

# Global Code of Conduct

*Doing business fairly, ethically and with integrity creates a better workplace, builds trust with customers and partners and supports the community.*



# Foreword

*"Beamex Global Code of Conduct – the principles that guide our employees in making ethical and legal business decisions, and the standards we expect from our partners."*



The Beamex Global Code of Conduct reflects the company's commitment to adhering to the letter and the spirit of the laws governing its business operations, as well as meeting the highest standards of

integrity and ethical judgment from its employees and representatives. These principles must shape the conduct of every aspect of Beamex's business.

# 1

## Workplace and Environment

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At Beamex, we treat each other with respect and dignity. This means that all employees are entitled to work in an environment that is free of harassment, bullying and discrimination. We also promote an environment that is inclusive of all people and their unique abilities, strengths and differences, and promote diversity as a competitive business advantage for the company.

### **HEALTH AND SAFETY**

All employees have the right to work in a safe workplace. Employees are expected to follow all safety rules and practices, take necessary steps to protect themselves and other partners; attend required safety training; and report immediately all accidents, injuries and unsafe practices or conditions. In order to enhance workplace safety, you should be familiar with and follow any work safety information and training provided to you and also require additional training, if so considered.

### **HUMAN RIGHTS, EMPLOYMENT LAWS AND COLLECTIVE AGREEMENTS**

We conduct our business in compliance with all applicable laws, rules and collective agreements, especially relating to equality, work safety, diversity, minimum employment age, wages and work hours. We do not tolerate any form of forced or child labour, and promote the observance of human rights. We expect the same from our partners, distributors, subcontractors and suppliers as well.

### **PROTECTING THE ENVIRONMENT**

We are dedicated to safeguarding the environment while fostering sustainable economic development. We strive to ensure all our activities comply with applicable environmental standards and actively seek innovative ways to develop environmentally friendly products. Our commitment extends to the continual improvement of our environmental performance.

# 2

## Business Practices

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### **COMPLIANCE WITH LAWS**

We conduct our business in full compliance with all applicable laws and regulations. If we become aware of any instance of non-compliance, it is our responsibility to take prompt corrective action.

If you believe Beamex may be acting in non-compliance with a law or have concerns about the legality of your own actions, you should immediately consult your supervisor or a manager.

### **FAIR DEALINGS WITH CUSTOMERS, SUBCONTRACTORS AND PARTNERS**

Everyone at Beamex should deal fairly and ethically with Beamex's customers, suppliers and other partners with whom they have contact in the course of performing their job at Beamex. These partners should be treated in the same manner as people would like to be treated themselves. At Beamex, we respect the confidentiality and privacy of our partners, suppliers and customers. Efforts should be made to correct any misunderstanding that may exist with a customer or potential customer.

### **BEAMEX QUALITY AND CUSTOMER PROTECTION**

Beamex commitment to high quality means that we take steps to protect our customers' health and safety as well. You can play your part by following all proper procedures relating to the development, manufacture, storage, handling, selling and service of Beamex products. Please notify your manager immediately if you become aware of anything that suggests that a product, process or situation may pose a danger to anyone's health or safety.

### **COMPLIANCE WITH VOLUNTARY CERTIFICATIONS AND DIRECTIVES**

Many of our customers operate under the regulations of external bodies and have chosen Beamex as their solution provider for critical calibration applications. These customers trust us to comply with and implement applicable standards, such as ISO 9001, ISO 14001, ISO 17025, ISO 27001, ISO 45001, and the ATEX Directive, to ensure that Beamex products and services are safe and reliable.

At Beamex, we are committed to ensuring that all employees are trained in the relevant



***In cross-border transactions, we need to pay close attention to export control rules and regulations.***

standards and policies according to their roles. We take pride in adhering to our internal processes, ensuring they are well-documented, up-to-date, consistently followed, and continuously improved.

## **INTERNATIONAL OPERATIONS AND EXPORT CONTROL**

Whenever we make international business transactions by transferring goods, technology, information or financial resources across borders, we need to consider the applicable export control rules and regulations. Government authorities enact export control regulations for foreign policy and national security reasons. Following export control rules is important and required by law. We require this also from all our partners and intermediaries. When in doubt, consult the person in the organization that monitors updates in export control regulations.

### **Four typical questions relating to export control:**

- What can be shipped? (product type)
- To which countries? (end destination)
- For what purpose of use? (end-use)
- To whom? (end-user)

### **SALES AND MARKETING PRACTICES**

Our marketing and communications with customers and potential customers must always be truthful, accurate, and transparent. At Beamex, we pride ourselves on the quality of our products and services, and we compete with integrity—never by disparaging our competitors.

#### **It's important that:**

- Our marketing communications can be recognized as marketing – important especially in social media
- Marketing is truthful, accurate and not misleading or inappropriate
- We refer and use customer brands only if we have permission to do so
- We do not speak badly about competitors
- We don't use other's photos, texts or logos in our marketing material without a permission

**Q&A: Customer logos.** *We have a great customer, can I use their logo or just name in reference in our marketing materials?* No, only if you have the permission first.

**Q&A: Pictures.** *I found great pictures online for my brochure and video production. Can I just use those?* You would need to acquire a license or make sure that it is a royalty-free photo first.

### **FAIR COMPETITION AND PROHIBITING ANTI-COMPETITIVE PRACTICES**

Companies are not only allowed to compete with one another, but they are also legally required to do so. Free and open competition benefits everyone by driving innovation, improving quality, and ensuring reasonable prices. For Beamex, this means making independent business decisions without any agreements, collusion, or discussions with competitors. While we can monitor competitors' public activities, our decisions must be smart, independent, and fully compliant with competition laws. Understanding the principles of fair competition is particularly critical for those in executive roles, sourcing, sales, marketing, and product management.

To maintain our commitment to fair competition, Beamex strictly prohibits all forms of anti-competitive practices, including price-fixing, bid-rigging, market-sharing, and abuse of market dominance. Employees must avoid any actions or communications that could be perceived as undermining competition. This includes informal conversations with competitors that could lead to inappropriate agreements, even if unintentional. Beamex supports a culture of compliance by providing guidance to ensure employees understand and adhere to antitrust and competition laws.



***No payments, gifts or excessive entertainment can be provided, which could be seen as an attempt to influence decision making.***

**In doing business, we agree that we will:**

- not discuss pricing, market, customer, product development or production details or strategies with competitors;
- not agree to divide customers or markets with competitors;
- not set resale prices with resellers and distributors;
- not share one distributor's resale prices with another distributor;
- not prevent a distributor in EU/EEA from selling to a customer outside its territory within EU/EEA, when the customer made a non-solicited request for proposal; or
- not induce our distributors to agree on resale prices or market sharing.

**Q&A: At an Exhibition.** *I went to an exhibition where our company's competitors also are. Can I go to their booth, look around and take their marketing materials?* Yes. However, if you engage in conversations, it's good to identify who you are and not discuss any strategic issues, such as pricing and business plans.

**Q&A: Resale prices.** *I have two distributors in the same territory. Can I set their resale prices?* No. A distributor must be free to set its own resale prices.

**Q&A: Key account.** *Our company has a key account in a distributor's territory and we have agreed that we can sell to them directly. Can I prohibit the distributor from selling to them or can I at least agree the resale prices?* No, you cannot do neither. It would be violation of law.

## **FRAUD, CORRUPTION AND EXCESSIVE GIFTS**

Theft, fraud, embezzlement, or any misuse of Beamex's assets is strictly forbidden. We are committed to honesty, transparency, and the proper use of company resources, ensuring they are safeguarded and utilized responsibly for legitimate business purposes. All financial transactions must reflect actual business events, be accurately recorded, and comply with accounting standards and applicable laws and regulations. Under no circumstances will false, misleading, or fabricated information be tolerated in our financial or non-financial reporting and records.

We are committed on conducting our business in ethical and fair manner without any kind of corruption. This also means that we cannot provide payments, valuable gifts or entertainment, which could be seen as an attempt to influence the relationship or decision making. Remember, corruption or bribing can be direct, but also indirect, through an intermediary (e.g. commercial agent). So remember, we at Beamex can be liable also for our intermediaries'

actions, so it's important to require similar standards from them. All this type of behavior is prohibited by law and could have severe penalties and consequences. It is especially important maintain high ethical standards when dealing with any public organizations as well as when negotiating commercial contracts.

We perform periodic corruption and bribery risk assessments to identify potential risks, their likelihood, and to select appropriate anti-corruption controls. These assessments support a strong compliance program and help ensure a robust approach to preventing bribery and corruption.

### **At Beamex, we will not:**

- offer, promise or accept, directly or indirectly, anything of value to a person that could be construed as a bribe to influence current or future decision-making.

### **Examples of "red flags":**

- Customer suggests that a sale is made through a specific agent or representative;
- Unusually high agent's commission or commission paid to other company or account than the agent's account;
- Requests to pay extensive travel costs (hotels, trips, daily allowance) for a large group of people from the customer organization (and possibly spouses), which is not relevant for the project;
- Customer solicits payment of entertainment or gifts; and

- A request to mischaracterize the nature of a payment to a contractor or consultant.

#### **What's usually allowed under local laws:**

- Giving low value (e.g. under 20 EUR/USD) promotional gifts, such as t-shirts, mugs or pens with company logo as marketing giveaways without an aim to influence decision making;
- Reasonable good faith entertainment costs (e.g. business dinner) in connection with certain marketing or contracting activities; and
- Payment of reasonable travel and lodging that directly relate to training, demonstration or execution of a contract.

#### **ANTI-MONEY LAUNDERING AND PREVENTING TERRORIST FINANCING**

We do not accept, facilitate, or support any transactions that violate anti-money laundering or counter-terrorist financing laws. Our products and services are strictly intended for legitimate purposes, with funds from lawful sources.

We actively monitor and screen transactions to detect and prevent involvement in illegal activities. Employees are encouraged to report any suspicious transactions, ensuring compliance with all relevant laws and regulations.

#### **CONFLICTS OF INTEREST**

A conflict of interest exists when a personal interest interferes or appears to interfere with the duties that you perform at Beamex. We all must avoid such conflicts. Avoidance of conflicts of

interest is important, as if such happens, they influence negatively the company culture and can lead to unethical or unlawful business practices.

#### **Examples:**

- Being employed or operating a company that does or desires to do business with Beamex or competes with Beamex
- Engaging personally in transactions in which Beamex has an interest
- Conflicts of interests does not always need to be personal, they could relate to benefits to relatives or other people with whom you have very close relationships (e.g. spouse).

**Q&A: Hiring a relative.** *I would like to hire a relative to a position. Is that ok?* Yes, but your relative must go through the same process as a normal applicant for the position and be objectively considered a good hire. We want to make sure that other employees also consider that we are not favoring any person based on their connections.

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## Intellectual Property & Privacy

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### CONFIDENTIAL INFORMATION

During the course of employment at Beamex, all employees gain some knowledge and information that is non-public, valuable and belongs to Beamex or its partners. Typically such information relates to product development, inventions, strategies, business plans and internal communications. Protection of confidential Beamex information as well as nonpublic information entrusted to us by our owners, management, other employees, customers and other business partners is integral to Beamex's business success. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

#### Basic rules:

- Beamex information should be used only for our business purposes and should not be disclosed to anyone outside of Beamex without permission
- Do not bring any material from prior employers to Beamex
- Do not accept or use anyone else's confidential information (or agree to maintain

anyone's information in confidence), unless you have a right to do so

- Do not solicit confidential information from another company's present or former employees or suppliers
- Public information, such as information in available and published marketing materials and corporate websites are not considered confidential

### PRIVACY AND DATA PROTECTION

Beamex respects the personal privacy of individuals, including its employees and customers, in accordance with applicable laws and EU regulation. We only collect and process personal information in accordance with applicable laws in the countries in which we operate in order to meet necessary business needs and legal requirements. We all have a personal responsibility to keep personal information secure and observe individual privacy.



***Intellectual property, such as trademarks, patents, copyright and designs, are among the most valuable assets in modern business.***

## OWN AND 3RD PARTY INTELLECTUAL PROPERTY

Intellectual property, such as trademarks, patents, copyright and designs, are among the most valuable assets in modern businesses. In our business dealings, we must make sure that we acquire and retain ownership of company core intellectual property and do not assign such rights in a way that would jeopardize our future business. Also, we should not disclose publicly trade names or inventions in a manner that would prevent us from obtaining necessary rights to them through registrations. When we deal with subcontractors, we must make sure that we get necessary intellectual property rights to the deliverables, based on our business needs.

Equally, we do not violate third party intellectual property by using them illegally or without a proper license. Customer intellectual property is used only in connection with a customer project to further the mutually agreed purpose. If we are unsure about a third party right, we must make further investigations.

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## Ethical Decision-Making Framework

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*"What's the right thing to do?"*

(2) List possible solutions and also challenges in resolving the problem.

(3) Seek input from managers or subject-matter experts, if necessary.

**(4) DETERMINE BEST APPROACH:**

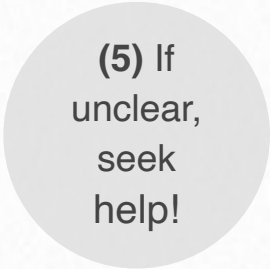
*"Is this in compliance with our Code of Conduct?"*

*"Is this in compliance with laws and company values?"*

*"Would it be ok to read about this from a newspaper?"*

*"Would you or Beamex be embarrassed about taking this action?"*

*"Would you like to hide and keep this action as a secret?"*



# FAQ's

## What is a Code of Conduct?

When companies and their partners and employees perform their actions, the actions they take may raise both ethical and legal questions. The aim of a code of conduct is to get people to understand the nature and implications of their actions and to help them in “doing what’s the right thing to do” in every situation.

## What is Beamex Code of Conduct?

Beamex Code of Conduct is a resource distributed to Beamex employees and key partners to raise their awareness of the ethical and legal issues related to their actions and to help in making right decisions. It provides our expectations on doing business and working for or with us.

## What should I do with this?

First, read carefully and make sure you understand it. Second, understand the key idea of “doing the right thing” and how it makes sense in terms of making Beamex a better workplace, better partner for our customers and suppliers and a better member of the community.

## What if I don't get an answer to my problem from this?

Contact your manager or a subject-matter expert. You're always free to get help in coming up with what's the right thing to do.

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## Questions, Guidance and Reporting

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### QUESTIONS AND SEEKING GUIDANCE

If you have any questions or are unsure about your responsibilities under this Code of Conduct, we encourage you to reach out to your supervisor.

Additional policies and guidelines may be available for employees to provide more detailed information or guidance on specific topics covered in this Code of Conduct.

### REPORTING CONCERNS AND SPEAKING UP

We expect everyone to report any violation of the Code of Conduct or any behavior that appears to be illegal or unethical. If you suspect a breach of the Code of Conduct or witness concerning conduct, we encourage you to speak up.

Reports can be made anonymously through our whistleblowing channel. You can also report directly for instance to a compliance representative, someone from HR, or your supervisor, either in person, by phone, or via email.

### INVESTIGATIONS AND HANDLING OF REPORTS

All reports of misconduct, whether observed or suspected, will be reviewed and investigated with confidentiality, and the identity of the reporter will be protected. Anyone who report concerns in good faith will not face negative consequences for coming forward.

Investigations are started internally, but may also involve external subject-matter experts when necessary. Serious matters may be escalated to executive management for further action and resolution.