

Code of conduct

How we do what we do: Our behavior towards business partners and among colleagues.



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Foreword

The key to top performance, profitable growth and sustainable success lies not least in our corporate culture. Values such as respect, fairness, discipline and loyalty in our daily interactions provide us with an orientation framework that motivates and promotes teamwork and exemplary behaviour within the company.

These values must always prove themselves anew. They apply between colleagues as well as to our business partners. Just as everyone wants to be treated well, everyone must also work to ensure that this right applies to everyone and is implemented. Supervisors have a role model function here.

The values in our daily interactions ensure respectful, successful cooperation in the here and now. For a future worth living and that of our children, we also protect the environment: by conserving resources, consciously using energy and chemicals and constantly improving organisational and technical measures to reduce environmental pollution.

Compliance with the law is an irrevocable basic principle of our actions. This Code of Conduct goes beyond this in part, defining and regulating our behaviour within the company and in our interactions with our business partners.

Works council and management of SWG
September 2023

Scope of application

This Code of Conduct applies to all employees of SWG and its subsidiaries. It is intended to serve as a guideline, prevent misconduct and promote and demand our values. Adherence to these values safeguards the credibility and reputation of SWG, both internally and externally.

Adherence to the Code of Conduct

This Code must be observed by ALL employees, regardless of their position or training. It is the responsibility of managers to ensure that this Code is communicated to all internal and external employees, internalised and implemented.

Breaches of any kind are to be penalised by superiors. In serious cases, measures under labour law, including criminal charges, are also possible.

All employees are also called upon to report violations of this Code and applicable laws immediately. This can be done by contacting the relevant line manager, the works council, the management and/or the company whistleblowing centre. No-one has to fear any detrimental effects on their employment relationship as a result of such complaints!

Our values

WE are proud of our **tradition**, build on the experiences and always look for **innovations**.

WE attach importance to **long-term partnerships**. To customers, suppliers and above all to our employees. Maximum performance needs constance.

WE set ourselves apart from the competition with our **high level of quality and service**.

WE **protect our environment** because we are part of it.

WE treat each other with respect. This includes:

- the **appreciation** of each individual, regardless of their position or work task.
- **attention** to other ideas and suggestions.
- **tolerance** in being different, but not in work success.
- **Politeness** in dealing with each other.

WE demand and live fairness. This means:

- **Self-responsibility** in the fulfilment of tasks, no shifting of problems to others.
- The **ability and willingness to criticise constructively** on the merits. There must be no bullying or marginalisation.
- Ability to **work in a team**, get involved and also subordinate.
- **Reliability** of the statements and actions of employees and managers.

WE are loyal to each other and to the SWG. This includes:

- **Commitment to SWG**, i.e. acting purposefully to increase the company's success and avert damage to it.

- **Incorruptibility** towards suppliers and customers.
- **Acceptance** of and compliance with management structures.

WE are disciplined. This includes:

- **Punctuality**, because every delay costs someone else time and money.
- **Clarity** in the statements and specifications in order to be able to comply with them.
- **Order** to ensure efficiency.
- **Ambition** and self-discipline.

Principles and guidelines of conduct

Customer satisfaction / product safety

We retain our customers through good service, adherence to deadlines, high-quality products and innovations - not by granting personal advantages or bribery.

Our products and services are legally compliant and of the highest possible quality. This gives our customers a competitive edge. In the event of complaints, we deal with them immediately, look for the causes and rectify them.

Conflicts of interest

All employees must protect and represent the interests of SWG. Conflicts of interest can arise if employees are inappropriately influenced in their judgement or actions by material, personal or family circumstances or if this impression could arise for an external third party. In such cases, the persons concerned must immediately report the conflict of interest to their line manager and disclose it in full. An objective solution will then be sought in the interests of SWG.

For example:

- Performance evaluation for employees who are in close personal or family connection
- Contract negotiations with customers/suppliers, with whom there are also personal relationships

Bribes, gifts, donations

We differentiate ourselves from our competitors through service and quality and expect the same from our suppliers. We reject any action, contribution in kind or in cash that serves to obtain an economic benefit by granting a personal advantage. We neither give nor accept such gifts to business partners. This constitutes bribery.

This does not apply to small financial tokens of appreciation that are also customary from the perspective of a third party or are part of hospitable hospitality. Gratuities over €50 are generally not customary. The same applies to hospitality in excess of €100 per person and the assumption of accommodation costs by suppliers in any amount.

As soon as employees become (potential) victims of an attempted bribe, they must reject it unequivocally and report it immediately to their line manager. The same applies as soon as employees become aware of bribery by or of other SWG employees. In addition to the line manager, the works council, management and the company whistleblowing centre are also available to deal with such allegations.

Donations made by SWG must be lawful and transparent and may only be made to organisations authorised to issue donation receipts. They must always be expressly authorised in advance by the management.

Confidentiality & Secrecy

Confidential information of SWG or its business partners may only be used for operational business purposes and is otherwise subject to confidentiality. This does not affect individual contractual confidentiality agreements.

All employees are obliged to treat confidential information as such, to protect it and not to pass it on to external third parties. This obligation extends beyond the duration of the employment relationship with SWG and can only be cancelled by law or official request.

Utilisation and handling of machines, systems and equipment

The machines, systems and equipment must be used carefully and only for their intended operational purpose. Handling and maintenance by our employees are carried out in accordance with the principle of preserving value and maintaining functionality. Any damage must be reported immediately to supervisors and the respective machine etc. must be labelled accordingly for other users and, if necessary/possible, taken out of operation.

If employees wish to use SWG machines etc. privately, this must be expressly authorised in advance by their supervisor. These authorisations are only valid for individual cases and are never of a permanent nature. Even repeated authorisation of similar procedures does not create a permanent legal entitlement.

Documentation & revision of business transactions

We document all business transactions completely and in a timely manner in a suitable, transparent and analysable form. In particular, this includes all purchasing and sales processes as well as all financial transactions. The valid signature regulation also serves, among other things, to ensure compliance with the documentation obligations.

The documentation obligation is checked by internal (e.g. accounting, controlling) and external control instances (e.g. auditors, accountants). In addition, business transactions are audited, and all employees are required to support this process in a timely, complete and objective manner.

Communication

We practise an open, addressee-orientated, transparent and timely information policy. In doing so, we ensure polite and respectful communication both internally and externally.

We maintain an open dialogue with all relevant contacts and deal with constructive criticism of the company. We defend SWG's reputation and defend ourselves as soon as it is damaged by false, untrue or incomplete reporting.

Protection of our employees

Every person is unique and is entitled to respectful treatment and protection from harm to body and soul. The following regulations therefore apply beyond our workforce. Within the scope of our possibilities, we therefore also exert influence beyond our company.

All employees are required to cultivate and promote a corporate climate of personal respect, appreciation and trusting cooperation. This also includes tolerance towards others. Everyone's religion, origin, age, gender and sexual orientation must be respected and must not lead to unequal treatment or discrimination.

Anyone who observes how other employees are not treated within the framework of these unalterable basic principles must immediately report the grievance to the management and the works council. As far as possible, all employees are encouraged to take a direct stand, offer support to those affected and criticise openly.

Employees who are themselves affected can contact the management, the works council or the company whistleblowing centre at any time for support and resolution of the grievance.

Sexual harassment

Any sexual act or comment that is not desired by the person concerned - whether inappropriate, offensive or intrusive - is sexual harassment and will not be tolerated in the company. If the management becomes aware of this, it will punish this misconduct up to and including exhausting all (labour) law options.

Sexual harassment includes, among other things:

- Suggestive remarks, sexist sayings and jokes
- Intrusive looks or intrusive physical contact
- Presentation of pornographic material
- advances combined with the prospect of advantages/disadvantages in the company, threats, etc.

Particularly serious forms such as blackmail, sexual assault, coercion and rape constitute criminal offences and will be reported to the criminal authorities.

Bullying

Bullying is the systematic harassment, harassment or marginalisation of someone in order to devalue them. It generally contradicts the respectful behaviour we want to see. In this way, the personality and self-esteem of others are violated. Bullying is not tolerated in the company and can have (labour) law consequences.

This must be distinguished from short-term conflicts that arise from a tense situation. Supervisors, management and all colleagues as well as the disputing parties have a duty to resolve such conflicts as quickly as possible and prevent bullying from arising.

Obligations of line managers

Supervisors ensure a working atmosphere free of harassment, bullying and discrimination in their area of responsibility, both through their role model function and by implementing this Code of Conduct. They must immediately follow up on reports of misconduct.

Contact points in the event of sexual harassment, bullying and discrimination

In addition to the contact points already mentioned, such as management, the works council, the company whistleblowing centre and the respective line manager, violations can also be reported to the HR department. These is only obliged to provide information to the management.

The first task is to put an end to the misconduct. At the same time, the management and HR department provide advice on possible steps under labour, criminal and civil law or establish contact with an appropriate external advice centre (e.g. lawyer).

By successively limiting the contacts to the management and HR department, the aim is to ensure that the allegations are investigated with the utmost rigour and at the same time with the greatest possible discretion. The person concerned is free at any time to involve other persons they trust, such as representatives of the works council.

Management and the HR department will interview both the accused and the person concerned as well as any witnesses. Both the accused and the person concerned will be informed of the outcome and consequences of the investigation.

All persons involved in the proceedings are obliged to maintain absolute confidentiality towards third parties, even after the proceedings have been concluded. Witnesses, affected persons and wrongly accused persons must not suffer any unjustified professional disadvantages.

Abusive accusations

Anyone who accuses others of sexual harassment or bullying against their better judgement must expect consequences, including legal action.

Entry into force, updating and disclosure

The Code of Conduct comes into force on 1 October 2023 and is valid indefinitely. Any amendments must be approved by the management.

This Code of Conduct is distributed to all employees and published on the company's website.

As line managers, customer advisors and employees in Purchasing have a special role model function and the regulations are particularly relevant to external business partners, their knowledge and implementation must be confirmed annually by signing the personnel file.

Works council and management of SWG