

Code of Conduct at Wallstabe & Schneider

Dear Ladies and Gentlemen
Dear employees

We want to be a reliable partner for our shareholders, customers, suppliers and, of course, our employees. The three key success factors here are transparency, trust and cooperation. Transparency creates trust, and trust is the basis for good cooperation.

As a family-owned company, we have earned an excellent reputation among our customers, suppliers and the general public through decades of dedicated work, innovative solutions, first-class quality and flexible service. This is a valuable asset which we intend to safeguard and build on.

We want to continue to grow profitably. But not at any price. No business is so important that we should violate applicable rules and laws. Irresponsible actions can lead to considerable damage. For this reason, we must comply with the rules and laws and see this as an integral part of our corporate culture. Our Code of Conduct is intended to provide guidance in this respect. It applies equally to everyone - management, executives, every single employee - and at the same time represents an important promise to the outside world.

Dear employees, we all want to contribute to leading Wallstabe & Schneider into a sustainably successful future. We expect every employee to feel personally responsible for complying with this Code of Conduct and to support colleagues in adhering to it as well.

Thank you for your support.

Best regards



Jürgen Wallstabe
Managing Partner



Christian Wallstabe
Managing Partner



Kai Peters
Managing Director

Table of contents

1	Basic behavioral requirements	3
1.1	Transparency, trust and cooperation	3
1.2	Compliance with applicable laws	3
1.3	Compliance with tax regulations	3
1.4	Respect for human rights	3
1.5	Diligence in handling business assets and protecting intellectual property	3
1.6	Avoidance of conflicts of interest	3
2	Conduct towards business partners and third parties	3
2.1	Integrity and prohibition of counterfeit parts	3
2.2	Fair competition	4
2.3	Fighting corruption	4
2.4	Trade Controls	4
2.5	Conflict Minerals	4
3	Handling information	4
3.1	Protection of confidential information	4
3.2	Compliance with data protection regulations	4
3.3	Correct reporting	4
4	Dealing with employees and colleagues	5
4.1	Fair working conditions and employee development	5
4.2	Diversity and the principle of equal treatment	5
4.3	Compatibility of career and family	5
4.4	Rejection of slavery, forced and child labor	5
4.5	Dialog with employees and employee representatives	5
4.6	Leadership culture	5
5	Environment, safety and health	5
5.1	Sustainable action	5
5.2	Safe and healthy working environment	6
6	Notification, notes and contact person	6
6.1	Reporting misconduct of any kind	6
6.2	Ombudsman	6

1 Basic behavioral requirements

1.1 Transparency, trust and cooperation

Wallstabe & Schneider wants to be a reliable partner. The company and its employees therefore act transparently towards their shareholders, customers, suppliers and each other. Because transparency is crucial for trust and successful cooperation.

Responsible cooperation requires actions and decisions that are transparent and comprehensible. Only then will they meet with the necessary acceptance. For cooperation, transparency also means dealing openly and honestly with problems and mistakes.

1.2 Compliance with applicable laws

Wallstabe & Schneider and its employees respect and comply with all applicable local, national and international laws and regulations. Compliance with these laws and regulations is a prerequisite for sustainable corporate success; violations thereof may result in serious consequences such as criminal convictions, fines or reputational damage.

Wallstabe & Schneider does not tolerate such violations and expects employees and business partners to comply with applicable laws and regulations. The principles described in this Code of Conduct represent a minimum standard for Wallstabe & Schneider. If national legal provisions are more restrictive than the regulations applicable at Wallstabe & Schneider, these provisions shall take precedence.

1.3 Compliance with tax regulations

In every action, the tax regulations (laws, directives, administrative instructions, rulings and similar) at national and international level, as well as all commitments entered into voluntarily, must be complied with. All employees and governing bodies are obliged to inform themselves about the regulations applicable to their area of responsibility in the Group, to comply with them and, in cases of doubt, to obtain supplementary information and advice from the bodies responsible for this.

1.4 Respect for human rights

Respect for human rights is an integral part of the company's corporate responsibility. Wallstabe & Schneider employees respect the dignity and personal rights of individual employees and colleagues as well as third parties with whom the company does business.

1.5 Diligence in handling business assets and protecting intellectual property

Wallstabe & Schneider takes great care to protect business assets, including all tangible and intangible assets, such as computers, information systems and intellectual property. Business assets should be used exclusively for business purposes. In addition, protected intellectual property includes all products and designs developed by employees for use at Wallstabe & Schneider.

1.6 Avoidance of conflicts of interest

Wallstabe & Schneider expects loyalty and integrity from all employees. This means that all employees act exclusively in the interests of Wallstabe & Schneider within the scope of their employment with the company. Employees' own private interests or their own economic interests must not influence or impair the economic interests of Wallstabe & Schneider.

A conflict of interest exists if the actions or private interests conflict in any way with the interests of the company or could even appear to do so.

2 Conduct towards business partners and third parties

2.1 Integrity and prohibition of counterfeit parts

Wallstabe & Schneider and its employees maintain integrity in their dealings with others and expect that business partners (e.g. customers, suppliers, consultants, service providers) also observe the relevant legal provisions. Wallstabe & Schneider maintains business relationships only with third parties who engage in ethically sound business practices and do not expose the company to criminal or other liability or damage the company's reputation.

Wallstabe & Schneider does not engage in, enable or tolerate any activities related to money laundering.

The production of counterfeit parts (plagiarism) and the trade in them are strictly rejected and fundamentally prohibited.

2.2 Fair competition

Wallstabe & Schneider stands for fair and undistorted competition. The antitrust regulations of the markets in which Wallstabe & Schneider operates are observed and complied with by Wallstabe & Schneider and its employees.

Almost all countries have laws and regulations that prohibit relationships or agreements between competitors, suppliers, distributors or dealers that could have a distorting effect on competition. Wallstabe & Schneider expects its employees not to engage in collusion or agreements with other companies that violate competition and antitrust laws.

2.3 Fighting corruption

Grants are only permissible if they are made or received in accordance with the Anti-Corruption Policy. This means that the benefit must be reasonable and transparent. In addition, offering an advantage in any form to a person in the public or private sector for the purpose of exerting influence is prohibited. The same applies to acceptance. Gratuities of any kind or the offering of such gratuities (such as gifts, invitations or favors) to public officials or government officials or representatives of such persons for the purpose of promoting business are not permitted. Likewise, indirect gratuities, e.g. via business partners, are not permitted. Giving or receiving gifts, entertainment or any other form of gratuity may influence the independence of our judgment or the judgment of our business partners. Donations and sponsorships are made solely on a voluntary basis and in accordance with applicable law. They are not used to gain unlawful business advantages.

2.4 Trade Controls

National and international laws regulate the import, export or domestic trade of goods, technology, services and the handling of certain products. Wallstabe & Schneider must have adequate procedures to ensure that transactions with third parties do not violate economic embargoes or trade regulations or requirements for import and export controls or requirements for the prevention of terrorist financing. All employees involved in the import, export or domestic trade of goods, technology, services and the handling of certain products are required to comply with the relevant laws and regulations.

2.5 Conflict Minerals

Wallstabe & Schneider is aware of the applicable legal requirements regarding "conflict minerals" including tin, tantalum, tungsten, their ores and gold from conflict areas, and will ensure that these laws are complied with. In addition, we will make every effort to avoid the use of raw materials in its products that directly or indirectly finance armed groups that violate human rights.

3 Handling information

3.1 Protection of confidential information

All managers and employees are obliged to protect all company information and to treat it confidentially. Documents marked as confidential are protected from access by third parties. This applies not only to the company's own confidential information, but also to confidential information entrusted to Wallstabe & Schneider by its business partners and customers.

3.2 Compliance with data protection regulations

The protection of personal data of employees and business partners is very important to Wallstabe & Schneider. Great care and sensitivity is exercised when processing data specific to business partners or employees. Personal data is handled in accordance with the applicable data protection regulations. The controls and processes implemented within Wallstabe & Schneider ensure the best possible protection of all sensitive data.

3.3 Correct reporting

All records and reports made internally or given externally shall be accurate and truthful. Data entry and other records shall always be complete, accurate, timely and system-compliant.

4 Dealing with employees and colleagues

4.1 Fair working conditions and employee development

Wallstabe & Schneider recognizes the employee's entitlement to appropriate remuneration and complies with the legally guaranteed minimum wages and the statutory working hours in the respective labor markets. Wallstabe & Schneider complies with the applicable labor regulations, in particular with regard to occupational safety.

At Wallstabe & Schneider, very great importance is attached to the further development of employees. Employees are the most valuable asset for the future of the company, and investments in their further training are important. Wallstabe & Schneider therefore offers a comprehensive training program.

4.2 Diversity and the principle of equal treatment

Wallstabe & Schneider consistently pursues the goal of providing workplaces that are free from discrimination and harassment based on gender, ethnic origin, religion, caste, age, disability or sexual orientation.

Everyone is entitled to fair and respectful treatment. Wallstabe & Schneider is committed to a diverse work environment in which the uniqueness of each person is recognized and each individual is treated with courtesy, honesty and dignity. Harassment, bullying or intimidation will not be tolerated.

4.3 Compatibility of career and family

As a family-owned company, Wallstabe & Schneider wants to contribute to increasing the satisfaction and motivation of its employees and thus the company's performance through family-friendly agreements.

Wallstabe & Schneider works with all employees and their representatives in a spirit of trust. The company strives to find a balance between the economic interests of the company on the one hand and the interests of its employees on the other. Trust is the solid basis for successful cooperation in the interests of the company and its employees.

4.4 Rejection of slavery, forced and child labor

Any form of slavery, forced labor and child labor is rejected. Wallstabe & Schneider condemns any form of exploitation and discrimination, including in the entire supply chain, and strictly adheres to legal requirements.

4.5 Dialog with employees and employee representatives

Wallstabe & Schneider respects its employees' right to freedom of association. Irrespective of this, Wallstabe & Schneider always enables its employees to voice their concerns directly.

4.6 Leadership culture

Every manager bears responsibility for his or her employees. They base their actions on the leadership principles that Wallstabe & Schneider has established.

5 Environment, safety and health

5.1 Sustainable action

Protecting our environment is an integral part of Wallstabe & Schneider's corporate responsibility. Wallstabe & Schneider is committed to complying with all environmental regulations and standards applicable to the company and to employing environmentally conscious practices at all locations. Environmental pollution is to be reduced to a minimum and environmental protection is to be continuously improved. Each employee shares responsibility for this in all his or her activities. The company works specifically on the following topics:

- Continuous reduction of CO₂ greenhouse gas emissions* into the atmosphere *Explanation: The CO₂ balance (carbon dioxide balance, also greenhouse gas balance, CO₂ footprint) is the measure of the total amount of carbon dioxide emissions directly or indirectly caused by activities or life stages of products or people.
- Protecting water quality by using sustainable filtration technology and continuously reducing water consumption.

- Sustainable improvement of air quality through the use of sustainable processes in production (e.g. filter systems)
- Commitment of own subcontractors/suppliers (supply chain management) to sustainable corporate management, with the aim of sustainable and environmentally conscious conduct

5.2 Safe and healthy working environment

Wallstabe & Schneider provides a safe working environment for its employees by meeting or exceeding the appropriate legal requirements, regulations or company policies regarding occupational safety, fire prevention and active health protection. Managers, in particular, are responsible for ensuring that appropriate health and safety precautions and measures are taken to meet company requirements.

6 Notification, notes and contact person

6.1 Reporting misconduct of any kind

At Wallstabe & Schneider, employees always find an open door and are always encouraged to speak out freely without fear of reprisal.

To clarify issues related to the Company Code or to address misconduct, employees may contact a person in their immediate work environment, for example:

- management and executives,
- the Compliance Officer at the location
- the human resources department
- or the employee representative.

6.2 Ombudsman

In addition to the local contacts mentioned above, anyone can also contact the ombudsman directly, who will consistently record tips (also anonymously) and initiate countermeasures if necessary.

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