

## Preamble

Our code of conduct is a guideline for the whole company Schraubenfabrik Schmidt GmbH and therefore applies equally to each of us. In detail it addresses the management, the executives and all our employees. On the one hand it represents the demand on ourselves to meet the values and principles listed there in and at the same time it signals a responsible behaviour towards our business partners, customers and our employees.

## Obligation of the company management

Schraubenfabrik Schmidt GmbH sees itself in the duty to act economically, socially and environmentally conscious. The company strives to conduct its business competently on an ethical and moral basis and to operate fair competition in all markets in which it is active. This includes compliance laws and acceptance of prohibitions or restrictions on cartels or competition. We want to avoid in any case giving ourselves undue advantages over customers, suppliers or competitors.

## Team spirit, constructive cooperation

We continuously question existing solutions and develop new ideas for the benefit of our customers. To this end, we encourage constructive cooperation between our employees. Their interests and demands on us are decisive for our work and further development. Only through consistent teamwork can we be successful in the various business areas.

## Standards of cooperation

We expect all our employees to always act according to the highest professional standards. If employees violate existing guidelines, rules or regulations in the course of their work through their conduct, the employees concerned must expect disciplinary action.

## Open communication with employees

We do not cover up misconducts. If employees report actual or suspected misconducts in good faith, we will not tolerate intimidation or reprisals against them. We understand „in good faith“ to mean that the employee is convinced that his or her account is true. This applies regardless of whether or not a subsequent investigation confirms the employee's version.

## Dialogue with cooperation partners

All business informations of our partners and their trade secrets are always treated with sensitivity and confidentially. Required documents are properly prepared, stored or, if necessary, returned or destroyed at the end of the cooperation.

## Customer orientation

We always act fairly and honestly towards our customers and business partners. We record the wishes, needs and expectations of our customers and business partners in order to ensure a targeted implementation in products, services or other processes. Our primary goal is to establish a long-term and stable relationship with our customers and business partners on the basis of trust.

## Acceptance of gifts, donations

### a) Gifts to our employees

Our employees do not demand or accept any personal advantages from customers or suppliers that would change their own behaviour with regard to their own work for influence or could influence the company.

If gifts are offered by third parties, these may only be accepted if they are common practice and can be accepted as courtesy or cortesy (promotional gifts with the logo of the company giving the gift, such as calendars or pens).

In the case of gifts whose value exceeds the usual amount, the compliance officer or management must be informed. If this is not possible, these gifts must be rejected as a matter of principle.

### b) Gifts by our employees

Gifts on our part may also only be offered within the usual framework for the business relationship and to a materially appropriate extent. The recipient must not be able to associate any obligation with them that would influence his or her business decisions.

### c) Donations

As a matter of principle, Schraubenfabrik Schmidt GmbH does not make donations to political parties, to individuals or to organizations whose goals contradict our corporate philosophy or damage our reputation. The allocation of donations is always transparent.

## Bribery and corruption

We do not tolerate any form of corruption or bribery, regardless of whether it damages our company assets or the assets of third parties.

We have control mechanisms in place to prevent bribery, theft, embezzlement, fraud, tax evasion or money laundering.

Our employees are prohibited from accepting or granting favours of any kind (cash, travel, gifts, etc.) that are linked to an undue advantage (order placement, project award, etc.)

Our business partners are also required to avoid conflicts of interest that may involve a risk of corruption.

## Data protection

We treat all personal data of our customers, business partners and employees with the most care. This includes names, addresses, telephone numbers as well as date of birth or information about the current state of health. Our employees are obliged to take all measures to secure the data, which are suitable to protect our IT system against internal and external data theft. This applies in particular to passwords misused within the company and unauthorised downloading of files, in inappropriate material from the internet.

## Protection of the environment

The protection of the environment and the climate are very important to us. Our employees are required to treat all natural resources used in our company (e.g., energy, water, land, paper) with care. Our employees are expected to treat our products and/or services in a responsible manner during production and distribution.

## Compliance with applicable law

We require our managers to familiarize themselves with the laws, regulations and rules relevant to their area of responsibility and to comply with them without exception. Our managers in particular bear a high level of responsibility in fulfilling the code of conduct. The business practices of our business partners and their suppliers must also comply with the applicable laws. This applies in particular to import, export and domestic trade in goods, technologies or services, but also to the movement of payments and capital. A violation of economic sanctions as well as of trade, import and export control regulations must also be excluded by our business partners, as must the financing of terrorism.

## Fair competition

We are committed to fair competition and adhere to the laws and rules. We refrain from agreements on prices, conditions and strategies with competitors, suppliers, other companies and dealers that hinder fair competition. We will not participate in any anti-competitive boycott.

## No discrimination

Any form of discrimination is prohibited in principle. It does not matter whether it is based on nationality, ethnicity, age, gender, sexual orientation, material status, pregnancy, disability, or religion or belief.

Promotions and new appointments are always free of discrimination.

## Dealing with internal company matters

We attach great importance to the careful and responsible handling of the products manufactured, the working materials used and the company's intellectual property.

# Code of conduct

## Protection against child or forced labour

We strictly reject any kind of child or forced labour without exception and expect the same from our business partners. School-age children (younger than 16 years) may not be employed even if the legal requirements of our supplier`s country would allow this.

## Implementation and enforcement

The company Schraubenfabrik Schmidt GmbH commits itself to make all necessary efforts to comply with the principles and values described in this code of conduct.

Halver, 02.09.2024

Place, date



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Managing Director