

Code of Conduct at Wallstabe & Schneider

Dear ladies and gentlemen, dear employees,

We aim to be a reliable partner for our shareholders, customers and suppliers, as well as our employees. The three main factors for success are transparency, trust and cooperation. Transparency creates trust, and trust is the basis for good cooperation.

As a family-owned company, we have earned an excellent reputation among our customers, suppliers and the public through decades of hard work, innovative solutions, high-quality products and flexible services. This is a valuable asset that we want to secure and expand.

We want to continue growing profitably. But not at any price. No business is worth violating laws and regulations. Irresponsible action can lead to considerable damage. For this reason, we are committed to complying with the rules and laws, and see this as an integral part of our corporate culture. Our Code of Conduct is intended to provide guidance in this regard. It applies to everyone equally – management, middle management and every single employee – and at the same time represents an important promise to the company's external stakeholders.

Dear employees, we all want to contribute to the sustainable success of Wallstabe & Schneider. We expect every employee to take personal responsibility for adhering to this Code of Conduct and supporting their colleagues in doing the same.

Thank you for your support.

Best regards,



Christian Wallstabe
Managing Shareholder



Kai Peters
Managing Director

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1. Basic Behavioral Requirements

1.1 Transparency, Trust and Collaboration

Wallstabe & Schneider aims to be a reliable partner. Therefore, the company and its employees act transparently toward its shareholders, customers, suppliers, and one another. Transparency is essential for building trust and enabling successful collaboration.

Responsible cooperation requires actions and decisions to be transparent and comprehensible. Only then will they receive the necessary level of acceptance. In the context of collaboration, transparency also means addressing problems and mistakes openly and honestly.

1.2 Compliance with Applicable Laws

Wallstabe & Schneider and its employees respect and comply with all applicable local, national, and international laws and regulations. Compliance with these laws and regulations is a prerequisite for the company's long-term success; violations may result in serious consequences such as criminal prosecution, fines, or reputational damage.

Wallstabe & Schneider does not tolerate such violations and expects its employees and business partners to comply with all applicable laws and rules. The principles described in this Code of Conduct represent minimum standards for Wallstabe & Schneider. If national legal requirements are more restrictive than the rules applicable at Wallstabe & Schneider, the stricter legal requirements shall prevail.

1.3 Compliance with Tax Regulations

All actions must comply with tax regulations (including laws, directives, administrative instructions, court rulings and similar requirements) at national and international levels, as well as all voluntarily imposed obligations. All employees and corporate bodies must inform themselves of the applicable regulations concerning their area of responsibility within the Group, comply with them and seek additional information and advice from the relevant departments in cases of doubt.

1.4 Respect for Human Rights, Including Minorities and Indigenous Peoples

Respect for human rights is an integral part of the company's corporate responsibility. Wallstabe & Schneider employees respect the dignity and personal rights of each individual employee and colleague, as well as those of third parties with whom the company maintains business relationships.

1.5 Due Care in Handling Company Assets and Protection of Intellectual Property

Wallstabe & Schneider takes great care to safeguard all company assets, including tangible and intangible property such as computers, information systems and intellectual property. Company assets should be used exclusively for business purposes. Protected intellectual property also includes all products and designs developed by employees for use at Wallstabe & Schneider.

1.6 Avoiding Conflicts of Interest

Wallstabe & Schneider expects all employees to act with loyalty and integrity. This means that, in the course of their employment with the company, all employees must act exclusively in the best interests of Wallstabe & Schneider. Personal or private business interests must not influence or compromise the business interests of Wallstabe & Schneider.

A conflict of interest exists when an employee's actions or personal interests conflict in any way with the company's interests, or even if they might merely appear to do so.

1.7 Standards for Sustainable Operations Through Integrated Management Systems

Sustainable and responsible operations are an integral part of Wallstabe & Schneider's corporate governance. Requirements in the areas of the environment, social responsibility, occupational safety, energy efficiency, quality, and information security are managed through an integrated management system. This system is based on internationally recognized standards including ISO 9001, IATF 16949, ISO 14001, ISO 50001, ISO 45001, and ISO 27001 as well as TISAX®. This systematic approach embeds ESG aspects in all business processes and ensures they are continuously monitored and improved.

2 Conduct Toward Business Partners and Third Parties

2.1 Integrity and Prohibition of Counterfeit Parts

Wallstabe & Schneider and its employees act with integrity in all dealings with others and expect their business partners (e.g. customers, suppliers, consultants, and service providers) to comply with the applicable legal requirements. Wallstabe & Schneider only maintains business relationships with such third parties which conduct their business in an ethically sound manner and do not expose the company to criminal or other liability or cause damage to the company's reputation.

Wallstabe & Schneider does not engage in, facilitate, or tolerate any activities related to money laundering. The manufacture of counterfeit parts (plagiarized or forged products) and any trade in such parts are strictly prohibited and categorically rejected.

2.2 Fair Competition

Wallstabe & Schneider is committed to fair and undistorted competition. Wallstabe & Schneider and its employees observe and comply with the antitrust regulations governing the markets in which the firm operates. In nearly all countries, there are laws and regulations that prohibit relationships or agreements between competitors, suppliers, distributors, or dealers that could distort competition.

Wallstabe & Schneider expects its employees not to participate in any agreements or arrangements with other companies that violate competition or antitrust laws.

2.3 Anti-Corruption

Benefits may only be granted or accepted if they are provided or received in compliance with the Anti-Corruption Policy, meaning that any benefit must be appropriate and transparent. In addition, offering any advantage in any form for the purpose of improperly influencing any person in the public or private sector is prohibited. The same prohibition applies to the acceptance of such advantages.

The offering of any benefits of any kind to public or government officials, or persons acting on their behalf, for the purpose of promoting business, is not permitted. This includes the offering of gifts, invitations, or other favors. The same applies to indirect benefits, for example those granted through business partners. Giving and receiving gifts, invitations or any other form of benefit may impair the independence of our judgment or that of our business partners.

Donations and sponsorships shall be made on a voluntary basis only and in compliance with applicable law. They must not be used to obtain improper business advantages.

2.4 Trade Controls

National and international laws govern the import, export, and domestic trade of goods, technology, and services, and the handling certain products. Wallstabe & Schneider must use appropriate procedures to ensure that transactions with third parties do not violate economic embargoes, trade restrictions, import and export control requirements, or regulations aimed at preventing the financing of terrorism.

All employees involved in the import, export, or domestic trade of goods, technology, and services, or in dealings involving certain products, are required to comply with the applicable laws and regulations.

2.5 Supply Chain Auditing and Sustainability

Wallstabe & Schneider takes responsibility for a sustainable and responsible supply chain. Suppliers and business partners are expected to comply with applicable legal requirements as well as recognized environmental, social and governance (ESG) standards. Wallstabe & Schneider verifies compliance with these requirements on a risk-based basis through suitable evaluation and auditing processes.

2.6 Conflict Minerals

Wallstabe & Schneider is aware of the applicable legal requirements regarding "conflict minerals" including tin, tantalum, tungsten, their ores and gold from conflict areas and ensures that these laws are complied with. In addition, the greatest efforts are made to avoid the use of raw materials that directly or indirectly finance armed groups that violate human rights in Wallstabe & Schneider's products.

3 Handling of Information

3.1 Protection of Confidential Information

All managers and employees are obliged to protect all company information and to treat it confidentially. Documents marked as confidential are protected from access by third parties. This applies not only to its own confidential information, but also to confidential information entrusted to Wallstabe & Schneider by its business partners and customers.

3.2 Compliance with Data Protection Regulations

The protection of personal data of employees and business partners is very important to Wallstabe & Schneider. When processing business partner- or employee-specific data, great care and sensitivity are taken. The handling of personal data is carried out in accordance with the applicable data protection regulations. The controls and processes implemented within Wallstabe & Schneider ensure the best possible protection of all sensitive data.

3.3 Accurate Reporting

All internal and external records, reports, notifications, and other documentation are to be prepared in a complete, accurate, comprehensible, and truthful manner. Business transactions, data entries, and other records are to be documented in a timely manner, in accordance with system requirements, and in compliance with all applicable internal and external requirements.

Incorrect, misleading, incomplete, or intentionally falsified statements or representations are prohibited.

3.4 Cybersecurity and Information Protection

The protection of information, data, and IT systems is a top priority for Wallstabe & Schneider. The company operates an information security management system in accordance with the requirements of TISAX® and is committed to the regular review and continuous improvement of its information security and cybersecurity measures. Business partners are expected to implement, maintain, and regularly review appropriate technical and organizational measures to ensure the confidentiality, integrity, and availability of information, data, and systems. This includes, in particular, protection against unauthorized access, loss, manipulation, and other cyber risks.

Wallstabe & Schneider and its business partners contribute jointly to minimizing information security risks throughout the value chain and to ensuring the security and integrity of business processes on a sustained basis.

4 Conduct toward Employees and Colleagues

4.1 Fair Working Conditions, Wages, Benefits, and Employee Development

Wallstabe & Schneider recognizes every employee's right to fair remuneration and complies with all applicable laws relating to minimum wages, working hours, and statutory social benefits in the relevant labor markets. The company also complies with applicable employment laws and regulations, including those relating to occupational health and safety.

Wallstabe & Schneider places great importance on the development of its employees. Employees are considered one of the company's most valuable assets and a key factor in its long-term success. For this reason, investment in training and professional development is regarded as essential. Wallstabe & Schneider therefore provides a comprehensive range of training and development opportunities.

4.2 Diversity, Equal Treatment, and Ethical Recruitment

Wallstabe & Schneider is committed to providing a workplace free from discrimination and harassment on the basis of gender, ethnic origin, religion, caste, age, disability or sexual orientation. Employment decisions, including recruitment and hiring, are made fairly and without discrimination or bias. Integrity, transparency, trust, and performance are key principles in this process. Every individual has a right to be treated fairly and respectfully. Wallstabe & Schneider is committed to fostering a diverse and inclusive working environment in which the uniqueness of each person is recognized and everyone is treated with courtesy, honesty, and dignity. Harassment, bullying, intimidation, or any other form of abusive behavior will not be tolerated.

4.3 Work-Life Balance and Family Compatibility

As a family-owned company, Wallstabe & Schneider seeks to support the compatibility of work and family life through family-friendly arrangements. In doing so, the company aims to enhance employee satisfaction and motivation and, in turn, strengthen overall business performance.

Wallstabe & Schneider works with all employees and their representatives in a spirit of trust and cooperation. The company seeks to balance its economic interests with the interests of its employees. Mutual trust forms the basis for successful collaboration and supports the long-term interests of both the company and its workforce.

4.4 Rejection of Slavery, Forced Labor, and Child Labor

Wallstabe & Schneider rejects all forms of slavery, forced labor, human trafficking, and child labor. The company condemns all forms of exploitation and discrimination, including within its supply chain, and strictly complies with all applicable legal requirements.

4.5 Dialogue with Employees and Employee Representatives

Wallstabe & Schneider respects its employees' right to freedom of association and collective representation in accordance with applicable law. Regardless of this, the company also ensures that employees are able to raise their concerns directly at any time.

4.6 Leadership Culture

Every manager bears responsibility for their employees and is expected to act in accordance with the leadership principles established by Wallstabe & Schneider. Managers are expected to lead by example and to foster a working environment characterized by respect, accountability, and trust.

5 Environment, Safety and Health

5.1 Safe and Healthy Working Environment

Wallstabe & Schneider provides its employees with a safe and healthy working environment by meeting or exceeding applicable legal requirements, regulations, and internal company policies relating to occupational safety, fire protection, and proactive health protection.

Managers in particular are responsible for ensuring that appropriate health and safety precautions and measures are implemented and maintained so that the company's obligations in this area are fulfilled.

5.2 Sustainable Action

Protecting the environment is an integral part of Wallstabe & Schneider's corporate responsibility. The company is committed to complying with all environmental laws, regulations, and standards applicable to its business and to applying environmentally responsible practices at all of its locations. Environmental impact is to be minimized, and environmental protection is to be continuously improved. Every employee shares responsibility for supporting these objectives in their daily activities.

The company works on the following topics in particular:

- continuous reduction of CO₂ greenhouse gas emissions* into the atmosphere
*Explanation: The carbon footprint (also known as the carbon dioxide footprint, greenhouse gas footprint, or CO₂ footprint) is a measure of the total amount of carbon dioxide emissions generated directly or indirectly by the activities or life cycles of products or individuals.
- protection of water quality through the use of sustainable filtration technology and the continuous reduction of water consumption;
- sustainable improvement of air quality through the use of environmentally responsible production methods, such as filtration systems; and
- the commitment of subcontractors and suppliers within the supply chain to sustainable business practices, with the aim of promoting environmentally responsible conduct throughout the value chain.

5.3 Biodiversity and Protection of Natural Habitats

Wallstabe & Schneider regards the protection of biodiversity and the responsible use of natural resources as important elements of its sustainability strategy. Within the scope of its operations and influence, the company supports the preservation of ecosystems and habitats and takes potential impacts on biodiversity into account in its business decisions.

At its sites, Wallstabe & Schneider promotes biodiversity through specific measures, including the creation and maintenance of flowering areas and near-natural green spaces. In addition, the company actively supports the preservation of the Bavarian Forest National Park, thereby contributing to the protection of valuable habitats and native animal and plant species.

5.4 Animal Welfare and Ethical Treatment of Animals

Wallstabe & Schneider respects animal welfare and rejects all forms of animal cruelty and unnecessary suffering. Although the use of animals or animal-derived products does not generally play a significant role in the company's business processes or products, Wallstabe & Schneider expects its business partners to comply with applicable animal welfare laws and recognized ethical standards in the treatment of animals.

Where business activities, products, or services involve animals in any way, they must be carried out responsibly, in compliance with the law, and with due regard for animal welfare.

6 Reporting, Information and Contact Persons

6.1 Reporting Misconduct of Any Kind

At Wallstabe & Schneider, employees are encouraged to speak openly and to raise concerns without fear of retaliation. The company promotes a culture in which questions relating to the Code of Conduct can be clarified and misconduct can be reported at an early stage.

To address questions relating to this Code of Conduct or to report potential misconduct, employees may contact a person in their immediate working environment, including:

- management and supervisors;
- the Compliance Officer at the relevant site: compliance@wallstabe-schneider.de,
- the Human Resources department;
- or employee representatives.

6.2 Ombudsperson / Whistleblowing

In addition to the local points of contact listed above, any person may also contact the ombudsperson directly. Reports, including anonymous reports where permitted, are received and reviewed confidentially and, where appropriate, followed by suitable corrective measures.

SWS Partner mbB

Mr. Thomas Sedlmayr, Attorney-at-Law (personal)

Metzgergasse 2-4, 94469 Deggendorf

cell: +49 (0) 991 379175 29

e-mail: ombudsmann-DTWS@sws-p.de