

CORPORATE GUIDELINES

Code of Conduct

National regulations and globally applicable standards.



“We are responsible not only for what we do, but also for what we do not do.”

Molière

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1. Principles

These corporate guidelines apply in addition to the existing “[Values and business principles](#)” and serve at the same time as the basis for further internal guidelines, in particular the “[Code of Conduct: Compliance with laws and Schöck regulations](#)” (Compliance Policy).

The aim is to provide further guidance on the application of the corporate guidelines, the respective national regulations and the other regulations of the Schöck Group. We are all equally responsible for their observance. If in any doubt, your superior must be consulted. The local compliance officer is also available for advice. Seminars on the relevant topics and the regulations to be observed on this subject are held at regular intervals.

If specific or imminent violations of ethical or legal principles or of internal Schöck regulations and principles become known, the respective superior and/or the Head of Compliance or local compliance officer must be informed.

The Head of Compliance and the compliance officers must treat any information on violations as strictly confidential and ensure that the incidents are clarified objectively.

No employee may suffer any disadvantage as a result of compliance with the law or Schöck regulations. This applies also to employees who point out irregularities.

1.1 Respect for human rights, fundamental rights

Schöck respects internationally recognised human rights and is committed to their observance. The same applies to the observance of protective rights under the respective national legal systems.

1.2 Prohibition of discrimination

The diversity of our employees offers great potential. That is why Schöck employs people with different origins and experience out of conviction. All employees are called upon to promote an atmosphere of respectful cooperation and to oppose discrimination on the grounds of race or ethnic origin, gender, ideology or religion, disability, age or sexual identity.

1.3 Prohibition of child labour and forced labour

Child labour and any exploitation of children, juveniles and other workers will not be tolerated. The minimum age for employment at Schöck must not be below the age at which compulsory schooling ends, and on no account below 15 years of age.

Schöck rejects all forms of forced labour. No employee may be forced to work by direct or indirect violence and/or intimidation.

2. Cooperation, dealings with business partners and third parties

2.1 Combating corruption, avoiding conflicts of interest

We must avoid situations in which personal or financial interests may conflict with the interests of Schöck. In particular, we are prohibited from holding participating interests in the companies of our competitors, suppliers or customers or from entering into private business relationships with them if this could lead to a conflict of interest. Such a conflict is always to be assumed if the type and scope of an interest is likely to influence actions in the performance of duties at Schöck. Conflicts of interest can also arise from business relationships with friends and relatives. In order to preclude a potential conflict of interests or loyalties, the immediate superior or the compliance officer must be consulted beforehand. No employee may offer or accept personal gifts or benefits arising out of Schöck business relationships that could reasonably be expected to influence business decisions or transactions.*

The acceptance/giving of monetary gifts is generally prohibited. This applies both vis à vis public officials as well as vis à vis employees of private companies.

Invitations to business dinners must be within the bounds of customary hospitality.

No employee may offer, procure or attempt to offer or procure improper advantages

for business partners, their employees or other third parties in connection with business activities of any kind.

This is to be assumed in particular if the nature and scope of such advantages are capable of unduly influencing the actions and decisions of the recipient.

Particular caution is required in the case of public officials and public employees. In case of doubt, the advice of the compliance officer should be sought here.

Third parties (consultants, brokers, sponsors, etc.) must not be used to circumvent these regulations.

In the event of violations, considerable consequences under labour law, criminal law or regulatory law or considerable claims for damages from Schöck or third parties must be expected.

2.2 Fair competition, observance of anti-trust and competition law

Schöck is committed to fair and open competition. Our companies, their management and employees must not engage in illegal or even criminally relevant practices. This applies in particular to illegal agreements that may exclude, restrict or distort competition. In this respect, both the relevant national regulations and the internal regulations of the Schöck Group, in particular the [“Code of Conduct: Compliance with laws and Schöck regulations”](#) (Compliance Policy) must be observed.

* The nature and scope or value of smaller considerations not covered by this are defined, e.g. in the travelling expenses guideline!



2.3 Donations and sponsoring

Schöck does not make direct or indirect donations to political organisations, parties or individual politicians. Any exception to this rule must be agreed in advance with the Executive Board and/or the Head of Compliance.

Sponsoring and donations to other, non-political recipients must not be used to circumvent the regulations of these guidelines.

2.4 Observance by partners

We are always a reliable partner for our customers and suppliers; our cooperation is based on trust and fairness. We strive here for a long-term relationship based on partnership.

It is therefore important to us that business partners, customers and suppliers observe the principles formulated in these corporate guidelines in the same way.

3. Health and safety

We are obliged to ensure a healthy and safe working environment. Strict compliance with the safety regulations, in particular, as well as the regulations of the employers' liability insurance association, is

indispensable for this. All employees are obliged to report violations of these principles immediately to the responsible company representatives. Any irregularities must be remedied immediately.



4. Environmental protection

Schöck is aware of the ecological effects of its business activities and is committed to protecting the soil, water, air and biological diversity. All employees are called upon to prevent the occurrence of harmful environmental effects in the performance of their duties by taking preventive and mitigating measures in the sense of

sustainable management, and to handle natural resources with care. All relevant legal and official requirements must be strictly observed. Any environmental damage caused must be reported immediately to your superior and/or to the company's environmental protection officer.



5. Communication, public relations (PR), training

We inform employees, business partners, shareholders, the media and the public as openly and transparently as possible about developments in our companies. The basis for this is a uniform and coordinated communication policy. This applies in particular if the company is confronted with allegations of significant violations of the principles described here.

Practice-oriented seminars are conducted at regular intervals in order to awaken and strengthen our understanding and awareness of the necessity of these regulations as well as of the risks associated with violations. This applies in particular to key points of the "[Code of Conduct: Compliance with laws and Schöck regulations](#)" (Compliance Policy), and here in particular to the combating of corruption and the observance of anti-trust and competition law.

6. Protection of company property, handling of information, data protection

All Schöck employees must handle company property carefully and responsibly. This includes, in particular, company know-how, trade and business secrets, inventions and objects of industrial property rights as well as the handling of office equipment, work equipment and company vehicles.

All Schöck employees are obliged to maintain secrecy with regard to information of importance to the company that has come to their knowledge in the course of their work or in any other way and, in

case of doubt, to inform their superior or the compliance officer. Irrespective of whether and to what extent personal data is protected under the respective national law, the prohibition applies to the use of personal data obtained in connection with work for Schöck for other purposes. This applies also to data and information relating to partner companies that are subject to a special confidentiality obligation. Insufficient protection of personal data can cause considerable damage to the company.



7. Consequences of violations

Compliance with these guidelines is mandatory for all employees. Violations must be subject to disciplinary action, irrespective of the legal situation in the

respective country, and may also lead to claims for damages and to criminal prosecution.



Schöck AG
Schöckstraße 1
76534 Baden-Baden, Germany
Phone: +49 (0)7223 967-0
schoeck-de@schoeck.com
www.schoeck.com

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