

Code of Conduct

Schlaeger Group



schlaeger

Formentechnik
Bayreuth



Technische Berufsbildung Bayreuth

Content

1	Introduction	2
2	Ethical Business Conduct	3
2.1	Compliance with Rights and Laws	3
2.2	Ban on Corruption and Bribery	3
2.3	Social Interaction	3
2.4	Compliance with Antitrust Laws	3
2.5	Data Protection, Information Security and Intellectual Property	3
2.6	Money Laundering and Financing Terrorism	3
3	Labour Conditions and Social Responsibilities	4
3.1	Ban on Forced Labour and Child Labour	4
3.2	Fair Remuneration and Working Hours	4
3.3	Ban on Discrimination	4
3.4	Accounting Standards and Finance Reporting	4
3.5	Freedom of Association and the Right to Collective Action	4
3.6	Protection of Privacy and Freedom of Speech	4
3.7	Avoiding Conflict of Interest	4
3.8	Occupational Health and Safety	5
3.9	Conflict Minerals	5
3.10	Education	5
3.11	Grievance and Complaints Mechanism	5
4	Environmental Protection, Energy and Sustainability.....	6
5	Acknowledgement of the Code of Conduct	6

1 Introduction

This code of conduct is based upon national laws and regulations, as well as international agreements, such as the universal declaration of human rights by the United Nations, the guidelines on children's rights and business principles, the United Nations guiding principles on business and human rights, the international labour standards by the International Labour Organisation (ILO), as well as the United Nations Global Compact. We place a high importance on responsible business practices, which especially include high standards in regards to environmental protection, sustainability, social responsibility and ethical business behaviour.

The code of conduct applies within the following companies:

Schlaeger Kunststofftechnik GmbH, Schlaeger M-Tech GmbH, Formentchnik Bayreuth GmbH, TBB – Technische Berufsbildung Bayreuth, hereinafter referred to as the Schlaeger Group.

The Schlaeger Group expects suppliers and business partners to also adhere to these principles and to review and implement them with their subsidiaries and suppliers. Documents of proof are to be presented to the Schlaeger Group on request.

The business partners are responsible for complying with their obligations defined in the code of conduct. Violations of this Code of Conduct or of the principles described in this Code of Conduct must be reported to Schlaeger immediately. A violation of their responsibilities does not free the business partner from other obligations defined in the code of conduct or the legal transaction with the Schlaeger Group. A supervision by the Schlaeger Group is not contractually mandatory, especially in regards to the compliance with applicable norms and laws.

The Schlaeger Group reserves the right to conduct audits and evaluations to ensure that these principles defined in the code of conduct are upheld. In the event of a violation of these principles by the supplier / business partner and a rejection of improvement measures or noncompliance with improvement measures after a reasonable time period has been given by the Schlaeger Group, the Schlaeger Group reserves the right to conduct a legal investigation on one or more business partnerships which could result in a termination of the business partnership.

2 Ethical Business Conduct

2.1 Compliance with Rights and Laws

The Schlaeger Group is subject to a number of national and international laws, regulations and norms. All business partners comply with the laws and regulations applicable to the them. The responsibility of conforming to applicable regulations lies also with each business partner of the Schlaeger Group.

2.2 Ban on Corruption and Bribery

We do not tolerate corruption, bribery, theft, embezzlement, fraud or extortion. We also reject any illegal payments or promises of other benefits to one person, a company or an official with the goal of influencing the decision making process. When it comes to donations and sponsoring, we also understand our social responsibility and ensure a proper and transparent conduct.

2.3 Social Interaction

We treat everyone with equal fairness. We accept and tolerate each other. Fairness, collaboration and mutual trust are a requirement. We do not tolerate and will take firm action against any form of sexual, psychological or physical harassment. Interactions with customers, suppliers and other business partners are subject to these requirements.

2.4 Compliance with Antitrust Laws

We commit without limitation to the principles of fair and free competition as an important component of orderly trade. We also comply with applicable rights and regulations of trade, including, but not limited to rules and regulations defined by cartel law, antitrust law and trade law.

2.5 Data Protection, Information Security and Intellectual Property

We securely store sensitive information and any form of valuable data, as well as intellectual property in accordance with the respective legal and contractual requirements. We place particular importance on the protection of personal data and comply with the applicable data protection laws.

2.6 Money Laundering and Financing Terrorism

We comply with all applicable legal requirements to prevent money laundering and the financing of terrorism and do not associate, either directly or indirectly, with money laundering activities or the financing of terrorism.

3 Labour Conditions and Social Responsibilities

The Schlaeger Group upholds the conventions set by the International Labour Organisation (ILO) and supports the international acknowledgement of human rights.

3.1 Ban on Forced Labour and Child Labour

We do not allow any form of tolerance towards slavery, forced labour, forced prison labour, bonded labour, mandatory commitment by workers, child labour, human trafficking or any related activities and strongly support the elimination of these.

3.2 Fair Remuneration and Working Hours

All applicable rules and regulations for ensuring fair working conditions as well as applicable regulations on working hours are upheld. We ensure a remuneration, which conforms to the applicable national laws on minimum wage.

3.3 Ban on Discrimination

We treat our employees with respect and create a working environment that is free of harassment and abuse in any form. Legal regulations regarding discrimination (e.g. due to sex, gender, race, colour, ethnic or social origin, disability, health status, political opinion, world view, religion or belief, age, maternity or sexual orientation) during hiring and employment are strictly upheld. All employees respect in all circumstances the identity and personality rights of each individual.

3.4 Accounting Standards and Finance Reporting

We comply with the accounting standards (GoB), the principles of the accrual method and the principles of proper accounting.

3.5 Freedom of Association and the Right to Collective Action

We respect the freedom of association and the right to collective action in accordance with the applicable laws and regulations.

3.6 Protection of Privacy and Freedom of Speech

The right of freedom of speech and the protection of employees' personal rights and privacy are respected. Employees and other stakeholders are given the opportunity to report concerns or potentially unlawful practices in the workplace.

3.7 Avoiding Conflict of Interest

Behaviours, which stand in conflict with company interests, will not be tolerated. The Schlaeger Group selects its business partners by objective and comprehensible criteria. Close relationships between employees and customers, suppliers or other business partners are to be addressed in a timely manner and the conflict of interest avoided.

3.8 Occupational Health and Safety

We offer our employees a safe and healthy working environment in accordance with the applicable legal standards. By introducing and applying appropriate occupational safety systems, we take the necessary precautions against accidents and health hazards, which may occur during the work. We ensure a high health and safety standard for all employees, external companies and visitors. We continuously review and improve our occupational safety guidelines. Additionally, each employee carries part of the responsibility of workplace safety in his or her working area and is obligated to ensure that occupational safety guidelines and instructions are strictly followed.

3.9 Conflict Minerals

We have established processes for the conflict minerals tin, tungsten, tantalum and gold, in accordance with principles defined by the Organisation for Economic Cooperation and Development (OECD). This is to fulfil our due diligence and to promote responsible supply chains for minerals from high-risk areas, which are affected by conflict. We expect the same from our own suppliers.

3.10 Education

The Schlaeger Group and its business partners support further education and training programs and established training opportunities with promising prospects and opportunities for young people to develop. The company creates the framework for modern training methods and recurrent training.

3.11 Grievance and Complaints Mechanism

All suppliers are obligated to pass on information received from the Schlaeger Group regarding availability, responsibility and implementation of a grievance and complaints mechanism to their employees in an appropriate manner. The grievance and complaints system must be accessible under strict and effective protection against retaliation and must maintain the confidentiality of the employee's identity.

We have created an anonymous whistle-blowing channel for our employees. This offers any employee the opportunity to report any infraction against European regulation (especially public procurement, financial services, financial products and markets as well as prevention of money laundering and financing terrorism, product safety, product conformity, traffic safety, environmental protection, protection against radiological hazards, food and feed safety, animal health and welfare, public health, consumer protection, protection of privacy and personal data, network protection and information security) via the following address:

F.E.L.S. Rechtsanwaltschaft mbH hinweis@fels-legal.de or by phone, +49 921 75 66 600

4 Environmental Protection, Energy and Sustainability

We are aware of the environmental impact of our business activities and are actively committed to mitigating and avoiding negative effects on the environment wherever possible. In particular, we comply with all applicable national and international laws, regulations and standards regarding health, energy and environment. We ensure the safe, energyefficient and environmentally sustainable development of our products as well as their transportation, use and disposal. Resources such as energy, water and raw materials are used responsibly, efficiently and sparingly. We utilize effective technologies to reduce waste and emissions to air, water and soil. We have taken effective measures in accordance to the Paris Climate Agreement to reduce direct and indirect CO₂ emissions, are making continual improvements, and promote the use of renewable and alternative energy sources. We regularly review and reevaluate our measures and adjust them accordingly.

In accordance with the Greenhouse Gas Protocol (GHG), the Schlaeager Group has committed itself to maintaining the status of CO₂ neutrality in Scope 1 & Scope 2 (since 2019).

The goal of company-wide greenhouse gas neutrality in accordance with Germany's targets by 2045 is our aspiration.

We also require our business partners to provide us with emissions data in the form of CO₂ equivalents for their delivery volumes that affect our Scope 3, as well as to work on reducing their emissions (Scope 1 & 2) themselves and to communicate this to us (CO₂ roadmap).

5 Acknowledgement of the Code of Conduct

By signing this agreement, the business partner acknowledges all principles and regulations defined by the code of conduct and commits to complying with them. This obligation applies to all locations of the business partner as well as to all locations of companies affiliated with the business partner within the scope of §15 et seq. of the German Stock Corporation Act.

By signing this code of conduct, the business partner confirms that they have all the necessary rights and authorisations to effectively agree to this obligation on behalf of the affiliated companies.

Place, Date

Place, Date

Name / Company

Name / Company