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# **CODE OF CONDUCT**

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## **EFFECTIVE AS OF JUNE 1, 2021**

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# CODE OF CONDUCT

Dear Employees,

I am proud of our employees around the world, they are the key to Burckhardt Compression's success as an international company. Together, we share common values: we are committed to conduct our business in an ethical, legal and environmentally and socially responsible manner.

This Code of Conduct contains the standards and principles of how we as employees interact with each other, with our stakeholders, our partners and the environment in all our business activities. Together with our Values and Behaviors, the Code of Conduct defines and impacts the decisions and actions in our daily work. They build the foundation and the guidelines for our conduct and for Burckhardt Compression's integrity.

I encourage every employee to engage in a culture of respect, openness and mutual trust. I am convinced that the responsible behavior of every Burckhardt Compression employee contributes to the sustainable success of our company.

Thank you for your support.

Marcel Pawlicek  
CEO

## WHAT ARE OUR OBLIGATIONS?

### **We comply with all laws and regulations**

We recognize all local, national and international laws, directives and standards and comply with them to the full. In addition, all employees are personally responsible for compliance with internal directives.

### **We protect the integrity and reputation of Burckhardt Compression and our partners**

No employee will act in a way that could be detrimental to the trust placed in the company by our business partners or the public. We will put the long-term prosperity of the company, not our personal interests, at the forefront of our thinking and actions. We will avoid situations in which there is a conflict between our personal interests and those of the company.

### **We promote employee satisfaction and good working conditions**

We strive to achieve a high level of employee satisfaction. We believe that only happy employees will result in happy customers. We undertake to survey employee satisfaction on a regular basis and compare the results with those of other companies. We offer flexible and part-time working models to our employees and working hours are in compliance with the applicable laws and regulations.

We pay our employees fair market rates for their work. To ensure this, we systematically compare the tasks and qualifications of all employees against internal and external benchmarks. Employees share in the financial success of the company through appropriate bonus schemes. We guarantee equal opportunities to all our personnel. In addition, we foster the personal and professional development of employees.

### **We take health and safety seriously**

All employees are responsible for their own health and safety and for that of their co-workers. All companies in the Burckhardt Compression Group will take the appropriate precautions for their line of business in accordance with the particular risks involved. We comply fully with all relevant legislation and safety standards, and we also conduct occupational safety analyses in order to make continual improvements. Burckhardt Compression applies a zero tolerance policy for drug consumption and alcohol abuse during working hours.

We attach great importance to prevention and education. We provide a workplace and a working environment that facilitate the mental and physical well-being of our employees. In cases of illness, accidents, difficult situations or social need, we will support our employees to the fullest extent possible and provide external specialist help if necessary.

### **We do not tolerate discrimination**

None of our employees may be discriminated against, either by the company or by other employees, in any shape or form on the grounds of gender, age, religion, ethnicity, nationality, sexual orientation, marital status, political opinion, health condition or other personal characteristics. Our employees are free to join a trade union. We are aware of our responsibility to support people with a physical or mental disability, both internally and externally in partnership with others.

There is no place for sexual or any other form of harassment and mobbing in our company. We encourage our employees to report any incidents, regardless of whether they are victims or witnesses.

### **We respect human rights**

We acknowledge the responsibility to respect the internationally recognized human rights. Burckhardt Compression seeks to avoid complicity in human rights abuses. We do not tolerate any kind of forced and child labor within our business activities and partnerships. Burckhardt Compression requires its business partners to follow the same standards through its Code of Conduct for Business Partners.

**We do not accept favors or bribes**

Irrrespective of the amount, employees are not permitted to make or accept gifts of money. Employees shall not engage in any act of corruption or any form of bribery. This also applies to non-monetary gifts exceeding a value that is reasonable and customary in the country concerned. With respect to business expenditure and hospitality, we adhere strictly to local expense rules.

No individual, organization or company should profit from a relationship with individual employees of Burckhardt Compression. Any conflicts of interest should be avoided from the outset.

We do not provide financial support to political organizations or individuals who are incumbents of or wish to stand for political office or political posts. We do not tolerate active or passive bribery.

**We respect the rules of fair competition**

We are committed to fair competition in which there is no place for price fixing, cartels or other activities that distort competition. Our employees are forbidden to enter into any unlawful or ethically dubious deals or agreements. They must comply with all antitrust legislation and regulations. In view of the complexity of these issues, experts should be consulted in cases of doubt. All employees undertake to observe good business practices.

**We keep our property and proprietary secrets safe**

We exercise great care with our equipment, resources and proprietary information. Commercial and proprietary secrets must not be disclosed to third parties, either inside or outside the company, without permission. In particular technical or commercial knowledge, drawings, customer information and other sensitive information and documents must be protected against loss or against access by unauthorized persons.

When using information technology such as e-mail or the internet for example, all employees must comply with the respective rules in order to prevent information being inadvertently lost or passed to third parties.

All employees are obliged to comply in full with our internal rules governing insider information. Employees and their family members living in the same household are not permitted to exploit confidential and non-public information for the purposes of trading shares in Burckhardt Compression Holding.

**We are committed to ecological sustainability**

We are an environmentally conscious company committed to the careful and considerate use of energy and natural resources. By our forward-looking actions, we make a contribution to minimizing the consumption of energy, water and chemicals of all types, as well as to reducing emissions. We strive to continually improve the environmental performance of our products and services and ensure a careful and compliant procurement of raw materials affected by embargoes or restrictions. We train and raise awareness among our employees, and also encourage our customers and suppliers to behave in an environmentally responsible manner. We do not condone irresponsible profit-seeking and cost-cutting at the expense of the environment and people. On the contrary, we endeavor to ensure sustainability by creating a balance between economic, environmental and social aspects.

## HOW DO WE ENSURE THAT EMPLOYEES ARE FOLLOWING OUR CODE OF CONDUCT?

### **Implementation and monitoring**

All employees of the Burckhardt Compression Group undertake to uphold the principles of the Code of Conduct of Burckhardt Compression as one of their conditions of employment. Managers are additionally obliged to inform and train their staff accordingly. Infringements of these principles are investigated and appropriate measures are taken, including summary dismissal and criminal prosecution if warranted.

Regular monitoring is essential in an internationally operating company to ensure that procedures and directives are followed, and to provide employees with the necessary support.

Employees who become aware of a violation of this Code of Conduct or other ethical guidelines and principles are encouraged and requested to report these through our standard grievance channels (line management, local human resources, legal department) or as a last resort via the Burckhardt Compression Speak Up reporting channel. The Speak Up grievance system is built upon an independent third-party tool and reporting also can be done on an anonymous basis. Burckhardt Compression will not accept any discrimination of or retaliation against individuals who report compliance concerns in good faith.

Complaints through the Speak Up reporting channel can be placed online or via phone. Such reports will be handled in confidence and may not be misused as an excuse for persecution or dismissal. Further information on the design and operation of the Speak Up reporting channel can be found at <https://www.burckhardtcompression.com/speak-up>.

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