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## SCHREINER GROUP CODE OF CONDUCT

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**The Schreiner Group Code of Conduct** contains important rules of behavior to assist our employees in correctly and appropriately answering questions of a legal and ethical nature that emerge in conjunction with the development of strategies and decision-making processes, as well as in everyday business.

Special, country-specific codes may complement the rules of this Code of Conduct in consideration of specific, regional aspects.

This Code of Conduct is based on our claim of conducting business in a manner that conforms to our values and is legally and ethically impeccable. The following corporate values define us:

- Innovation
- Quality
- Performance
- Enthusiasm

These values are the hallmarks of our actions within the organization and in dealing with third parties. Additional orientation is provided by our Leadership Principles.

Furthermore, our Code of Conduct explains that we can be trusted and that we will justify the trust placed in us in any of our actions.

### **Observance of Laws and Norms**

We are an internationally active company and thus subject to different legal systems and laws.

We fully comply with all applicable laws, irrespective of whether they are national, international or local laws, and respect national customs and traditions, as well as other social norms.

### **Basic Rights of Employees**

We respect the personal dignity, privacy and individual rights of each and every employee.

We will not condone any conduct by employees in contravention of the above, and will rigorously stop and take appropriate action against offenders.

We consistently comply with the labor laws in effect in the relevant country or state and guarantee fair pay for work performed.

We neither give preferential treatment to nor discriminate against members of labor organizations or unions. Legally granted rights to collective bargaining will be observed.

#### **Prohibition of Discrimination**

Any discrimination based on gender, age, religion, race, social background, disability, ethnic or national origin, political membership, personal views, or sexual orientation is prohibited in our organization and will not be condoned.

#### **Employee Conduct**

The reputation of our company is substantially shaped by the conduct of each and every employee.

We stand for a climate that values open, honest and respectful conduct, as well as mutual trust.

Therefore, all of us are expected to conduct ourselves vis-à-vis any third party or in public in a manner that reflects dignity and propriety, and represents our company accordingly.

#### **Prohibition of Forced or Compulsory Labor**

Any form of forced or compulsory labor is prohibited.

In any suspected case of employees being forced to work by labor agents through force or compulsion, coercion, deception, intimidation, or due to their political views or expression of political views, the relevant labor agents will be subjected to a careful examination, and appropriate actions initiated.

We expect all of our contractual partners to follow the same course of action.

### **Prohibition of Child Labor**

Child labor, as defined in the ILO Conventions, the Conventions of the United Nations and national law, as applicable, is prohibited.

We comply with the strictest of any of the standards mentioned above.

Any form of child exploitation is prohibited and will not be condoned by us.

We observe and actively protect the rights of juvenile employees.

### **Occupational Health and Safety**

We highly value a safe and healthy work environment for our employees.

Therefore, we take effective actions to avoid accidents and exposure of our employees to health risks posed by the work environment and the jobs they perform.

We ensure that an Occupational Health & Safety Management System encompassing all organizational units and processes of Schreiner Group is developed, applied and sustained.

Every employee of Schreiner Group assumes co-responsibility for supporting our efforts to create, sustain and support safe working conditions.

This responsibility for employees and colleagues results in the best possible precautions against accidents – and health risks.

This responsibility is reflected in:

- The Occupational Health and Safety Management System,
- Technical workplace, facility and process planning,
- Elimination and reduction of the chemical, physical and other hazards and
- Personal behavior in everyday operations.

All our employees have to constantly focus their attention on occupational health & safety in order to protect themselves and others from damage.

### **Integrity and Conflicts of Interest**

We respect the rights of employees to pursue outside activities that are of a private nature and have no adverse effects on their job performance at Schreiner Group, on Schreiner Group itself, or on Schreiner Group's reputation.

We trust that the personal interests of employees do not conflict with the company's interests and expect that all employees justify this trust through appropriate conduct and goal orientation.

Consequently, our employees will not engage in any external business or financial interests – either directly or indirectly – that contravene the interests of Schreiner Group or might impair the ability of employees to fully meet the obligations established by their employment contracts.

Therefore, our employees will avoid any activities or situations that might lead to a conflict between their personal interests and the interests of our company.

### **Personal Use of Company Property**

We treat the property of Schreiner Group with appropriate care and a sense of responsibility.

Personal use of company property is not permitted as a matter of principle, provided that no other rules or arrangements exist under individual contractual agreements or in line with established company practices.

### **Business Relations**

The image of our company is substantially shaped by the way we deal with our business partners.

Therefore, it goes without saying that our conduct in this sensitive area is legally compliant and conforms to ethical principles.

Trust, fairness and a high level of independence in business decisions characterize our dealings with business partners.

Personal interests and potential personal gain have no influence on our business decisions.

**Active and Passive Corruption**

To justify and preserve the trust of our business partners, we refrain from any form of corrupt behavior and also avoid the mere impression of such behavior.

We will not illicitly offer, promise or grant any favors or benefits either to members of the public sector at home or abroad, or to decision makers in private-sector companies, in order to encourage any behavior or decision that would be favorable for our company.

None of our employees is allowed to be influenced in any business decision by having suppliers and customers offer or promise any illicit favors or benefits, or by accepting such favors or benefits.

We have to pay particular attention to this rule with respect to gifts and entertainment or invitations to special events.

We make business decisions exclusively in the interest of Schreiner Group and disregard any personal interests.

Claiming illicit favors or benefits is strictly prohibited and will not be condoned by us.

In the event that we should be offered, promised or granted any illicit favors or benefits we will immediately inform our supervisor.

In cases of doubt regarding the appropriateness of accepting a gift, entertainment or invitation to a special event we will consult with our supervisor.

In the event that members of the public sector or decision makers in private-sector companies request us to grant illicit favors or benefits we will inform our supervisor.

### **Trade Controls**

We actively participate in the international flow of goods and support free world trade.

We comply with existing trade controls, import and export control regulations, as well as economic embargoes and actions to counter terrorism.

### **Data Security, Data Protection and Non-Disclosure**

Data security is of paramount importance to us as it decisively influences business success and the reputation we enjoy with our customers and business partners.

All of us are aware of the high sensitivity of the personal data of our customers, employees and suppliers entrusted to Schreiner Group.

Within the scope of our duties, all of us are responsible for guaranteeing a high level of protection within Schreiner Group.

Therefore, we protect company data as well as personal data relating to suppliers, customers and employees, using all suitable and appropriate technical and organizational means available, against unauthorized access, unauthorized use and/or misuse, loss and premature destruction.

A large number of technical, organizational and legal measures has been created and supports assurance of the confidentiality of personal data.

Company-internal rules result in a consistently high level of data protection worldwide.

Privileged information will only be gathered and processed with consent by the person concerned, or if permitted by a definite legal norm or required for the performance of a contractual obligation, within the permissible scope.

We respect the comprehensive rights of the persons whose data we gather, process and use.

Therefore, personal data in particular, will only be gathered and processed within the required, legally permissible scope, and only for the intended purposes.

In addition to the technical and organizational measures taken, all of us are obligated to carefully and prudently protect information on business and operational matters.

Therefore, we do not externally communicate any information to which we have access as employees of Schreiner Group.

In personal conversations or phone calls about Schreiner Group and its business partners in public (for instance, when using means of public transportation) we observe the confidentiality of information.

Furthermore, we protect our business documents as well as the data and documents of our business partners from disclosure to or access by third parties.

### **Environmental Protection**

Protection of the environment and conservation of natural resources is a corporate objective that takes high priority at Schreiner Group.

Through management's assumption of relevant leadership responsibility and the commitment of all employees we continually work on the improvement of our environmental footprint.

In development, manufacturing and shipping of our products, environmentally friendly processes and methods are of major importance to reducing waste, air and waste water emissions.

### **Dealing with Competition**

We engage in free competition and observe all legal provisions enacted to ensure free competition.

We do not enter into any agreements with competitors and other third parties if such agreements might impair competition.

We do not disseminate any false information about competitor products and services and refuse to gain any competitive advantages through any unfair means or practice.

**Grievances and Pointers**

Any employee can raise a grievance/complaint with his/her supervisor, the HR manager or the works council chairperson.

Confidential and anonymous grievances/complaints are possible; all reports will be followed up on. Suitable actions will be taken as required.

All documents will be retained as confidential matter.

Repercussions against individuals raising grievances/complaints, irrespective of the nature of the grievance/complaint, will not be condoned, provided that the individual raising the grievance/complaint, in doing so, does not violate the rules of fairness or commits an unlawful act.