



Code of Conduct

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Innovations for a **better world.**

 **BÜHLER**

Code of Conduct.

As a globally operating Swiss family enterprise with over 165 years of history, Bühler is driven by a strong sense of purpose and deeply held values. Our purpose is to create innovations for a better world. At the core of our business model is the transformation of raw materials to intermediate and finished consumer products. With our technologies, we aim to contribute to effective improvements in the value chains of our industries.

Our core values – Trust, Ownership, and Passion – guide us in all that we do and help us navigate our daily decisions. In this context, our Code of Conduct sets out the important guidelines for our performance and behavior in the relationships with our customers, employees, suppliers, business partners, governments and other stakeholders. We set our internal standards to fully respect and obey local laws and rules as well as recognized international standards.

The Code of Conduct is binding for all Bühler employees worldwide without exception and establishes a non-negotiable standard of behavior. Every employee is required to comply with it, irrespective of national boundaries and cultural diversity. Together we bear the responsibility for preserving the reputation of our company.

We are committed to living by these principles with dedication and passion in everything we do, day in, day out – only then will we win trust, recognition, and respect.



Stefan Scheiber
Chairman of the Board
Bühler Group



Samuel Schär
Chief Executive Officer
Bühler Group

A handwritten signature in black ink, appearing to read 'Stefan Scheiber'.

Stefan Scheiber
Chairman of the Board
Bühler Group

A handwritten signature in black ink, appearing to read 'Samuel Schär'.

Samuel Schär
Chief Executive Officer
Bühler Group

Business partnerships.

Customers

Customers are at the center of our business. We treat every customer with respect and strive to deliver this value sustainably and fairly for both parties. We are committed to promoting our products and services in alignment with our customers' needs and goals, ensuring they have sufficient information for informed decisions.

Contractual changes and non-authorized commitments

We ensure that commitments to our business partners are properly documented in accordance with legal regulations. All changes to contracts or general terms and conditions must be properly approved. Non-authorized commitments are strictly prohibited.

Product quality and safety

We are committed to delivering products and services that meet the highest standards of quality, operator safety, and food safety, complying with all applicable international regulations and standards. We continuously optimize our products through technological innovation and improvements in our production processes.

Suppliers

We select our suppliers with care and expect them and their sub-tier suppliers to respect and adhere to this Code of Conduct and our Supplier Code of Conduct worldwide. Suppliers must meet all applicable legal requirements in their countries of production and distribution and undergo appropriate due diligence. We ensure that all qualified suppliers are equivalently informed of our technical and commercial tender requirements.

Contracts are awarded based on long-term value to our organization, including the reliability of goods and services. External consultant engagements must be documented in written contracts, with payments made only for legal and standard remunerated activities.

Integrity

Bribery and corruption are strictly prohibited. We do not offer, promise, provide, or accept any form of gifts, payments, entertainment, or services intended to influence business decisions unduly. This includes interactions with both public officials and private sector representatives. Customary gifts and business hospitality are acceptable if they serve a legitimate business purpose, comply with applicable laws, and do not create an appearance of impropriety.

Confidentiality

We value and protect our confidential information and respect the confidential information of our business partners. Only "need-to-know" data shall be exchanged, and non-relevant data shall be refused.

External regulations, communications and artificial intelligence.

Compliance with laws and regulations

Bühler and its employees must comply with all applicable laws and regulations on an international and national level as well as with internal directives. Every employee is personally accountable for understanding and ensuring compliance with the legal requirements relevant to their job.

Sanctions and export controls

Bühler is committed to observing applicable embargoes, sanctions, and export control laws and regulations governing the import, export or provision of goods or services. All employees must be aware of the trade compliance requirements relevant to their work, including local laws and Bühler's internal policies and procedures. If there is any uncertainty or potential compliance concern, employees must consult the Export Control team before proceeding.

Anti-money laundering law and combatting financing of terrorism

Bühler is committed to observing applicable anti-money laundering and terrorist financing laws in all countries in which we operate. We conduct business only with reputable customers and partners engaged in legitimate activities.

Cash transactions

Cash payments have a higher compliance risk than normal payments. For this reason, Bühler tries to avoid cash transactions if possible. For every cash payment above CHF 500 (or equivalent) an application form has to be submitted to the appropriate businessperson and to Corporate Compliance for approval.

Competition and anti-trust laws

Bühler is committed to maintaining a fair and competitive market system. We comply with all applicable provisions of competition and antitrust laws. We avoid any agreements or practices that unfairly restrict competition, such as undue price-fixing, market division, or the exchange of sensitive information with competitors.



Communications

Our communications are open and transparent and provide the basis for constructive collaboration. Their goal is to strengthen trust and promote mutual understanding. We encourage communication among employees, customers, partners, and others, emphasizing politeness, honesty, and respect.

External communications

Only employees who are expressly authorized may communicate on behalf of Bühler with media, industry analysts, or government representatives. Such communications must be coordinated and authorized by the Bühler Corporate Communications team.

Use of social media

Social media enables engagement with stakeholders and the public. Statements made on social media are permanent and transferable, potentially impacting Bühler's reputation. Therefore, all postings must comply with the social media guidelines. Employment-related posts may include general information about an employee's role, but must not disclose specific project details, proprietary information, or confidential data about Bühler, its suppliers, partners, or customers.

Artificial intelligence

Bühler recognizes the transformative potential of artificial intelligence (AI) for businesses, governments, and society. We are committed to using AI responsibly and ethically while adhering to all relevant legislation. Our AI systems are developed, deployed, and sold in compliance with our Global AI Policy, which sets a company-wide minimum standard.



Employees.

Equal rights and fair treatment

Bühler is a global technology group. The cultural diversity of our workforce is one of our greatest strengths. We respect the rights and dignity of all employees and are committed to creating a work atmosphere that is characterized by mutual trust, respect, and is free from harassment, discrimination, and bullying, particularly concerning culture, race, ethnicity, age, gender, sexual orientation, gender identity or expression, and different work-life situations.

We recruit, employ and promote employees on the sole consideration of their qualifications and abilities. We are dedicated to fostering inclusion and equality ensuring that the diversity of our workforce reflects the demographics of the regions where we operate.

We respect everyone's integrity, dignity, rights, health, safety, and well-being. Our inclusive environment inspires employee engagement, sparks innovation, and drives customer success. All employees are expected to act as role models and uphold these principles, ensuring a positive and respectful working atmosphere for everyone.

Child labor

We are against any form of exploitation of children and do not provide employment to children below the minimum age agreed in international standards.

Forced labor

We reject forced labor of any kind, modern slavery, and human trafficking.

Human rights

Bühler respects and promotes human rights in all business activities and along our value chain. We uphold employees' rights to freely associate, join unions, and engage in collective bargaining as protected by applicable laws, fostering open dialogue and fair working conditions. We respect the human rights of communities affected by our activities and commit to sustainable practices that protect natural resources and local ecosystems.



All employees and business partners must avoid complicity in human rights abuse and report any concerns via our designated channels. Bühler is dedicated to maintaining a respectful and dignified environment for all.

Fair wages and working hours

Bühler is committed to paying fair wages and ensuring that working hours comply with legal and industry standards. We adhere to all applicable wage and working hour laws, ensuring that employees receive at least the minimum required pay and benefits, including public holidays, paid vacation, and sick days.

We ensure that employees are provided with adequate rest periods in accordance with local laws. Deductions from wages as a disciplinary measure are prohibited. By maintaining these standards, Bühler strives to promote fair and respectful working conditions for all employees.

Data privacy and confidentiality

Personal and legal entity related data are treated with care. Personal information about employees is only gathered and retained if required for effective business purposes or if it is required to comply with legal regulations.

Conflicts of interest

All employees must avoid situations in which their private interests are in conflict or could come into conflict with the interests of Bühler. In case of a potential conflict, everybody involved in the conflict has to inform their line manager or the Regional Compliance Officer. If a conflict arises, Bühler will resolve the situation in a responsible manner.



Health, safety and environmental protection.

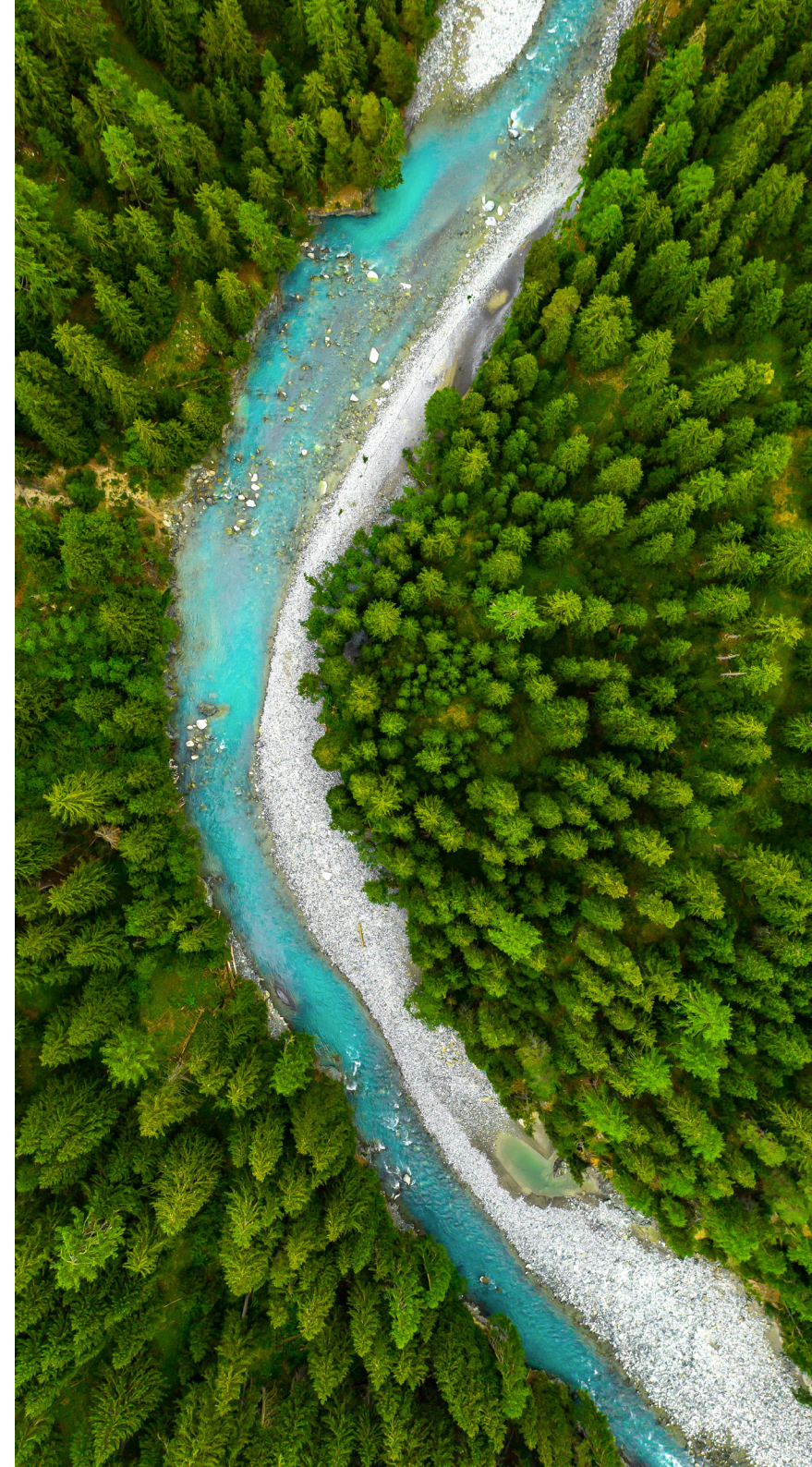
Health and safety

Bühler is committed to providing all employees with a safe, healthy, and state-of-the-art working environment. We are recognized as leaders in occupational health and safety within our industry, but our commitment goes further: we strive for true excellence, with the goal of achieving Zero Harm from work-related injuries and illnesses.

All employees are required to fully comply with the safety regulations established for their specific workplace. This responsibility also extends to all third-party personnel working at Bühler sites. By working together and adhering to these standards, we foster a culture of safety and wellbeing for everyone.

Environmental protection

We conduct our operations in accordance with recognized international environmental standards, prioritizing the efficient use of resources and materials, minimizing adverse environmental impact, and ensuring the responsible disposal of waste. As part of our commitment to sustainable development, we proactively develop and implement innovative, environmentally friendly technologies and processes.



Assets, intellectual property and financial integrity.

Assets

We treat the property of Bühler with care and protect it against loss, damage, misappropriation and destruction. This obligation covers both tangible and intangible assets.

We all take appropriate action to avoid and minimize risks: Our in-house Corporate Risk Management function regularly reviews the existing risks and reports them to the Board of Directors at least annually.

Intellectual property

The innovation power of our organization offers us a substantial competitive advantage and we foster an open environment of innovation in research, development, application and creation.

The protection of our intellectual property is, therefore, crucial. We report all relevant inventions made during employment, handle confidential information with care and refrain from forwarding it to any unauthorized person either inside or outside our organization.

Intellectual property and business secrets are subject to the most stringent non-disclosure requirements. All employees are required not to disclose information concerning our technical, technological and business expertise to third parties. By the same token, we respect the rights of third parties to their intellectual property and will not breach the valid intellectual property rights of others.

We further report suspected infringement of our intellectual property rights by third parties to the relevant position in our organization.

Financial integrity

Our reporting provides the basis for our management to make decisions and to fulfill our obligations toward different stakeholders. The data that we create, whether of a financial or any other nature, must provide an accurate picture of its related business and be in line with the applicable accounting standards.



Implementation and monitoring.

Managers on every level are charged with implementing the Code of Conduct within their area of responsibility. They will induce and monitor regular training sessions throughout the Bühler Group. The Internal Audit function will check compliance and regularly report to the Board of Directors as the final authority. The implementation and monitoring is further strengthened through various additional measures such as a reporting system, awareness trainings, and audits.

Violation of the Code of Conduct

The Code of Conduct is binding for all Bühler employees, regardless of their specific function and their location worldwide.

Any infringements will be prosecuted. It is the responsibility of every employee to comply with the Code of Conduct. Violations are subject to disciplinary actions.

Reporting of violations

Anything that may infringe the rules set out in the Code of Conduct must be reported to the Compliance Board.

No employee who reports such an observation will be subjected to sanctions, discrimination and/or retaliation by Bühler Group or its employees, the Executive Board or supervisors.

The members of the Compliance Board will treat the identity of employees and others who disclose the known or presumed violations as confidential and only disclose such information as necessary to the investigation body. If Bühler is legally obliged to disclose the name of the reporting employee to a court or investigator, confidentiality may not be upheld.

Please contact your line manager or a member of the Compliance Board in case of uncertainty. The contact data for the Compliance Board members can be found in the compliance sections of the Bühler website. The Compliance Board can be contacted by email under complianceboard@buhlergroup.com.

Bühler Group

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