Global Anti-Corruption Policy

24.07.2026

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 reputational damage, penalties, fines, exclusion from contract awards and the disgorgement 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: By 31 December 2027, at least 90% of employees shall have attended the compulsory training sessions on the Anti-Corruption Directive and the associated compliance requirements. Progress towards this target will be measured annually on the basis of the training participation rate and assessed in the Compliance Management Review. The participation rate achieved will then be maintained on an ongoing basis and reviewed annually.
- Assessment of corruption risks: By 31.12.2027, 100% of identified corruption risks are to be subject to an annual risk assessment. Progress towards this target is measured annually on the basis of the proportion of corruption risks assessed and evaluated in the Compliance Management Review. For all assessed corruption risks, appropriate remedial and preventative measures are defined, implemented and their effectiveness regularly reviewed.

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.

Corporate Compliance Management is responsible for risk analysis and provides training. It has a special responsibility to prevent corruption and bribery. The powers of Corporate 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 report corrupt conduct. They are fundamentally responsible for complying with the compliance rules when granting or accepting benefits. Violations of this policy must be reported immediately.

Breaches of this policy may result in significant damage to reputation and legal consequences for the employees concerned, their colleagues and Scheidt & Bachmann, including fines, criminal proceedings or restrictions on regulatory approvals. In most cases, such misconduct will also constitute a breach of employment law obligations and may lead to corresponding sanctions.

The aim is for suppliers and business partners to also embody and support these values and principles. Upon request and on a reciprocal basis, contractual partners should report on the key measures taken to comply with this policy, without, however, disclosing trade secrets or other information requiring protection. Reciprocity means that the requesting party should provide information to the same extent.

Corporate Compliance Management reviews this policy annually and updates it as necessary. 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, 24.07.2026

Scheidt & Bachmann GmbH Management Board