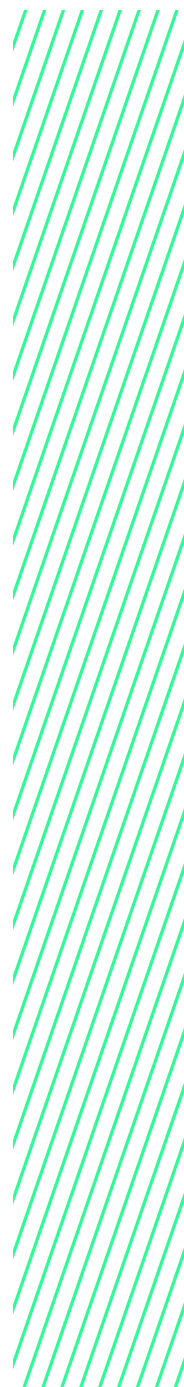


# Code of Conduct.

*Commitment. Integrity. Trust.*

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# Integrity is at the heart of Bechtle's identity.

Honesty, fairness and trustworthiness guide the actions and behaviour of every employee at Bechtle, both internally and externally. These principles are essential as our conduct has a significant impact on the credibility of our company and the trust of our customers, suppliers, investors, employees and the public. We are committed to upholding the values that define our corporate culture and philosophy: Integrity, determination, reliability and inspiration. These values also form the basis of our Code of Conduct and our compliance standards.

The Bechtle Code of Conduct sets the guidelines for our actions. Bechtle is fully committed to complying with legal regulations and ethical principles and expects all employee to act accordingly at all times. It goes without saying that Bechtle's employees must adhere to the laws of the countries in which they operate, and respect widely accepted,

non-conflicting customs and traditions. This includes laws prohibiting bribery and corruption in business transactions, as well as internationally recognised human rights that underpin our social standards. The principles of integrity set out in the Bechtle Code of Conduct are designed to support employees in making the right decisions in a business context.

The latest version of the Bechtle Code of Conduct is binding for all employees, regardless of their position. We expect all leaders within our company to exemplify the commitment to integrity outlined in the code, communicate it clearly and take personal responsibility for ensuring compliance. The integrity of our company is the foundation of our success. Our customers and business partners judge us by our actions. By acting with integrity, we can all play a key role in securing Bechtle's continued success.



**Dr Thomas Olemotz**  
CEO



**Konstantin Ebert**  
COO



**Michael Guschlbauer**  
COO



**Antje Leminsky**  
COO

# Conduct towards business partners.

When interacting with business partners (customers, suppliers, service providers, etc.) and representatives of government agencies, it is essential to maintain a clear distinction between the normal scope of a business relationship and personal interests.

## > Corruption.

Bechtel upholds the highest standards in preventing and combating corruption and fully complies with applicable anti-corruption laws. Bechtel employees are strictly prohibited from offering, granting, requesting or accepting money in connection with any business activity.

### **Offering and granting gifts or other benefits.**

Bechtel employees must not provide gifts, favours or any other benefits to business partners, their employees or other third parties in exchange for preferential treatment.

#### **EXAMPLE**

In a tender process for a service contract, I am responsible for evaluating the submitted bids. One of the participating companies has given me a bottle of champagne as a gift. Am I allowed to accept this gift?

No, you must decline it. An impartial observer could interpret the provider's actions as being solely intended to exert undue influence on your assessment of the bids.

(Please also refer to our internal guidelines on handling incentives and the acceptance or provision of benefits.)

Payments such as discounts or refunds to contracting partners may only be made on the basis of a contractual agreement and must be transferred exclusively to the business accounts of the respective partners. Courtesy gifts that align with generally accepted business practices must always be given in a manner that does not require the recipient to conceal their acceptance or place them in any form of obligation. A common guideline is the accepted threshold of €35 for tax-deductible business expenses. Gifts of higher value always require managerial approval, and any potential tax implications for Bechtle must also be taken into account. Invitations extended to business partners or their employees (e.g. for hospitality or events) must not exceed customary business practice.

**Requesting or accepting gifts or other benefits.**

Gifts and invitations from business partners are, to a certain extent, standard business practice. However, accepting them can create conflicts of interest and damage the company's reputation.

Employees must not use their position or role within the company to request, accept or obtain personal benefits. Accepting occasional low-value gifts is permitted. However, accepting any gifts or benefits exceeding this—for oneself or for close relative or associates—must be disclosed to and approved by a manager (e.g. if overriding company interests apply).

**Government representatives.**

No personal benefits of any kind may be offered to government officials, whether domestic or foreign. Exceptions apply only to occasional gifts, hospitality or other gratuities of minor, customary and appropriate value that align with general business practices and do not influence business-related decisions. Each case of such a benefit requires managerial approval.

Please also bear in mind that administrative regulations for government entities may set different—and in some cases very low—thresholds. Therefore, extreme caution is advised.

**PLEASE NOTE**

We do not, under any circumstances, offer, promise or accept financial or other benefits to improperly accelerate, favour or facilitate an activity.

We explicitly prohibit the payment or acceptance of bribes.

We do not offer or accept gifts or other benefits that an impartial third party could reasonably view as exceeding normal business practice or professional courtesy, or which are intended to unduly influence a decision or action.

## > Conflicts of interest.

Employees' personal relationships or interests must not influence Bechtle's business activities. All employees must therefore avoid situations where their personal or financial interests could conflict with those of the company or its business partners.

### EXAMPLE

My daughter works for a company that provides language services to Bechtle. Can I be involved in the tender process for awarding translation service contracts, even if I have no decision-making authority, when my daughter's company is also a participant?

Even without decision-making authority, your involvement in the tender process could compromise impartial decision-making. For this reason, you must immediately withdraw from the process and report the conflict of interest to your manager.

Conflicts of interests can arise when an employee's personal interests are at odds with Bechtle's business interests. Even the mere appearance of a conflict can be problematic if it creates the impression that a person's impartiality or independence may be compromised.

### **Secondary employment.**

Employees, who wish to take on secondary employment or hold an executive position in another organisation must first disclose the activity and obtain approval. This also applies to employees assuming public or political office, regardless of whether the role is paid or voluntary. The key factor in such cases is whether the nature and extent of the secondary role could reasonably be expected to conflict with Bechtle's interests.

**Shareholding in competitors, business partners or other companies linked to Bechtle.**

Employees must report and obtain approval for any significant shareholding in another company that could create a conflict of interest. This reporting obligation also applies if the shareholding is held not by the employee but by a relative or another closely associated person (as defined below), provided the employee is aware of it.

**Business transactions, decisions and reporting relationships involving relatives or closely associated persons.**

Employees and managers must promptly report any business or HR decisions related to Bechtle that involve relatives of other closely associated persons.

As a general principle, Bechtle employees separate personal and business matters. Any reporting relationships (i.e. between employees and their solid-line or dotted-line managers) involving relatives or other closely associated persons must be disclosed immediately and resolved as soon as possible to prevent any perception of bias or preferential treatment. Until such a relationship is resolved, all employment-related decisions (e.g. salary and bonus matters, target agreements, promotions) must follow the four-eyes principle, involving the manager to whom the related or closely associated person reports. These decisions must also be clearly documented in a transparent manner.

Relatives or closely associated persons, as defined in this context, include:

- Spouses
- Partners (including cohabiting partners)
- Parents, parents-in-law, step-parents
- Children, children-in-law, step-children, siblings, half-siblings, step-siblings
- Other individuals living in the same household
- Any other individuals with whom there is a close personal and/or financial relationship

**PLEASE NOTE**

We do not interfere in investigations, decision-making or oversight processes if doing so could even potentially lead to a conflict of interest.

We promptly report any conflict of interest to our manager. In particular, this applies to activities or situations where we, our family members individuals with whom we have close personal or business relationships hold financial or economic interests in suppliers, customers, competitors or contracting partners, or occupy roles in company administration, oversight or management.

Reporting relationships between relatives and other closely associated persons must be disclosed without delay and resolved in coordination with the relevant manager.

## > Financial integrity and money laundering.

All business transactions must be fully and accurately documented in compliance with legal requirements (e.g. retention obligations for annual financial statements, accounting records, business correspondence under tax and commercial law).

Any violation could lead to investigations for financial misconduct, such as balance sheet manipulation, document falsification, fraud, tax offences or money laundering. Money laundering is the process of concealing the origin of illegally obtained funds (e.g. from terrorism, drug trafficking, bribery or other crimes) by integrating them into the legal economy to give the appearance of legitimacy.

Our clear objective is to ensure that Bechtle is not directly or indirectly involved in any money laundering activities.

### PLEASE NOTE

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

We do not alter or destroy documents arbitrarily.

We carefully verify the origin of funds to ensure that we are not exploited for or contribute to money laundering or other illegal activities.

As a rule, we do not conduct any transactions outside the standard business processes.





# Conduct towards competitors.

Only performance-based, free and fair competition fosters economic prosperity, innovation and social balance. This forms the foundation for our business activities and growth. For this reason, we always act independently in shaping our business, uphold integrity in competing for market share and comply with the competition and antitrust laws applicable in each country. Violations of competition law can result in severe fines and damages under applicable antitrust regulations—affecting not only the company but also the individual employees.

## EXAMPLE

An employee of a supplier mentions, in the context of a specific tender, that their company is working with a competitor of Bechtle. They suggest that if Bechtle refrains from collaborating with a competing supplier and does not submit a bid for this tender, Bechtle could receive preferential terms when purchasing for another customer. What should I do?

You should refer to the applicable antitrust regulations, state that you cannot provide any assurances, withdraw from the conversation and report the matter to your manager.

## > Restrictive practices.

We do not enter into agreements with competitors that unlawfully restrict or seek to restrict free and open competition. This includes agreements that influence prices or terms, allocate markets or customers or otherwise impede fair competition. This applies not only to formal agreements but also to informal discussions, unwritten “gentlemen’s agreements” and concerted actions.

Sharing market or company information with competitors that could influence market dynamics—such as details on customers, pricing, market shares, bids, strategies or other competitive behaviour—is strictly prohibited. In particular, our employees must not engage in any restrictive or

anti-competitive arrangements with participants in public tenders or private-sector procurement processes that follow similar rules.

It is strictly prohibited to collude with competitors to withdraw from competition or to submit sham bids in tender processes. Additionally, agreements involving exclusivity obligations, non-compete clauses or most-favoured-nation clauses are not permitted if they unduly restrict downstream companies (such as customers or suppliers) in setting their own prices, managing their supply relationships with third parties or participating in fair competition.

A dominant market position must never be abused to disadvantage others through unfair business practices (e.g. supply boycotts).

## > **Unfair competition.**

We respect the legitimate competitive interests of our competitors and do not use unfair or unlawful commercial practices to market our goods and services. Unfair practices may include making disparaging remarks about competitors, criticising competing products, engaging in comparative advertising, attracting customers through deception or calling for boycotts.

### **PLEASE NOTE**

We refrain from any business practices that seek to obstruct, restrict or distort competition—or that have such an effect.

We avoid even the appearance of coordinated behaviour with market participants.

We conduct ourselves fairly and responsibly in all dealings with competitors.

# Conduct towards the company.

Our commitment to integrity is also reflected in our daily business practices. Our employees always handle company assets and those of business partners responsibly and in compliance with the law and ensure appropriate external communication.

## > Company property.

As Bechtle employees, we have access to Bechtle's significant tangible and intangible assets, as well as those of customers and other business partners. Our employees are required to handle these assets responsibly, with due care and in accordance with their intended purpose. This demonstrates integrity and honesty—fundamental elements in building trust within employment and business relationships.

Employees must protect the property of the Bechtle Group, as well as any assets entrusted to us by our customers and business partners, from waste, loss, theft, misuse or abuse. The private use of company property—including labour, equipment, buildings and other assets—is prohibited, unless expressly permitted by separate agreements. Additionally, company equipment and other items may not be removed from company premises without explicit approval from the responsible persons within the organisation.

Intellectual property is also a valuable asset that must be safeguarded against unauthorised use and disclosure. This includes trade secrets, confidential information, copyrights, trademarks, logos, customer lists and company-specific expertise. Protection extends not only to Bechtle's own intellectual property, but also to any intellectual property entrusted to us by business partners.

Employees must respect third-party property rights and may not use such assets without permission. This applies in particular to the use of software and images for business purposes without proper licensing, as well as to works and inventions created in the course of fulfilling our duties—whether 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 and company-specific expertise to which we have access, both within our organisation and in dealings with third parties. We demonstrate our commitment to this protection by reporting any incidents where these obligations are breached.

Regardless of the individuals involved, we do not tolerate any form of misconduct, especially theft or other property-related offences.

## > Data protection.

Compliance with statutory and contractual data protection and security requirements is central to Bechtle's business as an IT service provider and is therefore of utmost importance. When handling personal data entrusted to us by customers, business partners, employees and other stakeholders, we recognise its sensitive nature and the need to protect it. We respect the privacy and rights of the individuals concerned.

### EXAMPLE

For a training course, a customer provides us with a list containing participants' names, business addresses and e-mail addresses. I would like to allow a colleague from another Bechtle entity to use these contact details for marketing other services. Am I allowed to do this?

No, you may only use the personal data provided to you for purposes directly related to the training course. You are not permitted to share this data with other Bechtle entities without the explicit consent of the individuals concerned.

### Personal data.

Personal data includes all information that can be linked to an identified or identifiable individual. All employees are required to handle personal data responsibly and with due care. Within our business activities, we strictly adhere to applicable data protection regulations, including the EU General Data Protection Regulation (GDPR) and other relevant provisions.

Breaches of data protection laws can result in administrative, civil and criminal consequences for both Bechtle and individual employees. For this reason, we only collect, store, use, transfer or process personal data when legally permitted or when the individual has provided consent. At Bechtle, we implement all necessary technical and organisational measures to protect the integrity of personal data received from employees, business partners and customers, preventing unauthorised access and misuse.

The use of personal data must be transparent to the individuals concerned. Their rights—including access, correction, and, where applicable, objection, restriction or deletion—must be upheld.

Bechtle's internal policies, which apply across the organisation, define the proper use of communication systems (IT systems, e-mail, internet/intranet and telephone/voice-mail systems) and form an integral part of our data security efforts. These rules are binding for all employees.

#### **PLEASE NOTE**

We only process personal data when necessary and only for a legitimate business purpose, and we only disclose it to authorised persons or organisations.

We comply with all contractual and legal requirements for handling personal data, while also considering our internal data protection policies.

We always store personal data in a secure environment.

Every employee must familiarise themselves with internal data protection and security policies and contact the local data protection coordinator or data protection officers if they have any related questions or concerns.

## > Confidentiality.

Protecting information entrusted to us by customers and business partners, as well as safeguarding our own internal information, is essential to maintaining trusted relationships. As a reliable IT partner, we embed this commitment into all aspects of our business activities. Accordingly, every employee is responsible for maintaining the confidentiality of such information and taking all necessary measures to protect it.

### EXAMPLE

While travelling by train after a customer meeting, a colleague discusses an upcoming deal with another customer, mentioning the customer's name and sharing details about the service scope, pricing and sales strategies—despite my work having no connection to the deal. What should I do?

You should remind your colleague that confidential information must not be discussed in public, as it could be overheard by unauthorised third parties. Additionally, even within the company, confidential information should only be shared when strictly necessary for business purposes.

### Information security.

In the course of our work, we frequently create and receive confidential information related to Bechtle and our business partners. This includes not only trade and company secrets but also sensitive technical, legal or commercial information—such as details about current or potential customer relationships, contracts, sales and marketing strategies, know-how, pricing, financial results, and any personal data.

We protect confidential information from unauthorised access, both internally and externally. Within the company, such information is shared only with employees who need it to perform their duties, and only to the extent necessary. Beyond this, we maintain strict confidentiality regarding both internal and external information. Exceptions apply only to information that is already publicly available, accessible to third parties, or has been requested by public authorities. If Bechtle needs to disclose confidential information to a third party in a specific business context, this must be done under appropriate confidentiality agreements.

We must not attempt to use confidential information obtained during our employment for our own benefit or that of a third party. Such information may only be used for legitimate business purposes. Upon termination of employment, all documents, records, files or lists containing or derived from confidential data must be returned, and the obligation to maintain confidentiality continues beyond the end of employment. Additionally, new employees must not use any confidential information obtained from a former employer for the benefit of Bechtel.

In the event of internal conflicts of interest, we must avoid any negative external perception. We maintain strict confidentiality with third parties and seek internal resolutions. Under no circumstances should our business interests or the trust placed in us within our customer relationships be compromised.

We place the highest importance on our in-house information security management system, as its structures and processes enable us to organise ourselves effectively, act systematically and achieve results in line with information security requirements. Standards such as ISO 27001 help us identify and continuously improve specific actions, measures and risks associated with IT in critical business processes.

Our approach is guided by the core principles of confidentiality, integrity and availability. Customers rely on us to act securely and responsibly, supply chains demand consistently high security standards, and compliance with statutory regulations forms the foundation of our business activities in sensitive IT environments.

## PLEASE NOTE

We only share confidential information with internal and external parties who genuinely require it and are authorised to receive it ("need to know" principle).

We ensure that a suitable non-disclosure agreement is in place before disclosing confidential information.

We secure confidential documents when leaving our desks and dispose of physical records using secure containers or shredding. Electronic storage devices are returned to IT for secure erasure.

We adhere to all regulations and policies required by an information security management system and support the measures necessary for certifications, which serve as proof of compliance for customers, business partners and regulatory authorities.

## > Communicating with the media and online representation.

As a listed company with an international reach, we operate in the public eye and are subject to strict legal requirements regarding the disclosure of company matters. Accurate, consistent and truthful communication helps present a clear and reliable image of our company and is therefore a key element of integrity.

### EXAMPLE

At a trade show, a journalist asks about the background of Bechtle's business development abroad. What should I do?

Politely inform them that you are not authorised to disclose company-related information to the media and refer them to Bechtle AG's Corporate Communications department.

Public communication regarding Bechtle, including interactions with media representatives, investors or financial analysts, is handled exclusively by the Executive Board, Corporate Communications and Investor Relations. This includes, in particular, the disclosure of financial data, information about incidents and crises, mergers and acquisitions or changes in executive leadership.

Employees must obtain prior approval from Corporate Communications before making any public statements about the company to the media, regardless of whether the statement may be perceived as positive or negative for Bechtle.

The company's online presence is also coordinated with Corporate Communications and Investor Relations especially when it involves communication about Bechtle on social media. When expressing their personal opinions in public, employees must make it clear that they are speaking as private individuals.

Further rules of conduct for employees' private communication about Bechtle online can be found in the Bechtle Social Media Guidelines. As part of the Bechtle Code of Conduct, these guidelines are binding for all employees and form part of the onboarding process for new hires. The most up-to-date version is available on the intranet.

### PLEASE NOTE

We communicate transparently and openly with our stakeholders and the public—exclusively through the designated departments.

When expressing personal opinions about Bechtle, including on social media, we always do so in a responsible and fair manner.



## > Insider trading.

As a listed company, Bechtle AG is subject to specific regulations and obligations under capital market law. These apply to the entire Bechtle Group.

Employees are strictly prohibited from using internal, non-public information about Bechtle to gain direct or indirect financial benefits, particularly for the purchase or sale of securities or other financial instruments (ban on insider trading).

Additionally, members of the management team and Bechtle are required to disclose certain personal involving securities or other financial instruments of Bechtle AG (known as "directors' dealings").

### EXAMPLE

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

Notify the sender that you received the e-mail in error, delete it and maintain confidentiality regarding its content. Even if the information presents an opportunity to buy securities, you must refrain from any such transactions.

In principle, all employees of the Bechtle Group are permitted to trade in shares and other securities of Bechtle AG without restriction. However, statutory regulations strictly prohibit all employees from using insider information to buy or sell securities of Bechtle AG—or any other company within the Bechtle Group—whether for their own account or on behalf of a third party.

It is also prohibited by law to share insider information with unauthorised third parties or to encourage others to buy or sell securities based on insider knowledge. Access to insider information must be restricted to employees who require it for legitimate business purposes.

Insider information refers to any specific, non-public information about circumstances that, if made public, could significantly affect the stock market or trading price of a company's securities (in our case, particularly those of Bechtle AG).

To ensure transparency in the capital market, Bechtle is subject to special statutory disclosure obligations regarding certain personal transactions conducted by executives or other parties close to them involving securities or financial instruments of Bechtle. Executives must promptly report such transactions to Bechtle. Employees must also comply with the relevant internal policies.

Violations of insider trading laws or failure to meet reporting obligations can result in severe legal consequences, including civil and criminal liability for the employee, the manager and the company.

### PLEASE NOTE

We never share insider information with third parties unless expressly authorised to do so.

We do not use insider information to buy or sell securities, either directly or indirectly, for our own account or on behalf of others.

# Conduct towards colleagues.

We value and respect all employees equally. At Bechtle, our corporate culture is built on fairness, openness, understanding and tolerance. We expect every employee to interact professionally, kindly and fairly at all levels and across all areas of the company.

## EXAMPLE

Since my colleague openly shared his sexual orientation and relationship, he has become the target of implicit remarks and derogatory jokes from some colleagues. Without his knowledge, inappropriate comments, innuendos, and offensive nicknames have been circulating, creating a toxic work environment and undermining teamwork in the office.

What should I do?

Bechtle is fully committed to fostering a workplace that respects differences and is free from any form of discrimination. Therefore, be sure to report the situation to your manager and to the Bechtle Compliance Board.

## > Human rights, labour and social standards.

Bechtle's corporate culture is rooted in ethical principles, ensuring a work environment free from discrimination and abuse. As an internationally operating company, Bechtle upholds the principles of the Universal Declaration of Human Rights, the ten principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises, as well as the labour and social standards of the International Labour Organisation (ILO) and the principle of social partnership.

While all human rights are equally important, Bechtle places particular emphasis on the following:

- The right to equal opportunity and non-discrimination
- The prohibition of child and forced labour
- The right to freedom of association and collective bargaining
- Fair pay and benefits in line with local market conditions
- Compliance with applicable working time regulations

## > Respectful conduct – Non-discrimination principle.

No employee may be discriminated against—that is, unfairly disadvantaged—on the basis of race, gender, age, nationality, ethnicity, skin colour, political views, sexual orientation, religious beliefs, social background, physical condition or any other personal characteristic. We expect all employees to contribute to a workplace culture of mutual respect, where any form of personal harassment is unacceptable. This includes, in particular, bullying, unwelcome sexual advances, inappropriate physical contact, indecent proposals, or a work environment undermined by offensive jokes, remarks or humiliation.

## > Handling internal knowledge.

We communicate openly and share relevant information as a standard practice. Work-related knowledge must not be wrongfully withheld, distorted or selectively shared. Information should always be passed on accurately and in full to relevant departments, provided there are no overriding concerns (e.g. confidentiality requirements).

### PLEASE NOTE

We foster a workplace built on fairness, equality, non-discrimination, consideration and respect for human dignity.

We do not tolerate unjust advantage or preferential treatment of employees for personal reasons.

We prohibit all forms of sexual harassment. We reject all forms of forced and child labour.

We respect employee rights, including the freedom of 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 practices, striving to minimise our impact on the climate and environment. For Bechtle, sustainability also means actively contributing to our communities by supporting social initiatives.



## > Climate and environmental protection.

Protecting the climate and environment is a core element of our sustainability-oriented business strategy. A fundamental principle of our operations is the responsible and efficient use of natural resources. By integrating sustainability into our business practices, we ensure long-term economic success while helping to create better living conditions for future generations.

### EXAMPLE

During my work, I noticed that a device I was using had been damaged after being dropped and might soon release a hazardous substance into the environment. I know I should report the incident, but I'm already running late for a meeting with a customer. Can I postpone reporting it?

No, you must notify your manager immediately so that appropriate safety measures can be taken, and the risk can be properly contained.

### **Environmental protection and sustainability.**

We are committed to complying with all applicable environmental regulations and going beyond legal requirements by continuously assessing and reducing our environmental impact.

Every employee plays a role in protecting the environment within their immediate workplace. This includes using energy and resources efficiently—such as water, electricity and office materials like paper—following waste disposal regulations at all Bechtle locations and prioritising sustainability when working with partners, manufacturers, suppliers and customers.

A key focus is the entire lifecycle of IT products, from manufacturing and packaging to usage and disposal. We continuously work to improve the environmental footprint of our product and service offering. In addition, we integrate renewable energy and advanced technologies into the design, infrastructure, and operation of our facilities to further reduce our environmental impact.

### **PLEASE NOTE**

We operate a responsible environmental management system and actively promote sustainability.

Each of us is responsible for participating in risk prevention and environmental protection in our respective roles.

Beyond compliance with legal requirements, we work closely with manufacturers, partners and customers to maximise our contribution to environmental protection.

We publish all relevant information in our Sustainability Report, which forms part of our Annual Report.

## > Corporate social responsibility.

For us, sustainability also means recognising and embracing our social responsibility. We demonstrate this by selectively supporting social projects that help shape the communities where we operate. In doing so, we remain entirely independent of political activities.

As a global organisation with diverse geographic roots, we are committed to our social responsibility at a local level. Through transparent structures and clearly defined responsibilities, we support projects that align with our corporate values—without expecting anything in return. All contributions are made in accordance with clear guidelines that reflect both our ethical standards and legal requirements.

At Bechtle, we adhere to the principle of political neutrality and restraint. We do not support political parties, organisations, or institutions with a clear political affiliation or purpose. Similarly, we neither directly nor indirectly endorse candidates for public office. When employees participate in democratic political processes or other political activities, they must ensure that their actions do not create the impression that they represent Bechtle as a company. Company time and resources may not be used for such activities.

### PLEASE NOTE

We are committed to socially responsible entrepreneurship.

We support locally focused projects that align with our corporate values—without any political influence.



# Applicability, compliance 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. It is designed to help employees navigate legal and ethical challenges in their daily work, provide guidance and further strengthen trust in the performance and integrity of the Bechtle Group.

## EXAMPLE

I find myself in a situation where I am unsure how to act or decide because none of the examples in the Code of Conduct fully apply to my case. What should I do?

There is no substitute for personal integrity and sound judgment. If faced with a difficult situation, every employee should ask themselves the following questions:

- Is my action or decision legal?
- Does it align with our values and guidelines?
- Is it the right thing to do, and am I acting without personal bias?
- Would my action or decision withstand public scrutiny (e.g. if reported in the media)?
- Does my action or decision protect Bechtle's reputation as a company with high ethical standards?

If the answer to all these questions is "yes," then the action or decision is likely appropriate and in line with the Code of Conduct. If any doubts remain, employees should follow the four-eyes principle (seeking a second opinion) or consult their manager or the Bechtle Compliance Board.

## > **Applicability.**

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

## > **Introduction of the Code of Conduct and responsibility for its implementation.**

The latest version of the Bechtle Code of Conduct is available to all employees on the intranet. Managing directors within the Bechtle Group are also notified of updates via e-mail. Every executive is responsible for ensuring that their employees have access to, understand and adhere to the Code of Conduct. The latest version of the Code of Conduct can also be downloaded from bechtle.com.

## > **Guidance and inquiries.**

Bechtle has established a Compliance Board, which consists of the entire Executive Board of Bechtle AG and a permanent representative from the Legal department. If necessary, representatives from other departments may be appointed to the Compliance Board on a case-by-case basis. The Compliance Board also reserves the right to conduct random audits to monitor the implementation and compliance with the Code of Conduct. Employees can contact the Bechtle Compliance Board through the whistleblower hotline via phone or e-mail.

### **WHISTLEBLOWER HOTLINE**

For all inquiries related to the Code of Conduct:

#### **Bechtle Compliance Board**

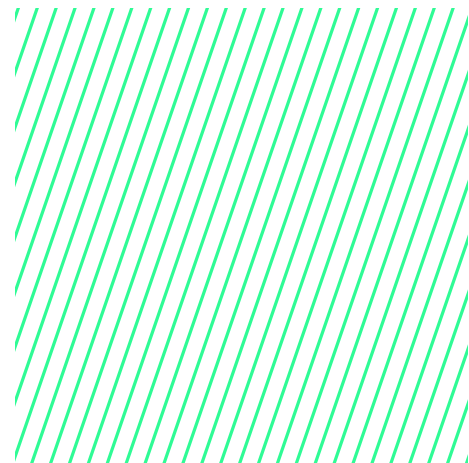
E-mail [complianceboard@bechtle.com](mailto:complianceboard@bechtle.com)

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We encourage our employees to address critical issues openly and without fear of retaliation. If you become aware of or suspect a violation of applicable laws, this Code of Conduct or other company policies, do report it without delay. Your first point of contact should be your direct manager to discuss the matter. Managers are expected to foster open dialogue, support their employees and investigate concerns and potential violations fairly and impartially. If reporting an issue through your manager is not possible—for example, if you suspect your manager has violated company policies—you can directly contact the Compliance Board. All reports are treated confidentially and, if requested, can be made anonymously, provided that this is feasible within the scope of the investigation and any required actions.

Employees who raise concerns or report suspected violations in good faith will not suffer any disadvantages as a result. This protection explicitly applies even if the reported concern or suspicion later proves to be unsubstantiated. “In good faith” means that the employee genuinely believes their report to be true. We do not tolerate any form of intimidation or retaliation against employees who, in good faith, seek guidance or report violations of the Code of Conduct, laws, or unethical behaviour. However, employees who knowingly submit false reports to harm others will face disciplinary action.



## > **Violations and consequences.**

The Compliance Board reviews and assesses all reported violations and takes appropriate action. Violations of applicable laws, the Bechtle Code of Conduct or company policies will not be tolerated. Depending on the severity of the violation, consequences may include labour or civil law measures, up to and including summary dismissal. Violations of applicable laws may incur claims for damages, fines or even criminal prosecution.

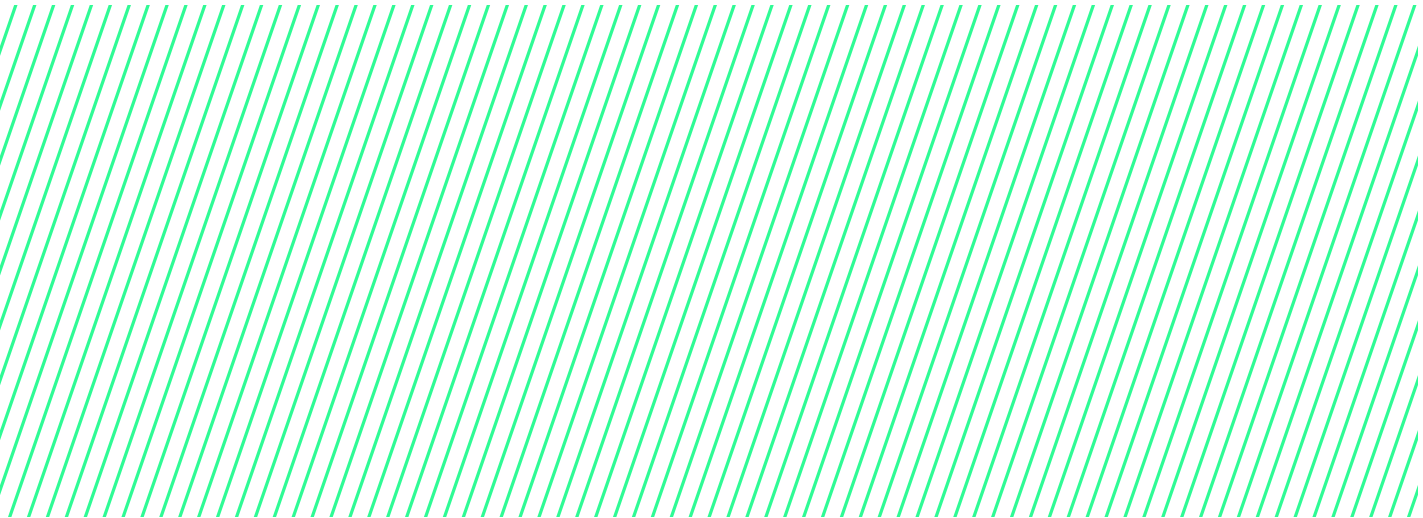
### **PLEASE NOTE**

In our daily work, we comply with the Bechtle Code of Conduct, our various policies and all applicable laws and regulations. We use our common sense and report any suspicions or concerns that could pose a risk to the company, our colleagues or our customers.

If in doubt, we follow the four-eyes principle (seeking a second opinion) or consult our manager or the Bechtle Compliance Board.

# Integrity is part of our identity.

*Honesty. Fairness. Trust.*



Version: December 2024

## **Bechtle AG**

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