

# Code of conduct and anti-corruption policy SCHRIEVER®

#### 1. Business Ethics and Conduct

SCHRIEVER conducts its business within the framework of the applicable laws and regulations and values openness and honesty in dealing with its business partners. This includes in particular that SCHRIEVER does not pursue any illegal business practices that could call into question the integrity of the company or its employees. Employees may not grant or accept any advantages to customers, suppliers or other third parties in the form of payments or promises in order to be treated preferentially or to give the impression of preferential treatment.

### 2. Confidentiality and Trade Secrets

As part of their work for SCHRIEVER, employees may have to deal with confidential information. Confidential information is technical and commercial knowledge about SCHRIEVER that must not be disclosed outside of the company. This protects the business interests of SCHRIEVER. This is all information that is marked "confidential" or "for internal use" or other confidential business documents and information, such as e.g. B. trade secrets, inventions, internal reports, strategies, sales data, internal price lists, sensitive product information or business plans and development projects.

During the term and validity of the employment contract, no direct or indirect confidential information may be disclosed or used, either verbally or in writing, without the prior written consent of the responsible manager. This obligation continues to exist after the end of the employment relationship if the relevant employment contract conditions exist. The careful handling of confidential information and internal knowledge protects the interests of SCHRIEVER.



### 3. Antitrust and Competition Laws

According to the applicable antitrust and competition law, agreements and activities that could impede trade or restrict competition in the countries in which SCHRIEVER operates are prohibited. Violations of these laws include: B. Collusion between competitors to set and control prices, boycotting certain suppliers or customers, allocating customers or markets, or restricting the manufacture or distribution of products.

Special care must be taken to ensure that activities involving representatives of other companies are not considered or construed as violating competition laws.

## 4. Dealing with customers and suppliers

Customers and suppliers must not be given excessive gifts or other benefits. Employees must refuse excessive gifts or other benefits granted to themselves or to persons close to them. Accepting or giving monetary gifts is strictly prohibited. It is important to maintain a professional relationship with customers and suppliers that is not jeopardized by conflicts of interest and excessive gifts that can be misconstrued.

Hospitality for customers and suppliers must be appropriate to the Company's legitimate business interests. In cases where the employees are unsure, the manager can provide information.

SCHRIEVER maintains a professional business relationship with its customers and suppliers that is free of conflicts of interest.

#### 5. Financial Records

SCHRIEVER's financial records are correct and comply with legal requirements. These documents are important for the fulfillment of corporate obligations towards shareholders, employees, customers, suppliers and supervisory authorities. Illegal practices related to financial records violate applicable laws.



#### 6. Environmental Protection

SCHRIEVER & SUPPLIERS are already committed to environmental protection through their own product portfolio. SCHRIEVER & SUPPLIERS continue this idea and also make a contribution to environmental protection in everyday business. This also includes employees protecting the environment and avoiding unnecessary waste of resources (e.g. energy, paper or other raw materials). SCHRIEVER & SUPPLIERS are committed to sustainable environmental protection.

#### 7. Preservation of the natural basis of life

SCHRIEVER & SUPPLIERS may not, in violation of legitimate rights, confiscate land, forests or bodies of water, the use of which secures the livelihood of people. SCHRIEVER & SUPPLIERS must refrain from harmful soil changes, water and air pollution, noise emissions and excessive water consumption if this damages people's health, significantly impairs the natural basis for food production or prevents people from accessing safe drinking water.

### 8. Handling conflict minerals

For the conflict minerals tin, tungsten, tantalum and gold as well as for other raw materials such as cobalt, SCHRIEVER establishes processes in accordance with the guidelines of the Organization for Economic Cooperation and Development (OECD) for fulfilling the duty of care to promote responsible supply chains for minerals from conflict and high-risk areas and expects the same from its suppliers.

## 9. Treatment and discharge of industrial wastewater

Wastewater from operating procedures and manufacturing processes must be typed, monitored, checked and, if necessary, treated before discharge or disposal. In addition, measures are being introduced by SCHRIEVER & SUPPLIERS to reduce the generation of wastewater.



## 10. Handling of air emissions

General emissions from operations (air and noise emissions) and Greenhouse gas emissions must be typed, routinely monitored, verified, and treated as necessary before they are released. SCHRIEVER & SUPPLIERS also have the task of monitoring their own exhaust gas cleaning systems and are required to find economical solutions to minimize any emissions.

## 11. Handling of waste and hazardous substances

SCHRIEVER & SUPPLIERS follow a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste. The bans on the export of hazardous waste in the Basel Convention of March 22, 1989, in the current version must be observed. Chemicals or other materials that present a hazard if they are released into the environment must be identified and managed in a manner that ensures safe handling, transport, storage, use, recycling or reuse, and disposal of these substances is. Mercury shall be used in accordance with the bans of the Minimata Convention of 10 October 2013 and persistent organic pollutants shall be treated in accordance with the Stockholm Convention of 23 May 2001 as amended.

### 12. Reduce consumption of raw materials and natural resources

SCHRIEVER & SUPPLIERS reduce or avoid the use and consumption of resources during production and the generation of waste of all kinds, including water and energy. This happens either directly at the point of origin or through procedures and measures, e.g. by changing the production and maintenance processes or processes in the company, by using alternative materials, by savings, by recycling or by reusing materials.



## 13. Equal opportunities for employees

As an employer, SCHRIEVER & SUPPLIERS are committed to a working environment that is characterized by fairness, respect and equal opportunities. The employees also contribute to this through open, friendly and fair dealings with colleagues and business partners. Our appreciation is equal for all employees – regardless of race, ethnic origin, gender, religion, ideology, disability, age or sexual identity. The contractual basis at SCHRIEVER & SUPPLIERS is also based on equal opportunities for employees. This applies to all aspects of the employment relationship, in particular employment, recruitment, working conditions, training, business trips, working hours, professional training, further development and remuneration. Employees who feel disadvantaged can confidently contact the respective manager or the HR department.

## 14. Relationships between employees

The success of the company depends, among other things, on open and trusting communication among each other, within the team and at all levels of the company. Meetings to promote internal information are held regularly in the company to inform employees about the current business situation and give them the opportunity to comment on all topics and express their opinions.

SCHRIEVER expects all managers and employees to be polite and respectful in personal conversations, on the phone, in written correspondence and especially in email traffic.

#### 15. Exclusion of forced labor

SCHRIEVER & SUPPLIERS undertake that no forced labor, slave labor or similar work may be used. All work must be voluntary and done without threat of punishment. Employees must be able to end their work or employment at any time. In addition, there must be no unacceptable treatment of workers, such as psychological harshness, sexual and personal harassment and humiliation. The commissioning or use of security forces is to be avoided if persons are treated inhumanely or degradingly or are injured or if freedom of association is impaired.



#### 16. Ban on child labor

SCHRIEVER & SUPPLIERS undertake not to use child labor in any phase of production. SCHRIEVER & SUPPLIERS are requested to adhere to the recommendations from the ILO conventions on the minimum age for the employment of children. Accordingly, the age should not be lower than the age at which compulsory schooling ends according to the law of the place of employment and in any case not less than 15 years. If children are found at work, the supplier shall document the actions to be taken to remedy the situation and enable the children to attend school. The rights of young workers must be protected. Children under the age of 18 shall not be employed in any work that is harmful to the health, safety or morals of children. Special protective regulations must be observed.

#### 17. Fair remuneration

Regular hours and overtime pay must be equal to the national statutory minimum wage or industry minimum standards, whichever is greater. In any case, overtime pay must be more than regular hours. Insofar as the remuneration is not sufficient to cover the costs of normal subsistence and to form a minimum of reserves, the supplier is obliged to increase the remuneration accordingly. Employees are to be granted all statutory benefits. Wage deductions as punitive measures are not permitted. SCHRIEVER & SUPPLIERS must ensure that employees receive clear, detailed and regular written information about the composition of their pay.

## 18. Fair working hours

The working hours of SCHRIEVER & SUPPLIERS must comply with applicable laws or industry standards. Overtime is only permitted if it is performed on a voluntary basis and does not exceed 12 hours per week, while employees must be given at least one day off after six consecutive working days. The weekly working time must not regularly exceed 48 hours.



#### 19. Freedom of Association

SCHRIEVER & SUPPLIERS respect the right of workers to form and join organizations of their choice, to bargain collectively and to strike. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative means of independent and free association of workers for the purpose of collective bargaining should be provided. Employee representatives must be protected from discrimination. Employees shall not be discriminated against for forming, joining or being a member of such an organization.

#### 20. Prohibition of discrimination

Discrimination and unequal treatment of employees in any form is not permitted unless it is justified by the requirements of the employment. This applies e.g. B. for discrimination based on gender, race, caste national, ethnic or social origin, skin color, disability, health status, political conviction, origin, world view, religion, age, pregnancy or sexual orientation. SCHRIEVER & SUPPLIERS respect the personal dignity, privacy, and personal rights of each individual.

## 21. Safety at work

SCHRIEVER & SUPPLIERS follow the recommendations of the World Health Organization (WHO), which defines health as a state of complete physical, mental and social well-being and not just the mere absence of illness or infirmity.

SCHRIEVER & SUPPLIERS undertake to ensure a healthy and safe working environment and to comply with occupational health and safety laws. These efforts relate, among other things, to avoiding the abuse of addictive substances such as medicines, alcohol and other drugs.

SCHRIEVER & SUPPLIERS regard their employees as an important success factor and therefore the most important asset in the company and not just as a cost factor. SCHRIEVER & SUPPLIERS understand the health of their employees as a social responsibility. It is therefore important to strengthen health potential in the long term, to improve the well-being of employees at work and to prevent hazards in the workplace. SCHRIEVER & SUPPLIERS take responsibility for the health and safety of employees in the workplace.



## 22. Use of Company Assets

SCHRIEVER provides its employees with the infrastructure and equipment they need to carry out their tasks. Employees thus have some assets of the company, such as B. Working hours, company products, office and business equipment, fleet vehicles, software, company data, brands and logos. Except where expressly permitted, use of these Company assets is for operational purposes only. The employees are responsible for the sustainable use of the company's assets.

Date

Jan Schriever

Dr. Thilo Hafenrichte

Managing Director

**Managing Director**