

## CODE OF CONDUCT

The SCHILLING ENGINEERING Group stands for a reliable and trust-based corporate culture.

A fundamental requirement therefore is, that the SCHILLING ENGINEERING Group and all of its employees comply with the applicable laws and internal guidelines. Therefore, this Code of Conduct shall serve as a ‚corporate constitution‘ for all employees of the SCHILLING ENGINEERING Group and shall summarise the major provisions and behavioural requirements.

The compliance with these basic principles is also expected from the business partners of the SCHILLING ENGINEERING Group. Business partners of the SCHILLING ENGINEERING Group are responsible to communicate the requirements of this Code of Conduct with their own employees and suppliers and to secure the compliance with these provisions.

### 1. SCOPE OF APPLICATION

This Code of Conduct shall apply to all directors, executives and employees (hereinafter referred to as „employees“) of the SCHILLING ENGINEERING Group (hereinafter referred to as „SCHILLING“).

SCHILLING also expects from its business partners to comply with the basic principles of this Code of Conduct.

### 2. BASIC PRINCIPLES

#### Compliance with Laws and Regulations

SCHILLING complies with the applicable laws and regulations of those countries, in which SCHILLING operates.

The employees of SCHILLING shall be aware and comply with the laws and regulations which are applicable for them, including data protection and competition laws as well as any internal guidelines.

#### No Discriminating

Any decisions in regard of the employment relationship with employees and candidates, including recruitment processes and promotions, remuneration, ancillary pay, trainings, dismissals and terminations, are made according to their skills and qualifications.

Discriminatory behaviour against employees and candidates on grounds of the ethnic or national origin, the skin colour, the gender, the religion or ideology, a disability, the age, the sexual identity or other discriminating reasons will not be tolerated.

#### Product Quality and Safety

Our core task is to manufacture and offer cleanroom systems to the market. As a responsible company, we always ensure a high level of product quality and safety. To this end, we have introduced a quality management system in the company and certify it regularly.

## **Fair Competition**

SCHILLING supports a fair and undistorted competition in accordance with the applicable competition and antitrust laws.

This means, for example, that no employee shall hold discussions with competitors in order to arrange prices and/or services nor shall make any other prohibited arrangements in regard of the market behaviour. Prohibited are also non-compete agreements with business partners and third parties as well as agreements in regard of the division of customers and territories.

## **Anti-Corruption**

No SCHILLING employee shall provide or try to provide improper advantages to business partners and third parties.

Promotional gifts shall be made in a reasonable and moderate manner in line with the social culture, so that no dependency will be created.

Any gifts, benefits or money, which might be suitable to influence business decisions or transactions, shall be prohibited as well. This shall apply also to a personal offer, which result out of a business relationship with SCHILLING. Invitations shall be made in a reasonable and moderate manner within the scope of the given social culture.

## **Money Laundering and Terrorist Financing**

We strictly reject money laundering and terrorist financing. Checking the identity of business partners is particularly important to us. We always observe the applicable laws in this regard in all our business relationships. In particular, this includes respecting trade, export and import laws.

## **Protection of SCHILLING's Property**

SCHILLING's property shall be used in a responsible and appropriate manner. The private use of company property is generally prohibited.

The protection of intellectual property rights is very important for SCHILLING. This includes, but shall not be limited to, confidential information, trade secrets, copyrights, trademarks, brands, logos, customer lists as well as customer know-how.

## **Conflicts of Interests**

SCHILLING expects strict loyalty from its employees. Therefore, it is prohibited for the employees to participate or interact with a competitor or business partner, if this participation may lead to a conflict of interests.

## **Fair Working Conditions**

SCHILLING complies with the applicable laws and provisions for fair working conditions. This includes provisions in regard of remuneration, working hours and privacy protection.

Any form of forced labour and child labour is not tolerated.

## Health and Occupational Safety

Occupational safety is of great importance to us. Therefore, high standards for a safe and hygienic working environment, which are based on legal regulations, are a high priority for us. The aim is to always improve working conditions through appropriate approaches. Every employee must adhere to occupational safety and health regulations. Regular training courses are used to transfer the relevant knowledge. In addition, working time planning ensures that the required work breaks are observed.

## Environmental Protection

The continuous improvement of best environment business practices, which include a responsible and sustainable use of natural resources, are essential for SCHILLING. The use and consumption of resources during production and the generation of all types of waste, including water and energy, must be reduced or avoided. To this end, we have introduced an environmental management system in the company and certify it regularly.

Harmful soil changes, water and air pollution, noise emissions and excessive water consumption must be avoided if this harms people's health, significantly impairs the natural basis for food production or prevents people's access to safe drinking water or sanitary facilities.

SCHILLING follows a systematic approach to identify, manage, reduce and responsibly dispose of or recycle solid waste. Chemicals or other materials that pose a hazard when released into the environment shall be identified and managed in a manner that ensures safety in their handling, transportation, storage, use, recycling or reuse and disposal.

## Social Responsibility

As a family-owned and medium-sized company, SCHILLING has a special social responsibility, which is solicited through social and cultural dedication as well as local activities.

Donations and sponsorship money shall only be paid in accordance with the applicable laws and internal SCHILLING guidelines, if any.

## Financial Responsibility

The accounting of our finances is based on the respective legal regulations and standards. Appropriate documentation is maintained about business processes in this regard in order to secure all relevant information. Any transcription of company facts that is published or used only for internal documentation must be complete, correct, accurate, timely and understandable.

## Data Protection

In order to protect personal data, we take all necessary measures to ensure that the collection, processing and use of personal data in our company comply with the applicable legal provisions of data protection law. All this with the aim of avoiding improper and prohibited use and creating a framework of confidentiality and integrity within the company.

## 3. RESTRICTIONS AND SANCTIONS

This Code of Conduct describes the main principles of SCHILLING. Each employee shall act in accordance with these basic principles. Executives and management shall ensure, that their assigned employees are aware of and comply with this Code of Conduct.

In case of any uncertainties, all employees are free to contact their respective supervisor or HR manager of SCHILLING.

Any breach of this Code of Conduct may lead to consequences and sanctions under criminal law as well as under civil and labour law, not only for SCHILLING but also for each employee. Moreover, any person may be held responsible, if they missed to reveal any breach in their responsibility due to insufficient supervision.

#### **4. CONTACT PERSONS**

Each SCHILLING employee and business partner is encouraged to inform its supervisor and/or HR manager of SCHILLING when noticing any breach of this Code of Conduct or any other violation of applicable laws, provisions or internal guidelines. Any information will be treated as confidential during the whole process.

Tips can also be reported anonymously via the whistleblower protection system. The following offices accept tips:

##### **External Partner (dokuworks GmbH)**

Whistleblower-E-Mail: Hinweisgeber-schilling@doku.works

Telephone-number: 0271 / 77237-60

##### **Web-based reporting channel**

We also offer a web-based channel through which both confidential and anonymous reports are possible. You can submit a report securely via the website and have the opportunity to track the status of the procedure at any time and make further contact with a contact person.

You can access the whistleblower system using the following link:

<https://whistleblowersoftware.com/secure/9a70374f-e69f-4a08-9c10-e4b073027e9a>