

## **BOLL & KIRCH Compliance Program Group Guideline on Combatting Corruption**

BOLL & KIRCH and its affiliated companies are committed to the nationally and internationally applicable legal and ethical principles on combating corruption. For BOLL & KIRCH it is absolutely essential that its enterprise is managed responsibly in accordance with ethical business principles and the laws and regulations of fair competition.

BOLL & KIRCH is interested in lasting collaboration with its business partners based on the convincing quality of its products and services. The trust of its customers and suppliers must not be jeopardized by corruption. The same applies to relationships with state bodies.

### **1. Scope of application**

On publication, this Group Guideline becomes binding for every employee of the **BOLLGROUP**.

The principles of this Group Guideline constitute a constant framework for all decisions. However, they are not exhaustive and do not release any employee of Boll & Kirch Filterbau GmbH and its affiliated companies from the obligation to comply with any possible stricter national laws and special regulations. Every employee of the **BOLLGROUP** is responsible for compliance with the statutory provisions and rules of conduct. In addition, the other guidelines and instructions of the "BOLL & KIRCH Compliance Program" must be observed.

### **2. Law-abiding conduct**

Compliance with the law and legal requirements is the overriding rule for BOLL & KIRCH. Each employee must observe the statutory provisions of the legal system in which he works. Infringements of the law, particularly infringements punishable by imprisonment or fines, must be avoided under all circumstances.

### **3. Corruption in business practice**

Corruption is criminal and will not be tolerated.

Corruption is encountered in business life and relationships with state bodies. Corruption in business life exists if, in the purchasing of goods and services, a benefit is given in return for unfair preference – or, without the consent of the company – in exchange for a breach of duty against the company. The benefit need not necessarily consist of cash or gifts but may also be of an intangible nature (e.g. personal advancement or promotion). It may favor either the employee himself or third parties. For example, cash bribes are usually paid to obtain a

specific return consideration for which no legal claim exists (e.g. an order). Kickbacks are paid to make employees (of state bodies) well disposed in order to speed up or otherwise promote certain (official) procedures and decisions (e.g. accelerated planning approval).

In relations with state bodies in the home country or other countries and with corresponding business partners, corruption must be avoided in all respects. The interests of BOLL & KIRCH and private interests must be strictly separated. The following guidelines apply:

**a. Offering and granting benefits**

BOLL & KIRCH competes on the basis of quality and price for its products, combined with good service.

It is improper in the home country or another country to obtain an illicit advantage over the competition by offering, promising or granting benefits to officials or employees of customers in procuring orders or other business transactions. This ban applies for benefits in any form.

**b. Demanding and accepting benefits**

Employees of BOLL & KIRCH may not take advantage of their position towards business partners for their own benefit or the benefit of third parties. Business partners must be treated fairly and correctly and the creation of personal dependencies or obligations towards them must be avoided.

No personal benefit may be demanded or accepted from business partners. This also applies to benefits favoring family members, friends, acquaintances or related organizations and expressly also to the acceptance of cash gifts.

Any personal interest in connection with the execution of job functions must be notified to the employee's superior. Without prior approval by the superior, employees may not place orders or issue releases or similar to business partners with whom they are related or otherwise closely connected.

Except in customary markets, employees of BOLL & KIRCH may not place private orders with business partners of BOLL & KIRCH.

**c. Exception/ Symbolic gifts and customary and appropriate invitations**

Smaller gifts as well as invitations to, for instance, entertainment events are common in business and do not automatically indicate corruption. They are therefore approved by BOLL & KIRCH within the customary business and social parameters and country-specific conditions. If they are regularly given however or are of unusually high value in an individual case, the danger exists that employees may expose themselves to creeping dependence on third parties and, because of this conflict of interests, no longer be able to fulfil their

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duties with due care. A high level of discretion and caution should therefore always be used. In the event of a possible conflict of interest, the superior should be consulted. Further details can be found in the "Instructions on the Group Guideline on Combatting Corruption" (see attachment).

#### **4. Cash transactions**

Receipts and payments of cash in the course of business activities of BOLL & KIRCH are generally prohibited. Exceptions are regulated in the "Instructions on the Group Guideline on Combatting Corruption" (see attachment) or must be approved by the management or Compliance Director of the **BOLLGROUP** in individual cases.

For transactions in countries without a fully developed banking and financial system, situations may arise where cash payments are required. In such cases, specific precautions should be taken to ensure the prevention of money laundering and other illicit financial transactions. The prior approval of the Compliance Director of BOLL & KIRCH must be obtained here.

Cash payments to cover cost of business travel by BOLL & KIRCH employees, are permitted in usual amounts, however should be avoided as far as possible and are only permitted if specifically justified.

#### **5. Obligation to comply with Group policy**

All employees of BOLL & KIRCH are obliged to comply with this guideline and applicable law. All managers are obliged to inform their employees about this Guideline and to ensure that they are able to comply with the rules of conduct in practice.

Infringements of the rules in this Guideline will – like any breach of the law – have consequences depending on their nature and intensity.

All employees of BOLL & KIRCH must promptly report to their superiors and the Compliance Director of BOLL & KIRCH any indications of infringements of this Guideline which come to their notice.

## 6. Questions, suggestions and contact persons

For questions and suggestions relating to this Guideline and its observation the employee's superior and the Compliance Director of BOLL & KIRCH, are available. In case of doubt it is essential that the correct procedure is agreed with one of these two persons.

Kerpen, December 2022



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CEO



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Director Compliance