

Scheurich GmbH Code of Conduct - Compliance Rules -

I Preamble

Scheurich GmbH recognizes its social responsibility.

The actions of Scheurich GmbH and its employees are based in particular on the values of integrity and fairness.

The Scheurich Code of Conduct is a voluntary code of conduct that aims to emphasize our interest in fair, sustainable, responsible ethical principles of action.

The Scheurich Code of Conduct applies to our company management as well as to all our employees and serves as the basis for all business relationships in our company.

The ethical guidelines described in this Scheurich Code of Conduct are based in particular on the principles of the UN Global Compact (Appendix), the ILO conventions, the United Nations general declaration of human rights, the UN conventions on the rights of the child and on the elimination of any form of discrimination against women as well as on the OECD guidelines for international companies. The following paragraphs II to V form minimum standards and are intended to prevent situations that could jeopardize the integrity of our company and our employees.

Scheurich GmbH observes the principles of the Global Compact and works in its management to achieve their goals.

II General Principles, Law and Order

Scheurich GmbH is committed to meet its social responsibility in all corporate activities.

Scheurich GmbH is committed to observe, in all business transactions and decisions, the applicable laws and other relevant regulations of the countries in which it is active. Business partners are to be treated fairly. Contracts are kept, whereby changes in the framework conditions are taken into account.

III 1. 1. Corruption/antitrust law/forced labour/child labour

(a) Corruption

When dealing with business partners (customers, suppliers) and government institutions, the interests of the company and the private interests of employees on both sides are strictly separated. Actions and (purchase) decisions are made free of irrelevant considerations and personal interests. The applicable corruption criminal law must be observed.

Among other things, the following should be noted:

Criminal offenses related to public officials

The granting of personal benefits (in particular of a monetary nature such as payments and loans including the granting of small gifts over a longer period of time) by Scheurich GmbH and its employees to public officials (such as civil servants or employees in the public service) with the aim of providing benefits for Scheurich GmbH or themselves obtaining yourself or a third party is not allowed.

Criminal offenses in business dealings

Personal benefits of value in return for preferential treatment in business dealings may not be offered, promised, granted or approved. Likewise, personal advantages of value may neither be demanded nor accepted when dealing with business partners. Scheurich GmbH has committed its employees, that they should not be promised any corresponding advantages.

Management and employees of Scheurich GmbH may not offer, promise, demand, grant or accept any gifts, payments or services in business dealings that are granted with the intention of influencing a business relationship in an impermissible manner or when there is risk to compromising the professional independence of the business partner. This is fundamentally not the case with gifts and invitations that are within the scope of business hospitality, custom and courtesy.

Scheurich GmbH can issue binding guidelines for the acceptance and granting of gifts, invitations to hospitality and events. This can regulate exceptions with regard to appropriate low-value and symbolic gifts, appropriate business meals and appropriate events of the own company and business partners (customers, suppliers). The guideline is to be communicated transparently within Scheurich GmbH and to existing and potential business partners (publication). Scheurich GmbH names a contact person who can be contacted if Scheurich GmbH employees are in a conflict of interest, or if they are unsure whether a conflict of interest exists or could arise.

(b) Conduct towards competitors (antitrust law)

Scheurich GmbH pays attention to fair competition. Therefore, Scheurich GmbH complies with the laws that protect and promote competition, in particular the applicable antitrust laws and other laws regulating competition.

When dealing with competitors, these regulations in particular forbid agreements and other activities that influence prices or conditions, allocate sales areas or customers, or hinder free, open competition in an inadmissible manner. Furthermore, these regulations forbid agreements between customers and suppliers in which customers are to be restricted from determining their prices and other conditions for resale autonomously (determination of prices and conditions). In view of the fact that the distinction between prohibited cartels and impermissible cooperation can be problematic, Scheurich GmbH names a contact person for its employees who can be contacted in case of doubt.

(c) Forced labour

Scheurich GmbH rejects any form of forced labour.

(d) Child labour

Scheurich GmbH observes the regulations of the United Nations on human and children's rights. Scheurich GmbH is committed in particular to comply with the Convention on the Minimum Age for Admission to Employment (Convention 138 of the International Labour Organization) and the Convention on the Prohibition and Immediate Actions to Eliminate the Worst Forms of Child Labour (Convention 182 of the International Labour Organization). If a national regulation regarding child labour provides stricter standards, these must be given priority.

III 2. Social Responsibility Principles

(a) Human rights

Scheurich GmbH respects and supports compliance with internationally recognized human rights.

(b) Discrimination

Scheurich GmbH is committed to oppose any form of discrimination within the framework of the applicable laws and regulations. This particularly relates to discrimination against employees based on gender, race, disability, ethical or cultural origin, religion or belief, age or sexual orientation.

(c) Health protection

Scheurich GmbH guarantees occupational health and safety in the workplace within the framework of national regulations. Scheurich GmbH supports the constant further development to improve the working environment.

(d) Fair working conditions

Scheurich GmbH respects the right to freedom of association of its employees within the framework of the respectively applicable rights and laws.

(e) Environmental Protection

Scheurich GmbH is committed to the goal of environmental protection for the current and future generation. Laws that were passed to protect the environment must be observed. Scheurich GmbH supports environmentally conscious actions by its employees.

(f) Trade secrets

Scheurich GmbH obliges its employees to observe company and business secrets. Confidential information and confidential documents may not be passed on to third parties without authorization or made accessible in any other way. Unless an authorization has been given or the information is publicly available.

IV Suppliers

Scheurich GmbH will convey the principles of this Code of Conduct (Section III -1.) to its direct suppliers promote compliance with the content of the Code of Conduct among its suppliers as well as possible and ask them also to follow the Code of Conduct. Scheurich GmbH recommends its suppliers to ask their suppliers to follow the Code of Conduct.

V Observance

Scheurich GmbH is committed to make its employees aware of the content regulated in this Code of Conduct and the obligations arising from it.

Scheurich GmbH is committed to work towards ensuring that the company complies with the principles of this code of conduct, in particular by designing and, if necessary, adapting guidelines and processes.

Upon request, Scheurich GmbH will name the responsible contact person for this Code of Conduct, who can provide binding information on compliance with this Code of Conduct.

Scheurich GmbH has taken by suitable organizational precautions to ensure that this Code of Conduct is adhered to by the company and its management.

This is done in particular by introducing and maintaining appropriate controls and plausibility checks.

Wolfegg, November 2020

Appendix

United Nations Global Compact

The ten principles

The principles of the Global Compact are based on a worldwide consensus that is derived from ...

- The Universal Declaration of Human Rights
- The International Labour Organization Declaration on Fundamental Principles and Rights at Work
- The Rio Declaration on Environment and Development and ...
- The United Nations Convention against Corruption.

The Global Compact requires companies to recognize, support and put into practice a catalogue of basic values within their sphere of influence in the field of human rights, labour standards, environmental protection and the fight against corruption:

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and ...

Principle 2: make sure that they are not complicit in human rights abuses.

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining; and stand up for ...

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and ...

Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and ...

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.