



Robert Bosch
Stiftung

Code of Conduct

**“Be human and
respect human
dignity”**



Foreword

Dear employees and partners of the Foundation,

Our founder Robert Bosch made it part of our mission to frequently review our own work. For this reason, we have not only profoundly restructured our strategic alignment, but are also seeking to develop Compliance further, anchoring it as a kind of guide for the Foundation.

The Foundation is made up of a whole range of employees with a variety of career paths, backgrounds, and experiences. What unites us is our work in different contexts at home and abroad across the many areas and topics we support. Equally, we are all committed to achieving societies in which every single human being is treated with dignity and respect. This is far easier to achieve if we share a common foundation.

A cornerstone of this foundation is the core values which have already shaped the way we act. We have summarized these again in this Code of Conduct. We operate on the assumption that we all want to make the right choices. As such, our primary aim is to provide guidance and advice to empower our people to recognize right from wrong in order to do the right thing. Compliance provides a framework to protect our employees as well as foster the courage to commit to responsible decision-making. It is up to each individual to implement the Foundation's goals and design projects and activities within this framework.

In order to meet these goals, we pledge our full support to all our employees and seek to foster a culture that truly values openness.

With best wishes,

Your Board of Management Team

The Foundation

I. Human Rights

The Foundation respects and supports the United Nations Guiding Principles on Business and Human Rights. Furthermore, across all our activities we undertake to observe the Universal Declaration of Human Rights, the Principles of the United Nations Global Compact, and the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

II. Integrity

Employees are ambassadors for the Foundation at all times. As such, we expect all of our employees to act with honesty and fairness. This includes compliance with legal regulations as well as agreements and internal policies. The same is true for the law of the country for which our support or services are intended.

III. Respect

We are international and diverse. We actively encourage tolerance and treat everyone as equals. Accordingly, we do not tolerate any form of discrimination, disparagement, harassment, coercion, or verbal assault, nor intimidating or offensive behavior. The same standards apply to all our partners, suppliers, and service providers.

“Only by understanding one another can we create a viable relationship. Those who express their honest opinion must also be believed.”

Robert Bosch

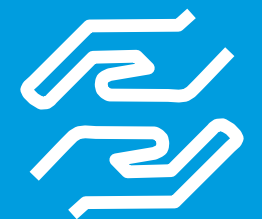
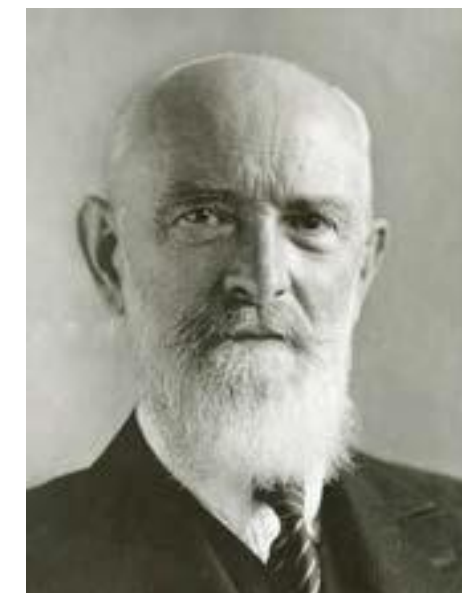
IV. Responsibility

We are true to our word. It is vital that managers, in particular, act as role models, and they are expected to set a good example. It is their responsibility to ensure that the relevant regulations are carried through in their area of responsibility and that no legal violations occur that could have been prevented through the right information and supervision. In doing so, we rely on a management philosophy that is based on trust and ensures fairness in all our work.

V. Openness

We foster an open culture of togetherness where all employees should feel able to ask for advice and express their concerns. The aim of this is to promote the interests of our colleagues and the Foundation. To this end, we have appointed various points of contact for Compliance as well as an external private attorney to whom employees and partners can turn. We have set out a separate process to protect against violence and sexual harassment and have appointed an intervention officer who is also available as a further point of contact.

Protection is afforded to anyone who makes a report in good faith. We follow up all reports with the utmost care and with due regard for the rights of all parties involved.



Common Principles

I. Corruption Prevention

The Foundation does not tolerate corruption or any other forms of illegal influence. Nor is unlawful conduct justified because “everyone does it,” because “that’s just how it is,” or because “needs must.”

Employees are allowed to exchange gifts and issue invitations in the context of partnerships or support relationships, and indeed this can be a key part of polite and respectful interactions. However, if this constitutes an attempt to exert unfair influence on the recipient’s decision-making, it may be unlawful behavior. We want to safeguard all parties involved and have set out a Policy for dealing with gifts and invitations. This is intended to protect against even so much as the appearance of any ability to influence or be influenced.

[Explanations and Examples: Corruption Prevention Policy](#)

As a general rule, gifts or other benefits may be accepted or given provided their value does not exceed a socially acceptable limit. Generally speaking, invitations to standard hospitality events, provided they remain within reasonable limits, may also be accepted or issued.



“I have always acted according to the principle that ‘I would rather lose money than trust.’ The integrity of my promises, the belief in the value of my products and in my word of honor have always had a higher priority to me than a transitory profit.”

Robert Bosch

II. Authorities, Public Office Holders, and Elected Representatives

On the one hand, the Foundation is reliant on its political work. On the other, such interactions are subject to legal requirements. Here, it is important to distinguish between holders of public offices and elected officials.

Public office holders not only include civil servants, but all persons appointed to perform public administrative duties. As a rule, employees or representatives of the Foundation are not allowed to offer, promise, or grant any benefits to public office holders. In the same vein, no benefits may be sought or accepted from said public officials.

This differs from political work with elected officials, for which an additional framework is in place.

[Explanations and Examples: Corruption Prevention Policy/ Handbook for Issues of Compliance in Political Liaison Work](#)

III. Conflicts of Interest

We expect all our employees to be loyal to the Foundation and to keep professional and private matters separate. Personal relationships with a partner in the Foundation must not lead to preferential treatment. Employees must never abuse their standing at work for personal gain.

[Explanations and Examples: Conflicts of Interest Policy](#)

Here, transparency is of the essence: In and of itself, a conflict of interest does not have to be a problem. However, a conflict of interest about which nothing is done creates a serious problem.

Basis

I. Business

1. Assets

Every employee has a responsibility to both protect and ensure the proper use of the Foundation's assets in a way that conserves resources. The removal of documents or other assets without official cause is prohibited. All assets must be used responsibly and never for personal gain. The same is true for employee working hours.

2. Business trips

When traveling for business, employees must take care to be conscious of costs in their use of the Foundation's funds. Each employee has a responsibility to fully and truthfully document any official expenses; receipts must be provided for travel and hospitality expenses. Travel expenses must not be misappropriated.

3. Documentation

Our books, documentation, and reports are only as accurate as the data upon which they are based. Any inaccuracies in our financial information could incur legal proceedings and could undermine the confidence of our shareholders, partners, and the public. As such, each and every record must be complete, truthful, up-to-date, and understandable in accordance with any applicable laws. It is prohibited to alter, destroy, or dispose of records that must be retained by either law or internal requirements.

“All work is important, even the smallest of tasks. No one should make the mistake of thinking their work is superior to that of their colleague. Everyone should work for the good of the whole.”

Robert Bosch



Employees may not withhold knowledge relevant to the Foundation's work from other authorized employees, providing this does not conflict with any overriding interests (e.g. confidentiality and secrecy obligations, data protection). As such, information must be documented and stored in such a way that it is possible for any authorized employee to find the relevant information within a reasonable timeframe.

4. Approvals and payments

Any major decisions or actions with a financial impact must be approved in line with existing regulations (e.g. on signatories and the principle of multiple checks). The Foundation accepts payments only from traceable sources. Payments made by the Foundation are contingent upon the approval of the grant or the service being received. Generally speaking, they are paid into a business account belonging to the relevant partner organization or service provider upon receipt of a proper invoice and traceable proof of service and never in cash. Employees must document the purpose of any transactions, the party giving or receiving the money, and the source and destination accounts for transferring money. The true nature of a transaction must never be falsified.

II. Information and Data

1. Duty of confidentiality

Confidential information must be respected. Confidentiality must also be maintained with regard to our partners' and projects' confidential information, unless the disclosure of said information is authorized or required by law. This duty of confidentiality remains in place even after the end of the working relationship.

2. Data protection

Personal data may only be collected, processed, or used to the extent permitted. It is vital to safeguard the rights of those concerned to access and amend information as well as to revoke, block, or delete said information as necessary. Each employee has a responsibility to ensure the proper handling of their login data.

3. Publicity

Our values are always the same, regardless of the medium. It follows that employees must also behave with respect toward the Foundation, their colleagues, and partners, especially on social media as well as on Internet forums or blogs. As a rule, public communications are implemented by the management and the employees authorized to deal with public relations.

4. Intellectual property

Employees may only use the intellectual property of others if the Foundation has been granted the corresponding rights of use. Intellectual property includes industrial property rights, such as patents or trademarks, and copyrighted work, such as software or images. As such, employees must ensure, particularly in the case of photos, videos, and texts, that the author has agreed to their publication and, if so, under what conditions. A person's right to their own image must be respected and third-party material must never be passed off as one's own.

III. Sustainability

1. Health

The Foundation actively promotes the health of its employees through programs and activities as part of occupational health management. Smoking is strictly prohibited in the workplace.

2. Occupational safety

Safety at work plays an integral role in all operational processes and is a core technical, economic, and social consideration from as early as the planning phase. In line with legal requirements, we regularly carry out occupational safety training, risk assessments, and preventive health care.

3. Environmental and climate protection

Protecting the environment and conserving natural resources are essential in this day and age and we want to play our part. As such, we reduce our environmental footprint by using resources responsibly and reducing our waste and emissions. Each employee has a responsibility to behave in a way that ensures they are playing their part in protecting the environment and climate. This also includes lowering their own personal energy consumption.



Scope and Points of Contact

This Code of Conduct applies to all employees of Robert Bosch Stiftung GmbH and its corporate entities. Previous regulations that do not conflict with the Code of Conduct remain in force. Should any discrepancies occur, the stricter regulation shall take precedence. Exceptions to the Code of Conduct must be legally reviewed and justified and must be coordinated with Compliance.

The Foundation encourages all employees and partners to address any issues and concerns openly and directly. Where questions or suggestions arise in relation to the Code of Conduct, you can contact the Compliance team or our external private attorney directly:

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Nobody is expected to learn the Code of Conduct by heart. It is far more important to familiarize yourself with the principles and to act with common sense.

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