

beeline group



beeline's Code of Conduct



July 2022



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Because we care – an introduction by Ulrich and Frank Beckmann

Dear beeliners,

If someone were to ask us today what makes us particularly proud of beeline, our answer would be the same as ever: “Our success can be clearly seen from the many millions of products that our customers buy every year. But even now, the best ‘product’ of all for us is seeing so many colleagues work together so well in so many countries.”

From the day beeline was founded, we naturally wanted our staff to support our common goal of making beautiful jewelry and attractive accessories for all. But we wanted more, too: The question of how we do business was a key benchmark for our success together back then – and it still is today.

This is why our corporate culture has always been driven by values that align our decisions and actions with our long-term, long-lasting success:

**Passion · Team spirit · Responsibility ·
Transparency · Excellence**

Our Guiding Principles and this Code of Conduct build on these fundamental values and set out in concrete terms how we all – staff and managers alike – should behave in our dealings with each other every day, and how we should interact with our partners, suppliers, and customers, and with the environment. This is how we guarantee quality, sustainability, and ethical business practices for our business partners.

Sustainability has always played a core role for us and it will remain a driver for our business activities going forward: Because we care. In other words, we treat both the environment and people in the way we ourselves would like to be treated. As a result, this is a core component of our Code of Conduct.



Ulrich Beckmann (Founder and Sole Shareholder) & Frank Beckmann (Advisory Board Member)

Complying with our Code of Conduct will maintain beeline’s sustainable success going forward and ensure we live up to our own standards by taking responsibility for our planet and our products, and for people.

We expect all beeliners to know and observe the rules and principles set out here.

Uli and Frank

Message from the *Managing Directors*

Dear colleagues,

Passion, team spirit, responsibility, transparency, and excellence have been our foundation at beeline for more than 30 years. They have ensured we are a reliable, ethical business partner.

We intend to continue acting enterprisingly, responsibly, and ethically in the future, too, so as to secure our business success and sustainability.

Our Guiding Principles and this Code of Conduct describe how we achieve our corporate goals today. Complying with these key corporate policies is something that affects each and every one of us – everywhere in the world and every day.

There can be no compromises when it comes to questions of integrity. This is why observing all legal and regulatory requirements in this area is particularly important. This Code of Conduct sets out our ethical principles. It provides all of us with guidance on how to behave

and make decisions in our day-to-day work. It describes the standards we set ourselves and that we comply with – and also demand – in our dealings with one another.

And it represents a promise to the outside world: to our customers and business partners, to society, and to the environment.

Together, we are responsible for complying with these principles. This is why we expect you to read this Code of Conduct carefully, to take it on board, and to apply it and the policies and guidelines derived from it in your daily work.

Hinrich and Marc

This version of the Code of Conduct was approved by the Advisory Board on August 30, 2022.



Hinrich Tode, Chief Executive Officer (CEO) & Marc Olivier Oeuvrard, Chief Sales Officer (CSO)

Our Guiding Principles

Our Guiding Principles shape what we do as an organization.
And we expect all employees and managers to behave in line with them.



Focus & Impact

All Employees:

- We think and act entrepreneurially
- We define ambitious objectives with realistic key results
- We act data-driven and measure the quality of our work
- We are accountable for our decisions and actions

Leadership:

- We enable teams and individuals to solve problems autonomously and work independently



Teamwork & Collaboration

All Employees:

- We act and think cross-functionally and partner-centric
- We support each other and contribute to the success of others
- We look for solutions, not problems
- We show respect and build a trustful environment

Leadership:

- We create psychological safety for our own teams and others



Growth & Improvement

All Employees:

- We challenge the status quo as well as ourselves regularly
- We give and seek feedback proactively
- We fail fast and learn from mistakes
- We look at challenges in an optimistic and opportunity-oriented way

Leadership:

- We act as coaches and sparring partners for others



Responsibility & Sustainability

All Employees:

- We strictly apply the beeline code of conduct
- We manage all available resources, including our own, prudently and cost-efficiently
- We strive to find environment-friendly solutions
- We act in a socially responsible manner

Leadership:

- We act as role models, take our duty of care seriously and promote highly ethical behavior

They are a fixed part of all our decisions and the framework in which we – as key elements of beeline – do business.

Our Code of Conduct

beeline's Code of Conduct is central to us, and compliance with it is a precondition for being a beeliner. The Code of Conduct applies both to beeline GmbH and to all its subsidiaries (beeline).

The Code of Conduct derives from our Guiding Principles and is based in particular on the following international standards and principles:

- ✔ **The UN Global Compact's Ten Principles**
- ✔ **The United Nations' Declaration of Human Rights**
- ✔ **The International Labour Organization's Fundamental Conventions**
- ✔ **The United Nations' 17 Sustainable Development Goals**

beeline's Code of Conduct not only contains the requirement to comply with the law but also sets out the need to behave ethically and in a more and more sustainable manner in all areas in which beeline is active or can exert an influence – be they economic, social, or environmental. At the same time, it provides overarching, binding guidance on how to behave.

Of course, we cannot foresee every individual case or possible situation. This is why we have formulated the Code of Conduct in broad, universally applicable terms.

It is not supposed to replace detailed regulations and procedural instructions. Rather, it aims to provide all staff with a clear understanding of the principles and ethical values applied at and by beeline, by setting out the core elements of individual and corporate responsibility.

“We adhere strictly to beeline's Code of Conduct”



The Code of Conduct applies to the entire beeline Group worldwide. In other words, it is binding on all companies and their governing bodies, managers, and employees, as well as on temporary workers, consultants, and everyone acting on behalf of, or representing, beeline.

It covers both beeline's organizational responsibilities and topics for which each and every one of us is responsible.

beeline's managers have a particular responsibility to take their duty of care seriously and, as role models, to act legally and ethically at all times. It is their duty to

ensure that employees are familiar with, and understand, the Code of Conduct. Managers are the first point of contact for questions about the rules set out in the Code of Conduct. In cases of doubt, the relevant Human Resources staff and the Group Compliance Officer can be contacted.

beeline cannot achieve the goals set out here without its customers, suppliers, and partners. beeline expects its partners to adhere to standards that correspond to these ethical requirements. The minimum requirements for our suppliers resulting from this Code of Conduct are set out in the beeline Group Supplier Code of Conduct.

The way we *work*

1. Compliance with statutory requirements

We undertake to comply with national law and any other applicable legal requirements and policies at all times. Where the statutory requirements differ from the provisions of beeline's Code of Conduct, we comply with the stricter of the two.

2. Our product quality

Our mission is to make beautiful jewelry and accessories accessible to everyone. This is why we not only adopt high design standards but have also made quality management a key part of our business operations. This applies in particular to the procurement of merchandise. Our product safety and quality requirements go well beyond the statutory requirements in some cases. In addition to chemical testing, we perform physical and performance tests such as for corrosion, plating thickness, fracture properties, and much more.

3. Reporting and communication

beeline undertakes to provide transparent, truthful, verifiable, and accurate external reporting. We ensure that the information is gathered carefully and that it is correct. Our financial reporting is prepared in accordance with the applicable statutory accounting framework.

We also communicate truthfully with our customers, especially regarding product information.

4. Conflicts of interest and sideline jobs

We undertake to act in beeline's interest and avoid situations that could lead to conflicts between personal and business interests or that could influence business decisions. In line with this, we inform our line manager without delay of circumstances that could influence our business decisions. These include but are not limited to personal and business relationships with suppliers, partner companies, and competitors, or other business relationships.

Further information on conflicts of interest is provided in the applicable internal signature and payment policy.

Since what we do outside work can also impact beeline, we disclose sideline jobs that could influence or conflict with our work at beeline. This also applies to activities in which we use knowledge gained during our work for beeline.

5. Anti-corruption

beeline does business fairly and transparently and does not tolerate any form of corruption, regardless of whether it involves employees, suppliers, partner

companies, or other business relationships. We do not offer bribes or other improper benefits, and we also do not promise, accept, demand, receive, or otherwise take possession of them. This applies regardless of whether they are direct or indirect, for business or personal benefit, or for ourselves or others.

6. Gifts, invitations, and other benefits

We do not accept any business-related courtesies such as gifts, hospitality, or other perks if these constitute undue influence or could be interpreted as such. Equally, we do not provide our business partners with such courtesies.

Monetary or similar gifts are prohibited. Equally, gifts and invitations extended by and to public office holders are not permitted as a matter of principle.

We only extend and accept appropriate and low-value gifts and invitations, and ask our business partners to take this into account.

Additional information is provided in the internal Gifts and Benefits Guidelines.

7. Sponsoring and marketing cooperation

Sponsoring and marketing cooperation are different to benefits, since beeline receives something – such as communications or marketing activities, for example – in return.

All sponsorships and marketing activities are based on written contracts, and are in line with the benefits provided.

8. Fair competition

beeline conforms to high business and ethical standards and undertakes to help ensure free and fair competition in the interests of all market players. We observe all local competition laws and consumer protections. This applies both with respect to our competitors and suppliers and to our partner companies and customers.

9. Fraud and deception

We undertake to act in beeline's best interests. beeline does not tolerate any form of fraud or deception, including but not limited to theft, embezzlement, money laundering, and any form of misuse of beeline's property or that of its business partners.

Handling *Company Resources, Information, and Data*

1. Property and financial resources

We treat beeline's property responsibly and protect it against loss, damage, theft, and unauthorized use.

Company property can only be used for business purposes. Copying and/or taking possession of company data for personal purposes is prohibited.

We protect beeline's intellectual property – such as patents, brands, designs, and specialist knowledge – and respect others' intellectual property.

In addition, we ensure that beeline's financial resources are used responsibly.

We act in a cost-conscious manner and check carefully whether expenditures in our area of responsibility or influence are necessary and reasonable.

2. Information, IT security, and IT systems

We work and use information, IT systems, and the Internet in a responsible and professional manner. The private use of our IT infrastructure is only permitted within the authorized, appropriate

“We manage all resources, including our own, prudently and cost-efficiently”

framework set out in our IT Usage Policy. We have introduced measures to protect our IT systems against unauthorized access or attack. In particular, we



comply with relevant public authority recommendations and industry standards such as the introduction of a core client-server management architecture, and network and infrastructure monitoring. We also regularly train staff belonging to defined risk groups on IT security and data protection issues.

3. Duty of secrecy, confidential information, and personal data

It is important to us that both our own information and information made available by our partners and employees is handled confidentially, securely, ethically, and for the designed purpose.

This is why we protect trade secrets and confidential documents from dissemination to unauthorized third parties and from misuse, regardless of whether they belong to beeline or our partner companies.

This includes security-related and personal data, and information about business and contractual matters, among other things.

beeline also requires its partner companies to treat such data carefully.

Dealing with *one another* and with *third parties*

1. Mutual respect

We treat each other with dignity and respect, and join forces to create a working environment filled with mutual esteem, support, and fairness. This means respecting our employees' personal dignity, privacy, and personality rights, along with those of our customers, partners, service providers, and suppliers.

2. Diversity and anti-discrimination

Diversity and variety enrich beeline and are a critical long-term success factor. This is why beeline aims to create a working environment defined by equal opportunities, diversity, and mutual respect. We ensure that all employees have the same opportunities regardless of their skin color, nationality, ethnicity, social or cultural background or origin, sex or gender, religion or belief, political affiliation, physical constitution or health status, sexual orientation, family status, age, appearance, pregnancy, parental leave, membership of a works council or union, or other personal characteristics.

Nobody is allowed to suffer discrimination (i.e., a disadvantage for which there is no objective reason) or be put at an undue advantage, either directly or indirectly.

3. Occupational health and safety, and working hours

beeline protects its employees against risks and hazards, and ensures their working environment is safe and healthy. It takes all precautions necessary to minimize risks as identified in current risk assessments. All employees receive regular training on occupational health and safety issues.

beeline ensures compliance with all applicable occupational health and safety and working time legislation, and with employment law in general.

“We show respect and build a trustful environment”



This applies in particular to the number of hours worked, the observance of rest periods, and annual vacation, maternity leave, or parental leave entitlements.

4. Child and forced labor

beeline does not tolerate any form of forced or child labor, either in its own operations or in its supply chain. beeline observes the statutory minimum working age at all times.

5. Freedom of association and collective bargaining

beeline respects employee representative bodies as serious, valued, and equal partners, and supports them in exercising their statutory rights and duties.

All employees have the right to found or join works councils or unions, and to participate in organized activities.

Putting *Sustainability* into practice

“We act in a socially responsible manner”

1. Sustainability

Achieving the right balance of environmental, social, and economic topics is more important than ever in view of today’s global challenges – such as climate change and the profound transformations that society is undergoing. beeline’s goal is to maintain an ongoing, open dialog on sustainability issues with its employees, partners, local communities, and other stakeholders. In addition, beeline aims to continuously make its products more environmentally friendly, reduce its environmental footprint, and ensure good social standards in its own operations, at its manufacturing partners, and throughout its supply chain.

2. The environment

As an international company, beeline is conscious of its responsibility for the environment. This is why we work continuously to minimize our impact on the environment and the climate. We do this in our own business operations, by ensuring our products are manufactured and shipped in a resource-friendly manner, by engaging in responsible and more sustainable procurement, and by working closely together with our suppliers. We strive to use energy, water, and raw materials as efficiently and economically as possible, and to ensure that waste is disposed of in an environmentally responsible manner in line with the relevant legislation.

We comply with applicable national environmental law at all times. In addition, beeline has established an environmental management system to deal with environmental risks.

3. Human rights and social standards

beeline undertakes to comply with human rights and fundamental social standards within the company and when working together with partners, and especially with suppliers. This also includes complying with the statutory minimum wage. We do not tolerate activities or working conditions that are in breach of these rights and standards.

„We strive to find environmentally friendly solutions”

4. Social commitment

Making a positive impact on society above and beyond our business activities is particularly important to beeline.

This is why we are establishing innovative long-term programs that permanently impact the people associated with our products for the better.

These include our support for employee volunteering and our sponsorship of selected social projects. Donations are made in a transparent and verifiable manner; this also applies to their purpose and the use to which they are put.

beeline does not support any political organizations, parties, or individual politicians.

5. Animal welfare and the conservation of species

beeline acknowledges the universal right for animals to be treated with respect, and does not accept any materials whose production involves the mistreatment of or cruelty towards animals.

beeline does not accept any materials based on plants or animals that are endangered in any way or that are on the Red List of Threatened Species in the products that it distributes.

Further details on these requirements are provided in the beeline Group Supplier Code of Conduct.

Compliance with the code of conduct and *dealing with any breaches*

1. Compliance with the Code of Conduct and personal responsibility

The personal commitment shown by, and actions of, beeline's employees and managers define its corporate culture and reputation.

This is why beeline expects all employees to familiarize themselves with and observe the requirements of this Code of Conduct, the related internal policies and processes, and the relevant laws and regulations.

Failure to comply with these principles can lead to disciplinary measures and sanctions, and to consequences under employment, civil, and criminal law.

2. Reporting breaches

Openness, transparency, and a culture of trust that allows discussions of ethical behavior are particularly important to beeline.

In line with this, we encourage all employees to openly and honestly report potential breaches of applicable laws, this Code of Conduct, and the associated internal policies and processes.

“We take responsibility for our decisions and actions”

Line managers, Human Resources department employees, and the Group Compliance Officer are available for this. Reports can also be submitted completely anonymously using a digital whistleblowing tool.

Anyone reporting concerns in good faith can do this without fear of negative consequences. Persons taking reprisals against a whistleblower who honestly

provides information on a potential breach must themselves expect to face disciplinary measures.

Additional information on reporting (potential) breaches (the whistleblowing system) is provided in the internal Whistleblowing Guidelines.



