

Code of conduct



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General principles and duties

The Scheffer Code of Conduct sets out the standards that we base our ethical behavior on mutual respect, honesty and fairness. in dealing with colleagues and business partners to ensure.

The Scheffer Code of Conduct applies to all business activities. the Scheffer Group and takes into account the diverse The cultures and values of all employees. This code is our commitment to social responsibility. Responsibility of our globally oriented family business.

An essential prerequisite for maintaining the high reputation that our company enjoys with customers, business partners and the public Preserving and enjoying this is a matter of impeccable and responsible conduct by every single employee.

The Scheffer Group's code of conduct is therefore binding for all employees.

Leadership topics

Every supervisor serves as a role model: He/She earns the recognition of his/her employees through performance, fairness, openness and respectful interaction.

As part of their leadership role, managers adhere to the principles of the Scheffer Group. They set realistic and clear goals and promote independent action by creating the necessary scope for it. Every manager has both organizational and supervisory responsibilities. Therefore, all employees entrusted with personnel management tasks have a particular responsibility to ensure that the Scheffer Group's code of conduct is observed.

The supervisor retains responsibility even when delegating tasks. These obligations supplement the existing employee guidelines.

Health and safety

At Scheffer, we prioritize safety – maintaining a safe and healthy working environment for all our employees is of utmost importance to us. We strive to ensure that everyone works in a healthy and safe environment, regardless of their location in the world. Annual audits of these conditions are conducted by an external certification body. Our occupational health and safety standards meet the requirements of DIN EN ISO 45001.

- We have clear health and safety standards, which we expect all employees to adhere to.
- To prevent workplace accidents, our standards are continuously reviewed.

Dealing with colleagues and business partners

All employees of the Scheffer Group contribute to a corporate culture characterized by honesty, openness, appreciation, and tolerance in their daily interactions. The dignity and personality of each individual are to be respected. Our employees are reliable business partners who keep their promises.

Mutual respect: condemnation of discrimination and harassment

Scheffer respects and promotes human rights and their observance, recognizing that human rights, based on internationally accepted laws and procedures, including the United Nations Universal Declaration of Human Rights, should be respected as fundamental and universally valid. Differences among employees are valued and respected, and we foster a diverse work environment. Discrimination, harassment, and intimidation based on gender, nationality, age, marital status, race, color, religion, ancestry, sexual orientation, social status, or physical disability are prohibited and contradict the principles of respectful and fair treatment. All forms of psychological and physical violence are condemned in the strongest possible terms.

Employees are therefore not permitted to use electronic systems to transmit or receive images or texts that constitute harassment as defined above. If employees experience, observe, or become aware of discrimination or harassment, they should report it to their supervisor and the Human Resources department. The company will investigate all reports of discrimination or harassment and take appropriate action in accordance with local laws.

Protection of employees and child labor

We reject all forms of forced, compulsory, or child labor at Scheffer and among our business partners. We are committed to actively supporting our employees in developing their skills and competencies. We respect the dignity of the individual and our employees' right to freedom of association. We adhere to the minimum age for employment as stipulated by government regulations. Where no government regulations exist, ILO Convention 138 applies. According to this convention, children under the age of 15 may not work, directly or indirectly, unless the exceptions provided for in Articles 6 and 7 of the ILO Convention apply.

We ensure that young workers under the age of 18 do not work overtime or night shifts and are protected against working conditions that are detrimental to their health, safety, morale or development.

Remuneration and social benefits

In addition to economic conditions, the requirements of economic development, and productivity, the remuneration paid to employees (workers and their family members) must comply with all relevant national laws on remuneration, including laws on minimum wages, overtime, and legally mandated social benefits. Remuneration must also enable employees to participate in social, cultural, and political life.

Handling of information and other assets

Open, effective, and targeted information sharing is crucial for business success. Information is one of a company's most valuable assets. However, information within the Scheffer Group is confidential or legally protected. Therefore, the respective contractual confidentiality obligations must be observed.

Silence in corporate matters

Confidentiality must be maintained regarding matters within the company group. If employees receive information by virtue of their company affiliation that is not publicly known, this information must be treated confidentially. Disclosure is permitted only to employees or contractors who are authorized to receive such information due to their responsibilities.

Whistleblowing / Protection from retaliation

To raise awareness and encourage reporting misconduct, we cultivate a culture free from fear of negative consequences for individuals. Employees are encouraged to seek advice and support without fear of punishment or reprisals. Action or retaliation against individuals who report

suspected misconduct or violations is strictly prohibited. They will neither be disadvantaged nor face dismissal.

Information protection

Employees must protect confidential company information, intended only for a limited group of people, from unauthorized access in the interest of the company.

Data protection

Taking all data protection rights into account, each company within the Scheffer Group treats all personal information about employees, business partners, customers, and suppliers carefully and confidentially. Protecting this information is of utmost importance to maintaining mutual trust. Disclosures to law enforcement agencies are only made by the heads of the relevant central functions and the responsible personnel at the respective locations when legally obligated to do so.

Compliance with laws / working hours

As an internationally operating company with suppliers and customers worldwide, Scheffer is bound by international trade laws and sanctions and complies with the applicable laws and other legal regulations of the

countries in which it operates. In particular, Scheffer adheres to all customs regulations and trade embargoes. All employees involved in the export and import of goods are obligated to comply with applicable economic sanctions, export and import regulations.

Our working hours comply with the German Working Time Act (ArbZG).

Responsible handling of assets

It is the duty of every employee to handle company property (e.g., equipment, company vehicles, furniture) responsibly and carefully. Company property must be protected against damage, misuse, theft, loss, embezzlement, or destruction. This regulation also applies to intellectual property such as know-how, trademarks, copyrights, and patents. This includes business and corporate plans, databases, reports, product samples, technical knowledge, designs, and business documents.

Private work on company premises and the use of company facilities for private purposes are not permitted. Exceptions are described in the relevant company regulations or require the approval of a supervisor.

Careful handling of highly confidential business documents

Every employee who has access to highly confidential information about the Scheffer Group or about a company with which Scheffer has business relationships must exercise special care in handling information and business documents in accordance with the duty of confidentiality (see also the organizational instructions on security).

This applies to the handling of plans and reports as well as the handling of information about new products or processes, acquisitions or disposals, mergers, business relationships, negotiations, contracts, business development or financial figures and legal disputes.

Fair competition

Scheffer pursues clean and recognized business practices and fair competition. In its competitive environment, it adheres to professional conduct and high-quality work. It maintains a cooperative and trusting relationship with regulatory authorities. We comply with all antitrust and fair competition laws and do not tolerate any anti-competitive activities.

Sustainability policy for suppliers

Scheffer expects its suppliers to comply with the fundamental employee rights stipulated in their respective national legislation. Furthermore, we expect them to acknowledge the core labor standards of the International Labour Organization, taking into account the laws and legal frameworks applicable in the various countries and locations.

Sustainable use of resources: The supplier minimizes the consumption of raw materials in all business activities. In particular, they pay close attention to the economical use of energy and water. The use of renewable resources is preferred where possible.

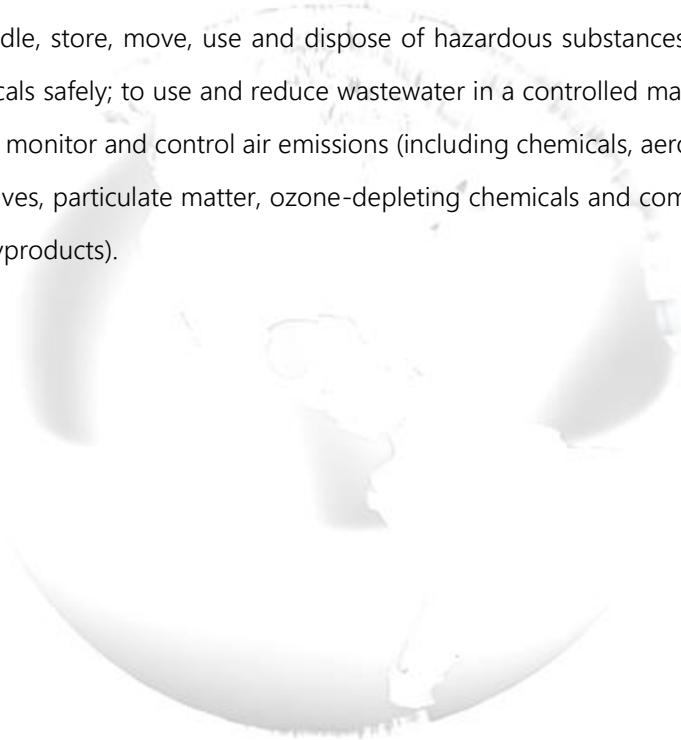
Scheffer expects his suppliers to neither tolerate nor participate in any form of corruption, extortion, or bribery. Gifts of any kind must not influence decisions regarding contracts or any other favors.

Our suppliers must respect their employees' freedom of association and right to collective bargaining, as enshrined in applicable laws and ILO conventions. Scheffer's suppliers comply with legal regulations regarding working hours, vacation time, and payment of the applicable statutory minimum wage.

Scheffer expects its suppliers to compete fairly and comply with applicable antitrust laws. Furthermore, we expect suppliers to adhere to all anti-money laundering obligations and not to participate in money laundering activities.

Suppliers must avoid all conflicts of interest while working for Scheffer. A conflict of interest exists when a supplier's representative attempts to positively influence their own personal interests or those of an acquaintance or relative due to their position as a supplier representative.

We require our suppliers to prevent pollution and conserve resources, to handle, store, move, use and dispose of hazardous substances and chemicals safely; to use and reduce wastewater in a controlled manner; and to monitor and control air emissions (including chemicals, aerosols, corrosives, particulate matter, ozone-depleting chemicals and combustion byproducts).



Occupational health and safety and fire protection

Scheffer complies with national occupational health and safety and fire safety laws. All occupational health and safety measures are free of charge for our employees. Regular training sessions are held on these topics.

We have established an integrated management process that enables the continuous reduction of work-related health hazards and the improvement of occupational safety, health, and fire protection. The information is available in the languages relevant to employees.

Aspects of implementation in our company:

- Employees are informed about the identified hazards and the associated preventive and corrective measures to minimize risks.
- Sufficient qualifications for the prevention of work-related health problems, the avoidance of workplace accidents, first aid, hazardous substance management and fire protection of employees.
- Suitable protective equipment and clothing is available free of charge.
- Suitable fire protection equipment, such as fire alarms and extinguishing systems, is installed.

- Monitoring and control of work-related health hazards and the resulting protective measures are carried out regularly.
- Chemicals used are labelled according to the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) or CLP in European countries. The storage of chemicals is handled according to national regulations.
- Corresponding emergency plans, fire protection equipment, and first aid supplies for initial medical care in the event of accidents are available. Adequate transport for further treatment of injured persons is guaranteed.
- An adequate number of emergency exits, escape routes and assembly points have been provided and are clearly marked with sufficient signs.

Should an accident at work occur despite all efforts, first aid will of course be provided in accordance with the relevant country-specific regulations.

Fake parts

We implement and maintain methods and procedures to reduce the risk of counterfeit parts and materials being used in our products. We employ effective procedures to detect counterfeit parts and materials, notify recipients of counterfeit products when there is justification, and exclude them from receiving further deliveries.

Conflicts of interest

All employees of the Scheffer Group must manage their private and other external activities and financial interests in such a way that they do not conflict with the interests of Scheffer. Our employees are obligated to make their business decisions in the best interests of the company and not based on personal interests.

Financial responsibility

At Scheffer, essential business processes are properly documented and relevant financial information is recorded to accurately reflect business operations through comprehensive reports. Employees who, as part of their duties, collect or transmit accounting or financial data, calculate and transmit indicators, or manage and disseminate other types of information must ensure that this data, indicators, and information are accurate, reliable, and truthful.

Corruption and bribery

The entire Scheffer Group has a zero-tolerance policy for corruption and bribery in business transactions. Scheffer employees and suppliers are expected not to influence their business partners in the performance of their duties, nor to be illegally influenced by offering, giving, accepting, or receiving bribes.

Slavery and human trafficking

For Scheffer, respect for internationally recognized human rights is the foundation of all business relationships. We are committed to respecting the rights of our employees and others affected by our company's actions and to treating them in accordance with the guidelines of the international community.

We reject any knowing use of forced or compulsory labor, as well as any form of modern slavery and human trafficking. Debt bondage and involuntary prison labor are not used. Employment relationships are based on voluntary participation and can be terminated by employees at their own discretion with reasonable notice.

Ethical recruitment

As an internationally operating company, we promote diversity within the company. We encourage collaboration between employees and partners of different nationalities, cultures, and ways of thinking, and are convinced that successful collaboration is only possible with mutual respect and appreciation for each individual.

Discrimination based on nationality, skin color, age, gender, sexual identity, religion, worldview, political opinion, or disability is strictly prohibited in the selection of new employees. Hiring and promotion are based solely on qualifications and skills.

Women's rights

Scheffer condemns any discrimination, restriction, or exclusion based on sex that results in or aims to impair or thwart women's recognition, enjoyment, or exercise of human rights and fundamental freedoms based on equality between men and women. Women are equal to other sexes in every respect.

Diversity, equality and inclusion

Scheffer is committed to a pleasant working atmosphere in which all qualified individuals are offered equal career opportunities and advancement prospects. We see the diversity of our employees as our strength, which is supported and promoted within the company.

Rights of minorities and indigenous peoples

We treat each other with respect and loyalty. We respect the rights and dignity of every individual. Social and cultural diversity enriches our work and contributes significantly to a productive work environment.