Code of Conduct
for Bender Business Partners

Bender is a globally operating family-owned company and a leading provider of solutions that make electrical infrastructures smarter and safer. Since 1946, products, solutions and services bearing the Bender brand have stood for safety, reliability and innovation.

We are aware of the responsibility arising from our business activities and have adopted strict ethical standards to guide us. We expect the same from all our business partners. To this end, we have established this Bender Business Partner Code of Conduct, which defines the minimum standards for business relationships with Bender.



Laws and ethical standards

The Business Partner shall comply with all laws applicable to its business activities. It supports the principles of the United Nations Global Compact, the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at Work, in accordance with national laws and practices. This applies in particular to:



Human rights and fair working conditions



Child Labour

The Business Partner shall not employ children below the statutory minimum age for employment in any country or local jurisdiction. Even where local law permits the employment of younger children, a minimum working age of 15 years shall apply. Employees under the age of 18 may only perform work in accordance with the legal requirements of their country of employment, for example regarding working hours and working conditions, and in compliance with all education or training requirements.



Forced Labour

The Business Partner shall not use any form of bonded, forced or compulsory labour or modern slavery. All work must be voluntary. Employees must be permitted to retain control of their identity documents, such as passports, work permits or other personal legal documents. The Business Partner shall ensure that employees do not pay fees or other payments related to obtaining employment, either during recruitment or throughout employment. Where required by law, the Business Partner shall bear all employee-related fees and expenses, such as permits and levies.

Punishment, psychological and/or physical coercion, and any other form of human trafficking are prohibited. Disciplinary policies and procedures must be clearly defined and communicated to employees in an understandable manner.

Remuneration and working hours

The Business Partner shall comply with all applicable local laws and binding industry standards regarding working hours, including overtime, rest breaks and paid leave. It shall compensate its employees in accordance with local minimum wage requirements, applicable collective bargaining agreements and industry standards, and shall pay all remuneration due to employees on time. Wage deductions as a disciplinary measure are prohibited unless permitted by law.

Freedom of association and collective bargaining

The Business Partner's employees must be free to decide, without threat or intimidation, whether to join a trade union or employee representative body of their choice. The Business Partner acknowledges and respects the right to collective bargaining in accordance with applicable local laws.

Diversity and inclusion

The Business Partner is committed to equal opportunities. It shall neither discriminate nor tolerate discrimination or harassment on the grounds of sex, ethnic or national origin, skin colour, religion, age, disability, sexual orientation or identity, or any other characteristic protected by law.

Occupational Health and safety

We expect our business partners to pursue a high level of occupational health and safety through a management approach appropriate to their business. The Business Partner shall comply with applicable occupational health and safety regulations and provide a safe and health-promoting working environment, including access to drinking water. The objective is to protect the safety and health of employees, safeguard third parties, and prevent accidents, injuries and work-related illnesses. This includes regular risk assessments, appropriate hazard control and preventive measures, and the provision of suitable personal protective equipment. Employees shall receive appropriate instruction on occupational health and safety matters in a language they understand.

Data Protection, Information security and disclosure of information

The Business Partner shall comply with applicable data protection laws, including requirements relating to the security of personal data. This applies in particular to the personal data of customers, consumers, employees and shareholders. All requirements must be observed when collecting, recording, storing, processing, transmitting, using or deleting personal data.

The information security requirements applicable to business partners regarding all data entrusted to them during and after their cooperation with Bender are based on international standards, for example a code of practice for information security management. Business partners shall protect the confidentiality, integrity and availability of information. The required level of information security and controls must correspond throughout the entire information lifecycle to the sensitivity, value and criticality of the information processed.

The Business Partner shall protect confidential information and use it only in an appropriate manner. It shall comply with all contractual data protection and information security requirements and shall not disclose any information that is not publicly known.

Bribery and corruption

The Business Partner complies with all applicable laws and regulations relating to the prevention of money laundering. Financial records and reports shall be maintained in accordance with applicable laws and regulations.

The Business Partner complies with all applicable national and international anti-corruption laws and regulations. The Business Partner shall neither directly nor indirectly offer, provide, or accept anything of value in order to improperly influence an official act or to obtain or retain business or secure an improper advantage. This includes so-called facilitation payments or any other benefits granted to public officials for routine actions that are non-discretionary in nature.

Trade Regulations

The Business Partner shall comply with all applicable export control, sanctions and customs laws and regulations, including prohibitions and restrictions. It shall ensure that neither the Business Partner itself nor its beneficial owners, representatives or any subcontractors engaged by it are listed as blocked or restricted parties on any applicable sanctions list.

Fair competition and conflicts of interest

The Business Partner shall comply with applicable competition and antitrust laws.
A conflict of interest is any personal or financial interest, business or personal activity or relationship, past or present employment, or obligation that may impair the objective performance of professional duties and responsibilities or restrict independence and objectivity. This includes, in particular, family or marital relationships, partnerships, shareholdings or investments involving business partners or competitors. The Business Partner shall immediately disclose any actual or potential conflict of interest related to its activities for Bender.

Environment and conflict minerals

The Business Partner shall comply with all applicable environmental laws, regulations and standards and implement an effective system for identifying and eliminating potential environmental hazards.

We expect our Business Partner to support Bender's environmental and climate protection commitments through the products and services they supply, acting efficiently and with due consideration for environmental impacts. Bender also expects its business partners to provide relevant environmental and climate protection data upon request.

The Business Partner shall comply with all applicable laws and resulting due diligence obligations regarding the sourcing of minerals and materials from conflict-affected and high-risk areas whose extraction may contribute to human rights violations, corruption, the financing of armed groups or comparable adverse impacts.

Community engagement

Bender encourages its business partners to engage in their local communities and support initiatives and activities aligned with the United Nations Sustainable Development Goals.

Business continuity planning

The Business Partner must be prepared for potential disruptions to its business operations, such as natural disasters, terrorism, supply chain disruptions, outbreaks of communicable diseases such as epidemics or pandemics, information security incidents or cyberattacks. This preparedness includes business continuity plans that protect both employees and the environment from the effects of potential serious disruptions within the Business Partner's area of responsibility.

By accepting this Business Partner Code of Conduct, the Business Partner undertakes to comply with the requirements set out herein in its business relationships with Bender and to agree on equivalent standards with its own business partners insofar as they are involved in the provision of services for Bender.

Any violations of these standards must be remedied. Bender reserves the right to verify compliance with the requirements of this Business Partner Code of Conduct, for example through self-assessments and audits conducted by Bender or third parties. Without prejudice to any other contractual remedies, Bender may consider terminating the business relationship in the event of a continuing violation.

For the purposes of this Code, "Bender" means Bender Industries GmbH & Co. KG, Grünberg, and its affiliated group companies (majority-owned subsidiaries, dependent companies, and parent companies). Where the Business Partner maintains business relationships with more than one Bender group company, the obligations arising from this Business Partner Code of Conduct shall apply separately to each respective Bender company. Bender Industries GmbH & Co. KG shall be entitled to enforce compliance with this Business Partner Code of Conduct also on behalf of and for the benefit of its group companies. Any amendments or updates to this Business Partner Code of Conduct made by Bender Industries GmbH & Co. KG shall automatically apply to all business relationships between the Business Partner and Bender upon notification to the Business Partner.

Notifications regarding violations of this Code of Conduct may be addressed either to the respective Bender company that is the Business Partner's contractual partner or directly to the Group headquarters:

Bender Industries GmbH & Co. KG

Londorfer Straße 65
35305 Grünberg
Deutschland

Telephone: +49 6401 807-0
info@bender.de
www.bender.de