

จริยธรรมทางธุรกิจ

Üzleti Etikai Kódex

Code de déontologie

Etik Davranış Kuralları

CÓDIGO DE CONDUTA DE NEGÓCIOS

Codice di Condotta commerciale

Kodeks poslovnega vedenja

VIRKSOMHEDENS
ADFÆRDESKODEKS

Codul de conduită în afaceri

KOD ETIKA PERNIAGAAN

Кодекс делового поведения

CÓDIGO DE CONDUTA

NOS NEGÓCIOS Кодекс ділової поведінки

Code of Business Conduct

Código de Conducta Empresarial

Verhaltenskodex 商业行为准则

KODEKS POSLOVNOG PONAŠANJA

Hyvä liiketoimintatapa

Uppförandekod

行動規範

Ετιχεν

бизнес

кодекс

Κώδικας Δεοντολογίας

商业行为准则

윤리행동규범

Kode Etik Bisnis



BOSCH

Invented for life

Foreword

Dear associates,

“In the long term, an honest and fair approach to doing business will always be the most profitable. And the business world holds such an approach in much higher esteem than is generally imagined.” Written by Robert Bosch in 1921, these words express a belief we still firmly hold today: reliability, credibility, responsibility, fairness, and above all legality are essential components of our business success.

For us on the board of management, for all associates, and for all the companies that make up the Bosch Group, this clear commitment is a common bond that transcends national and cultural differences. Its significance cannot be overstated. To explain just how significant it is, we have documented where we stand with respect to legal requirements and ethical issues in this “Code of Business Conduct.” It sets out how we act in our day to day business. In conjunction with the Bosch values, it provides a rock-solid foundation on which trust can grow – trust that is essential if we are to thrive as a company.



Stefan Hartung

Chairman of the board
of management,
Robert Bosch GmbH



Stefan Grosch

Member of the board
of management,
Robert Bosch GmbH

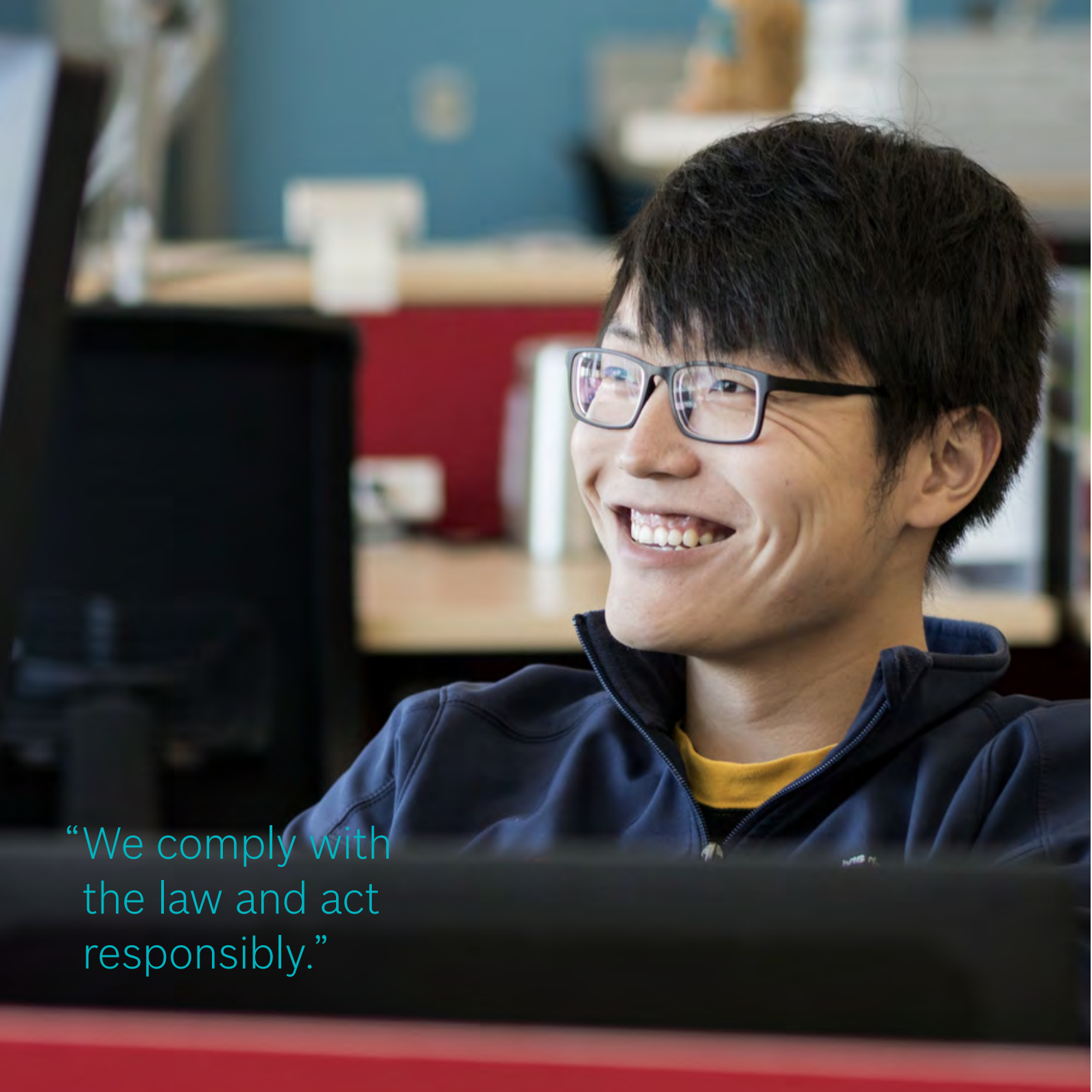
Code of Business Conduct

Introduction

For us as a company, observing the principle of legality and practicing business responsibly and fairly have always been paramount. Indeed, they are central Bosch values. Numerous guidelines and directives govern our actions as associates of the Bosch Group. At all times, we familiarize ourselves with them and comply with them. To facilitate this compliance, the essential aspects of these company rules are summarized in simplified form in this Code of Business Conduct. Should the above-mentioned guidelines and directives contradict this Code of Business Conduct, or if any other questions should arise, we contact the compliance organization or the legal department (C/LS).

Certain activities may also be governed by laws or rules from one or more different legal systems. We always comply with the law that is applicable in each individual case. This also includes the laws of the country for which a certain product or service is intended. If we are in doubt, we find out about the prevailing local laws, also by enlisting the support of the relevant regional subsidiary or operating unit. If this Code of Business Conduct conflicts with local laws, local laws take precedence. If the situation is unclear, we contact the compliance organization or the legal department.

If more specific guidelines or central directives exist for the issues addressed in this Code of Business Conduct, they must be observed. Specific company regulations must not contradict the basic principles of the Code of Business Conduct.



“We comply with the law and act responsibly.”

The principles that guide us

1. Basic principles

Lawful, regulation-compliant, responsible, and fair conduct

We adhere to the principle of legality in all dealings, actions, contracts, and other activities of the Bosch Group. In particular, we do not deceive customers, government agencies, or the public, nor do we collude in such deceit by third parties.

Adhering to the principle of legality also includes payment of applicable taxes and customs duties, compliance with competition and antitrust laws, a strict prohibition of corruption and money laundering, application of state-of-the-art technology, procurement of the required official licenses, compliance with export control laws, and respect for the legal rights of third parties. This basic principle is not driven solely by consideration of the grave consequences of violations and the harm that can be done to the company as a result of prosecution, fines, and claims for damages. Instead, we support the principle of strict legality regardless of whether the Bosch Group benefits from it. Legality and the Bosch values take precedence over customer requests and other business interests.

We are responsible for abiding by the laws that apply in our field of activity and are required to assess our working environment continuously from the standpoint of legality, responsibility, and fairness. If we are unsure as to the decision to make from the standpoint of legality, responsibility, and fairness, we contact our supervisor, the compliance organization, or the legal department.

Regardless of any legal sanctions, a violation of this Code of Business Conduct will, as a matter of principle, result in disciplinary action, up to and including termination and the right to assert claims for damages against those involved.

Reporting suspected irregularities

We are expected to report any possible violations of the rules embodied in this Code of Business Conduct to our supervisors. We can also contact the compliance organization at any time. In this case, there is the option of reporting our suspicions to the compliance hotline. While this should preferably be done personally, anonymous reporting is also possible. Reports will be treated confidentially. In addition, reports made in good faith will not result in any disadvantage whatsoever for Bosch associates or business partners. This is also the case if the report is subsequently found to be unjustified.

Who can we report violations to?

In addition to our supervisors or the department responsible, we can report violations to the compliance officer (directly or via the compliance hotline). The compliance officer responsible can be found on the BGN under "Compliance" (<https://bgn.bosch.com/alias/compliance>). This page also includes a link to the compliance hotline.

What is the compliance hotline?

The compliance hotline offers us an additional option for safely and confidentially reporting possible violations of our compliance principle. In most countries, reports can also be made anonymously.

Operated by a specialized service provider, the compliance hotline is a reporting system that is available over the internet to all associates as well as to people from outside the company. This worldwide system is available around the clock in many languages.

Additional information can be found on the BGN under "Compliance." Alternatively, go to <https://www.bkms-system.net/bosch-compliance> or <http://www.bosch.com/compliance>

If, as supervisors, we receive information about possible violations by associates or third parties, we contact the department responsible. We forward legally significant matters to the department responsible for legal advice.

Reports about possible violations are dealt with immediately in internal investigations. If the reports are substantiated, the necessary actions are initiated.

Cooperation with authorities

In its dealings with the authorities, Bosch pursues a cooperative approach. As Bosch associates and supervisors, we fully cooperate when lawful investigations are conducted by Bosch or the authorities. This does not affect legal privilege, the right to withhold information, and any other procedural rights.

Supervisors' responsibility

Our responsibility as supervisors is to ensure that there are no violations of legal regulations or of this Code of Business Conduct in our area of responsibility which could have been prevented or impeded through appropriate controls. We ensure that compliance with statutory and internal regu-

lations is continuously and properly monitored in our particular area of responsibility. As supervisors, we also ensure that our associates are aware that violations of the principle of legality and the Code of Business Conduct are prohibited and will, as a matter of principle and regardless of the associate's position in the company, result in disciplinary action.

If an associate reports a possible violation to us, we ensure that no disadvantage whatsoever results for that associate from a report made in good faith. This is also the case if the report is subsequently found to be unsubstantiated.

As supervisors, we act as role models for our associates, inform them about the rules embodied in this Code of Business Conduct, discuss these rules with them, and – together with the compliance organization and the legal department – make ourselves available as a contact partner. We are the driving force behind the compliance dialogs we regularly conduct in our departments.

Social responsibility

On our own initiative and in the interest of the company, we act responsibly, also taking our impact on society and the environment into account. When working with others in the company and with business partners, we believe our success depends on fairness. We reject any violation of human rights (for instance, forced or child labor), also on the part of our business partners. When performing our tasks, we keep the reputation of the Bosch Group in mind. We abide by the principle of legality and uphold the basic principles of responsible and fair action.

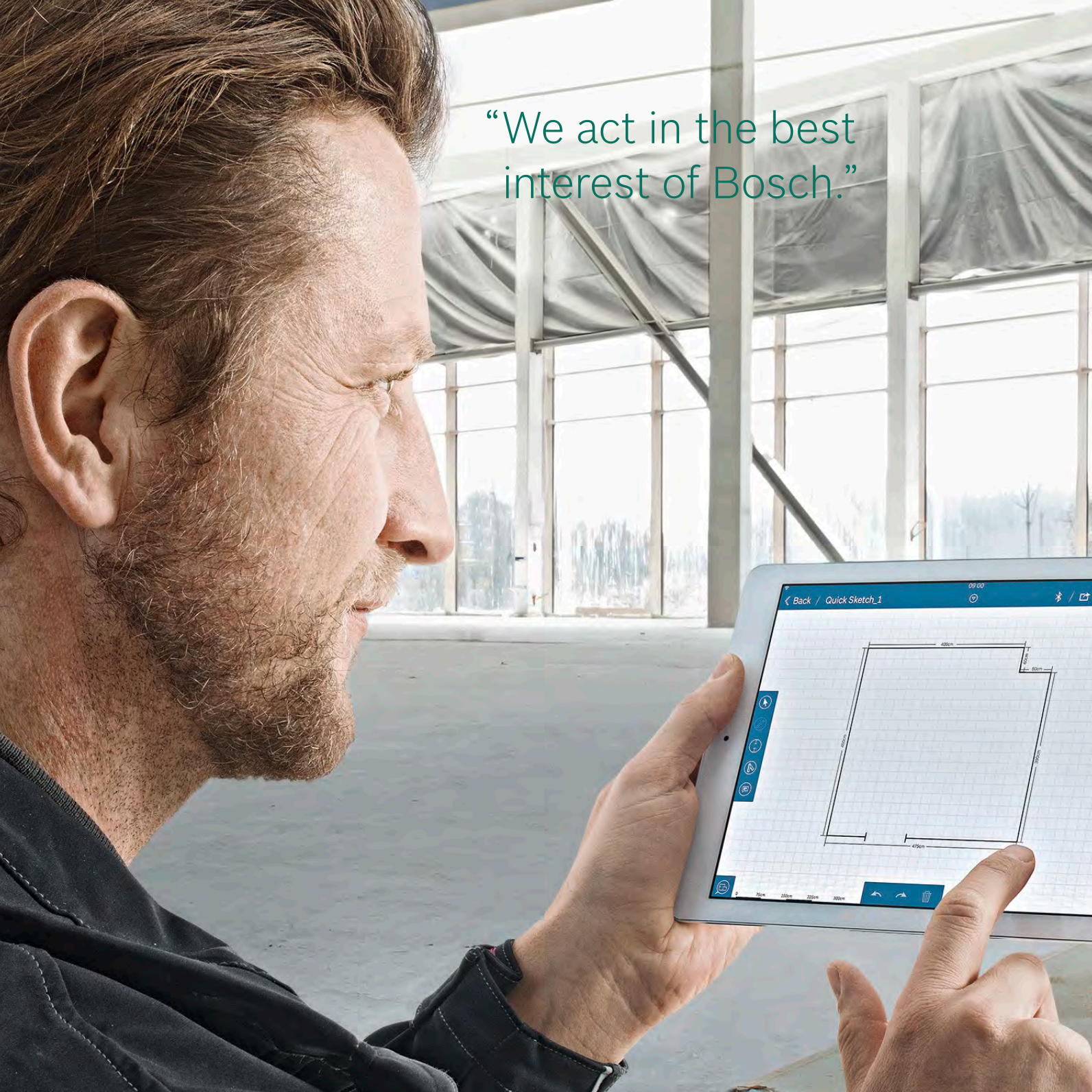
Conduct with respect to fellow associates

We respect and defend the personal dignity of each individual. We do not tolerate any discrimination or harassment of our fellow associates, and encourage diversity.



“We respect and defend the dignity of each individual.”

“We act in the best interest of Bosch.”



How we protect relationships based on trust

2. Avoiding conflicts of interest

Secondary employment and shareholdings

We take on secondary employment only with the prior consent of our employer. This consent will be granted if the secondary employment does not compromise any justified interest of the company. As associates, furthermore, we may only be involved in competitors, suppliers, or customers after notifying the company in writing of each individual case in advance. In the case of shareholdings, this rule does not apply if the shareholding is less than ten percent. We must notify the company in writing before we engage in business with companies in which we, our spouse or partner, or close family members have a shareholding or perform an executive function, provided we can influence the business relationship and there is a potential conflict of interest.

Engaging business partners for private purposes

If our work means we are immediately involved in the awarding or settlement of orders, and this gives rise to a potential conflict of interest, we may only engage a business partner of Bosch for private purposes after obtaining the advance written consent of the executive management responsible. This does not apply to generally available goods and services.

What is meant by “generally available goods and services”?

Goods and services are regarded as generally available if they are offered to all of us on the same conditions (price, etc.). Retail goods are an example. In contrast, a service for which we obtain a specific estimate is not generally available. One example is the estimate drawn up by a painter for renovating our apartment.

3. Dealing with information

Written documents

All records and reports, whether internal or external, must be accurate and truthful. We observe generally applicable accounting principles, which require that data and other records must always be complete, correct, up-to-date, and system-compliant. We may only use confidential company information to create records, files, and the like if this immediately serves the interest of Bosch.

Confidentiality

Confidential company information must be kept secret. This obligation remains in effect after our employment contract ends.

Data protection and information security

In all business processes and in compliance with the applicable statutory requirements, we ensure that privacy is safeguarded, personal data is protected, and all business information is kept secure. Technically and organizationally, and especially with regard to protection against unauthorized access and loss, we apply an appropriate standard that reflects the state of the art and takes account of the associated risks.

When developing Bosch products and new business models, we ensure that the legal requirements governing data protection and information security are taken into account at an early stage. In addition to the compliance organization and the legal department, the primary contact for questions regarding how to handle data properly is the data security officer.

Insider information

Insider information is information not known to the public that could affect the price of stock or other financial instruments ("securities"). If we are party to insider information, the following principles apply:

- (1) We do not purchase or sell any securities on the basis of this insider information. This applies regardless of whether these transactions are carried out for our own account, for the account of third parties, or on behalf of others.
- (2) We do not use our insider information to recommend that anyone purchase or sell securities, nor do we induce anyone to do so in any other way.
- (3) We treat insider information strictly confidentially. We never make such information available to third parties; this also applies to passwords that allow access to electronically stored insider information. We only make insider information available to fellow associates or consultants from outside the company if the recipient needs the information to perform their tasks, and has been sworn to strict confidentiality.

How do I identify insider information?

Examples of insider information include sales figures that are not intended for publication, information about M&A projects, major reorganizations, new appointments to the board of management and supervisory board prior to their official publication, conclusion or cancellation of a major contract with a customer or supplier, important legal disputes, or dealings with government agencies.

A man with short dark hair and a goatee is wearing clear safety glasses and a red t-shirt with a black and red graphic of a gorilla's face. He is focused on adjusting a pair of light blue nitrile gloves on his hands. He is also wearing a black smartwatch on his left wrist. The background is a blurred industrial factory environment with metal structures and overhead lights.

“We keep confidential information secret and handle sensitive data responsibly.”

How we shape our business relationships

4. Conduct toward business partners and third parties

Competition and antitrust laws

We observe the rules of fair competition as defined by applicable law. In particular, we are aware that competitors are not allowed to exchange information or reach agreements on allocation of territories and customers, prices and components of prices, supply relationships and the conditions governing them, production capacities, and the terms and conditions of bids. The same applies to exchange of information concerning market strategies and investment strategies. We are aware that it is prohibited not only to make written agreements in this respect, but also to make verbal agreements and to practice tacit, conscious parallelism (pricing strategies that occur without actual agreement between the players).

Only in strictly defined exceptional cases do we collaborate or exchange information relating to research and development projects. We do not restrict customers' and purchasers' freedom to set their own resale prices, and make no attempt to exercise such influence. We comply with the applicable national regulations governing anti-competitive clauses in contracts with customers or suppliers. We do not abuse a dominant market position to impose discriminatory pricing, to make business deals dependent on the purchase of other products, or to refuse delivery.

Supplier and customer relationships

The agreements we make with customers and suppliers are complete, unambiguous, and documented, including any subsequent changes and additions. This also applies to arrangements such as bonus payments and cost subsidies for advertising and sales promotion. We comply strictly with the internal regulations concerning the use of dual control and the segregation of executive and monitoring functions. We select suppliers solely on competitive merit, after comparing the price, quality, performance, and suitability of the product or service offered.

Corruption

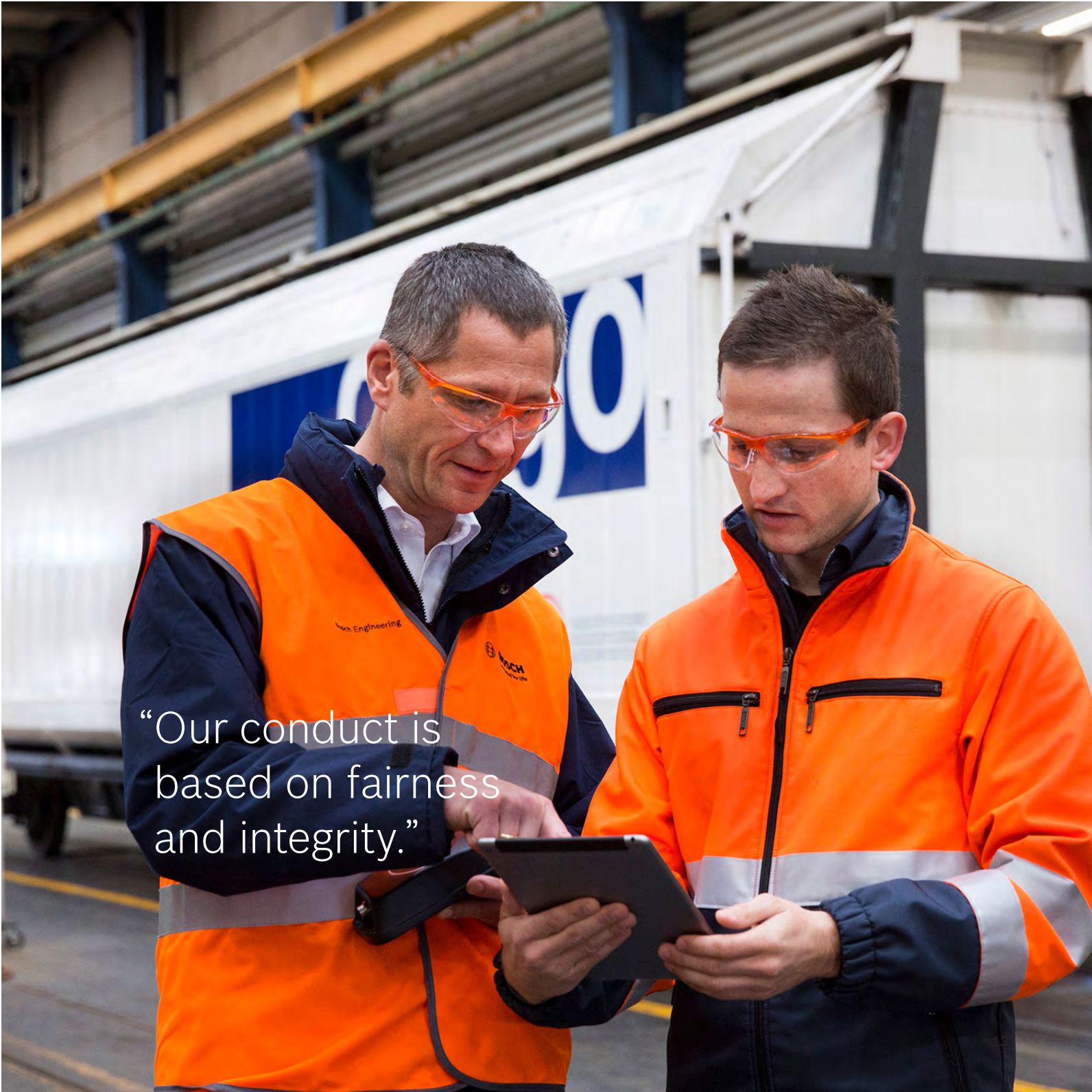
We do not tolerate corruption in any form. Corrupt behavior of associates or business partners is liable to prosecution. It distorts competition, results in financial loss, and harms the company's reputation.

What are the consequences of corruption?*

Corruption results in higher costs for companies, limiting the funds available for investment, growth, and innovation. It leads to dependency and prevents sustainable business relationships. Products become more expensive, and economies grow more slowly and fail to achieve their full potential. Corruption does everyone a disservice.

* Based on Transparency International

When it comes to giving gratuities to public officials or people in similar positions, we apply extreme restrictions. We wish to avoid even the appearance of an attempt to gain influence. We ourselves do not accept gratuities from public officials. We neither offer nor grant public officials benefits for carrying out or expediting official acts. We abide by this regardless of whether we are legally entitled to the official act, or the public official behaves in a manner that violates their official duties.



“Our conduct is based on fairness and integrity.”

Who is considered a public official?

Public officials are above all individuals performing sovereign tasks. Examples may include civil servants, judges, employees of official agencies, professors at public universities, and employees of testing institutes that perform sovereign tasks. Employees of publicly owned entities that are organized under private law and perform public functions (for instance, public utilities) may also be considered public officials in certain jurisdictions.

In the course of business, and especially in our dealings with customers and suppliers, we also refrain from any form of corruption or other unfair attempt to influence business decisions. This applies in particular to agreements concerning the brokering, award, delivery, settlement, and payment of orders. We do not agree to any payments where it can be assumed that they are intended to serve entirely or partially as bribes. We oblige agents or other intermediaries that we engage to procure orders or permits neither to pay or to accept bribes, nor to grant any undue benefits. For violations, our contracts provide for the right to terminate without notice.

When it comes to accepting and giving gifts and other gratuities, including invitations, we apply extreme restrictions.

If we allow ourselves to be unfairly influenced by public officials, customers, suppliers, or other third parties, or ourselves attempt to unfairly influence such individuals, we will be subject to disciplinary action – regardless of the consequences under criminal law. We report any attempts by public officials, suppliers, customers, or other third parties to unfairly influence our decisions to the executive management responsible and the compliance officer.

In the case of violations, we take appropriate action, such as an order embargo or termination of contract.

As a Bosch associate, am I allowed to invite customers to dinner?


We are allowed to invite customers to dinner if it is related to business and the expense remains within reasonable limits. For example, a dinner is business-related if it follows a workshop or product presentation and business or professional subjects are discussed. A dinner is reasonable if its cost does not exceed what is customary in the respective region. If there is any uncertainty, we contact our compliance officer.

Personnel rotation in sensitive areas

In sensitive areas such as purchasing and sales, we make provision for regular job rotation as a matter of principle. In many cases, this also serves our further professional development.

Donations

Robert Bosch Stiftung is involved in the fields of international relations, healthcare, education, science, and culture. It is both an operating foundation that pursues its objectives with its own programs and a grant provider that enables third parties to develop and implement their projects. By contrast, operating units of the Bosch Group express their commitment to civic society by making cash and non-cash donations to educational, scientific, cultural, and social causes. The rules governing the award of such donations are established exclusively by the board of management of Robert Bosch GmbH or the executive management of the operating units. When making such donations, we are not motivated by self-interest, and make a clear distinction between such donations and sponsoring.

A close-up photograph of a woman with long dark hair, wearing a dark blue polo shirt, looking intently at a piece of machinery. The machine is processing a bundle of bright orange fibers. A bright light fixture is visible in the background, illuminating the scene. The overall atmosphere is one of focused industrial work.

“We do not tolerate
any corruption.”

“We are aware of
our responsibility
to the environment
and society.”



How we develop and manufacture

What principles apply to the development of products?

At all times, our actions are guided by the principle of legality and our “Invented for life” ethos. Legality and the Bosch values take precedence over customers’ wishes. When developing and calibrating functions, Bosch adheres to the following principles:

- The development of functions to detect test cycles or other tests is not permitted (either on Bosch platforms or on functions or software developed by Bosch in fulfillment of customers’ wishes).
- Across the entire program map of the product’s normal operating conditions, calibration must be done in such a way that the contractually agreed performance is delivered, human life is safeguarded to the greatest possible extent, and impact on the environment and resources is kept to a minimum. Optimizing products solely to satisfy test cycles is not permitted.

These principles apply to all Bosch products (including services) in all phases of product development, and must also be observed during product monitoring. These principles help us do justice to our “Invented for Life” ethos. They express the unconditional primacy of legality.

5. Standards for our products and services

Outstanding quality is our strength. We deliver safe products of the highest quality and reliability. In this way, we satisfy our customers’ requirements and expectations. When developing and manufacturing products and providing services, we are guided at all times by the principle of legality and our “Invented for life” ethos. At the very least, our products reflect the state of the art. If putting these requirements into practice results in a conflict of goals, we bring this

conflict into the open. Any conflicts are resolved in accordance with the principle of legality, the principles of responsible and fair business practice, and the other Bosch values.

6. Intellectual property of third parties

The intellectual property of third parties comprises both the protected commercial rights (such as patents, trademarks, registered designs) and the copyrighted items (such as software, image rights) of third parties.

We respect the intellectual property of third parties and, as a matter of principle, may only use it if granted the right to do so. We may only use and distribute third-party know-how that does not have protected commercial rights or copyright protection if such use and distribution is not prohibited by other statutory regulations. If this third-party know-how was provided to us under a confidentiality agreement, it may only be used and distributed as stipulated by the provisions of that confidentiality agreement. This particularly includes third-party manufacturing drawings as well as individual data, dimensions, and tolerances obtained from third parties. We use third-party software – including open-source software and firmware – only within the scope allowed by law and in compliance with the respective license conditions.

7. Occupational safety, health, fire prevention and environmental protection

It is our duty to keep people and the environment from harm, to minimize our impact on the environment, and to use resources sparingly. Processes, operating facilities, and operating materials must comply with statutory and internal occupational safety requirements, as well as with health, fire prevention, and environmental protection regulations.



“We speak openly about risks and uncertainties.”

How we use this code

8. Communication and training

We are informed regularly about current topics relating to this Code of Business Conduct. We engage in regular dialog on compliance issues and address risks openly. We regularly receive training on individual subjects.

9. Internal control system

Bosch maintains an internal control system. Within their area of responsibility, the executive management of every operating unit is responsible for compliance with the rules contained in this Code of Business Conduct as well as with any additional company rules.

The corporate internal auditing department (C/AU), including its local units, has an unlimited right to request information and conduct audits, provided these do not run contrary to statutory or company regulations.

Note:

The rules contained in this Code of Business Conduct apply to the employment contracts between the respective Bosch Group companies and their associates. They are mandatory directives. Third parties may not derive any rights from this Code of Business Conduct.

Information and contacts

Further information is available at
www.bosch.com/compliance and
<https://bgn.bosch.com/alias/compliance>

Robert Bosch GmbH

Compliance Management (C/CM)

Postfach 10 60 50
70049 Stuttgart
Germany
Phone +49 711 811-48643

compliance.management@de.bosch.com

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