

The background of the entire page is a high-angle photograph of a snow-covered mountain. The snow is bright white and covers most of the terrain, with some dark rocks visible in the lower-left foreground. Two small figures of hikers are visible on a snow-covered ridge in the middle ground. The sky is a clear, pale blue.

# CODE OF CONDUCT

ORTOVOXX



Dear employees,

Success does not happen by chance. Success is the result of commitment and a wealth of ideas, of foresight and entrepreneurial courage. And: success is always based upon reliability. In a world where everything is always changing, being able to rely upon something is one of the most important cornerstones in our lives – both business and private.

Ever since our group was founded 160 years ago, this aspect has played a central role for us. Reliability, combined with open, transparent and fair interactions with one another, is what has made us successful in our markets and is the reason for Schwan-STABILO's excellent reputation in our home country and around the globe. That is something we are very proud of.

This Code of Conduct summarises the main basic rules and principles that we should all abide by in our actions and behaviour, and which we also expect from our business partners. This should provide a reliable framework to guide us, our employees, our customers and our partners. The Code of Conduct stands for our self-image, which is shaped by our willingness to accept personal responsibility, and by behaviour that is at all times lawful and ethical.

Thus, our Code of Conduct is proof of our inner attitude. We are utterly convinced that it is exactly this inner attitude that has made us successful over the past decades and will be the basis for our success in the future. Let's work together to do everything we can so that everyone can always completely rely upon us!

Many thanks,

Two handwritten signatures in blue ink. The first signature is for Sebastian Schwanhäüßer and the second is for Martin Reim.

Sebastian Schwanhäüßer

Martin Reim





ORTOVOXX

## OUR ORTOVOXX RESPONSIBILITY

Dear employees,

Economic activity influences our entire life and our society. Therefore, it is important that business and ethics are always viewed together. Unfortunately, there are too many examples of greedy managers acting irresponsibly and who in turn cause immeasurable harm to people and the environment.

Here at **ORTOVOXX**, we intend to set a positive example and stand for a responsible company with an understanding of humanity that is not based on competition and maximising personal profit, but one that regards people as social beings. We want to present a positive example of sustainable management that leads to win-win situations through cooperation. We thus want to contribute to strengthening the common welfare.

Since the company was founded 40 years ago, we have been listening to our inner voices and following the call of the mountains. A framework that is orientated on values determines our actions. This also includes friendship - a value that cannot exist without mutual trust.

The present Code of Conduct therefore reflects our convictions and, with its basic principles, provides a framework of orientation that helps us make the right decisions every day. That way, we can view our work with a good feeling.

Let us set a good example of ethically sound management and thus contribute to a better world.

Thank you,



**CHRISTIAN  
SCHNEIDERMEIER**  
CEO



## PREAMBLE

The focus of our actions is upon people – whether employee\*, customer, business partner or shareholder. Therefore, we are constantly committed to doing today what will still be right tomorrow – and always with a balance between economics, ecology and social responsibility.

Our Code of Conduct is based upon this premise, and outlines the most important principles and rules for all of our activities – transparently, openly and bindingly.

\* These and other general terms always refer to all genders.



# 1. BEHAVIOUR IN ALL CORPORATE ACTIVITIES

## **COMPLYING WITH THE LAW**

Compliance with all legal and statutory regulations is a matter of course for us, as is compliance with internationally recognised standards for good and responsible corporate governance and supervision. In this respect, the stricter of the internal and national regulations always takes precedence.

## **FAIR COMPETITION**

We resolutely oppose any anti-competitive agreements with our business partners and suppliers and agreements that violate cartel law.

## **AVOIDING CONFLICTS OF INTEREST**

Employees should avoid all situations in which personal interests conflict with the interests of the Schwan- STABILO Group. In the event of a conflict of interest, all employees must inform the company.

## **PROTECTING COMPANY PROPERTY**

We shall utilise company property and resources appropriately and considerately. This also means that we will protect company property against loss, theft, misuse and damage. This also refers explicitly to the intellectual property of the Schwan-STABILO Group, which we shall protect against unauthorised third-party access.

## **NO BRIBERY**

We resolutely oppose the direct or indirect offer, promise or guarantee of benefits to officials or business partners in Germany and abroad in order to attain a decision or behaviour that is favourable to the Schwan- STABILO Group. Our employees shall not accept the promise of benefits, nor shall they accept benefits, as this might give the impression that employees can be influenced when it comes to company decisions.

## **MONEY LAUNDERING PREVENTION**

We comply with all legal specifications for the prevention of money laundering and shall take all necessary measures to prevent money laundering within the Schwan-STABILO Group.



## 2. EMPLOYEE RELATIONS AND WORKPLACES

### **SAFEGUARDING HUMAN AND LABOUR RIGHTS**

We comply with internationally recognised human rights and ILO core labour standards and guarantee to uphold the minimum age for admission to employment – always in accordance with relevant national provisions. In this respect, the stricter of the internal and national regulations always takes precedence. We explicitly recognise the basic right to freedom of association, as well as the right to collective bargaining within the scope of national regulations and existing agreements.

### **EQUAL TREATMENT AND NON-DISCRIMINATION**

Equal opportunities and equal treatment are important to us. We resolutely oppose any form of discrimination in the workplace and are committed to expressly promoting equal opportunities and diversity amongst employees in relation to gender, age, culture, religion, ability and sexual orientation, taking into account respective cultural and legal specificities.

### **EFFECTIVE OCCUPATIONAL HEALTH AND SAFETY**

All of our employees have the right to a safe and healthy working environment. That is why we comply with the relevant national guidelines and standards as a minimum.





## 3. BEHAVIOUR IN SOCIETY

### **PUBLIC APPEARANCE AND COMMUNICATION**

All employees have the right to freedom of expression. Personal rights and privacy shall be protected. We shall always be aware that, as employees, we are perceived by the public as representatives of the company when we make comments about the Schwan-STABILO Group.

### **ENVIRONMENTAL AND CLIMATE PROTECTION**

We shall respect the environment and always aim to keep our impact on the environment as small as possible. Therefore, compliance with the respective statutory provisions and standards for environmental protection is a matter of course for us – as is the continuous optimisation of our use of natural resources and raw materials.

### **POLITICAL LOBBYING**

We resolutely oppose undue influence upon politics and legislation.

### **TRANSPARENCY IN DONATIONS AND SPONSORSHIPS**

We shall be transparent in our donations and other forms of social commitment.



## 4. HANDLING CONFIDENTIAL DATA AND INFORMATION

### **PROTECTION OF CONFIDENTIAL INFORMATION**

Confidential information is valuable. Unauthorised disclosure can cause significant damage to the Schwan- STABILO Group. We protect confidential information and company documents from unauthorised viewing and unauthorised access. Our employees shall observe their duty of confidentiality, even in their private lives and when using social networks.

### **GUARANTEED DATA PROTECTION AND DATA SECURITY**

All employees have the right to data protection. We protect personal data, in particular the data of employees, customers and suppliers, by handling it carefully and responsibly, and we process it in accordance with applicable data protection regulations. This naturally includes implementing the relevant technical and organisational measures to secure all company, customer, supplier and personal data against unauthorised access, unauthorised and improper use, loss and premature destruction.



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