



BLASER
GROUP

Code of Conduct



Code of Conduct

Contents

I.	Foreword from the management board.....	3
II.	Compliance Principles.....	4
1.	General compliance / Reaction to infringements	4
2.	Integrity in business actions / No corruption or money laundering / Avoidance of conflicts of interest	5
3.	Import / export and sanctions / terror list screening	5
4.	Fair competition.....	6
5.	Safety / health	6
6.	Environmental protection	6
7.	Compliance with human rights, fair working conditions and the respectful treatment of employees	7
8.	Data privacy / protection of confidential information and business secrets.....	7
9.	Handling company property	8
10.	Social commitment.....	8

I. Foreword from the management board

Dear Colleagues,

The commercial success of our company is closely linked to our assumption of responsibility in and towards our business. Compliance with the relevant national and international laws and standards contributes greatly to the achievement of this commercial success. An adverse reputation for our company caused due to infringements of applicable laws would hugely threaten our commercial success.

We work in a company that does not tolerate unlawful and unethical conduct. Therefore, it is a matter of course for us that in our actions we attach the greatest importance to compliance with the valid legal provisions and laws. This applies to each action undertaken by management board and the directors as well as by all employees of Blaser Group GmbH and its subsidiaries. The business success of the company must not be above the law and statute in any case whatsoever. The legally-compliant manner of achieving business success is just as crucial as the business success itself.

The aim of this Code of Conduct is to convey to each employee the values that must be applied and embodied in Blaser Group. It is to be used by all employees as guidance to support their daily actions and it will be complemented where required by detailed internal guidelines and a Compliance Handbook.

We therefore request that each individual employee exemplifies the values of this Code of Conduct and insist in your daily interactions with our customers and suppliers that these values are complied with.

Let's use these jointly embodied values of our company to keep us on the consistent road to success!



Dr. Jens Uwe Drowatzky
CEO

II. Compliance Principles

Blaser Group GmbH and its subsidiaries (hereafter “Blaser Group”) comply with all the relevant legal and statutory provisions within the corporate management remit. This applies in particular to the areas listed below:

1. General compliance / Reaction to infringements

As a benchmark for our daily business activities, we recognise the national and international laws and regulations that apply to us without reservation.

Should you as an employee become aware of infringements of this Code of Conduct and / or of applicable laws and regulations, please inform us accordingly.

The compliance officer, the relevant HR officers and management board are always available to you for this purpose.

The company management also provides the option for the anonymous and informal reporting of notifications of all types so that unlawful and unethical conduct can be promptly identified and possible damage to the company averted.

The following contact possibility is available for all employees:

Email: Compliance@blaser-group.com

Furthermore there is an anonymous whistle blowing system for possible compliance / data protection topics available as a mailbox at the employees entrance in plant 1 in Isny.

You can also look up these contacts in the Blaser Group intranet.

Only by addressing infringements can we all contribute to an open corporate culture and to the active protection of the company interests of Blaser Group.

Infringements of this Code of Conduct could lead to sanctions by the company and / or government agencies. This applies both to measures under employment law as well as to consequences under civil and / or criminal law.

2. Integrity in business actions / No corruption or money laundering / Avoidance of conflicts of interest

We resolutely reject all forms of corruption and corrupt business conduct and undertake all requisite measures to identify and prevent money laundering in the sphere of influence of our business.

All Blaser Group employees are forbidden to offer, promise or grant advantages to decision-makers in the public sector (e.g. officials) domestically or abroad with the aim of achieving conduct favourable to Blaser Group or a favourable decision.

All Blaser Group employees are further forbidden from receiving promises or offers from any third party, and from accepting such, if this could create the appearance that the employee would be influenced in their business decision-making as a result.

Every employee is also forbidden from demanding a personal advantage for himself or a third party from a business partner. Conflicts of interest through commissioning of family members and / or companies of family members are to be avoided.

Objective criteria such as quality, price or reliability and not personal relationships or advantages must prevail when commissioning third parties. Recruitment decisions on employees must also be guided exclusively by objective criteria such as qualifications, competence or work performance and not by personal relationships or advantages.

Also binding for all employees is the "Blaser Group Anti-Corruption and Money Laundering Policy". This is available on the intranet.

3. Import / export and sanctions / terror list screening

We adhere to the relevant and applicable export control rules, embargo and customs regulations and undertake counter-terrorism measures.

Within the framework of our international business activities we strictly adhere, both in the exporting of products and technologies and in importing, to all relevant provisions, in particular in relation to foreign trade legislation, customs legislation and arms legislation.

The validity of sanctions and embargoes is constantly under review and our customers are subjected to a continuous, automated matching with applicable sanctions and terrorist lists. Blaser Group complies with all valid sanctions / embargoes and categorically rejects business relationships with the countries concerned and with the persons and companies listed.

4. Fair competition

We consistently act with the objective of protecting and promoting competition in our business transactions through our conduct towards our customers, suppliers and competitors.

Blaser Group and its employees are committed without reservation to fair competition in all their business activities.

Also without reservation, we ensure that no agreements prohibited under anti-trust laws are made with competitors, in particular relating to prices / volumes and / or territory allocations.

5. Safety / health

The safety of our products and the health of our employees is our prime focus.

Therefore, through compliance with the relevant occupational health and safety provisions, Blaser Group ensures the maintenance of a high standard of safety in the workplace in order to minimise the risk of accidents, injuries or illnesses.

Of course, this also applies to our products. We constantly assume the obligation of our responsibility for the complete safety of our products in this sensitive business area.

Blaser Group constantly assesses possible product risks in all its corporate departments such as research and development or sales and ensures that comprehensive safety measures are deployed in order to guarantee the safe use of our products.

6. Environmental protection

Protection of the environment, the use of renewable raw materials and climate protection are ongoing objectives and part of our daily business activities.

In the manufacture and transportation of our products we avoid damage to our environment as far as possible. We are as sparing as possible in our use of resources and the sustainable and climate-sensitive production of our products assumes a high priority in our business activities.

7. Compliance with human rights, fair working conditions and the respectful treatment of employees

At all our sites we are committed to fair and decent working conditions for all our employees. We have zero tolerance for discrimination, harassment and mobbing and they are harshly punished.

Blaser Group cultivates and promotes an open company culture in our daily interactions with each other. Nationally and internationally we always interact respectfully with our employees and our business partners. We respect their different cultural views and support their development as much as possible.

We are committed without reservation to the adherence to, and promotion of, human rights. In particular, we strictly ban forced labour or child labour in this regard.

8. Data privacy / protection of confidential information and business secrets

In Industry 4.0 data are an extremely high value asset, worthy of protection. We strictly adhere to the valid and applicable legal regulations regarding data privacy.

Proper handling of personal data within Blaser Group, and also when collaborating with group companies and external service providers, is guaranteed at all times. To this end, the data protection officer and data protection coordinator as well as the management board are always available to you.

Our IT security also ensures this through the use of appropriate encryption methods and the provision of secure connections.

The protection of intellectual property along with the business secrets of Blaser Group and the business secrets of our business partners form the basis of our business success and are embodied and adhered to by every employee.

9. Handling company property

We are aware of the sensitivity of our products and of the handling of them.

Only employees with the relevant approvals are permitted to handle weapon, significant weapon components and munitions.

Through our conduct we will all prevent the loss and / or theft of company property and immediately report anything conspicuous.

We treat all company property with due diligence, respect and carefully.

10. Social commitment

We stand by our community and social responsibility. The preservation and creation of new jobs are ongoing objectives and part of our daily business activities.

Blaser Group supports social, ecological, cultural and other charitable activities.