



**BOSCH**

# CODE OF CONDUCT

What matters.

 **BECAUSE IT'S RIGHT**  
Committed to compliance

# Foreword

**Dear associates,**

Navigating the complexities of our business environment can be challenging, particularly when faced with critical and sensitive issues. Our Code of Conduct serves as a guide to help us adhere to legal and ethical standards, promote fair working conditions, and foster respectful collaboration. It encompasses principles such as integrity, transparency, equality, and environmental protection. We all play a part in ensuring that our working environment is safe, fair, and inclusive.

The Code of Conduct is an integral part of our corporate culture and provides a compass for our daily actions. It supports us in living up to the Bosch values and maintaining our high standards across all divisions. When dilemmas arise, it serves as a tool to help us make the right decisions.

Our success is not solely dependent on the quality of our products and services, but also on the trust of our customers and partners, as well as our reputation in the public eye. We have to work for this approval every day anew. It is therefore imperative that we all take responsibility and act in accordance with the principles outlined in our Code of Conduct.

We urge you to carefully review the Code of Conduct and integrate its principles into your daily work. Only through collective effort can we ensure that Bosch achieves its goals and remains successful over the long term.

Thank you for your continued commitment.



**Dr. Stefan Hartung**  
Chairman of the  
board of management,  
Robert Bosch GmbH



**Stefan Grosch**  
Member of the board  
of management and  
director of industrial  
relations, Robert  
Bosch GmbH

# A message from local leadership

**Dear associates,**

Observing the principle of legality and conducting business responsibly has always been paramount for the Bosch Group. These principles are integral to Bosch values and vital for the company's sustainable success.

The Code of Conduct outlines guiding principles that assist us in making informed decisions during challenging times, reflecting our commitment to human rights, social responsibility, sustainable governance, and reducing environmental impact across our value chain.

As Bosch associates, we are responsible for upholding our values and fostering a culture of fairness, integrity, and transparency in our daily work. It is crucial to raise compliance concerns promptly as part of our commitment to the organization. We have a compliance hotline available for associates, business partners, and third parties to report potential violations confidentially. Reports made in good faith will not result in disadvantages for our associates.


By adhering to the principles of the Code of Conduct in all business dealings, we protect our company's reputation and ensure our practices align with our core values.



**Guruprasad Mudlapur**  
President, Bosch Group  
in India and Managing  
Director, Bosch Limited

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 Certain terms (e.g., "Compliance") are capitalized because they are defined terms in RB/GF-Directive 120.



# 1

## Our Code of Conduct



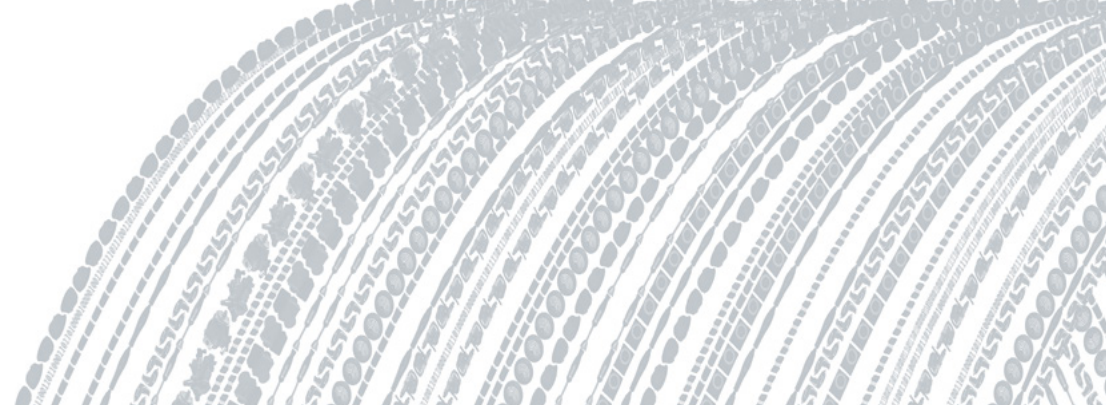


The Bosch<sup>1</sup> corporate culture, the law, and internal regulations govern our<sup>2</sup> business conduct. At all times, we familiarize ourselves and strive to comply with them. To facilitate this, essential aspects of our internal regulations are summarized in this Code of Conduct (“our Code”).

Our Code reflects our commitment to the law and internal regulations. It serves as a guideline to conduct our everyday business in line with our values.

<sup>1</sup> “Bosch” or “our company” refers to the Bosch Corporate Group according to RBGF 103, e.g., not including BSH.

<sup>2</sup> “Our” and “We”, unless stated otherwise, refers to all associates of Bosch regardless to their role or hierarchy.



## Our Moral Compass

Our Code is a guide to navigating the risks we face and the choices we make in our work at Bosch. Our Code cannot cover every situation, but it does help us to find answers and to report any concerns. Third parties may not derive any rights from our Code.

### More Information:

- RBGF 120 Bosch Corporate Group Compliance Management System





## Our objective

In the spirit of Robert Bosch, we aim to secure our company's future by ensuring its strong and meaningful development and preserving its financial independence.

## Our motivation

Invented for life: we want our products to spark enthusiasm, improve quality of life, and help conserve natural resources.

## We live our values

The foundation of our corporate culture is a clear commitment to our values, accountability, and above all, compliance with applicable law. We make responsible decisions while considering the effects on society and the environment.



### More Information:

- Mission Statement "Be #LikeABosch"



## **Our values – what we build on:**

### **Future and result focus**

We focus on results and securing our future. This also creates a sound basis for the social initiatives of the company and the Robert Bosch Stiftung.

### **Fairness and respect**

We deal fairly and respectfully with our colleagues and business partners, and view this as a cornerstone of our corporate success.

### **Initiative and determination**

We act on our own initiative, take entrepreneurial responsibility, and pursue our goals with determination.

### **Diversity, equity, inclusion**

We appreciate and encourage diversity, equity, and inclusion for the enrichment they bring, and see this as essential for our success.

### **Openness and trust**

We work and collaborate in a spirit of trust and communicate openly.

### **Responsibility and sustainability**

We act prudently and responsibly for the benefit of society and the environment.

### **Reliability, credibility, legality**

We promise only what we can deliver, accept agreements as binding, and respect and observe the law in all our business transactions.



## Our responsibility for acting legally

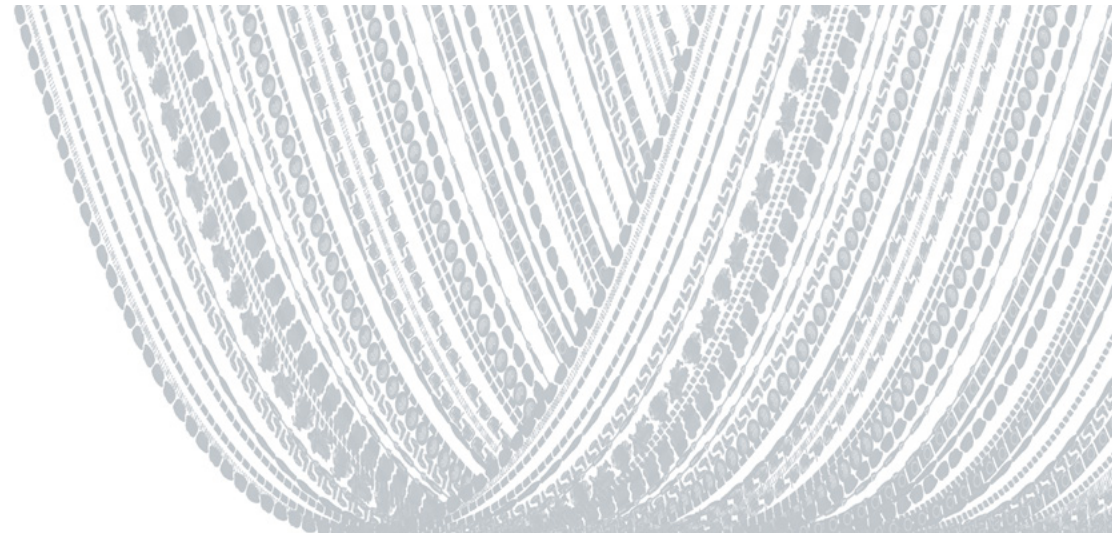
We always follow applicable law in all of Bosch's business activities. We do not mislead customers, government agencies, or the public, nor do we participate in any deceit by third parties. We always observe the principle of legality.



### Additional Insight

#### What is applicable law?

Examples include global tax, customs, and export control regulations including sanctions, competition and antitrust law, anti-corruption and anti-money laundering law, or any national, state or local law or regulation that applies to our business operations.





## Additional Insight

### The principle of legality

We follow applicable law. We support the principle of legality regardless of whether the Bosch Corporate Group benefits from it.



Law violations can cause considerable business consequences including fines or claims for damages. We can also face personal consequences, including fines and imprisonment. We always act lawfully, whether this results in an economic benefit for Bosch or not. Respecting Bosch values and following the law take precedence over economic interests and even customer wishes.



## Responsibility of all associates

In accordance with the Compliance Requirement, we are all responsible for conducting our business activities legally, responsibly, and fairly.

We aspire to learn from our mistakes, see them as a part of our innovation culture, and openly point them out. If we are unsure about the Compliance Requirement and its impact on our daily work, we contact our supervisors, the Compliance department, the legal department, or other responsible departments before we take action.

Any violation of applicable law, our Code, or other internal regulations can result in disciplinary action. For example, this can include termination of employment, withholding of discretionary compensation (e.g., bonuses), and holding violators responsible for any damages.

We engage in dialogue on Compliance issues, seek to address risks openly, and participate in training on relevant Compliance topics.

We do not follow instructions of supervisors that are unlawful. We address illicit behavior or actions that do not seem legal to us ([see chapter 7](#)).



### Additional Insight

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#### What is the Compliance Requirement?

The Compliance Requirement is the obligation to adhere to all legally binding external laws, our Code of Conduct, and all other internal regulations when doing business for the Bosch Corporate Group.

## Special responsibility of supervisors

Supervisors ensure there are no violations of applicable law or internal regulations, which could have been prevented or impeded through appropriate controls. Supervisors ensure that compliance with applicable law and internal regulations is continuously and properly monitored in their particular area of responsibility. Supervisors also ensure that their associates are aware that violations can lead to disciplinary consequences, regardless of their role or hierarchy. There are no exceptions for prestige or power.

It is important that supervisors act as role models for their associates, inform them about the rules of our Code, discuss these rules with them, and are available for questions or guidance about our Code's principles or other internal regulations. Supervisors are the driving force behind the Compliance Dialogs conducted routinely in their departments.



### Additional Insight

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#### What is the “Compliance Dialog”?

In the Compliance Dialog, supervisors and associates openly discuss Compliance and its impact on their work environment. Topics can include uncertainties about Compliance requirements and dilemmas encountered in everyday work. More information on the Compliance Dialog can be found [here](#).

If supervisors receive information about possible violations of the Compliance Requirement by associates or third parties, they contact the Compliance department or another responsible department. They forward legally significant matters to the department responsible for legal advice.





2

**We care for a safe and positive work environment**





We value the well-being and contributions of one another and recognize the advantages of a diverse workforce. Therefore, we actively contribute to workplaces that are safe, respectful, and inclusive.

#### **More Information:**

- Coordinators for work safety  
Contact person at site is HSE.
- RBGF 178 Sustainability and EHS

## **Safe and healthy workplaces**

We comply with national workplace safety and hygiene standards, as well as fulfill occupational health and safety requirements to ensure healthy working conditions.



### **Additional Insight**

With six memorable principles, our Safety Basics initiative calls on all executives and associates to always consider occupational safety in their daily work:

- Safety is the basis for everything we do.
- As leaders we care about your safety.
- We ensure a safe work environment for all.
- We take care of each other's safety.
- We speak openly about safety.
- We have zero-tolerance for negligence.



## Respectful working environment

We conduct ourselves professionally, based upon dignity, mutual respect, and trust. We do not tolerate any form of sexual harassment, harassment in any other form, or bullying of associates, contract workers, or candidates for employment.

### More Information:

- Contact information HR Shared Service  
Contact your local HR department (HRL) with any questions.
- MyHR Homepage

Similarly, we do not tolerate any form of discrimination which is illegal treatment based on race, sex, gender identity, sexual orientation, age, national or ethnic origin, color, social origin, religion and belief, marital, parental, and familial status, physical and mental abilities, health status, political or trade union affiliation, or any other characteristic protected by applicable law.



### Additional Insight

#### An example of workplace harassment:

An associate repeatedly makes suggestive comments or unwanted physical contact with a colleague. This behavior violates our Code of Conduct, which promotes a respectful and professional work environment and prohibits harassment of any kind. It is important that all associates feel safe and protected and that such incidents are reported immediately and treated appropriately.



## Diversity, equity, and inclusion

Encouraging diversity in our workforce is one of our most important commitments. We recognize that our diverse workforce is among our greatest strengths. We embrace our diversity and aim to maintain a culture of equity and inclusion, where each associate is valued for their knowledge, skills, experiences, and culture. We encourage fair employment practices worldwide and expect equal opportunities for all associates. In addition, we are committed to ensuring that all associates feel welcome and included regardless of any differences.

We do not engage in, or condone, any discrimination based on the characteristics mentioned previously in [Respectful working environment](#). The same applies to any form of harassment or bullying. Given comparable requirements and tasks, the principle of equal pay for work of equal value shall apply.



### More Information:

- Diversity Equity Inclusion Team (G6/PJ-DEI): [EquityInclusionTeam.Diversity@de.bosch.com](mailto:EquityInclusionTeam.Diversity@de.bosch.com)
- Bosch Connect community Diversity, Equity and Inclusion (DEI)



## Human rights and social responsibility

We respect and protect human rights in accordance with fundamental international frameworks on human rights. We take our social responsibilities seriously and comply with applicable International Labour Organization (ILO) conventions. We also fulfill our responsibilities regarding corporate due diligence both in our own operations and in our supply chains.

### More Information:

- Corporate Office Human Rights Management (C/SEH)
- RBGF 186 Management system for the implementation of human rights and environmental due diligence obligations at the Bosch Group

In this respect, we particularly stand by principles, such as:

- **No child labor:** Employment of persons only if they have reached the minimum legal age for work set out by the applicable law in the country of employment.
- **No forced labor:** No toleration of human trafficking, torture, slavery, or compulsory labor of any kind.
- **Freedom of association:** Respect of both the right of collective bargaining over working conditions and the right to strike in accordance with applicable law.
- **Fair pay and working conditions:** Observing the applicable law on minimum wages, working hours, breaks, and vacation entitlements.
- **No unlawful evictions:** No engagement in any unlawful deprivation of land, forests, and waters via acquisition, development, or other use.
- **Proper use of security personnel:** Engagement and use of security personnel for business purposes only in line with applicable law, particularly human rights requirements.



## Additional Insight

**We respect and protect international human rights based upon the following international frameworks:**

- the United Nations Guiding Principles on Business and Human Rights
- the United Nations International Bill on Human Rights
- the OECD Guidelines for Multinational Enterprises
- the International Labour Organization Declaration on Fundamental Principles and Rights at Work

**Typical indicators of forced labor (according to ILO):**

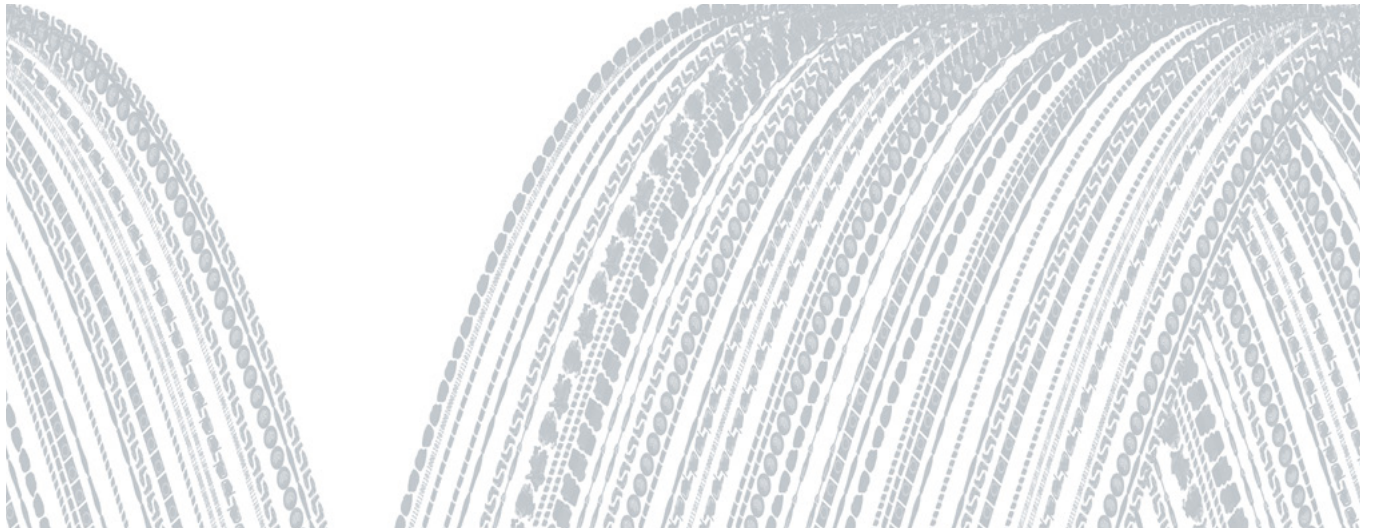
Abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, withholding of wages, debt bondage, abusive working and living conditions, and excessive overtime.





3

## We value the trust in our company and products



## Brand promise quality

According to our founder's vision, we strive for convincing reliability and exceptional quality. Our approach to quality is comprehensive, encompassing all stages of the product life cycle and applying to both, products and services. We aspire to meet our customers' wishes and expectations and aim at continuous improvement.

## Product Compliance

Our Product Compliance Management System (PCMS) is designed to meet all regulatory requirements relevant for our products in the relevant market. It applies to all products (hardware, software, and services) within the respective product life cycle. Thus, our PCMS incorporates elements that help us to identify, monitor, control, and minimize Product Compliance-related risks. We observe Product Compliance throughout our supply chain. Our Product Compliance Code expresses our commitment to "Invented for life" and legality for each product.



### Additional Insight

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#### Note:

We consider product-related aspects such as health, safety, data protection, information security, cybersecurity, intellectual property, and environmental protection as being part of Product Compliance.

A core principle in the Product Compliance Code (incorporated in RBGF 182) is that legality, Bosch values, and our claim "Invented for life" take precedence over customer wishes.

#### More Information:

- Product Compliance
- RBGF 182 Product Compliance Management System (PCMS) of the Bosch Corporate Group
- RBGF 133 Standardization



## Prohibition of insider trading

We respect the integrity of the capital markets and do not misuse sensitive information acquired while working for Bosch. Sensitive information not known to the public that could affect the price of stock or other financial instruments (securities) is called “inside information.”



Buying or selling securities while in possession of inside information is known as “insider trading,” which is illegal in many countries. Therefore:

- We do not purchase or sell any securities or cancel or change existing orders based on this inside information, regardless of whether these transactions are carried out for our own benefit, for the benefit of third parties, or on behalf of others.
- We do not use our inside information to recommend that anyone purchase or sell securities, or cancel or change respective orders, nor do we induce anyone to do so in any other way.
- We treat inside information as strictly confidential. As a general principle, we do not disclose such information to third parties; this also applies to passwords that allow access to electronically stored inside information. We disclose inside information only to associates or consultants from outside the company if the recipient needs the information to perform their jobs and is also obligated to treat it as strictly confidential.



## Additional Insight

### How do I identify inside information?

Examples of potential inside 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
- Dealings with government agencies

### How is this relevant to me?

At Bosch, we handle inside information not only about Bosch but also that of our business partners. Buying or selling securities, while having such confidential information about these companies, or sharing the confidential information with others, can violate insider trading laws if it is considered “inside information.” We can also violate insider trading laws by sharing inside information about a company with others.



## Questions and Answers

**Q:** Through your position at Bosch, you hear that one of Bosch's stock-listed logistics suppliers is suffering from financial issues. This information will only be published in their next quarterly report. Your friend invests in this company, so you're worried that he'll lose money. Before sending him a message, you hesitate and ask yourself: Is this information confidential?

**A:** As you suspected, the logistics supplier's financial issues are confidential or even strictly confidential information. You cannot tell your friend about the supplier's problems, because nonpublic information from or regarding suppliers needs to be protected in accordance with legal and contractual requirements.

## Data protection and information security

We ensure that in all business processes and products, data protection regulations are observed, and all necessary information security measures are implemented. This means we comply with applicable laws and respect relevant contractual obligations.

We seek to protect relevant information and personal data in particular against unauthorized disclosure, access, manipulation, and loss through the application of risk-adequate, technical, and organizational measures. We apply these information security measures in the selection, use, and operation of IT solutions closely coordinated with the applicable cybersecurity standards.

When developing Bosch products and new business models, we ensure that data protection and information security regulations and requirements are considered early and implemented at each stage.

### More Information:

- Data Protection Officer Mailbox (C/ISP): [dpo@bosch.com](mailto:dpo@bosch.com)
- RBGF 105 Information Security and Data Protection (ISP)





## Additional Insight

### What is personal data?

Information referencing an identified or identifiable person, such as name, address, date of birth, bank details, phone number or customer ID, as well as IP address are personal data.



## Questions and Answers

**Q:** You accidentally sent associate records (which included associates' names, home address, and date of birth) to the wrong party. However, you did reach out to the unintended recipient, and they agreed to delete all of this personal information. Is there anything more you should do?

**A:** Yes. If you disclose personal information without authorization to a third party by mistake, Bosch may have several legal obligations: notify people affected by such activity or authorities regardless of whether the unintended recipient agreed to delete the information.

Accordingly, you must immediately report this case into our data protection incident system (BKMS): <https://www.bkms.system.net/bosch-dataprotection>, inform your ISP contact or inform us via email to [dpo@bosch.com](mailto:dpo@bosch.com).

## Intellectual property rights of third parties

We respect the intellectual property of third parties and may only use it if granted the right to do so. Such intellectual property of third parties includes their protected commercial rights (such as patents, trademarks, and registered designs), their copyrighted items (such as software and image rights), as well as trade secrets.

We are only permitted to use and distribute third-party know-how not protected by commercial rights, copyright, or trade secret, if this is not prohibited by other legal or contractual regulations.

If third-party know-how was provided to us under a confidentiality agreement, it may be used and distributed only in compliance with that agreement, regardless of whether it is intellectual property or not. This includes manufacturing data, dimensions, and tolerances, as well as manufacturing drawings, individually 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.



### Questions and Answers

**Q:** As a software developer, you find a code in a forum that could help you with a problem you are working on at Bosch. Do you copy the code and paste it into your program?

**A:** Without knowing who owns the rights to the code or obtaining a license, you cannot use it legally. Just because a code is publicly accessible online does not mean that everyone is allowed to use it. At Bosch, we only use third-party software within the scope of the rights granted and in compliance with the relevant license conditions.

#### More Information:

- Corporate Intellectual Property and Intellectual Property, Contracts and Legal Consulting
- RBGF 108 Dealing with classified information (particularly trade secrets)
- RBGF 130 Principles of Intellectual Property Rights

# Cybersecurity

For the technical and organizational implementation of cybersecurity, we comply with applicable law and take into account appropriate standards. We use suitable security measures considering state-of-the-art technology. While developing Bosch products and business models, we ensure the early implementation of cybersecurity requirements covering the entire life cycle.



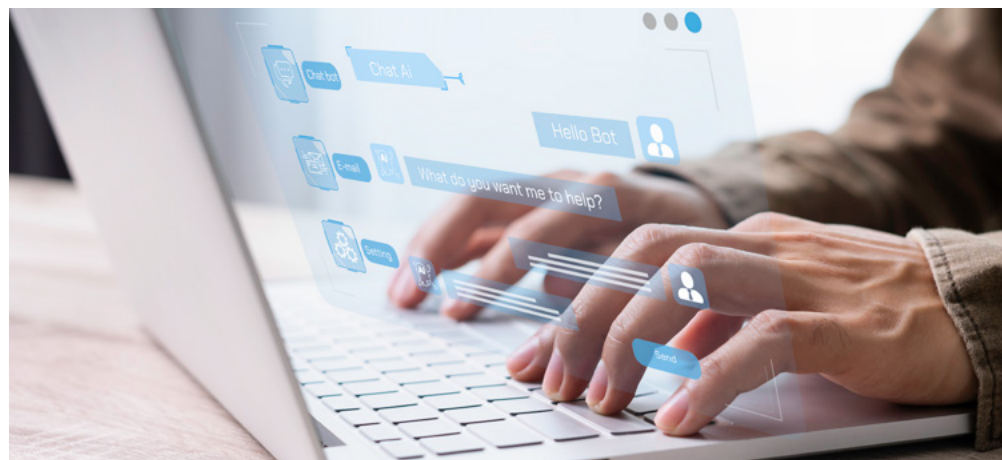
## Scenario

You are distracted and answer an email by quickly clicking the link and providing an email address and password for verification.

A few minutes later you have a bad feeling and recheck the email. You notice that this email came from outside of the organization and with a spoofed sender address. As you already clicked the link and provided your user credentials, you have to immediately inform the BOSCH CERT ([CERT@bosch.com](mailto:CERT@bosch.com)) for further investigations and measures.

## More Information:

- Corporate Cybersecurity
- CD 09000 Cybersecurity



## Artificial intelligence

We use artificial intelligence (AI) in a responsible way to improve products. The use of AI presents legal challenges and risks. When using AI, we comply with the applicable law and internal regulations concerning data protection, information security, cybersecurity, intellectual property, and dealing with classified information, among others.

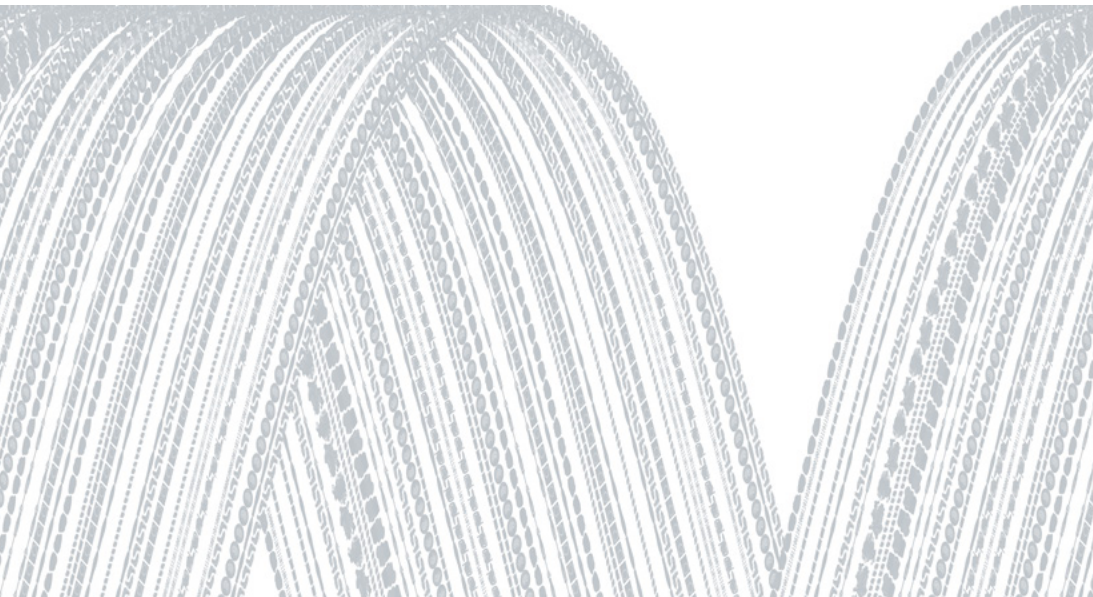
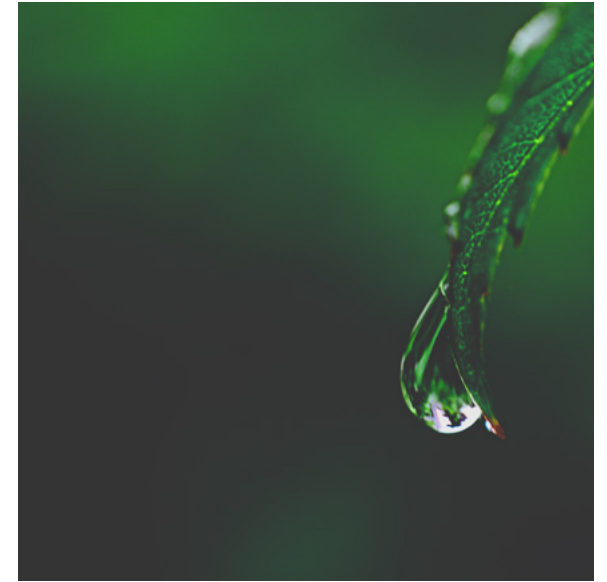
## More Information:

- [Bosch Center for Artificial Intelligence](#)



4

## We respect the environment



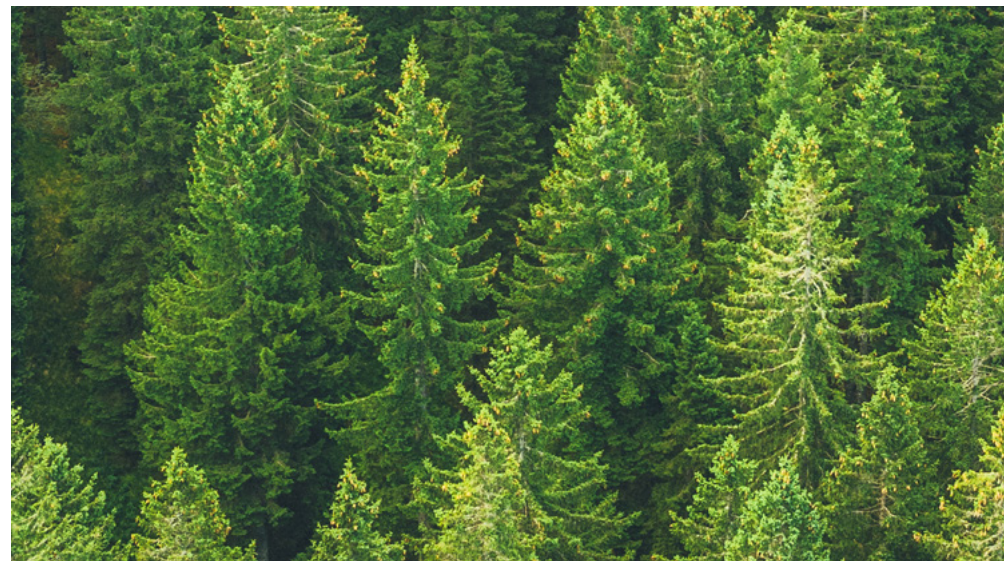
We act responsibly, further a sustainable corporate governance, and reduce our impact on the environment along the entire value chain.

We avoid harm to people and the environment in accordance with applicable law. We want to preserve natural resources for communities and society. Our processes, operating facilities, and operating materials comply with applicable law, including environmental protection regulations.

We strive to increase our energy efficiency and to generate and procure energy from renewable sources. We are making our CO<sub>2</sub> emissions transparent.

We handle water with care. Especially in areas of water scarcity, we feel committed to reducing water withdrawal and to not endanger access to potable water and sanitary facilities locally.

We use resources efficiently and apply the principle of circularity when feasible. We strive to reduce the impact of our business on the environment by using resources sparingly and reusing materials wherever reasonable. In dealing with waste, we follow the principle of first avoiding waste, then recycling, and finally disposing of it as a last resort.



*Bosch is working to use targeted strategies to protect the climate, save water, especially where it is scarce, and strengthen the circular economy.*

**More Information:**

- Coordinators for energy efficiency, waste/water & regional coordinators for carbon neutrality (scope 1 & 2)
- RBGF 186 Management system for the implementation of human rights and environmental due diligence obligations at the Bosch Group
- RBGF 178 Sustainability and EHS





# 5

## We conduct our business responsibly





## Business partner expectations

Our [Code of Conduct for Business Partners](#) explains our expectations for our business partners, which include treating each other with dignity and respect.

We strive for clear and unambiguous agreements with customers and suppliers. We comply with our internal regulations requiring review of certain documents by at least two persons and the separation of operational and monitoring functions. We aim to select suppliers on competitive merit, after comparing relevant criteria such as the price, quality, performance, sustainability, or suitability of the product or service offered. Following a risk-based approach, we require business partners to comply with our corporate due diligence requirements.

## Fair and decent business conduct

### Competition and antitrust law

We observe the rules of fair competition as particularly defined by antitrust laws.

We comply with the core principles and the more detailed rules laid out in internal regulations. In particular, we do not reach agreements with our competitors on allocation of territories and customers, prices, and components of prices. With third parties, we only exchange competition-sensitive information, such as market strategies, investment strategies, or internal research and development strategies, within the legal limits.

We comply with the applicable national regulations governing anti-competitive clauses in contracts with customers or suppliers, and particularly do not restrict customers' and purchasers' freedom to set their own resale prices where this is prohibited. We do not abuse a dominant market position.

#### More Information:

- Andy Trust (C/LSC-ATL): [Mailbox.CLSC-ATL@de.bosch.com](mailto:Mailbox.CLSC-ATL@de.bosch.com)
- C/LS Topics Antitrust Law
- CD 03012 Antitrust Law



## Additional Insight

### What are antitrust laws?

The purpose of antitrust laws is to protect competition. They prohibit business behavior which has the objective or the effect of preventing, restricting, or distorting competition.



## Questions and Answers

**Q:** You received a text message from an old friend who now works for a competitor. After writing about the strength of his company in one region and ours in the other, he wrote, “So, divide and conquer? What do you think?” What should you do?

**A:** Forward the text message to the Legal Department immediately with a note that you have concerns about violating competition laws. The message is extremely inappropriate and can lead to serious legal liability if handled improperly.

## Anti-money laundering

We do not engage in money laundering and act against conduct aimed at money laundering.

We check the identity of relevant customers, business partners, and other third parties with whom we want to do business and scrutinize suspicious behavior. We only establish and maintain business relations with serious partners whose business activities comply with applicable law. We comply with all applicable regulations on recording and accounting for transactions and contracts, as well as cash limits.



### Additional Insight

#### What is money laundering?

Money laundering is concealing or disguising the origins of illegally obtained proceeds so that they appear to have originated from legitimate sources.

#### More Information:

- Mailbox AML (C/LSC): [AML.Mailbox@de.bosch.com](mailto:AML.Mailbox@de.bosch.com)
- C/LS Topics Anti-Money Laundering
- CD 03017 Anti-Money Laundering

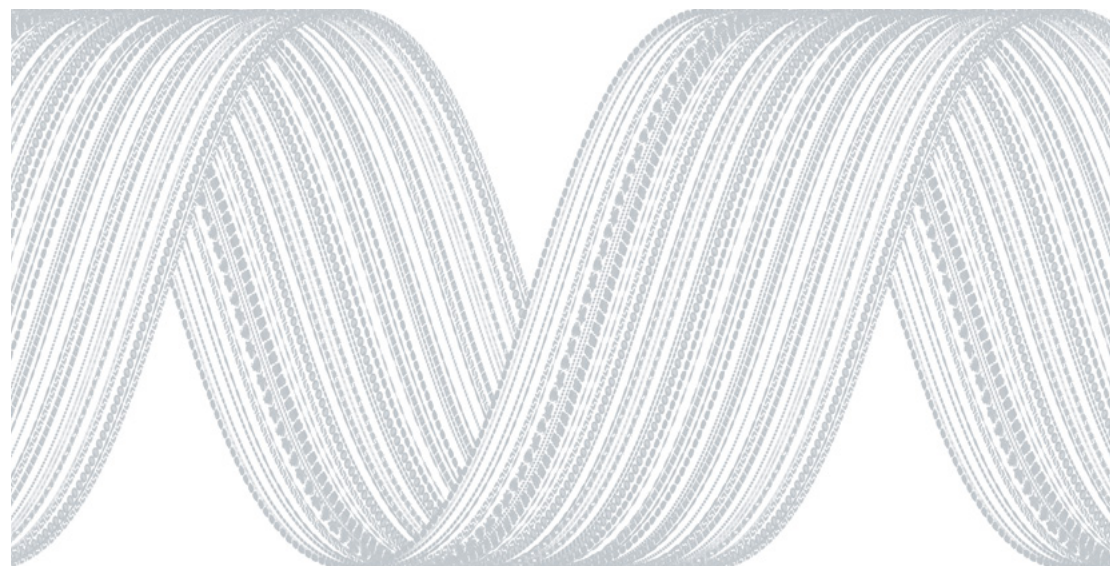
## Combat terrorist financing

Our checks on relevant customers, business partners, and other third parties with whom we want to do business also serve to combat financing of terrorism.

We strive to ensure that no funds or other financial resources are provided for terrorist offenses, or to support terrorist organizations, by complying with all applicable regulations to combat terrorist financing.

#### More Information:

- Find Your Lawyer
- C/LS Topics Finance and Capital Markets Law
- CD 03015 Capital market law & EU Market Abuse Regulation (EC) No 596/2014





## International trade and export control

In international trade, we comply with export control and customs regulations. We check to verify that none of our business partners is on a national or international sanction list. We also ensure during delivery, that the goods are not subject to any restrictions and that the necessary export/re-export authorization has been obtained from the relevant authorities.

### More Information:

- Find Your Export Control Officer
- CD 03400 Central Directive Customs
- CD 03402 Central Directive Export Control
- Docupedia RBW Export Control

## Taxes

We comply with all applicable tax regulations in our company processes.

Tax regulations apply to many company processes, such as financial and payroll accounting. These include:

- Transfer pricing regulations for intra-group supply and service relationships
- Wage tax treatment of monetary benefits to associates (such as gifts, hospitality)
- Assessment of cross-border activities, such as mobile working abroad (smart work)
- Correct VAT processing of business relationships (such as during invoicing and invoice audits)

### More Information:

- C/TX Global Corporate Taxes and Foreign Trade
- CD 03101 Central Directive Global responsibility for matters relating to taxation and foreign trade law



## Additional Insight

### Receiving gifts is great, but there could be tax implications.

Before giving a Bosch gift to an associate for a special occasion, check local tax regulations. Report potential wage tax implications to the Human Resources department, to determine if the tax value will need to be deducted from the associate's next paycheck, or if it can be taken on by the company.

## No corruption

We do not tolerate any form of corruption. Our business decisions are based on objective and well-founded reasons. We attract our business partners and customers with the high quality of our products and services, and not through undue influence.

In our business dealings, we refrain from any form of corruption and any attempt of undue influence. We do not offer gifts, hospitality, or other gratuities with the intent to gain an undue advantage. We object to any payments that appear intended to satisfy any form of corruption. We strive to ensure that business partners – or any other parties who maintain business relationships with us, work for us, or intend to work for us – do not engage in any form of corruption or in any actions or efforts made to exert undue influence. 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.

Any attempts to unfairly influence our decisions must be declined. In case of possible violations, we report our observations and take appropriate action ([see chapter 7](#)).



### Scenario

You received a letter from a supplier with two VIP tickets for an upcoming Formula 1 racing event. In a corresponding note the supplier expresses that they are grateful for the successful business relationship and would like to grant the tickets as a "thank you."

This sort of extravagant gift could be seen as an attempt to influence your decisions when dealing with the supplier. You have to decline the offer and inform the Compliance department.

#### More Information:

- Your Compliance Contact
- CD 06300 Prevention of Corruption
- BGN page Gratuities in Dealings with Third Parties



## Additional Insight

### What is corruption?

Corruption is the misuse of entrusted power for the private good or benefit, to gain or grant a tangible or intangible advantage for oneself or for third parties. Corruption occurs in politics, economy, and administration. It distorts competition, leads to financial losses, and damages the reputation of the company.

### What are the consequences of corruption based on the assessment of Transparency International?

Corruption takes a heavy impact on companies. It limits the funds available for investment, growth, and innovation. It leads to dependencies and prevents sustainable business relationships. Products become more expensive, and economies grow more slowly and fail to achieve their full potential.

### Conduct towards public officials

We do not provide or offer anything of value to any public official to obtain, retain, or to secure business or improper advantage, or to improperly influence a public official's actions or decisions. Gifts, hospitality, and other gratuities in interactions with public officials are handled extremely restrictively. Even the appearance of an influence must be avoided. We also do not make facilitation payments to expedite routine and non-discretionary government actions, e.g., for issuing permits or handling of custom procedures. Such payments are prohibited at Bosch.







## Additional Insight

### Who is considered a public official?

The term "public official" can vary from country to country and is to be interpreted broadly in case of doubt.

In general, a public official is any official or employee of a government, authority, other governmental agency, or public international organizations, employees of state-owned enterprises, and persons who perform public functions on behalf of those bodies.

**Examples of public officials:** Officials, judges, prosecutors, ministers; in some countries also professors at public or state-approved universities or employees of public-sector enterprises in the field of public services (e.g., electricity, gas and water providers, hospitals).

## Donations and sponsoring

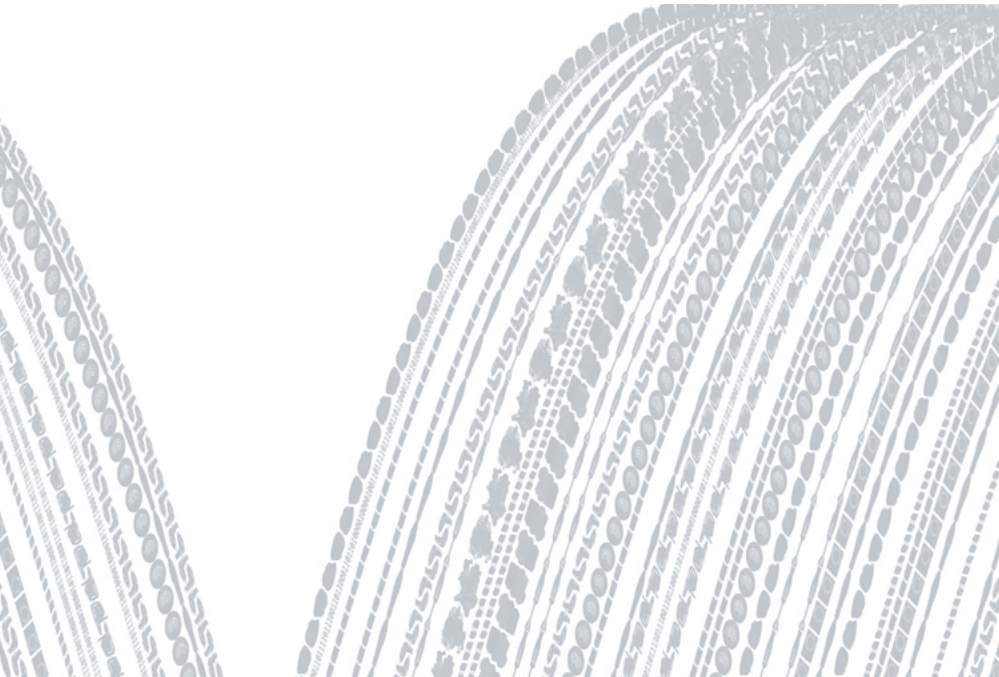
Bosch contributes to civic society by making considered donations to support causes like climate action, sustainability, digital education for disadvantaged children and young people, the promotion of democracy and tolerance, as well as social concerns. We donate without self-interest.

By contrast, sponsorship measures are part of our overall communications strategy. They are intended to support the achievement of company-relevant goals, such as product sales, reputation building, or the recruitment of qualified associates.

Our objective is to make a clear distinction between our donations and sponsorship activities. We refrain from promising or granting a donation or sponsorship to unduly influence public officials, business partners, or other third parties. In addition, we do not obtain an undue favor or advantage in return of a donation or sponsorship. We also reject respective offers to do so.

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## We protect our company



## Avoiding conflicts of interest

As Bosch associates, we act in the sole interests of Bosch and in accordance with the Bosch values. To do so, we strictly separate private interests from business interests in order to avoid potential conflicts with Bosch's interests. In case of doubt, we inform our supervisor or, if the supervisor could also be in a conflict of interest, another "neutral" person (for example, the next-level supervisor) in writing.



### Scenario

You are a decision maker in the awarding process for a new supplier in the automotive sector. The CEO of one of the potential suppliers is your sister-in-law.

Your relationship to the CEO of the supplier may lead to a conflict of interest, so you should inform your supervisor about this potential conflict and refrain from being part of this awarding process.



### Additional Insight

#### What is a conflict of interest?

The risk that the professional judgment or actions of associates are influenced by personal interests to the extent that business decisions are no longer made for the sole benefit of Bosch.



## Shareholdings and employment outside Bosch

Privately engaging in any kind of financial or business involvement (i.e., outside Bosch) with competitors, suppliers, or customers may impair the interests of Bosch. The same applies to engaging in or influencing the business relationship with companies in which we, our spouse or partner, or close family members have an ownership, share-holding interest, or perform an executive function, if we act on behalf of Bosch. So these engagements and shareholdings are only allowed in case a conflict of interest or its appearance is excluded.

Secondary employments may also impair the interest of Bosch. If the secondary employment interferes with our work duties or may be seen as a conflict of interest, the secondary activity may be prohibited.



### Scenario

You have taken a second job as an online content editor with a different company. You must work on editing projects sometimes when you are working for Bosch from home 2 days a week.

Engaging in an employment outside of Bosch could be seen as a conflict of interest and, in this case, it also may impact your job responsibilities at Bosch. You should inform your supervisor about your secondary activity.



### Engaging business partners for private purposes

If we are directly involved in the awarding or settlement of orders for Bosch with a business partner, further engagement with the same business partner for personal gain may give rise to a potential conflict of interest. In these cases, such engagements are only allowed in cases where a conflict of interest, or the appearance thereof, is excluded.



### Scenario

While dealing with an electrician who is also contracted by Bosch, you are offered special "Bosch conditions" for restoring the electrical lines in your apartment.

A potential conflict of interest may arise from accepting this exclusive offer, so you should decline.





## Responsible handling of company property

We handle the company's property responsibly. The assets of Bosch serve to achieve our company's success and may be used only within the scope of our internal regulations.



### Scenario

When arranging internal business meetings or team-building events, it is essential that the expenses are reasonable and made in the best interests of Bosch.

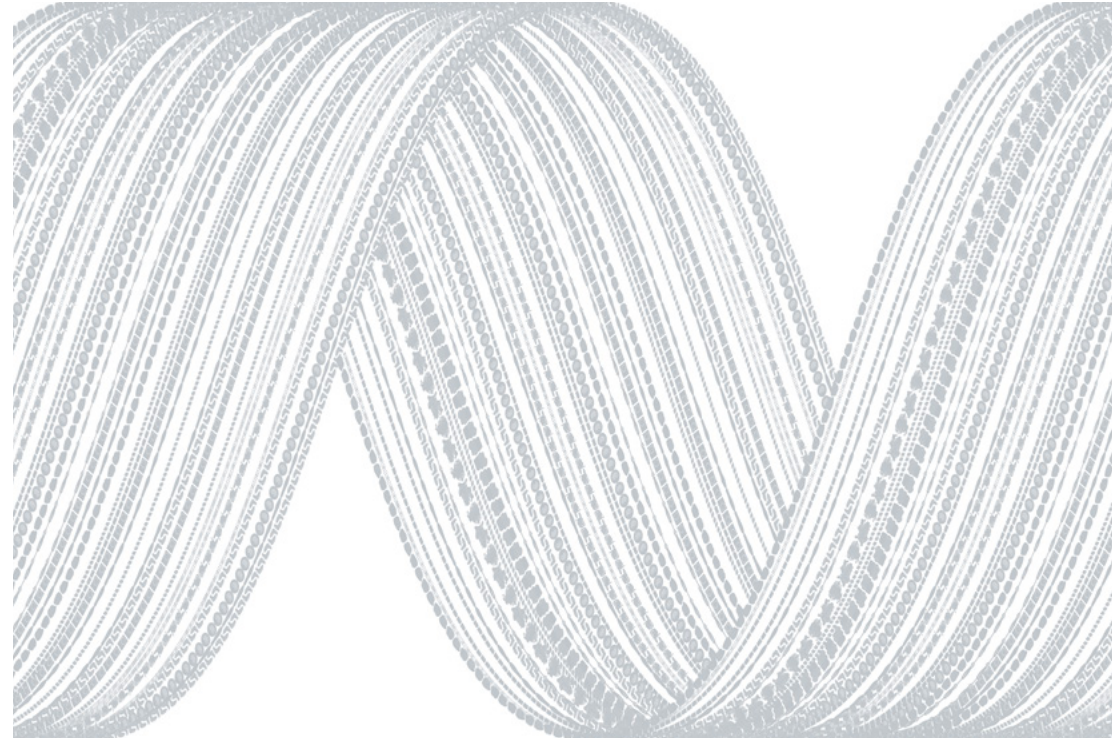
Events that could potentially harm Bosch's reputation are not permitted.





## Proper bookkeeping and accounting

All reports, whether internal or external, must be complete and provide a transparent picture of the current financial and economic situation. We adhere to the principles of proper bookkeeping and accounting, which require data and records be complete, comprehensible and, in alignment with materiality considerations, correct and system compliant.



### More Information:

- Bosch Connect community Finance Academy
- CD 02200 Principles of Accounting
- CD 05102 Value Limits for Internal Approvals of Selected Business Transactions
- CD 05150 Internal Reporting



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**We act correctly –  
because it's right**





We are committed to acting legally and ethically at all times. We are convinced that honest and responsible conduct is always the right thing to do. This is what distinguishes us at Bosch. By acting on this commitment, we are making an important contribution to customer satisfaction and our long-term success. Invented for life.

## **Consequences of violations**

We are all bound by the principles set forth in our Code. We do our best every day. If we have questions or doubts, we ask.

Violations of our Code endanger Bosch's long-term success. They damage our reputation and can lead to other serious consequences: damages or penalties, including criminal consequences, order blocks, or other reprimands by public authorities that are detrimental to our business.

We therefore expect every associate to comply with our Code.



## Resources for notifying possible violations

We come forward and speak up at Bosch. If we have serious concerns, or see potential violations of our Code, applicable law, or internal regulations, we are encouraged to notify them openly. Notifying possible violations or risks protects us, our colleagues, and Bosch. It contributes to preventing violations in the future.

Our whistleblowing system *Speak up!* is also open to any third party, such as business partners, or former or future associates, to report a possible violation of the Compliance Requirement. It is designed to protect whistleblowers and allows for anonymous reporting. It follows a clear process in alignment with the principle of confidentiality when investigating a report.

Retaliation of any kind against individuals as a result of their notification, including the threat thereof, will not be tolerated. This protection applies also where the reporter's notification proves to be unsubstantiated but was made in good faith.



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.

### More Information:

- Your Compliance Contact
- [Whistleblowing system](#)
- Reporting a possible Compliance violation



## Additional Insight

### Whistleblowing System:

Associates can contact their immediate supervisors, the central Compliance organization (C/CM), or the legal department (C/LS).

At Bosch we have the following channels to report possible violations of the Compliance Requirement:

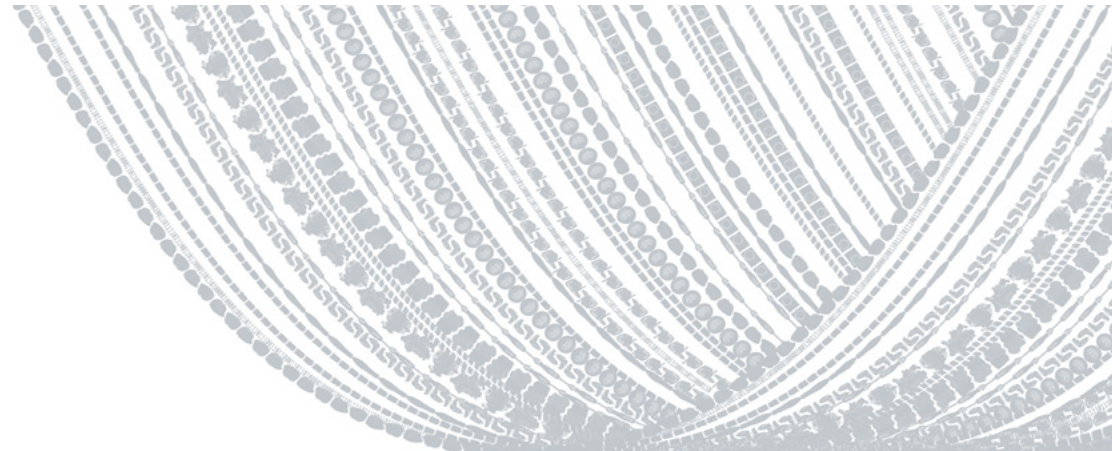
- Whistleblowing system *Speak up!*:  
<https://www.bkms-system.net/bosch-compliance>
- Reporting Office: Robert Bosch GmbH, Compliance Management C/CMI, Postbox 10 60 50, 70049 Stuttgart (Germany)

According to the EU-Directive on Whistleblower Protection and several local laws, external reporting channels can also be addressed to report possible violations. Further information can be found on the Compliance BGN page.

You can use *Speak up!* to contact the Compliance Organization and provide reports at any time, 24/7. The *Speak Up!* platform can be reached through BGN or the internet. If permitted by law in the respective country, you can also use *Speak up!* to report anonymously.

### What does protection of reporting persons mean?

Bosch is committed to protecting reporting persons from all forms of discrimination on account of their reporting in good faith. Any retaliation due to such a report is prohibited.



# Making ethical decisions

We always strive to make ethical decisions in accordance with our values. In case of doubt, we seek advice, for example by checking our internal regulations, and receive support from our supervisors, the Human Resources departments, or from the Compliance department and other responsible departments. For legal questions, we may contact the legal department directly.

For many topics addressed in this Code, specific internal regulations exist and must also be observed. In cases of perceived conflicts with local laws or other internal regulations, or if any other questions should arise, we contact the Compliance department, the legal department, or other responsible departments for guidance. We keep ourselves informed about current topics relating to this Code of Conduct, and we participate in applicable training.



## Additional Insight

Important other responsible departments include the Responsible Cs for a Compliance Area, such as Tax or Quality. Overview: [link BGN / Compliance](#)





We have all been in situations where making an ethical decision is challenging. In these cases, our decision-making framework ‘I CARE’ offers guidance for choices that aren't clear-cut. It helps us to understand the underlying reasons and outside influences affecting a decision, to make potential actions clear, and it encourages reflection for future learning.



**Identify** possible concerns or conflicts of interest keeping our values in mind.

- Conflicts with our values: What boundaries do I have to observe if I want to act according to our values?
- Conflicts of interest: Are there any incentives or relationships with Bosch externals influencing my actions?

**Consider** the best interest of Bosch, external pressures and internal biases that might affect the choices you make.

- Situational influences: Do external pressures or internal biases influence my decision making?
- Company perspective: Do I have the best interest of Bosch and the Bosch values in mind?

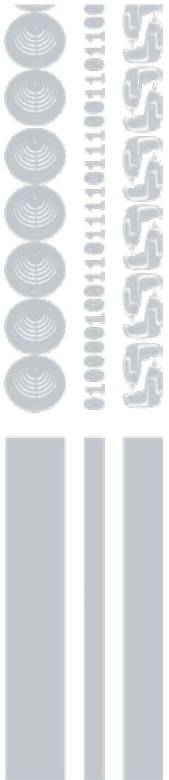
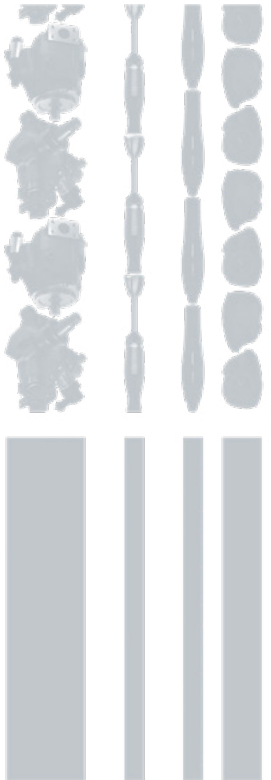
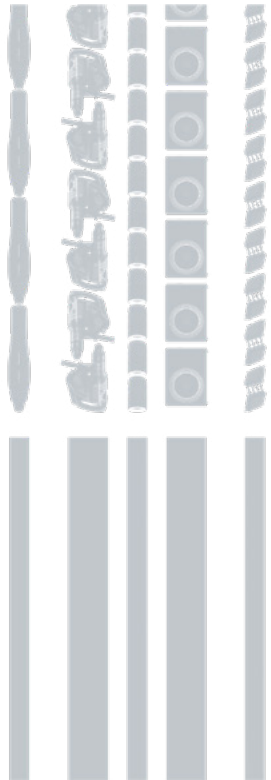
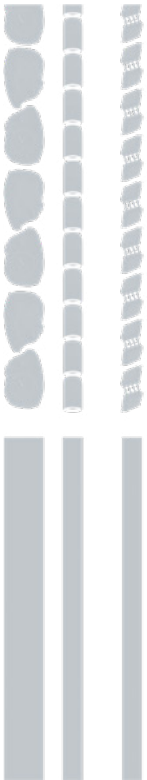
**Act** by sharing concerns with supervisors or experts and document your decisions and reasoning.

- By elevating the issue: Sometimes it is best to make your concerns transparent to your manager or a subject matter expert.
- By documenting your decision: Do not forget to document your decision and why you have chosen this option

**Reflect** on your learnings and consider how you can share your insights with others.

- On what you have learned: Once you have made a decision, take the time to review the path you have taken. The lessons learned will help your future decisions.
- On what you could share: What insights might be valuable to others and how might you share them?

**Ethical decision making:** Using the ‘I CARE’ model helps in making ethical decisions.





**BOSCH**



Your code to the Code

### **Information and contacts**

Further information is available at

<https://code.bosch.com> and

<https://bgn.bosch.com/alias/compliance>

### **Robert Bosch GmbH**

Compliance Management (C/CM)

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