



Global Anti-Corruption Policy

07.07.2025

The Scheidt & Bachmann group of companies maintains business relationships with a large number of external partners in the course of its business activities. This policy exists to prevent corruption and bribery in connection with the business activities of Scheidt & Bachmann. The reputation of Scheidt & Bachmann is based on trust and compliance with the law. Any form of corruption and bribery can have serious consequences, including: loss of reputation; penalties/punishments; fines, exclusion from contract awards; and, skimming of additional profits. It is therefore essential that Scheidt & Bachmann and its employees act responsibly and lawfully.

This policy applies to the entire Scheidt & Bachmann group of companies.

The obligations apply worldwide. Scheidt & Bachmann requires, but does not monitor, all third parties who provide services on their behalf, and with whom it cooperates to comply with all relevant laws against corruption and bribery. Representatives in associated companies without a controlling influence should advocate for comparable measures.

Scheidt & Bachmann rejects all forms of corruption and bribery. It is a fundamental obligation to refrain from any form of corruption, to take action against it, and to take preventive measures. The payment and acceptance of advantages in any form is prohibited and will not be tolerated. This also applies to the granting of unauthorised advantages to public officials. Scheidt & Bachmann's due diligence and oversight obligations extend to direct actions as well as preparatory and deceptive conduct across various business units.

The Anti-Corruption Directive, which is available internally to all employees, sets out the procedures to be followed and describes the processes designed to prevent corruption and bribery. It is binding for all employees, the executive management and other bodies of Scheidt & Bachmann.

The following points list areas in which we set quantitative targets or collect quantitative indicators to promote and monitor compliance with this policy:

- Training on the Anti-Corruption Directive: We aim to ensure that at least 90% of employees participate in mandatory training on relevant anti-corruption topics each year. Such training helps to raise awareness and improve understanding of the Anti-Corruption Directive.
- Identification of corruption risks: We are committed to identifying ongoing corruption risks and taking remedial and preventive measures.

The executive management and all managers are responsible for integrating the contents of this policy into management decisions and for providing the necessary resources. All employees, including executive management and managers with their role model function, are responsible for complying with this policy and the Anti-Corruption Directive.



Compliance Management is responsible for risk analysis and provides training. It has a special responsibility to prevent corruption and bribery. The powers of Compliance Management are set out in the Anti-Corruption Directive.

In accordance with Scheidt & Bachmann's company values, all employees are obliged to refrain from any form of corruption and to intervene if they become aware of any. They are fundamentally responsible for complying with the compliance rules when granting or accepting gifts. Violations of this policy must be reported immediately.

Compliance Management reviews this policy as necessary and proposes updates to the executive management of Scheidt & Bachmann. This policy and its updates are published and communicated in electronic form via the company-wide communication channels. Printed versions of this policy are not subject to any organised change service. The electronic form published in the company-wide channels is valid.

Mönchengladbach, 07.07.2025

Scheidt & Bachmann GmbH Management Board