



# Code of Conduct

Südwolle Group

# Our Legacy

Dear Colleagues,

The Südvolle Group\* is a global player. We manufacture and trade around the world. For over 50 years, we have recognised our responsibility for helping to shape tomorrow's world as a matter of course. For many of our partners and customers, we are a technological pioneer of our industry and we aim to be a role model as well. That is why we also set the highest standards when it comes to our ethical business conduct because we know that the continuation of our heritage depends on it.

**Our ethical business behaviour is set out in this Code of Conduct.**

It summarizes all the rules of conduct that are essential for us to **A.C.T. compliant** and make decisions for the good of the company.

It helps us to act with integrity and provides the knowledge for dealings with colleagues, business partners and customers and with our resources, products and data.

**That is why it is important that each and every one of us takes the time to familiarise oneself with our Code of Conduct and make it the basis for our actions and decisions.**

In particular, our managers are committed to provide their employees with guidance on business ethics. They have a special responsibility not only to demand behaviour with integrity, but also to set a credible example in practice. Violations of this Code of Conduct harm Südvolle Group and all of us. We therefore strive to avoid even the

appearance of misconduct. We also expect our business partners to be aware of our Code of Conduct and to act accordingly.

In our daily business there are situations in which we cannot always immediately recognize which action or decision is correct. Therefore, this Code of Conduct outlines the most important rules of conduct and provides orientation for making the right decision in difficult situations. However, the Code of Conduct cannot provide a solution for all specific situations. That is why we have issued more detailed local rules and policies for our employees.

Your Management Board

\*Südvolle Group GmbH and all its affiliated companies

# Our Values

Each and every one of us is responsible for his or her own behaviour. At the same time, we support and help each other and find solutions together. Our 5 corporate values are derived from this foundation.

To achieve this goal, one thing is particularly important to us: an open and honest exchange with each other! Let's all seek dialogue not only within the team, but also with our specialists and managers and the respective experts in the company.

We know that we personally and also as a company can always learn from mistakes.

Mistakes help us to develop further and become better. That's why we want to live a culture in which we ask for and give feedback and can discuss and correct possible mistakes constructively. We have the courage to openly and honestly disclose and address any misconduct to colleagues and superiors. We are all required to deal with it responsibly. Anyone who feels that behaviour is inconsistent with the principles of our Code of Conduct is encouraged to address it openly, even if it means admitting mistakes, missing goals, questioning instructions or incurring costs.

**We take our rules seriously!**

# Our Values

Our 5 MAGIC WORDS in our dealings with each other are the foundation for our actions and thinking, guiding our attitudes and decisions.

We live these values among ourselves, towards our customers as well as our internal and external partners.

We stand for:

**Trust**



Having a fundamentally trusting attitude towards each other from the outset.

**Respect**



Treating all people with respect, regardless of their position and background, inside and outside our company.

**Active listening**



Always listening attentively and being there and responsive to others.

**Care**



Deal with resources and relationships in a responsible and appreciative manner.

**Support**



Recognize the benefits of teamwork and view diverse interests as an opportunity.

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**T.R.A.C.S.**

# Core Compliance



## Anti Corruption

We are convinced that neither bribery nor any other form of corruption is required to enable our products to compete successfully in the marketplace. Therefore, we do not tolerate corrupt practices and require our employees to reject and prevent any form of corruption. It is prohibited to grant, offer or accept bribes, kickbacks, unauthorized donations or other unauthorized payments or benefits to customers, public officials (judges, etc.) or other third parties. We only conclude business transactions with reputable, trustworthy customers, suppliers, consultants and business partners.

## Foreign Trade Regulations

As an internationally operating company, the observance of export regulations, and in particular the observance of prohibitions, restrictions, approval reservations is of elementary importance to us. Therefore, we do not maintain business relationships with companies or individuals known to us to be in violation of sanctions. We also monitor our products to ensure that they are not used for illegal purposes.

## Fair & Free Competition

As a global player respect for fair and free competition is another basis of our business conduct. We do not engage in price fixing, market sharing, production restrictions, bid rigging and other practices that are contrary to free competition. In situations where we are the market leader, we do not abuse our leadership position or violate local and state legal requirements.



# HSEQ

Health,  
Safety,  
Environment,  
Quality

## Working Environment

We select our employees on the basis of their qualifications and skills, taking into account equality, both in recruitment and promotion. We increase the satisfaction of our employees by paying them according to their performance, offering flexible working hours and flextime models when possible and developing them into knowledge and performance leaders for our company. We refrain from any form of discrimination, for example on the basis of skin colour, gender, ethnic origin, religion, nationality, sexual orientation, age, social origin, mental or physical impairments, membership in a trade union or political views insofar as these are based on tolerance towards those with different opinions. We do not tolerate harassment in any form.

## Occupational Health & Safety

We strive to maintain and promote the health, performance and job satisfaction of our employees by constantly striving to improve working conditions as well as preventive and health promotion measures. In addition, we contribute to a safe working environment by complying with and constantly monitoring the applicable occupational, accident prevention and health regulations. To prevent accidents in the workplace, these standards are regularly reviewed and audited, and our employees receive regular training in this regard. We reject any form of alcohol, drugs and abuse of other substances in the workplace and offer support to employees with addiction problems. We all take responsibility for our own safety and that of our colleagues and should therefore always strive to help improve working conditions.

## Product Quality

When creating our products and providing our services, we ensure compliance with legal and internal company requirements and attach great importance to using only primary products and materials of doubtless origin and suitability. For this purpose, we have established an integrated management system in our company in order to constantly improve within the framework of a continuous improvement process.

# Corporate Sustainability



## Human Rights & Social Standards

As a global player, respect for human rights is a cornerstone of our business. We reject any knowing use of forced labour as well as any form of modern slavery and human trafficking. This applies not only to cooperation within our company, but also, of course, to the behaviour of and toward business partners. All employment relationships are based on voluntariness and can be terminated by our employees at their own will and subject to a reasonable period of notice. Child labor is prohibited. The minimum age for employees is based on the corresponding applicable legal regulations. If there are no state regulations, Convention 138 and 182 of the International Labor Organization (ILO) apply accordingly. Working hours and remuneration comply with the legal regulations of the relevant country, taking into account international and industry standards. The fundamental right of employees to form and join trade unions and employee representatives is recognized. We respect the right of employees to freedom of association, assembly, collective bargaining and collective bargaining to the extent legally permissible and possible in the respective country. If this right is restricted by local laws, alternative means of employee representation that comply with the law are promoted. We strictly reject the deprivation of the livelihood of the population, e.g., unlawful eviction and the unlawful violation of land, forests and water.

## Transparency in the Supply Chain

We are aware of our responsibility as a globally operating group, which is why our cooperation with our partners is based on trust and respect. As a matter of principle, we require our partners to comply with our standards and to pass them along to their suppliers. Through this commitment on the part of our suppliers, we also set important standards in the supply chain. In particular in the areas of human rights, business ethics, labour and social standards, and environmental protection. These include, for example, compliance with the law, the prohibition of child and forced labour, minimum wages, maximum working hours, equal opportunities, and ensuring humane working conditions.

## Environment & Climate

Dedication to ecological responsibility is our way of contributing to the fight against climate change. At Südwolle Group we must always carry out our activities with the environment in mind. We try to keep all interventions in nature as low as possible. We handle hazardous substances and other chemicals professionally and responsibly. We try to reduce or prevent waste and to minimize emissions from our operations. We are increasingly concerned with the environmentally compatible production and processing of our raw materials, the careful use of dwindling resources, efficient energy consumption, measures to save water and recycling. New products and technologies must be developed with due regard for natural resources and state of the art in science and technology, with the aim of continuously reducing environmental impact.

# Information Security



## Protection of Business Secrets

Our know-how is the basis of our business success, and we are aware that unauthorized disclosure of such knowledge can cause very high damages to the company. We protect our trade secrets by entering into appropriate non disclosure agreements prior to sharing information. Information from which possible business secrets may be derived must also be treated as confidential and may only be made available to those employees who require it in the course of their professional activities. We also treat the intellectual property of business partners, competitors and third parties with care and ensure that we sign appropriate non disclosure agreements.

## Safeguarding Data Protection

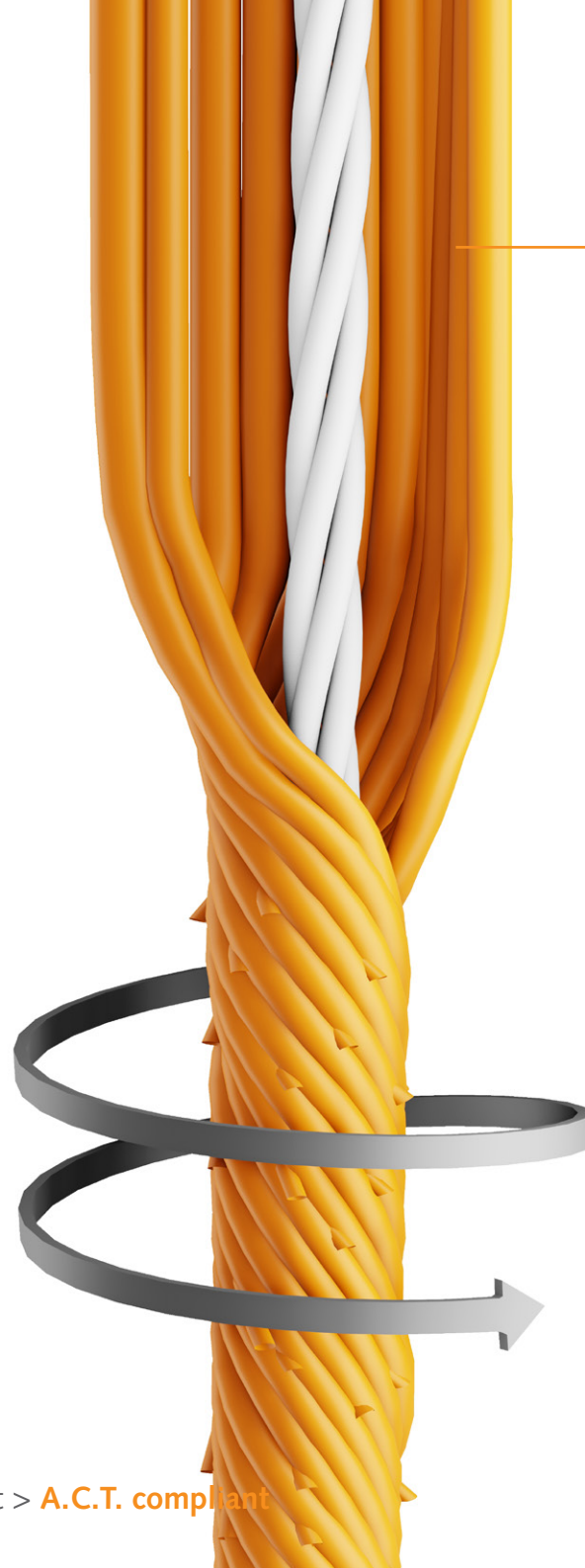
We are aware that disclosing personal data to employees, customers and suppliers violates the right to informational self-determination. Therefore, we collect only the data that we need for the execution of the business relationship and delete the data afterwards. All of our employees are bound by their employment contracts to protect business secrets accordingly and not to publish confidential information without authorization, pass it on to third parties or make it available in any other form.

## IT Security

To ensure that we do not inadvertently disclose business secrets and personal data, we constantly invest in a state of the art IT infrastructure. In addition to using appropriate software, we regularly impart knowledge to our employees in the form of training and awareness measures.



Compliance for us is more than just following the written rules. It is also about our Ethical Business Conduct.



# A.C.T. compliant

at Südvolle Group means:

## A for Accountability

Each and every one of us accepts full responsibility for their actions for good and bad outcomes. Ethical conduct cannot and will not be delegated.

## C for Competence

Our rules and policies within our 4 focus areas:

- Core Compliance
- Corporate Sustainability
- HSEQ
- Information Security

deliver the knowledge to empower our employees to make the right decision in each situation.

## T for T.R.A.C.S.

When dealing with one another at Südvolle Group as well as with our customers and suppliers our 5 MAGIC WORDS always apply.

# Ethical Business Conduct

# Ombuds Office

We know that compliance and adherence to the many rules in our daily work is a complex issue. However, we can actively and sustainably support compliance with the law and our internal rules especially regarding violation of human rights, environmental and climate issues.

If something does go wrong which is hard to address openly at Südvolle Group, we set up different reporting channels:

**Your managers and supervisors are always available to provide advice and support.**

**We have a Compliance Office that can always be contacted with questions and hints** ([compliance@suedwollegroup.com](mailto:compliance@suedwollegroup.com)).

**In addition, an external Ombuds Office has been established. The ombudsperson is bound to professional secrecy and can anonymously pass on information to the Compliance Office for clarification. The Ombuds Office can be reached at [www.suedwollegroup.com/compliance](http://www.suedwollegroup.com/compliance)**

We always examine violations in context and will never let anybody suffer disadvantages if misconduct is reported internally with good intentions.



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