

SCHWEICKERT



Code of Conduct

Schweickert GmbH

Expression of our core values



SAFETY
WE ACT PROACTIVELY



COMPLIANCE
COMPLIANCE WITH REGULATIONS



DIVERSITY
WE FOCUS ON DIVERSITY IN THE TEAM



INTEGRITY & SUSTAINABILITY IN PRACTICE
WE ARE RESPONSIBLE



VALUE CREATION & RELIABLE QUALITY
WE ARE CONSCIENTIOUS



FAIR APPRECIATION & SINCERE PARTNERSHIP
WE ARE LOYAL AND HONEST

This edition of the Schweickert GmbH Code of Conduct was published in December 2023. Please visit our website www.schweickert.de or the Schweickert Employee App (Intranet) to ensure that you have the latest version.

For reasons of better readability, the simultaneous use of the language forms male, female and diverse (m/f/d) is omitted. All personal designations apply equally to all genders.

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FORWARD

Dear Readers,

The integrity of our company is fundamental to our business success. From the point of view of our customers, suppliers, employees and other stakeholders, we are measured by the integrity and level of accountability of our actions. Our Code of Conduct is therefore aimed at both Schweickert GmbH employees and our stakeholders. It provides guidance on the rules of behavior and ethics we expect in our day-to-day dealings with each other. The following Code of Conduct builds on these values and formulates the guidelines for our daily actions.

Integrity does not only mean compliance with laws and regulations, but also respect for generally recognized standards and Schweickert GmbH's own rules and requirements. Our aim is both to comply with legal requirements and to fulfil the expectations of our stakeholders.

The fundamental principles for acting with integrity set out in the Code of Conduct apply equally to all business areas and hierarchical levels - to the company management as well as to all employees.

The Code of Conduct is not an independent legal basis, but has far-reaching economic significance in addition to its ethical and social significance: Schweickert GmbH will only remain competitive and successful in the long term if the company fulfils its responsibilities - towards customers, shareholders, competitors, business partners, the supervisory authorities and, last but not least, its own employees.

We have the common goal of ensuring that all activities in the company are aligned with these principles every single day. We ask you to read our Code of Conduct carefully, not to lose sight of it and to comply with it at all times during your working day. Talk to us if you are not sure what these principles and rules mean for your work.

Our managers have a special responsibility in this area. Not only do they act as role models, they also have the task of ensuring that our rules are followed. By setting an example with our values and rules, we can all contribute to the sustainable success of Schweickert GmbH.

Thank you for your support



Ralf Schweickert
Managing Director

1 VISION, MISSION AND CORE VALUES

Schweickert GmbH is an independent, owner-managed family business founded in 1962. Reliability, quality and customer proximity are and remain the basis of our national and international success. Our vision is to shape a more secure digital future. Our focus is on providing excellent customer service and building long-term partnerships.

The core values of our company are: Security, compliance, diversity, integrity, sustainability, value creation, quality, appreciation and sincere partnership.

1.1 SAFETY - WE ACT PROACTIVELY



Safety is particularly important to us. This includes avoiding and reducing risks, minimizing the frequency and extent of injuries and illnesses and protecting our employees from them.

1.2 COMPLIANCE - ADHERENCE TO REGULATIONS



Our aim is to comply with all applicable laws and regulations that apply at the respective locations.

1.3 DIVERSITY - WE FOCUS ON DIVERSITY IN THE TEAM



As an international company, we value the diversity of our workforce, which makes us more flexible, creative and innovative. We are convinced that in an environment where employees are encouraged to think for themselves, the broader the team, the better the solutions.

1.4 INTEGRITY AND SUSTAINABILITY IN PRACTICE - WE ARE RESPONSIBLE



Integrity means honest, transparent and respectful behavior. We work on the basis of proven business practices, including sustainability. We expect all employees to comply with our Code of Conduct, which enables them to deal with difficult situations correctly.

1.5 VALUE CREATION & RELIABLE QUALITY - WE ARE CONSCIENTIOUS



The aim of all our endeavors is to create value for our stakeholders. High added value through sustainable business practices/use of resources enables us to be socially committed. We work carefully and precisely on problems and tasks. We are convinced that our stakeholders are always entitled to the best possible quality.

1.6 FAIR APPRECIATION & SINCERE PARTNERSHIP - WE ARE LOYAL AND HONEST.



Constructive cooperation is important to ensure continuous improvement. We honor the agreements we make. Our actions are characterized by inner solidarity and appreciation towards colleagues, customers and stakeholders. For us, professionalism goes beyond mere legal obligations, guidelines and framework conditions: it is a matter of trust to take instructions and local requirements into account just as much as appropriate behavior. We use methods of cooperation within our organization that we also apply when dealing with upstream and downstream stakeholders in order to create mutually beneficial solutions.

2 COMPLIANCE WITH THE CODE OF CONDUCT

The Code of Conduct is intended to guide us in our day-to-day decision-making and help us to handle business matters in a professional and legally correct manner. It applies equally to all business areas and hierarchical levels. Each and every one of us is responsible for ensuring that we internalize and live by the laws and regulations as well as the principles set out in this Code of Conduct. We will not tolerate any violation of the law or the Code of Conduct.

Especially if you are a manager, the promotion and support of behavior is one of your core tasks, which is your personal responsibility. As a manager, you have a role model function in your words and actions in everyday working life with regard to the implementation of the applicable laws, regulations and the requirements of this Code of Conduct. You ensure that the rules and standards are known and followed in the business environment.

We also expect contractors, consultants and other third parties who temporarily work for Schweickert GmbH or provide services to comply with the Schweickert Code of Conduct.

3 PEOPLE, SAFETY, HEALTH AND THE ENVIRONMENT

At Schweickert GmbH, we are committed to protecting our employees, customers, contractual partners, the environment and the social environment in which we operate. We see this as an essential element of our recognition as an internationally active company.

We are convinced that companies that operate sustainably prioritize issues such as safety, health, the environment and protection. Our internal standards and goals are the foundation for our continuous development and are applied in every project. We are committed to safety at all levels and strive to create a safe working environment.

- We take precautions to ensure the health and well-being of our employees.
- We try to involve our employees as much as possible in order to create a culture in which we can continue to develop.
- We are committed to reducing our ecological footprint.
- We offer our employees, contractors and visitors a safe working environment. We fulfil all regulatory and internal compliance requirements. We protect our assets to ensure the security of our business operations.

4 FAIR WORKING CONDITIONS AND DIVERSITY

All our values are centered on people. We want to treat each other with fairness, respect and dignity in our daily work. We support and promote equal opportunities for all our employees.

This corporate maxim applies not only to fair and objective recruitment practices, but to all aspects of the employment relationship.

We firmly believe that the diversity of our workforce is a significant advantage for our company. Diversity means a workforce that reflects different cultures, nationalities, genders, generations, ethnicities, abilities, social backgrounds, religious beliefs, sexual orientations and all the other unique differences that make each of us an individual human being.

We strive to be inclusive. We want to create a work environment where every individual has the opportunity to fully participate in our company's journey to success.

Schweickert GmbH lives by the maxim of a non-discriminatory culture, in which the diversity and variety of employees is seen as an opportunity and in which everyone is treated with equal respect and esteem. Neither ethnic origin, descent or other background, gender, sexual identity or orientation, religion or ideology, disability or age may lead to personal or professional disadvantages and influence the access, promotion and qualification opportunities of individuals.

5 PROTECTION AGAINST SEXUALIZED DISCRIMINATION, HARASSMENT AND VIOLENCE

It is important to Schweickert GmbH to protect its employees from any kind of discrimination. It is committed to prevention, information and assistance and consistently opposes any behavior that violates the dignity of its employees. All persons working for Schweickert GmbH are called upon to contribute to the creation of a workplace and training center that is characterized by mutual respect and tolerance and in which there is no room for disadvantage and discrimination.

We understand sexualized discrimination, harassment and violence to mean, among other things, when the purpose or effect of unwanted, sexually oriented behavior is to violate the dignity of the person concerned, in particular when an environment characterized by intimidation, hostility, humiliation, degradation or insults is created. This can occur verbally, non-verbally and also through physical assaults, in particular through comments of a sexual nature, such as sexually degrading language and gestures, through the unwanted display and visible attachment of obscene, sexually degrading or pornographic images, e.g. in the form of graffiti, and through unwanted sexual acts and requests for these, in particular through sexually determined physical touching of a person, so that their lifestyle is seriously impaired or their safety is threatened.

We would like to point out that there is no conclusive definition of the terms sexualized discrimination, harassment and violence. Those affected decide for themselves where to draw the line.

6 INTEGRITY OF BOOKS AND RECORDS; TRUTH IN REPORTING

As Schweickert GmbH, we see it as our duty to maintain a complete, correct, up-to-date and comprehensive reporting system and to publish financial information in accordance with the applicable legislation. We document all business transactions correctly and accurately and ensure that records are kept properly and in accordance with the law.

The term "records" includes records in both electronic and paper format. This includes all data, certifications and other written information compiled for the purposes of financial reporting and statutory disclosure obligations, as well as documents that must be retained for other record-keeping purposes.

We ensure that all records are made fully available for audits by internal auditors and independent external auditors. Records include, but are not limited to, business plans and marketing strategies, sales-related and technical reports, contracts, supply chain documentation, IT records, accounting and tax records, and records of travel, accommodation, and other expenses (list not exhaustive).

7 CONFLICTS OF INTEREST

We ensure that we always make decisions in the best interests of Schweickert GmbH and avoid conflicts of interest. Conflicts of interest are situations in which our own financial, social, political or other personal interests come into conflict with the business interests of Schweickert GmbH.

Examples of such a conflict of interest could be:

- Hiring family members of employees is generally permitted, but the person in question must be independently assessed and judged to be the best qualified person for the job.
- Employees who are considering a secondary employment with another company or an office/office in another organization must report such connections and have them approved in advance.
- Employees who hold financial interests in a company that may give rise to a conflict of interest (e.g. in relation to a supplier) must report such interests and obtain prior authorization.
- We take particular care when selecting contractors and suppliers. We want to avoid any situation that could give the impression that a conflict of interest exists.
- If a spouse, partner or close relative of an employee is connected to a company that has a business relationship with Schweickert GmbH or is in competition with it, the employee must actively disclose the connection.

8 PROHIBITION OF CORRUPTION

8.1 BUSINESS BENEFIT

Corruption is prohibited and is contrary to our values. We never make offers or financial, material or immaterial promises to customers, suppliers or other third parties if the reason for doing so is to influence decisions or achieve results of any kind or to gain an unauthorized advantage.

8.2 PRIVATE BENEFIT

Conversely, our employees must not accept anything of value or agree to accept anything if this is done with the intention of obtaining an unauthorized advantage.

8.3 AUTHORISATION

Payments or favors to expedite or guarantee routine government procedures (to which one is entitled) are considered bribes and are therefore prohibited.

8.4 SPONSORING/DONATION

All activities with regard to donations and sponsoring must comply with the Schweickert values and are carried out in accordance with our anti-corruption requirements. Schweickert GmbH does not make donations to political organizations, political parties or individual politicians.

8.5 ACCEPTANCE OF GIFTS / HOSPITALITY

Occasional giving or receiving of gifts, entertainment or hospitality may occur in the normal course of business. However, we must never use this as a means to influence business decisions or to obtain an improper advantage from a public official or private individual. Furthermore, we must never allow the impression to be created that our objectivity and impartiality could be influenced in our favor by our offer or acceptance of such gifts. All gifts, entertainment and hospitality must be moderate and appropriate in the given context and must not be frequent. In case of doubt, they should be actively reported to the disciplinary superior or the People & Talent department.

9 MONEY LAUNDRY

Money laundering is a criminal process in which illegally acquired assets from unlawful activities are channeled into the legal economic cycle in order to conceal their origin.

When initiating a business relationship with a customer or business partner, we pay attention to warning signals that indicate potential breaches of the law through money laundering in accordance with the applicable anti-money laundering laws.

10 INTERNATIONAL TRADING PRACTICES

Our company operates internationally. We are obliged to comply with the laws and regulations applicable in the respective countries and to organize our business activities accordingly.

11 FAIR COMPETITION

We promote and demand fair competition. When dealing with competitors, the applicable antitrust laws and other laws regulating competition prohibit, in particular, agreements and other activities that influence prices or conditions, allocate sales territories or customers or obstruct free and open competition in an unauthorized manner. Furthermore, these regulations prohibit agreements with customers and suppliers that are intended to restrict customers in their decisions.

Market participants can only act freely in fair competition. That is why we are committed to integrity when competing for market share. Every employee is obliged to respect and comply with the rules of fair competition. Particularly, employees may not hold discussions with competitors in which prices or capacities are agreed or information relevant to prices and capacities is exchanged.

Agreements with competitors on the waiver of competition, on the submission of sham bids in tenders or on the allocation of customers or territories are not permitted. This also includes informal discussions, informal agreements or actions that have as their object or effect any of the above-mentioned restrictions of competition.

12 PROTECTION OF INFORMATION AND ASSETS

We trust our employees and give them access to the assets of Schweickert GmbH so that they can fulfil their tasks effectively. Schweickert GmbH owns tangible and intangible assets. Examples of this are:

- Tangible assets: work equipment, PPE, tools, vehicles, office and communication equipment
- Intangible assets: strategies, business secrets, financial information, calculations, customer data, employee expertise, other proprietary information

The list is not exhaustive.

We all have a duty to protect the company's assets from improper use and to ensure that they are protected from theft, destruction, misuse and waste.

Our confidential business information, whether on paper, in electronic or other form, is protected and not made available without a legal basis. Unlawful disclosure of such information can massively weaken our competitive position. Communication must be authorized by the management before information is published.

Our employees are obliged to maintain confidentiality towards third parties; this also applies beyond the termination of the employment relationship. The same applies to employees of our competitors, who have a duty of confidentiality towards their employers. We respect this; at the same time, we do not tolerate any breaches of this obligation.

Schweickert GmbH respects the privacy of its employees and business partners. We comply with the law when processing the personal data of our employees and the data of our business partners and follow the Schweickert data protection guidelines. In addition, we take appropriate measures to ensure that this data is protected at all times and is processed and stored in compliance with data protection regulations.

13 FURTHER INFORMATION, CONTACT PERSONS AND REPORTING OF POTENTIAL VIOLATIONS

It is not possible to exhaustively describe every potential ethical/moral scenario that we could be confronted with here.

If you have any further questions, please contact your disciplinary manager or the Schweickert Compliance Team (compliance@schweickert.de) confidentially. If you require support in assessing a matter, please also contact the above-mentioned functions. Your issue will of course be treated confidentially and anonymously.

Each and every one of us is requested to report any known or suspected violations of our Code of Conduct to the above-mentioned offices to the best of our knowledge and belief.

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