelines in the Intranet.



PLEASE NOTE

We communicate transparently and openly to our stakeholders and the interested public. We do so exclusively via the designated departments.

When expressing our personal opinion about Bechtle – also and especially in social networks – we always do so in a responsible and fair manner.

Insider trading.

As a listed company, Bechtle AG is required to comply with special capital market laws and regulations. These apply to the entire Bechtle group. As employees, we are not permitted to use internal, non-public information about Bechtle for the purpose of gaining direct or indirect economic benefits, in particular not for the purpose of acquiring securities or other financial instruments (ban on insider trading). Moreover, members of the management and Bechtle must disclose certain proprietary transactions that they execute with securities or other financial instruments of Bechtle AG (known as 'directors' dealings').

CASE EXAMPLE

An e-mail that was obviously sent to me by mistake reveals that Bechtle plans to acquire a well-known IT service provider. What should I do?

I need to inform the sender of that I have received the e-mail, delete it and keep the information secret. Though it might be tempting to buy securities on the basis of this information, I need to refrain from such transactions.

In principle, all employees of the Bechtle Group are permitted to trade in shares or other securities of Bechtle AG without any limitations. However, according to statutory regulations, all employees are categorically prohibited from buying or selling securities especially of Bechtle AG or of another company of the Bechtle Group for their own account or for third-party account or on behalf of someone else on the basis of insider information. Furthermore, the unauthorised forwarding of insider information or the recommendation to buy or sell securities on the basis of insider information is forbidden by law. The communication of insider information must be limited to employees who need such for legitimate business purposes. Insider information comprises every concrete piece of information about circumstances not publicly known, which, if they were to become publicly known, could have a material impact on the stock exchange or market price of the respective company's securities (in our cases especially those of Bechtle AG).

To enhance the transparency in the capital market, Bechtle is subject to special statutory disclosure obligations with regard to certain transactions that executives or related parties execute for their own account with securities or financial instruments of Bechtle. The respective executive shall notify Bechtle of such transactions without delay. The additional internal guidelines must be observed.



Insider trading and violation of reporting duties can have severe consequences under civil and criminal law for the employee, the manager and the company.

PLEASE NOTE

We never share insider information with third parties without being authorised to do so.

We do not use insider information for the direct or indirect purchase or sale of securities for our own account or for third-party account.

Conduct towards colleagues.

We equally appreciate all of our colleagues. In Bechtle’s corporate culture, all employees thus treat each other with fairness, openness, understanding and tolerance. We expect each and everyone to maintain professional, friendly and fair dealings with each other at all levels and in all areas of the company.

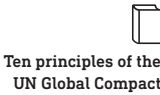
CASE EXAMPLE

Since my colleague came out of the closet and revealed the relationship with his partner, he has been subject to allusions and derogatory jokes by some of my colleagues. Without his knowledge, inappropriate comments, innuendos and offensive nicknames have been circulating, ruining the work atmosphere and the cooperation in the office. What should I do?

Bechtle is determined to promote a work environment that respects differences and is free from all kinds of discrimination. Therefore, be sure to report the situation to your manager and to the Bechtle Compliance Board.

Internationally acknowledged human rights, labour and social standards.

Bechtle’s corporate culture stands for an ethical work environment that is free of all forms of discrimination and abuse. As an internationally active group of companies, Bechtle especially respects the principles of the International Bill of Human Rights, the ten principles of the UN Global Compact, the OECD guidelines for multinational enterprises, the labour and social standards of the International Labour Organisation (ILO) and the principle of social partnership.



Though all human rights are equally important, Bechtle pays particular attention to the following:

- the right to equal opportunities and the right to non-discrimination
- avoidance of all kinds of child labour and forced labour
- the right to freedom of association and the right to collective bargaining
- fair pay and fringe benefits according to local market conditions
- compliance with applicable working time regulations

Dealings with each other – prohibition of discrimination.

It is forbidden to discriminate against an employee on the basis of gender, age, nationality, ethnic affiliation, skin colour, political opinion, sexual orientation, religious conviction, social background, physical condition or other personal properties, i.e. without an objective reason. We call on every employee to contribute to a respectful atmosphere in which all kinds of personal harassment are ruled out, especially workplace bullying, unwelcome sexual advances, unwelcome physical contact, indecent propositions or a working environment impaired by offensive jokes, remarks or humiliation.

As a matter of principle, Bechtle employees keep their private affairs separate from the business. Where private friendships exist between employees and their solid-line or dotted-line managers, the respective leadership relationship must be dissolved in order to avoid even giving the impression that defrauding or preferential treatment is on hand. If such relationships cannot be dissolved quickly, within a reasonable period or, in absolutely exceptional cases, even in the long run for overriding business reasons, the manager must be openly informed without delay. In such cases, all decisions that directly concern the employment (e.g. salary and bonus issues, target agreements, promotion) shall be made according to the double-checking principle with the involvement of the manager, and the decision must be documented in a comprehensible, auditable form.

Handling of internal knowledge.

It goes without saying that we exchange information with other and communicate openly. Work-relevant knowledge must not be unlawfully withheld, manipulated or forwarded selectively. Unless overriding interests (e.g. confidentiality) are on hand, information must be forwarded to other departments correctly and completely.

PLEASE NOTE

We establish work relationships that are characterised by fairness, equality, non-discrimination, thoughtfulness and respect for human dignity.

We do not tolerate any defrauding or preferential treatment of employees for private motives.

We prohibit all kinds of sexual harassment in any form.

We reject all forms of forced and child labour.

We respect employee rights, especially the right to association and the right to collective bargaining.

We promote a healthy and safe work environment.

Conduct towards society and the environment.

Wherever we operate, we are committed to sustainable operations and thus to minimising the negative impact on the climate and environment. For Bechtle, sustainability also means that we share in shaping the social environment in our region by promoting social projects.

We protect our climate and our environment.

The protection of the climate and of the environment is an integral part of our sustainability-oriented business development. Therefore, the responsible and careful use of the environment and its resources is one of the guiding principles of our business operations. In this way, we ensure the economic success of our business on a long-term basis and contribute to the establishment of good living conditions for future generations.

CASE EXAMPLE

During my work, I noticed that an appliance I used is damaged after it fell down and could therefore soon release a substance that is harmful to the environment. I know I should report the incident, but I am already late for an appointment with a customer. Can I postpone the report?

No, you need to notify your manager without delay in order to make sure that any required safety measures can be initiated and the hazard can be duly eliminated.

Environmental protection and sustainability. We undertake to comply with all applicable environmental protection standards and provisions. We are future-oriented in our thinking and dealings, and we carefully evaluate the impact of our business operations on the climate and environment in order to continually reduce and avoid negative effects and consumption of resources. Every employee shares the responsibility for protecting the environment in their immediate work setting. This comprises the efficient and economical use of energy, utilities and consumables such as water and paper as well as the observance of all waste disposal rules at our locations. The efficient use of resources and ecological aspects also play a key role in our cooperation with partners, manufacturers, suppliers and customers. In particular, this applies to the entire life cycle of IT products from the production and packaging to the use and disposal. We endeavour to continually improve the environmental footprint of the products and services we offer. In connection with the design, equipment and operation of our locations, we also make use of renewable energies and modern technologies to protect the environment.

PLEASE NOTE

Within the scope of our business activity, we engage in responsible environmental management and promote sustainability and environmental protection.

Each and every one of us undertakes to actively participate in the risk prevention and environmental protection process within the scope of his or her duties.

Besides complying with legal requirements, we endeavour to contribute to the protection of nature and the environment in the best way possible in collaboration with vendors, partners and customers.

In this context, we publish relevant details in the yearly Bechtle Sustainability Report.

We assume social responsibility.

We believe that a sustainable approach also comprises social responsibility, which we demonstrate by selectively sponsoring social projects in order to actively share in shaping the social environment at our locations. In doing so, we refrain from any political activity.

As a global corporation with diverse geographic roots, we are committed to social responsibility in our regional setting. Based on transparent structures and clearly defined responsibilities, we promote projects that match our corporate values without expecting any benefits in return. All sponsoring is done according to clear guidelines that reflect our ethical standards and legal provisions. Bechtle observes the principle of political neutrality and restraint. Therefore, we do not support any political parties or organisations and institutions that obviously pursue a political agenda. We do not support any candidates for political offices, neither directly nor indirectly. Where employees are involved in political democratic processes and other political activities, this should not give the impression that Bechtle as a company is represented, and the working time and company assets shall not be used for such purposes.

PLEASE NOTE

We advocate socially responsible entrepreneurship.

We promote projects with a local focus that match our corporate values, but without being guided by political interests.

Applicability, observance and implementation of the Code of Conduct.

The standards outlined in the latest version of the Code of Conduct are binding for all employees of the Bechtle Group. The Code of Conduct is designed to help them to successfully deal with the legal and ethical challenges they encounter in their daily work, to provide guidance and to further strengthen the trust in the performance and integrity of the Bechtle Group.

CASE EXAMPLE

I am in a situation in which I am unable to determine exactly how I should conduct myself and decide, as none of the descriptions in the Code of Conduct fully match my case. How should I proceed?

There is no alternative to personal integrity and common sense. Every employee who is faced with a difficult situation should first ask themselves the following questions:

- Is my action or decision legal?
- Is it in accordance with our guidelines?
- Is it correct, and is it free of personal interests?
- Would my action or decision stand up to public scrutiny (e.g. if a report would appear in a newspaper)?
- Does my action or decision protect Bechtle’s reputation as a company with high ethical standards?

If all questions can be answered in the affirmative, the respective action or decision can be deemed to be correct and in accordance with the Code of Conduct according to human judgement. If you have any questions or doubts, be sure to observe the double-checking principle or consult your manager or the Bechtle Compliance Board.

Applicability.

This Code of Conduct applies to the entire Bechtle Group, i.e. to all employees of Bechtle AG, all employees of all companies of the Bechtle Group, the Executive Board of Bechtle AG and all executive bodies of the companies of the Bechtle Group.

Introduction of the Code of Conduct and responsibility for the implementation.

A sufficient quantity of the latest version of the Bechtle Code of Conduct is distributed to the managers, in particular to the Managing Directors and department heads of the Bechtle Group. Every Bechtle executive must ensure that their employees receive, are familiar with and observe the Code of Conduct. The latest version of the Code of Conduct can also be downloaded from bechtle.com or from the Intranet.



Notes and questions.

Bechtle has set up a Compliance Board that comprises the entire Executive Board of Bechtle AG and a permanent representative of the legal department. If necessary, representatives of other departments may also be appointed to the Compliance Board. The Compliance Board reserves the right to conduct sampling checks with regard to the introduction of and compliance with the Code of Conduct. The Bechtle Compliance Board can be reached via the central contacts of the whistleblower hotline, both by telephone and by e-mail.

CENTRAL CONTACT

Contact for all questions concerning the Code of Conduct and whistleblower hotline:

Bechtle Compliance Board
E-mail: complianceboard@bechtle.com
Telephone: +49 7132 981-4555

We encourage our employees to address critical topics openly and without having to fear repercussions. Therefore, if you notice or suspect any violation of applicable law, this Code of Conduct or other company policies, be sure to report it without delay. First of all, you should approach your direct manager and discuss the incident. Managers encourage freedom of expression, assist their employees and investigate concerns and suspicious cases in a fair and unbiased manner. If it is not possible to report or discuss a matter in this way (e.g. because you suspect that your manager has also violated rules), please feel free to approach the Compliance Board. Reports will be treated confidentially or, if requested, even anonymously insofar as this is possible in the context of the investigation and the measures taken in line with the requirements in our company.

Employees who voice their concerns with respect to happenings in the company or who report suspicious incidents in good faith will not suffer any disadvantages due to such whistleblowing. This expressly applies even if the concerns or suspicion should turn out to be unfounded. "In good faith" means that the employee is convinced that their view of matters is truthful. We do not tolerate any acts of intimidation or revenge against employees who, in good faith, seek counsel or report violations of the Code of Conduct or other unlawful or unethical behaviour. However, intentional false reports that are made for the purpose of harming another person will result in disciplinary measures.

Violations and sanctions.

The Compliance Board reviews and assesses reported violations and takes suitable measures. Violations of applicable laws, of the Bechtle Code of Conduct or other company policies are not tolerated. Depending on the severity, violations can have various consequences under labour or civil law, up to summary dismissal. Breaches of laws can result in claims for damages, fines or even criminal prosecution.

PLEASE NOTE

In our daily business, we always follow the Bechtle Code of Conduct, our guidelines as well as applicable laws and regulations. However, we also use our common sense. Hence we report any incidents that appear suspicious or that could endanger our company, our colleagues our customers.

In case of doubt, we always apply the double-checking principle or consult our manager or the Bechtle Compliance Board.

**Integrity is part
of our identity.**
Honesty. Fairness. Trustworthiness.



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