



Global Code of Conduct

07.07.2025

Our values as a compass: This Code of Conduct (CoC) is more than just a set of guidelines; it is an expression of who we are as the Scheidt & Bachmann group of companies and what we stand for. It is based on our shared values

– respect, trust, team spirit, reliability and social responsibility –

which are shared and lived by all national and international companies within our group of companies. These values are our compass and serve as essential guidance for our daily work and our interactions with our employees, customers, suppliers and business partners.

Our self-image and our goals: We have been managing and maintaining Scheidt & Bachmann as an independent family-owned company for over 150 years. We want to continue this path together in the future. Our goal is to preserve Scheidt & Bachmann as a family-owned company for future generations and to secure this through lasting, profitable growth and long-term, sustainable value enhancement. In doing so, we strive for profitable growth through sustainable business practices. A fundamental principle of our corporate identity is respect for human rights and the sustainable protection of the environment and resources.

Purpose and function of the Code of Conduct: This CoC specifies our values and sets out the basic rules, standards and behaviours that apply to all of us. It serves as a binding guideline for honest, lawful and ethically responsible conduct. It is intended to help prevent situations that could call into question the integrity of our conduct and trust in our services, while encouraging every employee to act responsibly and providing them with guidance in doing so. We are constantly striving to adapt to changing conditions. This CoC is not a rigid framework, but a voluntary commitment that is continuously updated and adapted.

Integration of existing directives: This CoC summarises the overarching principles of our actions and is supplemented by topic-specific policies, internal instructions and directives that provide essential support and guidance.

The CoC applies worldwide to all business activities of Scheidt & Bachmann. It is binding for all employees, the executive management and other bodies of Scheidt & Bachmann. The members of the executive management and all managers bear special responsibility for its active implementation and serve as role models.

Scheidt & Bachmann is committed, within the scope of its possibilities and the scope of its actions, to ensuring that our immediate supply chain also complies with the contents of this policy statement and promotes similar standards in its own supply chains. Compliance with the CoC principles can be made mandatory for individual contractual relationships by means of contractual agreements. This does not establish any rights in favour of third parties.



In line with our corporate responsibility and our understanding of sustainable action, Scheidt & Bachmann undertakes to observe and comply with the following values and principles.

Compliance with laws and internal directives: We are committed to complying with applicable laws and other legal regulations in the countries in which Scheidt & Bachmann operates. This also includes internal instructions and directives. In the event of conflicts between this CoC and mandatory local law, local law shall take precedence. We nevertheless endeavour to comply with the contents of the CoC. Compliance with applicable labour law provisions, including collective bargaining agreements, where applicable, is an integral part of this. If Scheidt & Bachmann is legally obliged to disclose information, Scheidt & Bachmann will comply with this obligation.

Human rights and working conditions: We are committed to promoting human rights and complying with human rights in accordance with the UN Human Rights Charter. We are guided by the core labour standards to which we have committed ourselves in our Human Rights Policy. This includes, in particular, the prohibition of child labour, modern slavery and forced labour or oppression in the workplace. To support this goal, Scheidt & Bachmann GmbH has appointed a Human Rights Officer. We comply with applicable labour standards regarding remuneration (including minimum wage), working hours, and occupational health and safety.

Foreign trade and sanctions: As an internationally active group of companies, we comply with all applicable national and international foreign trade regulations, in particular customs, trade, import and export control regulations as well as sanctions and embargoes. This applies to the import and export of products, services and technologies. We check whether dual-use goods are subject to licensing requirements. Internal company measures ensure that violations are avoided.

Integrity, corruption prevention, money laundering and fair competition: We reject all forms of corruption, bribery and unfair business practices and promote integrity. This includes the prevention of theft, fraud, embezzlement, money laundering and similar behaviour. We comply with antitrust regulations, including the prohibition of collusion in tenders, and promote fair competition.

Avoiding conflicts of interest / dealing with gifts and invitations: We ensure that decisions are made on the basis of objective criteria. Conflicts of interest between personal or financial interests and business interests are avoided or disclosed. We have clear rules for giving and accepting gifts and invitations, as well as for donations and sponsorship.

Protection of intellectual property, information and data protection: Scheidt & Bachmann's intellectual property is one of our most valuable assets and must be protected by all employees. We respect the intellectual property of others, in particular the industrial property rights of third parties, to the same extent. Scheidt & Bachmann does not create or use plagiarised content or products. We treat confidential information (including customer, employee and company data) and trade secrets of Scheidt & Bachmann and third parties discreetly and confidentially. We do not pass them on to third parties without authorisation or make them accessible to them. We comply with the applicable laws on the protection of trade secrets and data protection regulations.

Information security and data protection: Scheidt & Bachmann's business activities depend on information technology and the associated data and systems. As a globally active group of companies, we are responsible for ensuring the confidentiality, integrity and availability of the data processed within the Scheidt & Bachmann group of companies and the systems operated, and for eliminating the risks to the rights and freedoms of natural persons arising from the processing of



personal data. Compliance with these protection objectives is of great importance to Scheidt & Bachmann.

Respectful treatment and non-discrimination: We are committed to respecting the rights and dignity of every human being. We do not tolerate discrimination or harassment on the basis of age, disability, ethnic origin, gender, religion, ideology, sexual identity or orientation, or other characteristics. We promote a working culture that excludes no one and encourages respectful interaction.

Environmental protection: We are aware of our responsibility towards the environment and are committed to the sustainable protection of the environment and resources. We comply with relevant environmental regulations and standards. We take appropriate measures to continuously improve our environmental performance and observe human rights and environmental due diligence obligations, in particular within the framework of the Supply Chain Due Diligence Act (LkSG). This includes the prevention of harmful water, soil and air pollution and excessive water consumption.

Handling of conflict minerals: We take careful measures to avoid the use of conflict minerals without transparent proof of origin in our products in order to prevent human rights violations, corruption and the financing of armed groups.

Safety and quality of our products: Scheidt & Bachmann has set itself the goal of developing and marketing innovative products and solutions with high practical benefits for and with its customers. We comply with applicable consumer protection regulations. This also includes compliance with special legal regulations in our target markets, such as (national/international) machine directives, technical guidelines, product safety or product liability laws.

Consumer interests: If consumer interests are affected, we comply with the applicable consumer protection regulations and apply appropriate sales, marketing and information practices. Groups requiring special protection receive particular attention. The company's key statements and reports, in particular information and advertising material about our products, must be complete, honest, accurate, timely and understandable. We strive to develop innovative products and solutions with high practical benefits for our customers.

Civic engagement: We recognise the importance of contributing to social and economic development in the communities where we operate and encourage voluntary activities by our employees.

Protection of company assets and natural resources: We handle company property responsibly and protect it from loss, damage, misuse, theft or destruction.

The following describes the procedures and processes that support the implementation of and compliance with the CoC. These include:

Communication and documentation: We communicate openly and in a dialogue-oriented manner with employees, customers, suppliers and other interest groups and stakeholders about the requirements of this CoC and its implementation. All documents and records are created in accordance with our obligations, are not altered or destroyed in an unfair manner and are stored appropriately.

Whistleblower protection system: Scheidt & Bachmann offers its employees, business partners and third parties access to a protected mechanism (whistleblower system, complaints procedure) in accordance with legal requirements so that they can report possible violations of the principles of



this CoC in line with local laws. The aim is for the whistleblower to remain anonymous and not to suffer any reprisals or disadvantages. The process is described in the Whistleblower Protection Directive and rules of procedure for the complaints procedure.

Employee training: All employees are made aware of the contents of the Code of Conduct and receive training on relevant topics as required.

Processes in the supply chain: Supply chain management is primarily the responsibility of the central purchasing department at Scheidt & Bachmann GmbH. Together with the supplier management team, it regularly audits selected suppliers. If these audits reveal any deviations from Scheidt & Bachmann's requirements, appropriate improvement measures are planned together with the supplier and implemented by the latter. The same applies to compliance with the requirements of the Supply Chain Due Diligence Act (LkSG).

Scheidt & Bachmann shall make all appropriate and proportionate efforts to continuously implement and apply the principles and values set out in this CoC. The executive management and all managers are responsible for integrating the contents of the CoC into management decisions and for providing the necessary resources. All employees, including executive management and managers with their role model function, are responsible for compliance with the CoC.

In line with our corporate values – in particular the value of "trust & personal responsibility" – all employees are called upon to follow the CoC as a binding guideline for honest, lawful and ethically responsible conduct in the course of their work, to identify risks and to act accordingly in order to protect employees and the Scheidt & Bachmann group of companies.

We strive to ensure that suppliers and business partners also live and support these values and principles. Upon request and on the basis of reciprocity, contractual partners shall report on the essential measures taken to comply with the CoC, without however disclosing trade secrets or other information worthy of protection. Reciprocity means that the requesting party should provide information to the same extent.

Violations of the CoC can result in significant reputational damage and legal disadvantages for the employees concerned, their colleagues and Scheidt & Bachmann, including fines, criminal proceedings or restrictions on official permits. In most cases, such misconduct will also constitute a breach of employment law and may lead to appropriate sanctions.

Compliance Management reviews the Code of Conduct as necessary and proposes updates to the executive management of Scheidt & Bachmann. The Code of Conduct and its updates are published and communicated in electronic form via the company-wide communication channels. Printed versions of the Code of Conduct 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