

Code of Conduct

for Business Partners

Think Tomorrow.

Code of Conduct for Business Partners

The SSI SCHAEFER Group¹ (hereinafter referred to as SSI SCHAEFER) is an experienced and high-performance solution provider in the area of internal material flow, on whose sense of responsibility and integrity customers and employees can always rely. Our Business Partners contribute significantly to this, which is why a common understanding of values is essential for the cooperation of SSI SCHAEFER with Business Partners. The requirements and principles of conduct of this Code of Conduct are therefore part of the contractual basis for the cooperation of SSI SCHAEFER with natural and legal persons who sell products to SSI SCHAEFER themselves or through third parties (e.g. subcontractors, agents or affiliated companies) or provide services to SSI SCHAEFER themselves or through third parties or cooperate with SSI SCHAEFER in any other way (hereinafter referred to as Business Partners).

Business Partners of SSI SCHAEFER shall consistently comply with all relevant legal provisions as well as the principles of this Code of Conduct for the duration of the cooperation and ensure their compliance by third parties used to fulfill business activities for SSI SCHAEFER. In addition, Business Partners of SSI SCHAEFER must pass on the principles defined in this Code of Conduct directly or with the same content to their direct suppliers and ensure compliance with internationally recognized human rights. Along the lower supply chain, i.e. towards indirect suppliers, Business Partners of SSI SCHAEFER shall work towards the passing on of these principles and the observance of human rights to the extent of their influence.

The Code of Conduct for Business Partners of the SSI SCHAEFER Group includes the following principles of conduct:

01

Fairness

SSI SCHAEFER is committed to fair competition in its markets

SSI SCHAEFER convinces due to the quality of its products and services. Accordingly, we expect our Business Partners to behave fairly in competition and to reject any kind of market manipulation. In particular, Business Partners of SSI SCHAEFER undertake to comply with antitrust and competition regulations and not to participate in prohibited agreements or cartels. The same applies to the exchange of competitively sensitive information as well as to any other behavior that may inadmissibly restrict or limit competition.

¹ Fritz Schäfer GmbH & Co KG and all companies in which Fritz Schäfer GmbH & Co KG directly or indirectly holds a majority share.

02

Integrity

SSI SCHAEFER values integrity and does not tolerate corruption

Customers and Business Partners can always rely on the sense of responsibility and integrity of SSI SCHAEFER. This is based, among other things, on the fact that SSI SCHAEFER does not tolerate any form of corruption and refrains from doing business that involves bribery or corruption in any form. SSI SCHAEFER refrains from any unfair business practices and takes action against them. We expect our Business Partners to behave with integrity and to comply with the respective applicable legal regulations for the prevention of corruption. In particular, Business Partners of SSI SCHAEFER undertake not to engage in active corruption and to prevent passive corruption. SSI SCHAEFER Business Partners only use consultants or intermediaries to the extent legally permissible and compensate their services as actually rendered to an appropriate extent. Our Business Partners do not tolerate any form of unlawful material and immaterial benefits (including the offering thereof) to public officials or persons comparable to them (regardless of whether directly or indirectly via third parties). Unlawful material and immaterial donations of any kind from our Business Partners to political parties, their representatives as well as to elected officials and candidates for political offices will also not be tolerated. Donations are made only on a voluntary basis and without expectation of any consideration in return. Sponsorship of individuals, groups or organizations will not be used to gain unlawful business advantages.

03

Sanctions & Money Laundering

SSI SCHAEFER observes export control and anti-money laundering regulations

SSI SCHAEFER strictly complies with sanctions and embargo regulations as well as regulations on money laundering prevention. We therefore expect our Business Partners to comply with the applicable trade and export control regulations and in particular to subject all (potential) Business Partners to an embargo and sanctions list check. Only persons who are not listed on relevant sanctions lists may be used in the cooperation with SSI SCHAEFER.

In addition, our Business Partners take appropriate measures to prevent money laundering and terrorist financing.

04

Interests

SSI SCHAEFER makes decisions based on factual considerations

SSI SCHAEFER is successful as a family business and has an excellent reputation. This is due, among other things, to the fact that we strictly separate our private interests from the interests of SSI SCHAEFER and make business decisions exclusively on the basis of objective criteria. We therefore expect our Business Partners to also make a strict distinction between business and private interests and not to allow themselves to be guided by private interests in an undue manner when making business decisions.

05

Confidentiality

SSI SCHAEFER respects data protection and information security

When developing innovative products and solutions, SSI SCHAEFER cooperates across divisional and national borders. Compliance with data protection requirements as well as confidentiality obligations and information security standards are always a priority for us. Accordingly, we expect our Business Partners to ensure that confidential information is kept secret and intellectual property is protected. This also applies after termination of the business relationship. In particular, Business Partners of SSI SCHAEFER undertake to comply with all applicable data protection laws.

06

Diversity & Human Rights

SSI SCHAEFER promotes diversity and is committed to safe and fair working conditions

SSI SCHAEFER is active in over 70 countries worldwide. Fair and respectful interaction with each other always forms the basis of our entrepreneurial activities. We therefore expect our Business Partners to respect and comply with internationally recognized human rights². Any form of forced or involuntary labor, modern slavery, debt bondage or human trafficking is prevented, and migrant workers and other vulnerable groups are not exploited. Workers have unrestricted access to their identity documents and other personal property at all times. Our Business Partners consistently reject child labor and provide special protection for underage workers, employing them only after they have reached the legally permissible minimum age, but no earlier than 14 years of age³, and not under dangerous or harmful conditions or in night work. Compliance with local minimum wage laws and industry standards, as well as all regulations on working and rest times, is a matter of course for our Business Partners. Similarly, consistent compliance with the right of employees to form and join trade unions, freely elect employee representatives and participate in collective bargaining without resulting discrimination is guaranteed.

Our Business Partners ensure consistent compliance with all regulations on occupational health and safety, health protection and fire prevention. Business Partners must establish a process that enables continuous reduction of work-related health hazards and improvement of occupational health and safety and fire protection. SSI SCHAEFER Business Partners work towards a working environment that is free from discrimination and harassment of any kind. Furthermore, our Business Partners commit to comply with all applicable laws and the resulting due diligence requirements regarding the procurement of minerals and materials from conflict regions and high-risk areas ("conflict minerals") that may contribute to human rights violations, corruption, the financing of armed groups or similar negative effects. Our Business Partners also respect the prohibition of unlawful eviction or otherwise unlawful taking of land, forests or waters whose use is the basis of people's livelihoods, as well as the prohibition of the use of private or public security forces in the workplace involving torture, injury to life or limb, inhumane treatment, or interference with the freedom of association or labor union.

² The SSI SCHAEFER Group understands internationally recognized human rights to be those derived from the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the ILO Core Labour Standards.

³ In accordance with ILO Convention No. 138.

07

Environment

SSI SCHAEFER is committed to environmental protection and the careful use of resources

One of the core values on which SSI SCHAEFER bases its business is long-term thinking. For SSI SCHAEFER, it is therefore a matter of course to take responsibility for the environmental compatibility and sustainability of its products, services and locations, as well as to strive to reduce emissions and lower energy and water consumption. We expect the same from our Business Partners. In particular, SSI SCHAEFER Business Partners are committed to complying with all applicable environmental laws, including those regarding chemicals, hazardous and non-hazardous waste, wastewater, and air and noise emissions. Our Business Partners also avoid all environmental risks that pose a threat to human life or health and comply with the ban on the use of mercury (according to the Minamata Convention), the production and use of persistent organic substances (POPs, according to the Stockholm Convention) and the export of hazardous waste (according to the Basel Convention). Furthermore, SSI SCHAEFER's Business Partners respect the requirements of the REACH regulation as well as the RoHS guidelines within the legal scope of application. We expect our Business Partners to actively address both the climate footprint of their company and that of their products and to establish corresponding targets for the reduction of greenhouse gases. This includes the consideration of their own and product-specific energy efficiencies as well as the use of renewable energies, the management of sustainable resources and waste reduction.

08

Quality

SSI SCHAEFER attaches particular importance to the quality of its products

As a globally operating Group, quality management (QM) plays a major role at SSI SCHAEFER. The focus is always on the continuous improvement of our processes and procedures as well as the achievement of quality requirements and expectations. SSI SCHAEFER makes this objectively visible through certifications according to internationally applicable standards. We apply the same standards to our Business Partners and expect them to supply us only with goods and services that meet the agreed quality requirements. Under no circumstances do Business Partners supply counterfeit goods to SSI SCHAEFER. With regard to product safety and conformity, Business Partners always comply with legal requirements and agreed standards.

Risk Analysis

SSI SCHAEFER will perform regular and ad hoc risk analyses with regard to its Business Partners in accordance with legal requirements. If this results in expectations of the Business Partner that go beyond this Code of Conduct, e.g. due to an increased risk situation, SSI SCHAEFER will inform the Business Partner in writing.

The same applies if SSI SCHAEFER significantly changes the Code of Conduct due to findings from the risk analysis or due to legal requirements and new expectations arise for the Business Partner as a result. The Business Partner must then meet these additional expectations within a reasonable period of time from receipt of the notification.

Violation of the Code of Conduct

The requirements and principles of conduct of this Code of Conduct are an essential part of the cooperation with our Business Partners. Any violation of this Code of Conduct constitutes an impairment of the business relationship between SSI SCHAEFER and the Business Partner. For this reason, SSI SCHAEFER reserves the right to review compliance with the Code of Conduct at any time and in an appropriate manner. The announcement of the review will be made in due time and SSI SCHAEFER undertakes to communicate the result of the review to the Business Partner in a timely manner. Without prejudice to further rights, SSI SCHAEFER reserves the right to demand clarification of the facts and initiation of countermeasures in the event of any identified or suspected violations of this Code of Conduct. If the Business Partner demonstrably fails to initiate suitable improvement measures within a reasonable period of time or if the violation is so serious that a continuation of the business relationship becomes unreasonable for SSI SCHAEFER, SSI SCHAEFER reserves the right, without prejudice to further rights, to terminate the contractual relationship concerned without notice or to withdraw from the contract concerned.

Reporting Misconduct

Illegal or irregular behavior is actively raised at SSI SCHAEFER. Both our employees and our Business Partners and other third parties are encouraged to report violations of this Code of Conduct, in particular (potential) violations of internationally recognized human rights and other dangers to human life or health, to SSI SCHAEFER. It is irrelevant whether the dangers arise directly from SSI SCHAEFER's business activities or are associated with them in an indirect way. Reprisals against employees, Business Partners or other third parties who in good faith express concerns about misconduct in connection with SSI SCHAEFER are prohibited.

SSI SCHAEFER's Business Partners and other third parties have access to the Group Compliance Team and the SSI SCHAEFER Group's whistleblower system at <https://www.bkms-system.com/ssi-schaefer>.

SSI SCHAEFER consistently follows up on every indication of possible misconduct, considering the principle of proportionality.

Compliance Affects Us all - Join in!

If you have any questions about the Code of Conduct and the principles of conduct contained therein, or if you would like to submit a report of potential wrongdoing, you can reach the Compliance Team at:

Fritz Schäfer GmbH & Co KG | Group Compliance
Fritz-Schäfer-Strasse 20 | 57290 Neunkirchen | Germany
+49 2735 70-9595 | compliance@ssi-schaefer.com

The web-based whistleblower system can be found here:

<https://www.bkms-system.com/ssi-schaefer>

Declaration of Consent

We hereby agree to the provisions of the Code of Conduct for Business Partners of the SSI SCHAEFER Group and undertake to comply with them within the business relationship with SSI SCHAEFER and to pass them on to our supply chain to the extent stated.

The Code of Conduct for Business Partners is made available for download on the SSI SCHAEFER homepage (www.ssi-schaefer.com) in the currently valid version.

Date

Signature and stamp or digital signature of the Business Partner

