

# BayWa Code of Conduct

Guiding principles  
for our actions





## Dear colleagues,

Our Group continues to grow: internationalisation, development of new business areas and increasing digitisation create an extremely dynamic process in which we face new challenges every day.

The basic requirements for the company's sustainable success are a clear corporate vision and binding guidelines. This is why we promote responsible and legally impeccable behaviour of each individual and have adopted this Code of Conduct with our Board of Management. These principles of conduct form our value system and are applicable throughout the Group as a binding Code. They help us to act with fairness and responsibility towards our colleagues, customers, society and the environment. Similarly,

they help us identify and avoid possible breaches of the law in good time. The Code of Conduct is an essential part of our corporate culture. We enjoy the trust and respect of our customers, business partners, shareholders and the public. Even minor violations can damage BayWa's good reputation and inflict economic damage. Therefore all of us in the Group are asked to take the Code of Conduct seriously and to embed it in our day-to-day thoughts and actions

Yours,

Prof. Klaus Josef Lutz

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## Editor's note:

For the sake of easy readability, the report uses the masculine form throughout to refer to both genders equally.

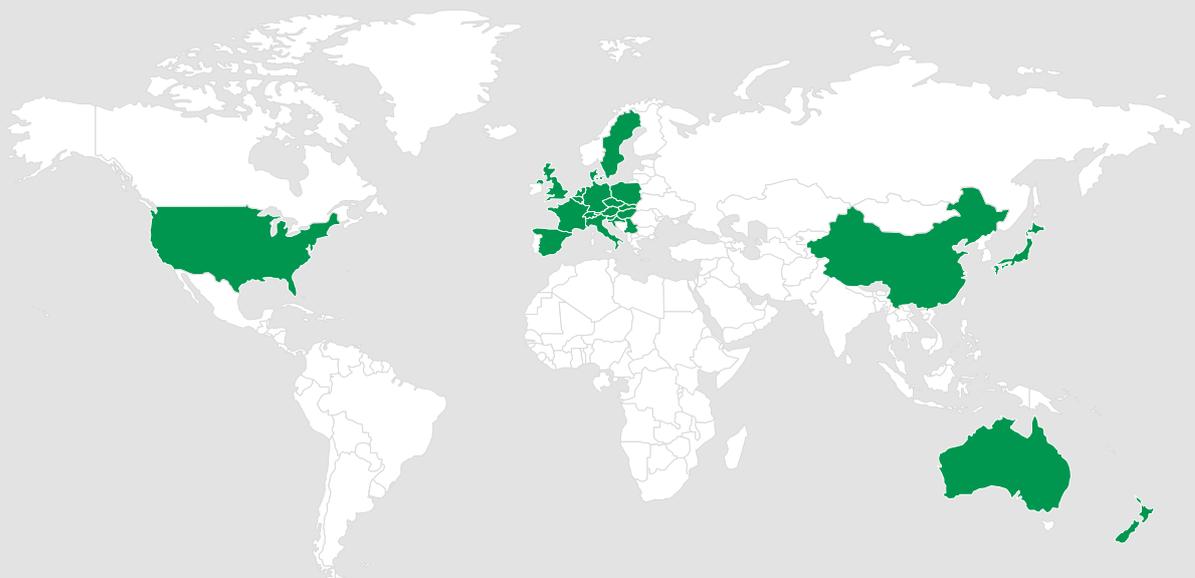
# Scope of application

This Code of Conduct summarises the essential principles of our actions. These are intended to serve as guidelines for all employees when dealing with particular challenges and to contribute to the protection of the BayWa Group.

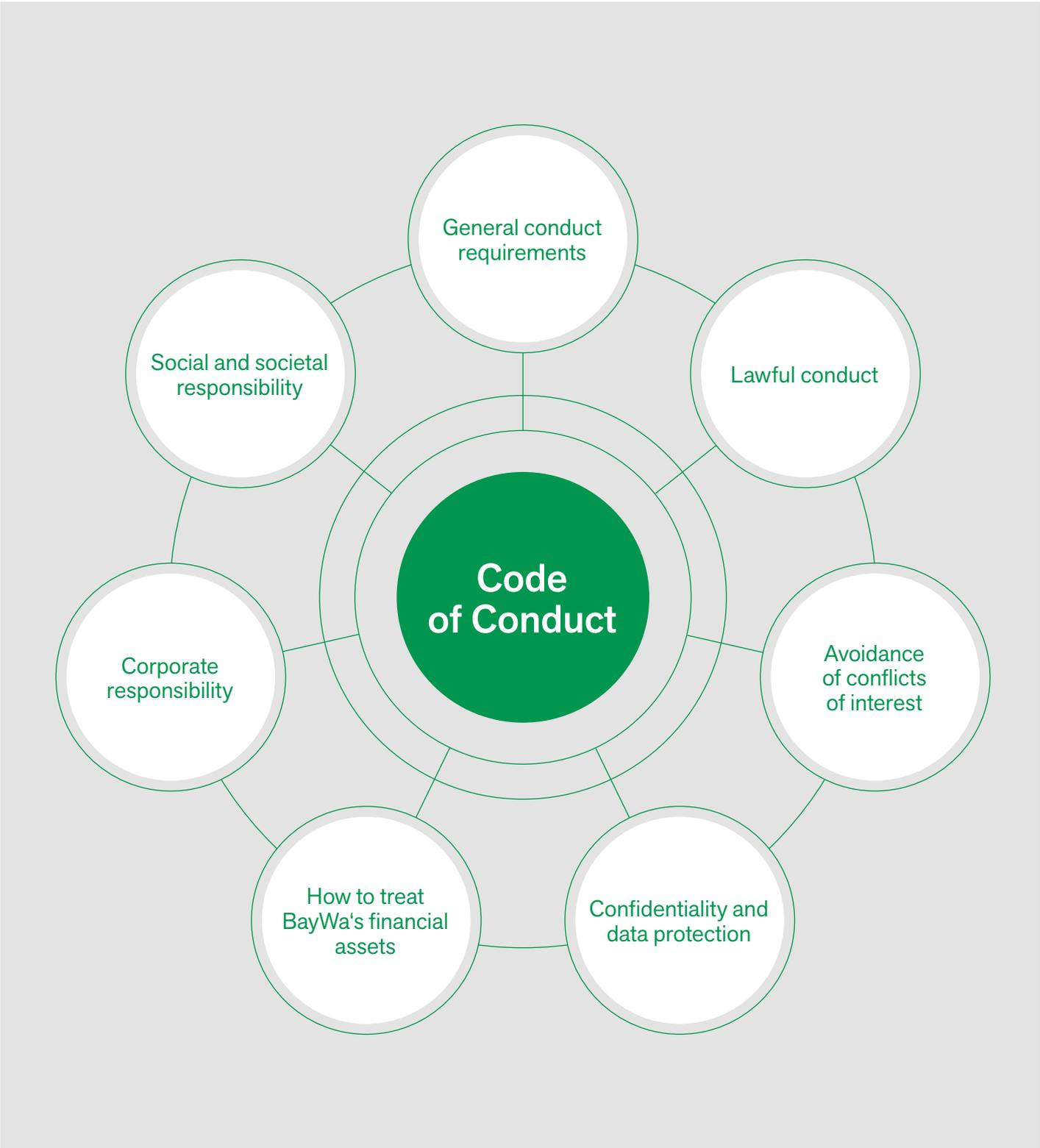
The Code of Conduct represents a Group-wide behavioural code that is equally binding for directors, executives and employees. It also applies to affiliated companies of BayWa in Germany and abroad.

Group companies can implement additional principles of conduct which may not be inferior to the minimum standards of this Code of Conduct. Any deviation must be submitted to Corporate Compliance for review.

Ethically and legally impeccable behaviour is the responsibility of every individual. We are all called upon to create an environment in which, for example, the bottom line is not valued more highly than acting with integrity.



# BayWa Code of Conduct



# General conduct requirements

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## Dealing with customers and business partners

As a reliable partner, BayWa stands for trust, solidity and innovation.

Our business partners, customers and investors therefore expect BayWa and its staff to act in accordance with the law and regulations.

We follow this responsibility and expect our business partners to do so, too.

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## Protecting our reputation

As a trade and services company, we are in close contact with our customers, suppliers and business partners. We protect both their interests and the interests of BayWa.

We are aware that we may be perceived as representatives of BayWa even in private. In public, for example on social media, we therefore pay attention to the reputation of BayWa.

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## Human rights

We respect the global regulations on the protection of human rights as fundamental and universal rules. This mainly includes accepting neither forced labour nor child labour.

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## Mutual respect and integrity

We treat everyone fairly and treat our colleagues, our business partners and customers how we would like to be treated.

We denounce any form of harassment (e.g. bullying or sexual harassment), accept other opinions and attitudes and respect that all colleagues have the same personal rights and obligations.

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## Equal opportunities and non-discrimination

As an international Group, we respect the personal rights of our business partners, customers and employees and oppose any type of discrimination, for example due to ethnic origin, religion, ideology, disability, age, sexual orientation, gender or other personal characteristics.

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## Leadership concept

Because of their large influence on employee motivation, our executives are called upon to live the corporate values. All executives of BayWa act as dependable role models and call for clear and targeted communication and for a fair and respectful treatment of employees. Moreover, they must promote independent acting, a solution-oriented attitude and the development of employees' skills.

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## Occupational health and safety

We respect the applicable laws aimed at ensuring fair labour conditions, including wages and working hours. Our employees' workplaces satisfy the current standards in terms of occupational safety. BayWa also promotes the long-term performance of employees through preventive occupational safety measures and active health management.

# Lawful conduct

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## Compliance with applicable laws and internal regulations

We respect and observe applicable law and the Group's internal regulations. In all countries in which BayWa operates, we are obliged to comply with locally applicable rules and legislation. We do not enter into any agreements with our customers, suppliers, competitors and business partners that are illegal in any way. Violations of applicable law and internal regulations are not tolerated and will be sanctioned accordingly.

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## Compliance with competition law and antitrust rules

We commit to open markets and fair competition. We do not enter into illegal agreements with competitors, customers or suppliers. We are therefore prohibited from exchanging information about prices, market shares, capacities, investments, strategies, tendering procedures or similar with competitors, let alone fix them.

All employees and executives including members of the BayWa Board are obliged to comply with antitrust rules.

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## Compliance with anti-corruption laws

We always use serious funds and decline any form of bribery. In particular, we do not allow ourselves to offer business partners illicit benefits, nor do we accept these.

We value the fact that the mere appearance of such behaviour is avoided.

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## Anti-money laundering, foreign trade and tax law

In our international activities and the development of new markets, we respect the various legal provisions on foreign trade, customs and tax law that apply to BayWa. Moreover, we comply with all regulations to combat money laundering.

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## Whistleblower system

Our employees can anonymously make use of the BayWa whistleblower system ([www.baywa.compcor.de](http://www.baywa.compcor.de)) if there are any indications of law infringement.

Contact is strictly confidential. Misuse of the system by employees is prohibited.

# Avoidance of conflicts of interest

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## Separation of professional and private interests

We strictly separate the interests of BayWa and our personal interests.

We always take professional decisions for the benefit of BayWa. A conflict of interest exists when a professional decision could be influenced by private interests.

This is especially true if our employees can directly or indirectly influence the awarding of orders.

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## Secondary employment

We do not pursue any secondary employments that are opposed to the interest of BayWa.

We notify our superiors or Human Resources of any secondary employments, thereby ensuring transparency.

# Confidentiality and data protection

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## Data protection and privacy

Due to the high sensitivity, we strictly protect the personal data and operational secrets of our business partners, BayWa and also our employees.

We ensure that confidential information does not reach third parties or the public. Furthermore, we do not use information for personal gain to which we have access as a result of our business activity.

We are aware that even electronic correspondence is legally binding and therefore pay close attention to the content and wording.

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## Obligation of discretion

We are obliged to treat as confidential operational and business secrets of both BayWa and our business partners that come known to us in the context of our business activity or any other way.

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## Compliance with legislation on capital markets

We treat insider information that we obtain in the course of day-to-day business as confidential, comply with applicable legislation and refrain from trading stock in critical phases before annual reporting.

We inform the persons concerned in good time in order to avoid infringements.

BayWa publishes all price-sensitive information in accordance with capital market regulations.

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## Reporting

Any of BayWa's financial reporting is correct, complete and understandable.

In particular, this applies to reporting on business performances and all information about the current financial performance and cash flows. We create and communicate our reports on time and in accordance with national and international regulations on accounting.

# How to treat BayWa's financial assets

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## Careful use of work equipment and protection of property

We treat BayWa's work equipment conscientiously. We treat the equipment made available to us with care and use it appropriately. We responsibly ensure the preservation of value of existing buildings and facilities and prevent damage, unnecessary costs and other disadvantages for BayWa.

We protect BayWa's property from loss and use it exclusively for professional purposes, except where authorisation for private use has been granted.

We protect BayWa's intellectual property against unauthorised access or disclosure to third parties. This includes all business secrets such as strategic planning, customer lists and internal calculations.

We observe the trademark rights of third parties and defend attacks on our trademarks to protect BayWa.

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## Use of resources

We are aware of our responsibility towards the environment and society.

Therefore we strive to always consider the economic, societal and environmental impact of our work and to act in an environmentally and socially responsible manner.

We ensure intelligent use of natural resources by continually attempting to minimise the harmful effects of our products and processes on the environment and the climate.

As an innovative partner, we support our customers in being responsible in their actions and business.

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## Environmental management

The business activity of BayWa has effects on the environment throughout the value chain. BayWa contributes to the emission of greenhouse gases and the consumption of natural resources both through our own business activity and through upstream and downstream processes.

In our own activity, BayWa meets the global challenge of protecting the environment and climate in a variety of ways – for instance with a company-wide environmental organisation, standardised waste management or by raising awareness among employees for environmentally friendly conduct through regular training on measures to protect the environment. We ensure that the current legal provisions are complied with.

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## Responsibility in the supply chain

We offer our customers high-quality products and reliable services. In addition to our own processes, BayWa wants to ensure supplier management with regard to compliance with human rights as well as environmental and social standards via the selection of its suppliers.

As a global company, we place great value on regional procurement in the respective countries to avoid long transport routes as far as possible. This protects the environment and promotes the local economy. However, inter-regional flow of goods is a fact in procurement. In the case of long distances, where possible, we focus on resource-efficient logistics with the integration of rail and inland waterways.

# Social and societal responsibility

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## BayWa Foundation and further activities

We accept social and societal responsibility. BayWa makes a particular contribution in this regard through the BayWa Foundation.

The purpose of the Foundation is to promote science and research, education and training.

It therefore pursues exclusively and directly charitable purposes.

The BayWa Foundation provides valuable help through the realisation of sustainable educational projects in the fields of healthy nutrition and renewable energy in Germany and abroad.

The aim is to impart knowledge and to promote education in order to improve people's quality of life in the long term.

The BayWa Foundation enables the exchange of ideas between science and industry for example through the awarding of scholarships.

In addition to the activities of the Foundation, BayWa ensures integration into their social environment for example by involvement in the areas of sports, education and society.

The Foundation's donations are never granted to obtain business benefits and are not given to persons or organisations that could harm BayWa's reputation.

# Responsibility in dealing with the Code of Conduct

BayWa AG and all affiliated companies contribute to the implementation and constant development of this Code of Conduct. They also ensure that no employee is personally disadvantaged in complying with the Code.

The Board and all executives are the initial points of contact for employees in the event of any questions. They contribute to the non-occurrence of unacceptable behaviour and violations as far as possible or ensure that these are punished to an appropriate extent.

All employees of the Group have the option of reporting violations of internal regulations and applicable law to supervisors, Human Resources or the Group-wide whistleblower system ([www.baywa.compcor.de](http://www.baywa.compcor.de)) and contributing to resolving the issue.

A trusting and positive cooperation between all BayWa employees is reflected in open communication and mutual support.

**Join in!**



