
THE SPEAK UP POLICY OF BURCKHARDT COMPRESSION

EFFECTIVE AS OF JULY 1, 2022

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PREAMBLE

Dear Employees

Our Code of Conduct contains the standards and principles governing 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 Burckhardt Compression Code of Conduct is the foundation and the guideline for our conduct and for Burckhardt Compression's integrity.

I encourage every employee to engage in a culture of respect, openness and mutual trust. We have an open communication culture. If you would like to report suspected fraudulent or unethical conduct in violation of our Code of Conduct, you can report this misconduct as before through the existing standard grievance channels (line management, local human resources, legal department) or, as a last resort, through the Burckhardt Compression Speak Up reporting channel, where reporting also can be done on an anonymous basis.

I am convinced that every Burckhardt Compression employee contributes to the sustainable success of our company by acting responsibly.

Thank you for your support.

Fabrice Billard
CEO

1. SCOPE AND PURPOSE

- 1.1 This Burckhardt Compression Speak Up policy describes how reports of confirmed or suspected incidences of fraud and misconduct are handled.
- 1.2 The Burckhardt Compression Speak Up policy applies to all employees, business partners of Burckhardt Compression and third parties using the Speak Up reporting channel.

2. SUSPICION OF MISCONDUCT/FRAUD

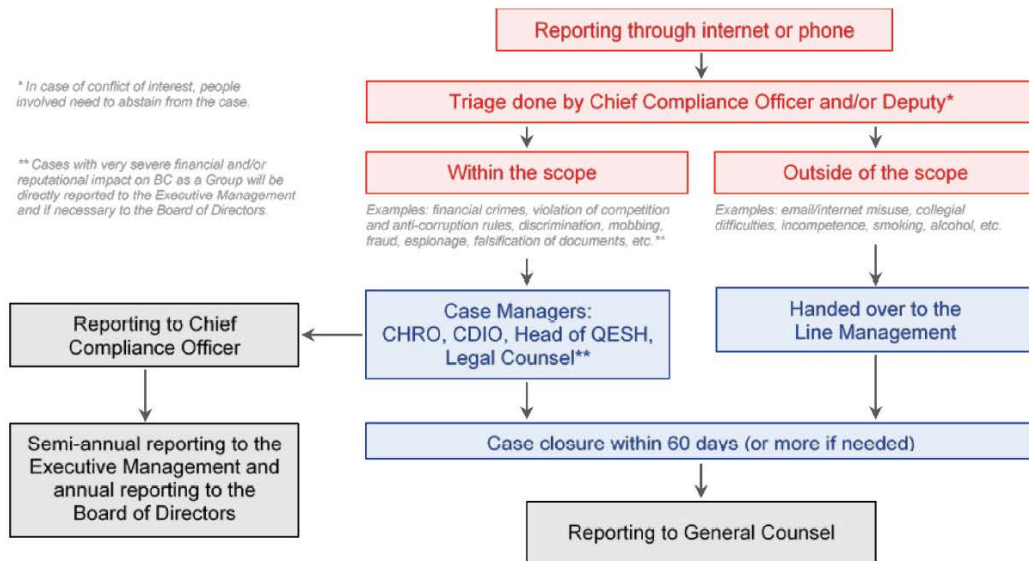
- 2.1 All employees, business partners of Burckhardt Compression and third parties with knowledge of suspected misconduct by any Burckhardt Compression employee or business partner are encouraged to report violations of the law and any fraudulent or unethical conduct in violation of the Burckhardt Compression Code of Conduct.
- 2.2 To the extent possible, all employees are encouraged to report such suspicions primarily through the normal reporting lines, which are mainly the line management, local human resources and legal and compliance department.
- 2.3 If the normal reporting lines are not an option (e.g. conflict of interest of the involved line management), employees are encouraged to use the Speak Up channel.
- 2.4 The normal reporting lines as outlined above are not available to business partners of Burckhardt Compression and third parties. Business partners and third parties can only use the Speak Up channel.
- 2.5 The Speak Up channel is hosted by an independent third party, located in the Netherlands.
- 2.6 Burckhardt Compression encourages all parties to make themselves known when reporting a case through the Speak Up channel. Reports can also be made anonymously through the Speak Up channel, or directly to the Chief Compliance Officer. Anonymity may hamper the company's ability to investigate the case fully.
- 2.7 In order to minimize unclear and false reporting, Burckhardt Compression has decided to only investigate anonymous reports from employees or reports made by business partners or third parties that have been submitted through the Speak Up channel. Anonymous reports from employees or reports received from business partners or third parties through other channels than the Speak Up reporting channel will not be followed up on.

3. REPORTING IN BAD FAITH

- 3.1 Burckhardt Compression takes the practice of reporting in bad faith very seriously. This act is a serious breach of our Code of Conduct and disciplinary action will be taken against employees reporting in bad faith. Business partners and third parties reporting in bad faith may also be confronted with legal and other consequences.

4 ASSIGNING RESPONSIBILITIES

4.1 All reports coming in through the Speak Up channel will be processed according to the following workflow diagram:



4.2 The Chief Compliance Officer, upon receipt of reports of alleged misconduct or fraud, will evaluate and assess the information received and determine the appropriate next steps as well as assign the Case Manager (CHRO for employment matters, CDIO for IT matters, Head of QESH for health, safety and environmental matters and Legal Counsel for fraud, anti-trust and bribery matters).

4.3 If a reported case may have severe financial and/or reputational impact on Burckhardt Compression as a Group, it will be reported by the Chief Compliance Officer directly to the Executive Management and, if necessary, to the Board of Directors of Burckhardt Compression.

4.4 The Case Manager is responsible for the investigation, reporting and close-out of the cases handed over to him. The Case Manager may go through the following checklist to substantiate the allegation:

- Observation: What has been reported?
- Source: Where did the report come from?
- Location: Where did the incident take place?
- Time: When did the alleged violation take place?
- Allegation: Type of criminal act or severe infringement of the Code of Conduct?
- Frequency: Is it an isolated or repeated incident?
- What additional data is needed to better understand the alleged violation?
- Which individuals or organizations need to be contacted in order to gain a comprehensive understanding of the issue or allegations?

The objective of the Case Manager is to systematically assess the credibility and the severity of the allegations in each report. If needed the Case Manager will have to collect more data and evidence in order to determine whether the allegations can be substantiated or not. The Case Manager can conduct interviews with the persons involved and external support can also be requested by the Case Manager. Unless more time is needed, the goal of the Case Manager is to close the case within 60 days.

4.5 Chief Compliance Officer and/or the Case Managers need to abstain from a case in the event of a Conflict of Interest. Such cases will then be handled by a deputy.

4.6 Burckhardt Compression expects management at all levels to handle all matters concerning any misconduct seriously, confidentially and promptly. Management is obliged to co-operate fully with and assist the Case Managers appointed to investigate the misconduct.

5 REPORT NOT UNDER INVESTIGATION

5.1 The Chief Compliance Officer and the Case Managers have the right to close a case. This may occur in the following (non-exhaustive) circumstances:

- (1) The case has been investigated and resolved. Actions (if any) have been defined.
- (2) There is insufficient information for an adequate investigation and there is no possibility of obtaining further information.
- (3) The case has been withdrawn by the informant/complainant.

6 REPORTING

6.1 The Case Managers will provide a monthly report to the Chief Compliance Officer with all open and closed cases. This report will also include information about cases that did not warrant investigation or that were closed during the preceding month. The Chief Compliance Officer will report the cases on a semiannual basis to the Executive Management and on an annual basis to the Board of Directors of Burckhardt Compression Holding.

7 PROTECTION AND RIGHTS OF THE INFORMANT/COMPLAINANT

7.1 The identity of all informants/complainants will be protected. Burckhardt Compression has a strict policy of non-retaliation against informants/complainants. The third party that hosts the Speak Up channel will never disclose voice-files, IP addresses or phone numbers, except under the exceptions given below.

7.2 The right of non-retaliation is guaranteed under the Code of Conduct and violation of this right will not be tolerated. Becoming an informant/complainant does not, however, automatically result in immunity for misconduct.

7.3 This protection is applicable to those informants/complainants who follow this policy

7.4 Even when the procedure has been followed correctly, there are exceptions when an informant's/complainant's protection cannot be guaranteed. In these matters, the authorities might be involved. Voice-files, IP addresses or phone number might be handed over to the authorities:

- (1) In cases where it is established that a report has been made in bad faith.
- (2) If the report itself is a criminal offense (e.g. a serious threat).

7.5 If the informant/complainant is not satisfied with the follow-up and/or outcome of his/her report or he/she doesn't feel protected, he/she can file a complaint directly to the Chief Compliance Officer or through the Speak Up channel. The Chief Compliance Officer must give a reply to the informant/complainant within 30 days.

8 PROTECTION AND RIGHTS OF THE ACCUSED

8.1 When a person is officially under investigation, he/she needs to be notified about this fact. Burckhardt Compression will notify the person under investigation in due time, taking into account any substantial risk of destruction of evidence and/or impediment to the investigation. The person under investigation will be granted the right to present the case from his/her own perspective to ensure a fair procedure.

9 DATA PROTECTION AND PRIVACY

9.1 Burckhardt Compression and the assigned Case Manager will treat all information received in strict confidence. The privacy of both the messenger and the subject(s) in the reports will be protected. Information will only be shared on a strict need-to-know basis. If the Speak Up channel is used, information will also be accessed by staff and/or translators of the service provider – again, only on a need-to-know basis.

9.2 Burckhardt Compression complies with the applicable rules and laws of data protection.

10 CONTACT DETAILS AND WEB ADDRESS

10.1 Contact Details

Chief Compliance Officer: Marko Denadic, Burckhardt Compression AG, Franz-Burckhardt-Strasse 5, P.O. Box 3352, CH-8404 Winterthur, Switzerland, Tel. +41 79 505 29 42, Mobile +41 79 505 29 42 marko.denadic@burckhardtcompression.com

10.2 Links for the Speak Up reporting channel:
To create a report please use the following links on the intranet or on the internet:

Intranet: <https://speakup.burckhardtcompression.com/internal>

Internet: <https://speakup.burckhardtcompression.com/external>

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