

CODE OF CONDUCT 2023

PREAMBLE

Dear employees,

we have revised our Code of Conduct in 2022. Employees from all over the company have contributed to this revision.

Our Code of Conduct defines general minimum standards relating to environmental and social aspects as well as business integrity. They form the foundation of our responsible actions.

We are aware that this Code of Conduct cannot cover every conceivable situation. However, it provides us a binding framework for our business activities and guides our actions in accordance with laws and global standards. It applies to all of us, in all countries and at all levels of our group. We demand compliance with these minimum standards – as the basis of our cooperation – to the same extend from our business partners.

Please ask if you are unsure how to behave in a specific situation.

We encourage you to address actions or behaviors you observe and which you understand to be contrary to our Code of Conduct.

You can do this by contacting your manager or our confidential counsellors. Use can do this e.g. by using our whistleblowing system, where you can submit anonymous reports – if desired – around the clock.

Employees which addressee a suspected violation with good intentions will under no circumstances suffer any disadvantages as a result.

You can find the contact date of our confidential counsellors as well as information about our whistleblowing system under the following link:



SEBASTIAN SCHWANHÄUßER

ANKE BUTTLER

HORST BRINKMANN

TOMÁS ESPINOSA

MARTIN RIEBEL





OUR CODE OF CONDUCT

Preamble

People are at the centre of everything we do – whether as employees, business partners or stakeholders. Therefore, it is our constant aspiration to do today what is still good tomorrow – always in a balance of economy, ecology and social responsibility. This Code of Conduct is based on this premise and describes the most important principles and rules for all our activities – transparent, open and binding.

Scope

The principles of this Code of Conduct apply to all companies in the Schwan-STABILO Group. Where companies within the Schwan-STABILO Group have made additional regulations, these apply in addition.





01 RESPONSIBILITY IN DEALING



WITH NATURE

As a company we bear responsibility for the environmental compatibility and sustainability of our products.

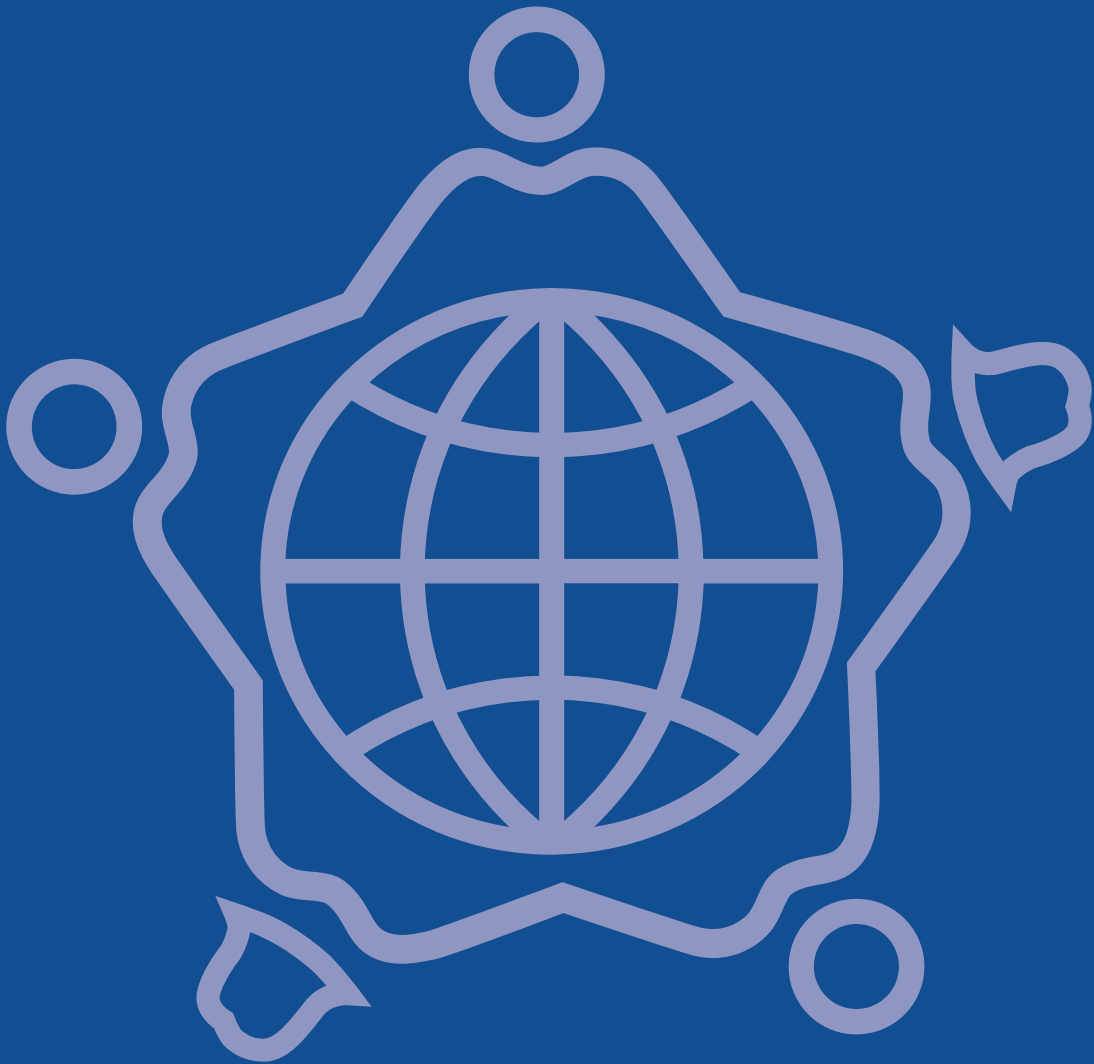
Therefore, compliance with the respective legal provisions on environmental protection is a matter of course for us. In addition, we have the ambition to be as efficient as possible in the development of our products and in our production processes in terms of energy, water and natural resources along the supply chain in order to conserve resources, reuse used materials and limit global warming and climate change.

We are also aware of the responsibility we have in the procurement of materials of animal origin. We observe the regulations of animal and species protection and also demand this from our suppliers and partners.

WHY IS THIS IMPORTANT TO US?

Both our future and that of future generations depend on protecting our environment. It is the basis of life for us and for all those in the supply chain who are involved in our economic activities.

02 SOCIAL RESPONSIBILITY



We are explicitly committed to internationally recognized labour and social standards.

Our voluntary commitment includes labour standards as set out in the United Nations (UN) Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multi-national Enterprises and the ILO Core Labour Standards. Existing stricter internal and national regulations always take precedence. We ensure compliance with these standards within our own company and also demand compliance from our suppliers along the supply chain.

WHY IS THIS IMPORTANT TO US?

A working environment characterised by respectful interaction and mutual appreciation is a fundamental part of our business activities – and at the same time a prerequisite for realising our full potential as a company.

1

Prohibition of forced labour

We do not tolerate any form of slavery or forced labour, human trafficking or other involuntary labour. Employees shall not be subjected to inhuman or degrading treatment, corporal punishment or any form of mental or physical hardship.

(ILO Convention 29, 105 and 182)



2

Prevention of child labour

We ensure compliance with the ILO core labour standards on the minimum age for employment of children and the protection of workers of adolescent age. This applies in particular if local requirements fall short of these stipulations.

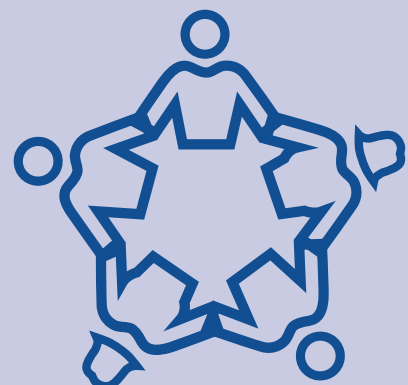
(ILO Convention 138 and 182)

3

Prohibition of discrimination

We do not tolerate any form of discrimination. This includes any unequal treatment, for example based on skin color, national or social origin, gender, age, disability or sexual orientation as well as religious affiliation or world view.

(ILO Convention 100 and 111)



4

Securing fair working conditions

We ensure fair working conditions that allow for a decent life. We ensure compliance with the maximum working and break times set out in the ILO core labour standards. (ILO Convention 1, 26 and 131)



5

Take effective health and safety measures

We take appropriate measures to establish a safe and healthy working environment to prevent accidents and injuries and to protect the health of workers. (ILO Convention 155)

6

Respect for freedom of association

We respect the rights of freedom of association. This includes, in particular, the right to form interest groups and to engage in collective bargaining. We ensure that all workers have access to an effective grievance mechanism that enables open communication between management and the workforce. (ILO Convention 87, 98 and 135)

03 BUSINESS CONDUCT AND



HANDLING OF PROPERTY AND DATA

1 Fair competition and vigilance against corruption

We firmly reject anti-competitive agreements with our business partners and suppliers as well as agreements that violate anti-trust law. This applies to agreements among competitors on pricing, trading conditions, production quantities, market shares or sources of supply as well as to agreements with customers or suppliers that unduly restrict them in their market behaviour. We work with business partners who equally support fair competition and behave accordingly.

WHY IS THIS IMPORTANT TO US?

Competing means inspiring our customers with our ideas and high-quality products and thus asserting ourselves on the market. As a company that wants its products to be among the best on the market, we see competition as a challenge and therefore appreciate the rules for fair competition because they enable open and transparent markets.

We resolutely refuse to offer, promise or grant advantages in order to achieve behaviour or a decision that is favourable to a Schwan-STABILO Group company. This applies both at home and abroad. We also do not allow ourselves to be promised advantages and do not accept advantages because this could give the impression that employees can be influenced in business decisions.

We are also careful when giving gifts and invitations so that motives are not misunderstood and reputational damage is avoided. We do not give or accept cash or other means of payment such as gift cards and shopping vouchers.

Gifts to public officials and political representatives are subject to special scrutiny worldwide. Most countries have stricter criminal laws for dealing with public officials. We ensure compliance with these laws and do not influence public officials with gifts.

WHY IS THIS IMPORTANT TO US?

Bribery and corruption damage competition and lead to decisions that are not made for objective reasons.

Avoidance of conflicts of interest

We are all aware that our personal relationships and interests should not influence our business activities and decisions. We therefore take care to avoid situations where private and professional interests could collide or even give the impression that this could be the case. In the event of a possible conflict of interest, we are transparent and disclose it.

WHY IS THIS IMPORTANT TO US?

All our business relationships are based on mutual trust. For this reason, we place the highest level of integrity in all our actions and also bear in mind that even an apparent conflict of interest can be just as damaging to our reputation as an actual conflict of interest.



Protection of company property

We use company property and the resources of our company appropriately and carefully. This also means that we handle company property responsibly and protect it from loss, theft, misuse and damage. This expressly includes the intellectual property of all the companies in the family business, which we protect from unauthorised access by third parties.

WHY IS THIS IMPORTANT TO US?

We should all treat company property with the same care and prudence as we do our private property. This applies just as much to the property of business partners, because their trust is of central importance to us.

4 Prevention of money laundering

We only conduct business with partners who comply with applicable laws and obtain their resources from legal sources. We verify the identity of potential customers, business partners and other third parties and ensure that our money laundering prevention measures effectively protect our company from criminals who want to “cleanse” their illegally generated funds.

WHY IS THIS IMPORTANT TO US?

Money laundering is the smuggling of illegally earned money, e.g. through drug or arms trafficking, into the legal financial and economic cycle. With our money laundering prevention measures, we make an important contribution to the fight against organised crime and serious criminal offences.



5 Customs, Export Control and avoidance of sanctions violations

Our business activities are subject to various national and international regulations on customs clearance, export control and sanctions rules. These relate directly to the import and export of our products. They can also have an impact on financial transactions and are crucial for being able to legally supply certain customers. For this reason, experienced colleagues support us in keeping an eye on all legal boundaries.

WHY IS THIS IMPORTANT TO US?

Trade restrictions and economic sanctions are an important instrument to bring about a change in the behaviour or foreign policy of another nation, to enforce human rights or to avoid the use of force.

6 Public appearance and communication

We attach importance to open, clear and correct communication among ourselves, with our customers and suppliers and in dialogue with politics, the media and society. Regardless of the form in which communication takes place, we choose the content carefully and respect personal rights and privacy.

We are always aware that we as employees can be perceived as representatives of the company when we make statements in public. This also applies in particular when we make statements in the social media about the Schwan-STABILO group of companies. That is why we always make sure that what we say does not damage the reputation of our company.

WHY IS THIS IMPORTANT TO US?

Official statements on behalf of the Schwan-STABILO group of companies are made exclusively by authorised colleagues with the aim of informing the public in a timely, complete and transparent manner.

7 Political Representation of interests

We strongly oppose undue influence on politics and legislation.

WHY IS THIS IMPORTANT TO US?

Bringing ideas and concerns into the political process is quite legitimate in a democracy. However, lobbying can hinder necessary developments. For us, responsible management therefore also means being transparent with the outside world when we get involved in politics as a company.

8 Transparency in dona- tions and sponsoring

We are transparent in our dealings with donations, sponsoring measures and other forms of social commitment.

WHY IS THIS IMPORTANT TO US?

We use donations and our sponsorship activities to promote goals that are important to us, in particular social engagement, environmental protection and fairer living and working conditions.



9 Guaranteeing data protection / security

We protect personal data, especially that of our employees and business partners, by handling it carefully and responsibly and process it in accordance with the applicable data protection regulations. This naturally includes that we secure all company, customer, supplier and personal data against unauthorised access, unauthorised and improper use, loss and premature destruction through appropriate technical and organisational measures.

WHY IS THIS IMPORTANT TO US?

Our respect for the individuality and self-determination of the individual obliges us to carefully protect the personal data entrusted to us. We want our employees and business partners to be able to rely on us to handle their personal data responsibly.

10 Protection of confidential information

We protect our confidential information and business records from access and inspection by unauthorised persons. To this end, we adhere to the company's rules on information security. As employees, we also observe our duty of confidentiality when we are in private or in public and when using social networks.

Our customers and business partners also entrust us with a wide range of data. We therefore respect the privacy of the data of our customers and business partners.

WHY IS THIS IMPORTANT TO US?

Our ideas and know-how are the cornerstone of our business activities. Therefore, we protect our confidential data and intellectual property and treat the confidential information of others with the same care.

