

Code of Conduct



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This Code of Conduct is about our values such as trust, responsibility and reliability as the basis of our actions.

INTRODUCTION



Dear colleagues,

We are a family-operated business based in Bielefeld. Values such as trust, responsibility and dependability are important to us and we consider the trust of our clients and business partners to be a valuable asset.

The environment in which we operate is not always an easy one. Our system solutions have to be based on the latest, environmentally friendly technologies. As a result, they provide a reliable foundation for the decades to come – both for the next Schüco organisation and for the next generation of buildings. Staying abreast of all this requires adopting an approach and way of life that reflects our values.

And that is exactly what this Code of Conduct is about – by codifying our values and ideals, it demonstrates the fundamentals on which we want to base our work. The Code of Conduct applies to every one of us at Schüco, regardless of the organisational levels, cultures or markets in which we work within the large Schüco family worldwide.

It is my hope that you will carefully read through this Code of Conduct and consult it whenever you may have any doubts. If you have questions about any of the issues touched on here, please

do not hesitate to contact your colleagues in our Compliance Organisation for advice or assistance.

For me, it is very important that you familiarise yourselves with the values and rules set forth here and act accordingly – for your own protection and that of our company. The Code of Conduct is based on legal provisions with which we at Schüco are all required to comply. And this Code of Conduct will also shield you from making the wrong decision.

Indeed, only our integrity can ensure that our company will continue to develop and that each one of us is successful in our jobs by serving as the basis for a reliable partnership between us and our clients and business partners.

Kind regards,



Andreas Engelhardt
CEO & Managing Partner
Schüco International KG

This Code of Conduct
describes the policies on
how to behave at Schüco.

OUR CODE OF CONDUCT

In our Code of Conduct, we define the fundamental legal and ethical rules which all of us at Schüco are bound to uphold. We have made the conscious decision that we want to run our businesses according to this legal and ethical framework. Failure to comply may cause substantial damage to you, Schüco and our business partners. In addition to business losses and administrative penalties, there is a risk of significant reputational damage. Compliance means that at Schüco, we adhere to applicable laws and statutes and follow our own standards and guidelines.

Our Code of Conduct applies worldwide to the entire Schüco Group and to all employees, regardless of their jobs or positions within the organisational hierarchy. All Schüco employees are required to know the policies outlined in our Code of Conduct and to integrate these into their daily work activities. That is the only way we can protect our company and ourselves from liability risks and the risk of criminal prosecution. At the same time, Schüco expects all business partners (e.g., clients, suppliers, consultants and sales/distribution partners) to respect the policies outlined in the Code of Conduct and to act accordingly.

Schüco's Compliance Organisation

Naturally, Schüco's employees will not face alone their duty to comply with the basic rules set forth in the Code of Conduct. Schüco's management has established a Compliance Organisation specifically

for this purpose which will help the company and its employees to comply with the policies outlined in the Code of Conduct. Schüco's Compliance Organisation will notify employees about the contents and significance of the Code of Conduct and the related provisions and will offer training courses.

At Schüco, we want the decisions we make to be legal, ethical and responsible. However, the day-to-day complexities of our business mean that often it is not always clear what the proper course of action is or what one is supposed to do to reach the right decision. So, all employees and business partners are free at any time to contact our Compliance experts at the e-mail address **compliance@schueco.com**. Our Compliance experts look forward to providing you with advice.

What will happen if we do not follow our Code of Conduct?

In our day-to-day business, we act ethically and follow applicable laws. Even a seemingly trivial violation of this Code of Conduct could have serious consequences for Schüco or individual employees. Aside from the liability risks and court-imposed penalties indicated above, this could also entail damage to our company's reputation. In addition, violations of the Code of Conduct may also entail consequences for employees, up to and including termination of the employment agreement.

Our policy: Free and fair competition.

FREE AND FAIR COMPETITION

In our business dealings, we want to stand for fair competition.

At Schüco, we place a high priority on free and fair competition and believe this is our duty to our business partners, clients and competitors. Fair competition enables us to score points in the marketplace with our innovative technologies and the quality of our products. Finally, we also benefit from functioning, fair competition, which motivates us to continue to improve and become even more innovative.

We want to protect our company, our business partners and our employees.

Our conduct towards competitors

Our belief in the free and fair treatment of our competitors means that we do not engage in collusive practices with competitors to set prices or the terms and conditions of sale, to divide up markets, to limit production or to influence procedures for tendering and procedures for awarding contracts. We see to it that communications and correspondence with competitors contain no information that could permit one to draw improper conclusions about Schüco's current or future market behaviour or that of its competitors. This includes information about prices, sales volumes, production capacities, costs or margins,

client information, marketing and sales/distribution strategies, etc. That would put our clients and our suppliers at a disadvantage. For that reason, we must neither participate in such activities nor even give the appearance of engaging in such behaviour. We want to treat our competitors in a sustainable way that follows the law.

Our conduct towards clients and suppliers

Our belief in treating others freely and fairly also means that we shall not enter into any collusive agreements with clients or suppliers that would restrict the conditions for resale. We always work to ensure that we are not unreasonably restricting our clients' and suppliers' business activities. Not only that: we are aware that suppliers and clients may also be competitors, because they have corporate ties with companies that are our competitors or because they sell to the same clients and/or purchase from the same suppliers as we do.

Abuse of a dominant market position

Our goal is to become the market leader. In no case will we take advantage of our financial strength to unreasonably hinder competitors or to place undue pressure on suppliers and clients.

GOOD TO KNOW

Competitive situations can exist in both purchasing and sales. When in contact with competitors, avoid any exchange on competition-related topics such as prices, pricing, planning and developments.

Our policy:
We reject all forms of
corruption.

ANTI-CORRUPTION

We want to ensure that we conduct our business with integrity and transparency.

Corruption is against the law around the world. It creates obstacles to free market competition, damages entire economies, has extremely negative consequences for the persons involved and damages the company's reputation. At Schüco, we reject all forms of corruption. This includes bribery and the acceptance of bribes, the acceptance of benefits and the granting of undue advantages. We do not offer or grant any benefits that are intended to influence any individual's decision, actions or stance. Nor do we accept any bribes ourselves. We also expect our business partners to take steps to fight corruption in the same way.

GOOD TO KNOW

If you are unsure or have doubts about a benefit, be transparent and ask your Compliance Officer.

We want to protect our company's reputation in order to ensure that it will have the opportunity to continue with its development.

Recognising corruption

The form corruption takes may not always be easy to recognise. Corrupt actions may also be concealed through agreements to provide free advice, lavish gifts and expensive invitations or the use of similar, hidden methods.

Good business relationships: gifts and invitations

At Schüco, we also place a high priority on good, sustainable relationships with our business partners and our clients. Naturally, our employees may offer gifts and issue invitations – provided that these are moderate and do not exceed certain limits. Schüco has instituted rules covering this. Here, once again, it should be noted that we do not offer gifts and invitations with the intention of illegally influencing the recipients.

Political activities and lobbying

We do not tolerate any payments to office holders in order to expedite, facilitate or otherwise influence official procedures, actions or services. In our dealings with civil servants and government officials, we follow transparent guidelines and applicable statutory provisions.

Our policy:
Social responsibility must
not be abused for the
purposes of corruption.

CONTRIBUTIONS AND SPONSORSHIPS

We follow the laws and internal rules regarding contributions and sponsorships.

The issue of contributions and sponsorships is closely related to the issue of corruption. Indeed, even a charitable commitment may be a hidden form of bribery.

At Schüco, we demonstrate our social responsibility through contributions and sponsorships.

In this regard, we are committed to transparency at Schüco. As a result, the following policies apply to employees:

1. Benefits in the form of contributions and sponsorships must always be provided in a transparent manner.
2. It must always be possible to track the recipients and the specific intended use.
3. With contributions, we are not pursuing any financial self-interest and under no circumstances will we demand a quid pro quo.
4. In the case of sponsorships, there must always be reasonable proportionality between the financial benefit and the agreed consideration.
5. Contributions and sponsorship agreements always require the prior approval of our general partner.

Our policy:
We know our business
partners.

MONEY-LAUNDERING

We comply with all anti-money-laundering laws and maintain no business ties with individuals or companies that have a known terrorist or criminal background.

By money-laundering, we mean the channelling of ill-gotten money into the legitimate financial and economic system. Money-laundering is a criminal offence. We do not want Schüco to be abused as a tool for money-laundering.

In order to protect our company from criminal liability and reputational damage, we engage in business only with respectable partners that comply with the applicable laws. We thoroughly check the identities of our business partners and third parties and ensure that our business relationships are transparent.

To prevent money-laundering, we follow four simple, but important, principles:

1. We only make payments for products and services received directly to the accounts of the respective business partners.
2. Payments to business partners are always made to the country in which our business partners' registered office is located.
3. We only accept payments if they originate from known business partners. Payments must be based on a previously issued invoice.
4. Cash payments are allowed only if the amounts are small and a proper receipt has been issued for them.

Our policy:
Everything we do is in the
interests of our company.

CONFLICTS OF INTEREST

We act and make decisions to further the interests of the company, not our personal interests.

Conflicts of interest are situations in which one's own interests conflict with those of the company. Personal interests may affect our professional judgment and, in the process, our decision-making ability, to the company's detriment. At Schüco, we do not allow family or personal ties to influence our selection of business partners or decisions regarding employees and applicants.

Yet a conflict of interest does not in and of itself constitute misconduct – it only becomes misconduct if such a situation is not handled properly. Therefore, for Schüco it is important that employees adhere to the following policies when dealing with conflicts of interest:

Providing transparency: Potential conflicts must be disclosed to superiors.

Objectivity and compliance with customary internal company processes: Decisions regarding employees and applicants, as well as the selection of business partners, must be based on objective considerations as part of the internal processes established by Schüco.

Getting help: If you have any doubts as to whether there is a conflict of interest and if so, how it should be dealt with, Schüco's Compliance Office is there to provide advice to all employees.

EXAMPLE

You are asked by your supervisor to review quotes from several suppliers for aluminium/polymer parts. You find that one of the most favourable offers is from a good friend's company.

RECOMMENDED ACTION

In connection with business decisions, strictly separate professional and private matters. Inform your superior about the situation and withdraw from the decision-making process to avoid any appearance of a conflict of interest.

Our policy:
We treat data on our
employees and business
partners confidentially and
we protect such data.

DATA PROTECTION AND CONFIDENTIALITY

Schüco follows the applicable laws on data protection and protects personal data.

At Schüco, we are very careful to ensure that there is no unauthorised disclosure of personal data either inside or outside the company and we see to it that the necessary measures are taken to protect such data. Our processing of personal data is limited to defined, clear-cut and legitimate purposes and always has a statutory basis. If there is no statutory basis for processing, such as a legal requirement or the consent of the concerned parties, personal data are not processed by Schüco. In addition, legal principles are observed whenever personal data are processed.

EXAMPLE

You are organising a product training course for Schüco with external participants and have received personal data of the participants for this purpose. A colleague from sales asks you to pass on the addresses.

RECOMMENDED ACTION

Do not pass on this data without consulting your superior and your contact person responsible for data protection.

Generally, data may only be used for the purpose for which it was communicated.

Our policy:
We handle company
resources responsibly.

PROTECTION OF COMPANY ASSETS

Schüco employees handle Schüco's company assets carefully and with respect. The same applies to assets owned by third parties.

Company resources include plants, production lines, processes and materials, as well as technical know-how and operating and trade secrets. A modern technology company such as Schüco depends for its existence on its ideas, innovations and technical know-how. As a result, it is important to protect these company resources. Schüco's employees do not share operating and trade secrets, but do implement the protective measures prescribed for such information and ensure that the company's assets are not misappropriated, damaged, misused or wasted.

EXAMPLE

You are involved in the development of an innovative technology. You are to present your development at various company locations and want to take your laptop with you for presentation purposes, on which the relevant documents are stored. You intend to review these documents on the way to the individual locations on the plane or train.

RECOMMENDED ACTION

Ensure that third parties do not take note of such information. Do not access such information from locations where third parties can access or take note of it.

Our policy:
We believe that respecting human rights and implementing labour standards and social standards are fundamental elements of responsible corporate governance.

HUMAN RIGHTS, LABOUR STANDARDS AND SOCIAL STANDARDS

Schüco respects internationally recognised human rights and rejects all exploitative working conditions.

At Schüco, we follow fundamental rules of conduct, treat our fellow humans with respect and respect human rights worldwide.

Respect for human rights, labour standards and social standards

At the same time, we undertake to respect the following international standards:

- The United Nations' (UN's) Universal Declaration of Human Rights
- Core labour standards of the International Labour Organisation (ILO)
- 10 Principles of the UN Global Compact
- OECD Guidelines for Multinational Enterprises
- The UN's Guiding Principles on Business and Human Rights

In our business activities, we make every effort neither to cause nor to contribute to violations of human rights. We condemn any form of forced labour or child labour. We likewise expect our business partners to respect human rights and internationally recognised labour standards and social standards and to act accordingly. We also do everything in our power to ensure that our indirect suppliers do the same.

Working conditions

The health and safety of all employees is very important to Schüco. Schüco therefore provides employees at all its locations with fair working conditions that satisfy legal requirements and it recognises their right to unionise. Moreover, at Schüco, we want our employees to feel appreciated and respected. Therefore, we will not tolerate any condescending, demeaning, discriminatory, offensive and disrespectful words or actions against co-workers. We do not tolerate any unfavourable treatment or discrimination on account of age, ethnic background, skin colour, gender, sexual orientation, national origin, religion or disability.

Our policy:
For us, acting sustainably
is both a duty and an
incentive – our “motivation
green”.

SUSTAINABILITY

We want to be pioneers for active sustainability in the construction industry.

Schüco places a very high priority on sustainability. The UN's Sustainable Development Goals (SDGs) form the basis of our understanding of sustainability and mean that, for us, the issue of sustainability is a holistic challenge that goes far beyond protection of the climate and the environment. For us, sustainability is not an abstract notion, but a specific task that confronts us every day in each of our six defined action areas: the environment, products, business development, the supply chain, employees and society.

As a company in the construction industry, we assume long-term responsibility and can leverage our products and services to actively contribute to a more sustainable world. Our products are helping to achieve global climate protection goals worldwide by continually optimising energy consumption in both the manufacturing and utilisation stages. In product development, we think holistically, considering the entire product cycle – ranging from the use of reusable commodities through recyclable products and the development of innovative solutions to dismantling and recycling.

By 2040, we want to be in a position across our entire value chain where we are no longer causing any emissions that are harmful to the climate. In line with the Paris Agreement on climate change, our climate protection goals are helping to limit global warming to a maximum of 1.5 degrees Celsius. The WWF is helping us with implementation; since 2018, it has been our critical, skilled partner for greater sustainability in the construction industry and has provided constructive support by auditing our goals and measures. This enables us to ensure that the way we approach our work is solution-oriented. However, in order to achieve our goals, we especially need the support of our suppliers, clients, partners and employees – because only if we work together can we contribute to a more sustainable world.

GOOD TO KNOW

Sustainability is not a trend, but an attitude that we at Schüco demand and implement every day. For us, acting sustainably is both a duty and an incentive – our “motivation green”.

Our policy:
Schüco's management
expects its employees to
help protect the company.

REPORTING VIOLATIONS

Schüco employees reporting a well-founded suspicion of a violation of our Code of Conduct will be protected from any retaliation!

Reporting violations of this Code of Conduct is one of the ways in which our employees are able to protect the company. Naturally, reporting substantiated violations will never result in retaliatory measures.

If you should become aware of a violation of this Code of Conduct or simply suspect that one has occurred, please contact our external lawyer of trust.

We have appointed as ombudsman:

Dr Carsten Thiel von Herff, LL.M.
c.thielvonherff@thielvonherff.de
Tel.: +49 521 557 333 00
Mobile: 00800 – OMBUDSMANN
www.report-tvh.com

Of course, we will also be grateful to our business partners and/or suppliers and their suppliers, as well as any other person or organisation, if they report violations of our Code of Conduct to us. They may also contact our ombudsman.

All leads will be looked into with the greatest care and discretion.

Leads concerning violations of the Code of Conduct, as well as suggestions for improvements, may also be sent to our Compliance Organisation at: **compliance@schueco.com**.

If you have any questions about the Code of Conduct or are not sure whether or how it will affect your daily decision-making, please feel free at any time to contact our Compliance Organisation. Our Compliance experts will be happy to answer any questions and to help with your decision-making, and you will benefit from working with them thanks to their skilled, practical and solution-oriented approach.

You can reach the Compliance Organisation at:

compliance@schueco.com

Compliance Office

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