

STRÄHLE + HESS

Code of Conduct

Dear Colleagues,

STRAHLE+HESS combines commercial and economic success with social responsibility and the protection of the environment. In all areas we act as a global player. This is why our conduct standards are essentially the same the world over and are based on a global Code of Conduct.

Nothing is more important than our integrity as a company and everyone's integrity as individual people. STRAHLE+HESS is firmly bound to adhering to legal regulations and ethical principles and expects all employees to abide by them. This kind of commitment must be deep-seated in the entire organisation because every employee is also an ambassador of our company. Compliance-compatible conduct is always our top priority. There can be no compromises. We thus expect you to be personally responsible for adhering to all

- applicable laws,
- fundamental international standards as well as
- in-house guidelines, rules and standards.

The STRAHLE+HESS Code of Conduct summarises important laws and in-house rules and standards which define and regulate the conduct of all STRAHLE+HESS employees in their dealings with business partners, public officers, other employees and society. It helps us to make the right decision, but cannot hope to describe every situation with which you are likely to be confronted. Special laws and regulations may well apply to specific positions or activities or may even apply at individual locations.

Ensuring compliance is an essential part of our daily work. We have to nurture and further develop a culture of sincerity and fair-mindedness in which executives are role models when it comes to promoting business ethics and lawful conduct, and in which law-abiding conduct is the personal responsibility of each individual.

Anybody who, in good faith, reports a suspected violation of legal or ethical guidelines or a conflict of interests - regardless of whether this suspicion proves to be true - will not experience retaliatory or disciplinary actions or any other disadvantageous professional consequences.

Employees who retaliate against a person because this person has reported a violation may well, on the other hand, have to attend a training session or could face legal consequences, including disciplinary measures, or could even face termination of employment.



Peter Mazzucco
Chairman of the Management Board STRÄHLE+HESS Group

21.02.2024

STRAHLE + HESS

Human rights, work and social standards

STRAHLE+HESS is committed in particular to the abolition in every form of child and forced labour, to the principle of non-discrimination, the recognition and acceptance of the freedom of association, collective negotiations and social partnerships, fair pay and additional benefits in accordance with local market conditions, acceptable working times and paid vacation as well as reasonableness in disciplinary and safety and security measures.

STRAHLE+HESS is committed to equal opportunities on the employment market and adheres to all corresponding laws which forbid discrimination particularly due to age, race, skin colour, gender, sexual orientation, identity or expression, origin, religion or disability. This principle applies to all personnel decisions such as recruiting, hiring, training, change of position, promotion, remuneration, additional benefits, disciplinary measures and notices of termination of contract. Furthermore sexual harassment and any other form of harassment at the workplace are strictly forbidden. We promote a diverse and inclusive working environment in which all employees are to be treated with respect and dignity.

Ethical Recruitment, Women, Indigenous People

Any form of harassment or discrimination, e.g. based on nationality, ethical reasons, indigenous peoples, origin, religion, gender (woman, man, diverse), age, sexual orientation, etc. is prohibited.

Dealing with colleagues and business partners

In the way employees of the STRAHLE+HESS Group treat each other on a daily basis, they contribute to a corporate culture shaped by openness, honesty, esteem and tolerance. The personality and dignity of each individual must be respected. STRAHLE+HESS employees are reliable business partners who adhere to their promises.

Management

Every line manager acts as a role model: he/she earns the respect of his/her employees with performance, respectful conduct, fairness and openness, and is the contact person in both professional and personal matters. In their leadership duties, they set clear, realistic goals. They encourage employees to act on their own initiative and create the necessary freedom and scope for this to be possible. Every executive has organizational and supervision duties to perform. In the implementation of this task, all line managers/executives or anyone assigned HR tasks have the additional special responsibility to ensure that the Code of Conduct of the STRAHLE+HESS Group is adhered to. The line manager is still held responsible when he/she assigns tasks.

Quality and environmental protection

Premium quality and constant quality improvement are essential for the growth and success of the company. All employees are called upon to fulfil the expectations of both the internal and external customers and constantly improve the quality of our products and services.

Environmental protection and the careful use of natural resources are a top priority for us. With the appropriate managerial responsibility and the commitment of the employees, STRAHLE+HESS aims to carry out its business in an environmentally-friendly manner and is constantly working on improving its ecological efficiency. Executives and employees at STRAHLE+HESS ensure the laws and the company's own high standards are adhered to. An environmental management system implemented by STRAHLE+HESS provides the necessary help. As early as in the development of our new products, environmentally-friendly design, technical security and health protection are key targets.

In his/her own conduct, every employee must contribute to achieving these goals.

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Antitrust law

Our corporate policy envisages the promotion of fair competition. We thus expect all employees to strictly adhere to the applicable antitrust law.

Violations will result in severe punishment or fines and can result in the relevant agreement becoming invalid.

Agreements and coordinated modes of behaviour between competitors ("horizontal agreements") are forbidden if they aim to or result in competition being hindered or limited. This includes, for example, agreements on prices, offers, customer assignment, sales or purchasing conditions, production or sales quotas and the division of geographical markets. Forbidden are not only explicitly contractual agreements, but also coordinated actions as a result of one-sided declarations (e.g. the announcement of price increases aiming to induce a similar reaction on the part of the competitors).

Many kinds of vertical agreements, in other words agreements between suppliers and customers or patent owners and licensees, are prohibited in the EU, US and other countries. They can result in a fine or the invalidity of the relevant agreement. These include defining limitations of the customers' freedom, prices or delivery conditions for their business partners (geographic limitations, restrictions with relation to customers or product applications), certain most-favoured-nation clauses, exclusive clauses such as total demand coverage or exclusive delivery as well as bans on competition.

Corruption

Our business partners, in particular our suppliers and customers, must be treated fairly at all times. STRAHLE+HESS expects the same of its business partners. Our relations to all business partners should be based solely on objective criteria, in particular quality, reliability, competitive prices as well as the observation of ecological and social standards and the principles of good business management. In most countries in the world, laws on fighting corruption forbid the bribing of domestic and foreign office holders as well as employees of domestic and foreign companies in the private sector.

STRAHLE+HESS forbids its employees as well as sales representatives and any others commissioned by STRAHLE+HESS to indulge in any form of corruption or bribery. When dealing with business partners or office holders, you must never demand or accept material advantages (e.g. cash, gifts, entertainment offers or other personal advantages). This could give the impression that business decisions may have been influenced or certainly that there has been an attempt to do so. Equally, employees from other companies and office holders must never be promised or given personal advantages with the aim of acquiring an order, ensuring a deal or procuring for STRAHLE+HESS a wrongful advantage.

Demanding and accepting benefits

All decisions in the company are made free of personal interests and are based on corporate goals. Corporate decisions are made exclusively to increase customer benefit and achieve sustained corporate success. To retain their independence, employees must not demand gifts or any other gratuities, personal services or favours from business partners.

It is forbidden for STRAHLE+HESS employees to accept benefits and perks from business partners which can impair an objective and fair decision. Drinks or benefits/perks totalling in value more than 50 € must not under any circumstances be accepted. When an employee rejects any such offered benefits, he/she should make the particular business partner aware of the STRAHLE+HESS Code of Conduct.

Data protection

STRAHLE+HESS undertakes to respect the privacy and integrity of its employees and business partners. We adhere to strict standards when we process the personal data of our employees or business partners.

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All personal data collected and saved by STRAHLE+HESS is only processed for the declared reason, comprehensibly and carefully, and in compliance with the relevant applicable data protection acts.

Access to personal documents is limited to STRAHLE+HESS employees and persons authorised to access such documents and who have a legitimate business interest in such a right of access. Confidential employee data must not be forwarded to anyone outside the company without the appropriate authorisation and must not be forwarded if there is no legal necessity to do so.

If there is any doubt, please ask the Data Protection Officer or Legal Department for advice.

Responsible dealing with assets

It is the duty of every employee to act responsibly with the company's property (e.g. furnishings, facilities, company vehicles), handle this property with care and protect the property from loss, damage, misuse, theft, misappropriation and destruction. This regulation also applies to intellectual property such as brands, patents, copyright and know-how. This includes business and corporate plans, technical knowhow, databases, product samples, drafts, business documents and reports. It is strictly forbidden to carry out private work in the company and to use corporate facilities for private purposes. Exceptions must be approved by the line manager or are described in the relevant internal regulations.

Adherence to the STRAHLE+HESS Code of Conduct

The STRAHLE+HESS Code of Conduct and other valid instructions are binding for all employees. Any other form of conduct is not accepted by the company and may result in legal steps being taken! It is the duty of every line manager to ensure that the employees for whom he/she is responsible are familiar with the STRAHLE+HESS Code of Conduct and adhere to it.

Questions

If there is any uncertainty about correct conduct, employees should contact their line manager, the HR Department or the workers' representative/works council.

If this does not lead to clarification, the employee can contact the management of the STRAHLE+HESS Group. The matter will be treated in strict confidence.



Peter Mazzucco
Chairman of the Management Board STRÄHLE+HESS Group

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