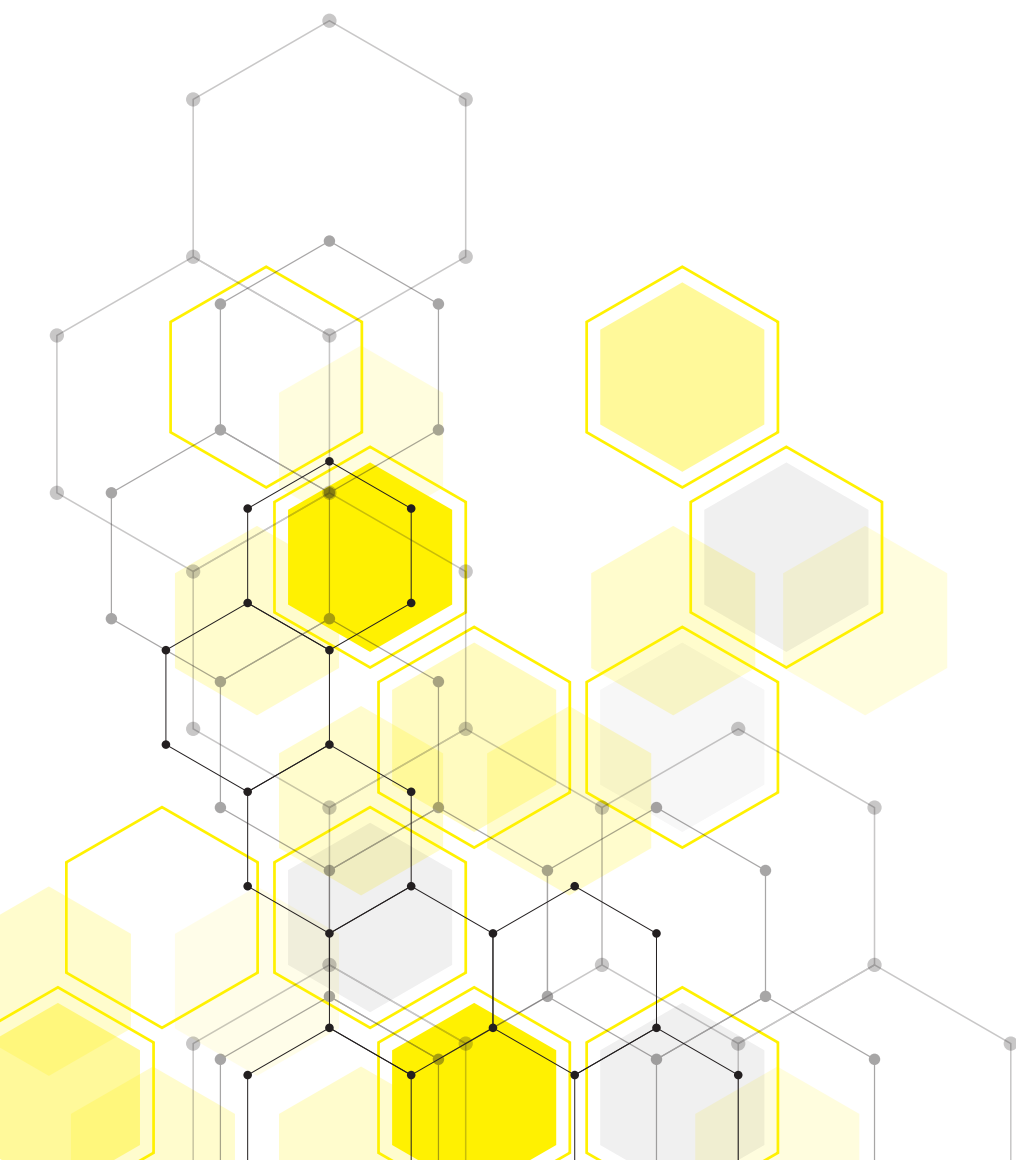




CODE OF CONDUCT

Think Tomorrow.



PREAMBLE



Dear employees,

As a traditional family-owned business, the SSI SCHAEFER Group has always operated based on the core values of the founding family. Among these values are integrity and taking a long-term view in the actions we take as well as our commitment towards our customers and employees.

In addition, the activities of the SSI SCHAEFER Group are subject to numerous regulations and the principles set forth in our Code of Conduct. This Code of Conduct applies to all employees and managers of the SSI SCHAEFER Group (subsequently referred to as employees) alike, regardless of their position.

Through integrity, fair competition and sustainable investments, we will continue to be a trailblazer for the future of the intralogistics sector. In addition to economic success, we value transparent actions and rational and comprehensible decision-making as tools to help maintain the trust in the SSI SCHAEFER Group as well as our credibility and reputation.

For this reason, we ask you to carefully read and internalize this Code of Conduct and to integrate its principles into your everyday work. In this way, we all help to guarantee the long-term success of the SSI SCHAEFER Group.



Steffen Bersch
CEO SSI SCHAEFER Group



Bruno Krauss
CFO SSI SCHAEFER Group



Harald Rackel
COO SSI SCHAEFER Group

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INTRODUCTION

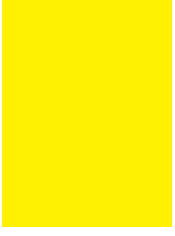
This Code of Conduct is binding on all employees of the SSI SCHAEFER Group worldwide. It summarizes our main principles of conduct and, in view of the diversity and complexity of the various subject areas it addresses, is intended to serve all employees of the SSI SCHAEFER Group as a guideline for compliance with the core values described in the Code of Conduct and to help direct our daily actions.

Our Code of Conduct may not cover every conceivable situation that we encounter in our daily work. We therefore ask every employee of the SSI SCHAEFER Group to also inform themselves about any specific rules and laws that may apply to their areas of responsibility and to refrain from any conduct that is not in compliance with such rules.

It is crucial that we adhere to the Code of Conduct of the SSI SCHAEFER Group, even if common business practices would allow us to take different actions and such behavior is allegedly tolerated by local authorities and the public. If a particular country has stricter rules than the ones stipulated in our Code of Conduct, we must always observe the stricter rules.

In our everyday work lives, we have to face challenging situations, such as demanding project objectives or tight schedules. However, our efforts to achieve these targets or objectives in the best possible way must never lead us to disregard the principles set forth in this Code of Conduct.

We are aware that it is not always easy to know whether particular behavior complies in all respects with the rules and our principles of conduct. For this reason, every employee can always seek advice in case of questions, uncertainties or doubts. Your supervisor, the Group Compliance Team and the employees of the Human Resources or Legal Department are available to you at all times. Violations of applicable law or our Code of Conduct, as well as any attempt to violate such rules, will not be tolerated and will be consequently pursued and appropriately sanctioned. Independent of the sanctions prescribed by law, this can also lead to consequences under employment law for those involved.



Together, we want to maintain the excellent reputation of the SSI SCHAEFER Group. For this reason, we would like to encourage everyone to come forward if they have any concerns or knowledge of a violation of the SSI SCHAEFER Group's Code of Conduct.

You can confidentially contact your supervisor, the Group Compliance Team and the employees of the Human Resources or Legal Department with your information. In addition, you have the opportunity to anonymously report concerns or a (suspected) violation via our confidential, web-based whistleblower system. All reports will be appropriately investigated by the Group Compliance Team.

Employees who raise concerns or report (suspected) violations in good faith, even if these ultimately prove to be unsubstantiated, will not face reprisals, since we actively protect them from retaliation.

COMPLIANCE AFFECTS ALL OF US - JOIN IN!

If you have any questions about the Code of Conduct and the principles of conduct contained therein, you can contact the Group Compliance Team at:

Fritz Schäfer GmbH & Co KG | Group Compliance
Fritz-Schäfer-Strasse 20 | 57290 Neunkirchen | Germany
+49 2735 70-9595 | compliance@ssi-schaefer.com

The whistleblower system for inquiries and reports via web form can be found here:

<https://www.bkms-system.com/ssi-schaefer>

FAIRNESS



1. WE STAND UP FOR FAIR COMPETITION IN OUR MARKETS

We are an experienced and high-performance solution provider in the field of in-house material flow.

We persuade our customers to do business with us by the quality of our products and services, and for this reason we are not afraid of fair competition.

We reject any form of market manipulation and always observe all laws that protect fair competition.

1.1. DEALING WITH COMPETITORS

The risks associated with violations of competition or antitrust laws must be taken very seriously, since significant fines or other sanctions exceeding 10% of the total annual turnover of the SSI SCHAEFER Group may be imposed.

In addition, violations may also result in heavy fines and imprisonment for employees who participate in any illegal conduct. We therefore always behave professionally when dealing with our competitors. In particular, we do not enter into any formal or informal agreements with competitors, for example, to coordinate prices or sales conditions, to divide up markets or to influence the results of tendering or awarding procedures. When we are in contact with competitors, we avoid any discussion of confidential information and/or information that may be relevant to a competitor. This includes, for example, (non-public) prices, costs and margins, sales volumes and production capacities as well as customer data, contract terms, marketing and sales strategies, research and development plans and much more (*see also 4. We observe requirements for data protection, confidentiality obligations and requirements for IT security*).

If we, the SSI SCHAEFER Group as a whole or individual companies within the Group, hold a dominant position in the market, we do not abuse this position in order to illegally eliminate competition, prevent new competitors from entering the market or manipulate prices.

WE

- adhere to the legal requirements of antitrust and competition law.
- do not participate in prohibited agreements or cartels and avoid even the appearance of them.

EXAMPLES OF ANTI-COMPETITIVE AND THUS PROHIBITED BEHAVIOR:

- Agreements with competitors to purposefully raise, lower or stabilize prices/price components (price-fixing agreements);
- Agreements with competitors to reduce production or limit capacity (production constraint);
- Agreements with competitors not to do business with certain persons/companies (boycott);
- Agreements on the distribution of customers, areas or markets with competitors;
- Agreement/coordination of activities with competitors during the bidding process (e.g. submission of protective or sham bids);
- Both explicit agreements as well as coordinated behavior resulting from unilateral declarations (e.g. announcements of price increases aimed at encouraging a similar response from one or more competitors);
- Use of a dominant position (alone or together with competitors) to impose exclusive terms of trade on customers (abuse of market power).

Example:



After a trade fair, you meet a former co-worker who now works for a competitor. She starts a conversation about a new sales campaign her company is planning. What do you do?



I make it clear to my former colleague in a friendly but firm manner that we cannot talk about such potentially competitive issues. Therefore, I immediately break off the conversation. Afterwards, I inform the Group Compliance Team and my supervisor. Together, we document the incident and state that we have rejected the competitor's request to engage in such a discussion and that no competitive information has been exchanged.

1.2. DEALING WITH CUSTOMERS AND SUPPLIERS

When in contact with customers and suppliers, various business activities may be considered anti-competitive. Among these are:

- Agreements that oblige a customer or supplier to purchase exclusively from or supply to a certain company (exclusivity agreement);
- Agreements which make the purchase of one product conditional on the purchase of an additional product which the customer does not wish to purchase (package deals); and
- Price dumping - selling goods below cost price.

We must avoid all such business activities. As soon as we are no longer certain whether our activities or a specific agreement may be appropriate, we have to involve the legal department and carefully check whether the arrangement is permitted under antitrust and competition law.

WE

- > must avoid exclusivity agreements, package deals and price dumping.
- > have to involve the legal department at an early stage in negotiating agreements that may pose a risk of being inappropriate or impermissible.



1.3. DEALING WITH RELEVANT TRADE CONTROL AND SANCTION REGULATIONS

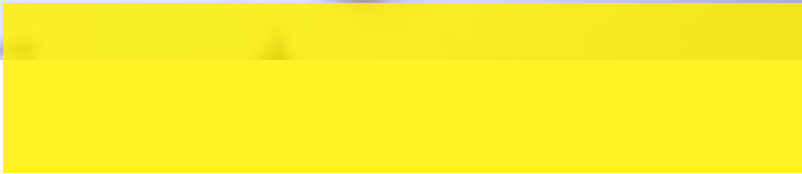
Although markets are usually free and open, there are legal requirements to promote and protect competition as well as different foreign trade regulations that restrict and prohibit the import and export of certain products and services. These restrictions may apply to a certain type of product or its intended use, but also to the country of origin or destination, or the customer itself.

As the SSI SCHAEFER Group participates in foreign trade, we are obliged to comply with these trade control and sanction regulations. To ensure that our products do not fall into the wrong hands and that the SSI SCHAEFER Group will continue to be regarded as a reliable partner who complies with foreign trade law in the future, the legal feasibility of transactions must be assessed in advance by the responsible person on the basis of the applicable regulations (export control).

In addition, before entering into a contract, we must check and inquire whether any (potential) business partner is listed on any relevant sanctions list (sanctions list check).

WE

- ensure that all business partners are subject to a sanctions list screening and that export checks are carried out when necessary.
- only work with business partners of integrity.



Example:



A potential customer asks you whether the SSI SCHAEFER Group would be interested in producing various components for a high-bay warehouse and delivering the components to Iran. What do you do?



In cooperation with the respective departments, I clarify the export restrictions for deliveries to Iran and whether they apply to the inquiry of the potential customer. As long as this check has not been completed, I do not enter into any contract with the potential customer that obligates the SSI SCHAEFER Group to export goods to Iran.

1.4. COMBATING MONEY LAUNDERING AND TERRORIST FINANCING

Money laundering and terrorist financing undermine legal and fair competition worldwide, giving rise to tax evasion and helping to finance terrorist organizations. Money laundering means concealing the origin of illegally earned money (e.g. from drug trafficking) and reintroducing the money into the legitimate financial cycle.

Terrorist financing occurs when funds and other resources are made available to terrorist organizations. In principle, any company can be abused for these purposes. To be liable for money laundering, it is irrelevant whether the parties involved were aware of the illegal origin of the money. For this reason, it is especially important to only cooperate with reliable business partners whose financial means and resources are of legitimate origin.

WE

- thoroughly check the identity and seriousness of potential business partners before entering into a business relationship.
- immediately allocate incoming payments to the corresponding services and thus ensure transparent payment flows.

Example:



A customer accidentally settled an invoice twice and asks for repayment to be made to the bank account of a subsidiary in Switzerland. Can you meet the customer's request without hesitation?



No. I go to the Group Compliance Team and my supervisor to discuss how to proceed. Repayments may only be made in the same manner as the original payments. The customer's request therefore requires additional explanation.

INTEGRITY





2. WE ACT WITH INTEGRITY AND DO NOT TOLERATE CORRUPTION

Our customers and business partners can always rely on our sense of responsibility and integrity.

This is based on the fact that we do not tolerate any form of corruption and abstain from doing business connected to any form of bribery or kickback.

2.1. OFFERING AND GRANTING BENEFITS - AVOIDING ACTIVE CORRUPTION

Benefits in the form of gifts and invitations are common in business relationships and are often an act of courtesy. If these gratuities do not exceed a nominal amount and do not violate internal or legal regulations, they are permitted. However, if such benefits exceed this scope and are used to influence third parties, this can trigger a considerable risk of criminal prosecution.

For this reason, we do not promise or grant any payments, valuable gifts, invitations or other benefits (for instance, business opportunities or employment offers) to induce others to provide us or the SSI SCHAEFER Group with a business advantage. We never ask third parties to offer such benefits on our behalf.

Gifts and invitations made by employees of the SSI SCHAEFER Group must always be mere courtesies in the course of and incidental to our normal business. Gifts may only be of reasonable value. Invitations are only issued as secondary to ordinary business events. Only then are they considered socially acceptable and legally justifiable. Gifts and invitations may not be made for the purpose of unfairly influencing the recipient's decisions or actions in favor of the SSI SCHAEFER Group; this also applies if the gifts or invitations are offered or provided for the benefit of relatives or related persons. We always avoid even the appearance of exerting undue influence.

WE

- abstain from offering or granting gratuities, gifts or invitations for the purpose of or unlawfully influencing a decision or action of a person. We even avoid giving the appearance of doing so by not giving gratuities, gifts or invitations that could give the impression that we are attempting to exert such influence.
- do not engage in active corruption.

Particularly strict legal restrictions apply to gratuities to national and foreign officials. Officials include all persons who have responsibilities for public administration, such as civil servants or government officials. However, employees of nationalized companies, military staff or professors at public universities can also be considered public officials. We do not offer or grant officials any benefits for performing or accelerating official acts. We observe this regardless of whether the official is acting within his or her power to perform the official act or whether the official is in violation of his or her official duties in taking the action. The same strict regulations apply to all business relationships with officials, authorities and their representatives, e.g. if authorities are acting as customers of the SSI SCHAEFER Group.

Examples of benefits



USUALLY PERMITTED:

- Symbolic, appropriate, low-value occasional or promotional gifts;
- Invitations to business meals/events of a reasonable value in the normal course of business (the business occasion must be the main focus and clearly outweigh any possible entertainment elements).



GENERALLY NOT PERMITTED:

- Cash, gift vouchers or other money equivalents;
- Valuable or excessive gifts;
- Free or extremely reduced products or services;
- Invitations to meals, trips or events outside the normal course of business;
- Employment offers or business opportunities;
- Personal favors.

Example 1



You have been working with a service provider for several months. After the successful conclusion of the joint project, you would like to invite the service provider to dinner to maintain the good business relationship. Are you allowed to do so?



Yes, but I have to make sure that the dinner is held at a reasonably priced restaurant and that it is an ordinary act of courtesy. An invitation should only be extended if doing so is accepted business etiquette in the country. Additionally, I have to ensure that the dinner does not raise any questions as to whether the service provider is under any obligation to me (e.g. due to value of the dinner or frequency of my invitation); only then will my personal integrity as well as the integrity and independence of the SSI SCHAEFER Group and the service provider be maintained.

Example 2



You are a sales representative within the SSI SCHAEFER Group and have prepared a quotation for a bulk order for a potential customer. In a telephone conversation with the potential customer's contact person, she offers to make sure her company will place its order with the SSI SCHAEFER Group if her son is given the opportunity to complete a dual study program in the field of International Management at SSI SCHAEFER Group. What do you do?



In a friendly but firm manner, I refuse to influence the awarding of the contract and, after the end of the telephone call, I immediately contact the Group Compliance Team and my supervisor to discuss further steps regarding the tender.



2.2. DEMANDING AND ACCEPTING BENEFITS - AVOIDING PASSIVE CORRUPTION

To us, a sense of responsibility and integrity mean that we make our decisions based on objective criteria. To avoid the impression that our decisions have been influenced by other means, we do not accept any gifts aimed at or for the purpose of influencing our decisions or actions.

Of course, we also do not ask to receive any such benefits. We will comply with these guidelines even if our decisions or actions would not be affected by receiving any benefit. To report attempts by public officials, suppliers, customers or other third parties to unfairly influence our decision-making, our supervisor and the Group Compliance Team as contact persons are always available.

WE

- › do not accept or solicit any benefit that is intended to, or is likely to, influence or appear to influence our business decisions or actions.
- › avoid passive corruption.

Example



A long-term supplier invites you to a company event which lasts one day and takes place on a Friday. The program includes several technical presentations and a joint dinner is planned for the evening. The supplier invites you to stay the entire weekend. He offers to pay for a good hotel and to organize a city tour and a visit to a musical. What do you do?



I can accept the invitation to the company event on Friday. Due to the long-term business relationship and the planned presentations, there is clearly a business connection. I can also take part in the dinner unless it is beyond a reasonable price range. In this situation, I ask myself: Would I go to a comparable restaurant privately or is it out of my usual range in terms of price? I reject the invitation to stay over the weekend in any case since the private component and the entertainment program clearly outweigh any legitimate business purpose here, and would lead to the appearance of exerting undue influence.

INTERESTS



3. WE ACT IN THE BEST INTERESTS OF THE SSI SCHAEFER GROUP

In large part due to the loyalty of all employees of the SSI SCHAEFER Group, we are successful as a family business and have an excellent reputation in the market.

We want to continue to build on this in the future, which is why we consistently take care to separate our private interests from the interests of the SSI SCHAEFER Group and make business decisions based exclusively on objective criteria.

3.1. DEALING WITH PERSONAL RELATIONSHIPS IN EMPLOYMENT OR BUSINESS RELATIONSHIPS

Decisions regarding personnel matters (such as hiring, transfers and promotions) and the selection of business partners (such as engaging third parties to provide services or selecting suppliers or subcontractors) are made exclusively based on objective decision-making criteria.

We are not influenced by family or personal relationships. If there are conflicts between our private interests and the interests of the SSI SCHÄFER Group, it is recommended that we inform our supervisor as well as the Human Resources Department in order to avoid any appearance of a conflict of interest from the outset. In this way, we ensure transparency and thus protect ourselves. If we are unsure whether a conflict of interest exists, we contact the Group Compliance Team to discuss the matter and answer any questions.

WE

- separate private from business interests and ensure that family or personal relationships do not affect our business decisions.
- note that we may report conflicts of interest to our supervisor and the Human Resources department.
- refrain from making decisions that appear to be influenced by family or personal relationships.

EXAMPLES OF SITUATIONS IN WHICH A CONFLICT OF INTEREST MAY ARISE FROM FAMILY OR PERSONAL RELATIONSHIPS:

- My brother is applying for a job with a company of the SSI SCHAEFER Group. I myself work in the Human Resources department of the same company.
- My husband works in Public Relations (PR) for a company of the SSI SCHAEFER Group, I myself work in Marketing for the same company. Through a restructuring, the PR department is to be integrated into the marketing department. As a result, I would be my husband's direct supervisor.
- A company of the SSI SCHAEFER Group has been working with an external consulting agency for several years. Due to various problems in the past, a different consulting agency will be used in the future. A good friend works at this agency and would be my direct contact person in the future.



3.2. DEALING WITH SECONDARY ACTIVITIES AND SHAREHOLDINGS

Secondary activities and shareholdings in competitors, business partners and other companies with a business relationship with the SSI SCHAEFER Group may lead to a conflict between our private interests and the interests of the SSI SCHAEFER Group. For this reason, we do not take on any secondary employment which may interfere with the interests of the SSI SCHAEFER Group and has not been approved in advance by our supervisor or the Human Resources department.

The same applies to freelance activities and setting up our own company. Direct or indirect participations in a competitor or a business partner (e.g. customer, supplier, consultant or service provider) of the SSI SCHAEFER Group will be reported to our supervisor or the Human Resources department if the shareholding exceeds 5%. This also applies if not we ourselves, but a family member (parents, siblings, children or spouse) holds such a share and we are aware of this. We will report the participation of family members without disclosing personal data.

WE

- › disclose participations in a competitor or business partner of the SSI SCHAEFER Group to our supervisor or the Human Resources department.
- › do not engage in any secondary employment which may interfere with the interests of the SSI SCHAEFER Group unless previously approved by our supervisor or the Human Resources department.



Example



A friend of yours owns a logistics company and asks you if you would accept a seat on the board of directors of his company. What do you do?



Since there could be a conflict between my private interests and the interests of the SSI SCHAEFER Group, I discuss the offer with my direct supervisor or the Human Resources department and ask for their approval before I accept the position on the board.

3.3. DEALING WITH SOCIAL MEDIA

The presence of social media is continuously increasing both in our professional and personal lives. Our social media posts can reach millions of people around the world in a matter of seconds. We are aware that our posts may not only have positive but also negative effects. Employees of the SSI SCHAEFER Group who have access to official company profiles (e.g. on LinkedIn, Facebook, YouTube or Instagram) are therefore specially trained in the appropriate use of social media.

When using our private profiles on social media, we must be aware of the consequences of our actions. For this reason, we do not register on social networks using our professional email addresses and do not synchronize our business contacts with our private accounts. In addition, we never publish sensitive information about the SSI SCHAEFER Group on our private profiles, such as information on prices, profit margins, market shares as well as user accounts and passwords we are not expressly authorized to disclose (*see also 4. We observe requirements for data protection, confidentiality obligations and requirements for IT security*).

If we discuss work-related topics or topics that affect the SSI SCHAEFER Group on social media, we always make clear that we are only expressing our private opinion. If this is not recognizable to an uninvolved third party, we make it clear that this is not the official opinion of the SSI SCHAEFER Group.

WE

- › always behave responsibly towards the SSI SCHAEFER Group in our professional as well as in our private activities on social media.
- › do not register on social networks using our business email address and do not publish sensitive information of the SSI SCHAEFER Group.

Example



Facebook advertises an event close to you discussing the latest developments in the intralogistics sector in connection with Industry 4.0. Posts on the event's Facebook page already include numerous comments and various discussion threads. Scrolling down, you come across a discussion in which a person unknown to you describes the SSI SCHAEFER Group as unable to adapt to the current developments in the field. You know that this is not true and would like to contradict this person's statements. Is this okay?



I am an employee of the SSI SCHAEFER Group and, of course, such discussions concern me, but my posts on the Internet may not only have positive but also negative effects. For this reason, I instead refrain from engaging in such a discussion on a Facebook page. Additionally, my comment may appear to be an official statement of the SSI SCHAEFER Group, which should be avoided in any case when I am not expressly authorized to communicate the official opinion of the SSI SCHAEFER Group on social media. If I find the entire discussion in the Facebook event rather alarming and if I am afraid that this may cause severe damage to the reputation of the SSI SCHAEFER Group, I can inform my supervisor so that he or she can forward it to the person responsible for the company's social media posts.

PRIVACY



4. WE OBSERVE DATA PROTECTION REQUIREMENTS, CONFIDENTIALITY OBLIGATIONS AND REQUIREMENTS FOR IT SECURITY

In developing innovative products and solutions, we cooperate across divisional and national boundaries.

Compliance with data protection requirements as well as the observance of confidentiality obligations and IT security requirements is always our top priority.

4.1. PROTECTION AND SAFETY OF PERSONAL DATA

In our digitalized world, data can be easily collected, spread around the world, analyzed and used. It is therefore particularly important that every employee handle the data entrusted to him or her responsibly in order to prevent data breaches and serious financial consequences for the SSI SCHAEFER Group. This includes the data of applicants, business partners, customers, suppliers and colleagues. Special care must be taken with regard to personal data. This includes all information that can identify a person directly or indirectly, such as name, date of birth, location data, health data, bank account details, online ID or information on a person's family or financial situation.

We collect, process or use personal data only if and in the manner we are authorized to do so. Personal data may therefore only be processed if a legal regulation permits or requires such processing.

We do not disclose personal data either within or outside the SSI SCHAEFER Group unless we are legally authorized or obliged to do so. In case of uncertainty or doubt, we always contact our data protection coordinator.

WE

- › do not process personal data without permission, but only if we are legally authorized to do so.
- › observe the requirements for the safety of personal data within the company.

4.2. CONFIDENTIALITY, PROTECTION AND SAFETY OF COMPANY INFORMATION

Sensitive information concerning the SSI SCHAEFER Group or its business partners is treated confidentially, particularly if this is required by internal company regulations, by contract or under obligations of legal confidentiality. If confidential information includes any personal data, we also observe the applicable requirements for data protection.

Confidential handling of company information also requires that we do not make this information available to third parties without authorization. We adhere to this principle while we are employed by the SSI SCHAEFER Group as well as after our employment has ended.

DEVIATIONS FROM THIS PRINCIPLE ARE ONLY POSSIBLE IF:

- we are expressly authorized to disclose the information,
- we have officially published the information previously,
- the information has been published by third parties and we have officially confirmed the contents of the publication, or
- we are legally obliged to disclose the information, e.g. in the context of governmental requests for information.

In these cases, we take great care when disclosing confidential information so that it is protected against negligent disclosure to unauthorized third parties.

WE

- › always treat information concerning the SSI SCHAEFER Group and/or its business partners confidentially and prevent unauthorized access by third parties.

4.3. DEALING WITH PERSONAL DATA BREACHES AND OTHER IT SECURITY INCIDENTS

To protect personal data and company information from security breaches that, whether accidental or lawful, could result in destruction, loss, alteration, unauthorized disclosure or access (also called “personal data breaches”), we have taken several measures internally.

Should a breach of personal data or any other IT security incident nevertheless occur, we report the incident to our local IT department and the responsible Information Security Manager or Data Protection Coordinator. The responsible departments will then take further steps, taking the scope of the incident and the applicable legal provisions into account, also regarding any communication of the incident to external parties (*see also 3.3. Dealing with social media*).

Example 1



During a meeting with a business partner, you receive a USB stick containing a copy of a document discussed during the meeting. What do you do?



I only use devices provided by SSI SCHAEFER for data exchange. In a situation like this, it is better to ask the business partner to send the document via email. USB sticks and other electronic devices can contain malware that could be transferred to my notebook unnoticed and cause severe damage to the IT environment of the SSI SCHAEFER Group.



Example 2



You receive an email in which a colleague from the accounting department of a foreign subsidiary asks you to make an urgent payment to a supplier without delay. Your colleague also sends bank details in an attached file and asks you to make the payment to this account. Your colleague's request seems unusual to you, but the sender's address is correct and the email also makes a serious impression in other respects. What do you do?



Such an email is to be considered suspicious. Before I even open the attached file or make the requested payment, I make sure that the email was actually sent by my colleague and that the contents are legitimate. The best way to do this is to call my colleague by looking up her number in the Outlook directory, not dialing the phone number noted in the email's signature block. If I cannot verify the authenticity of the email in this way, I will contact my supervisor and report the incident to the person responsible for IT security. It is possible that my colleague's Outlook account has been hacked and that unauthorized persons have access to sensitive data, such as that of the supplier named in the email. Such an incident constitutes a severe breach of IT security and must be reported urgently so that appropriate measures can be taken right away.

SOCIETY





5. WE CONTRIBUTE TOWARDS SOCIETY AND TAKE PART IN PUBLIC LIFE

The SSI SCHAEFER Group is a responsible member of society. Through commitment and investment in society, we are able to tackle major social challenges and can therefore give something back in a meaningful way.

For this reason, we get involved, participate in charitable activities, make donations and enter into sponsorships, always complying with applicable laws and our internal approval processes.

5.1. DONATIONS AND SPONSORSHIPS

WHEN MAKING DONATIONS AND ENTERING INTO SPONSORSHIP CONTRACTS, WE OBSERVE THE FOLLOWING STANDARDS:

- Donations are made and sponsorship contracts are only awarded after consultation with the management of the SSI SCHAEFER Group and their express written approval has been obtained.
- Donations (voluntary, gratuitous contributions), e.g. as cash or non-cash benefits or as waivers of payment for work performed, are always awarded without expecting anything in return. They are only permissible when social causes or other purposes recognized as worthy of support are involved. Donations to political parties are not permitted. The beneficiary and the respective use of the donation must be known before the donation is made and documented in full for later tracking.
- Sponsorships (contracts for the promotion of individuals, groups of persons, organizations or events), e.g. in the form of money, goods or services, are usually awarded in expectation of a certain trade-off. There must be an adequate ratio between the promotional component and the agreed trade-off from the beneficiary. It must be clear beforehand who the beneficiary is and what form the sponsorship will take and this must be documented in full for later tracking. Sponsorships must not lead to the appearance that the SSI SCHAEFER Group is exerting undue influence on the beneficiary with regard to business decisions.

WE

- › only make donations and award sponsorship contracts after receiving the written consent of the management of the SSI SCHAEFER Group.
- › do not make any donations or enter into any sponsorship contracts that conflict with our standards.

Example 1



A member of the local volunteer fire department approaches you with a request to support its local chapter of firefighters. Is it possible for the SSI SCHAEFER Group to support the volunteer fire department in the form of a monetary donation?



In theory, supporting the volunteer fire department with a donation is possible. However, the donation may only be made if the internal approval process has been completed and the explicit written approval of the management of the SSI SCHAEFER Group has been obtained. For this reason, I inform the member of the local volunteer fire department that we will review his request internally and that I will contact him once the review process is complete.

Example 2



Your daughter has been an avid soccer player for years, and her team is currently looking for a sponsor for new jerseys. Is it possible for the SSI SCHAEFER Group to become a sponsor?



Basically, sponsorships of sports teams are possible if there is an appropriate benefit in return (e.g. visible integration of the company logo in the design of the new jerseys). However, entering into a sponsorship contract requires the explicit written approval of the management of the SSI SCHAEFER Group, which is why I initiate the internal approval process and wait for the results of the review before signing a sponsorship contract in the name of the SSI SCHAEFER Group.

5.2. POLITICAL ACTIVITY AND COOPERATION WITH AUTHORITIES AND REPRESENTATIVES

We are neutral in terms of party politics and do not use company funds to make donations to political parties, affiliated or similar organizations, individual holders of public office or candidates for public office, either domestically or abroad. This includes, for example, the purchase of tickets, the active support of a political event or any funding of election campaign advertisements.

If we work together with public authorities or their representatives in our everyday business activities, this does not count as political activity. In this situation, we strictly comply with the law and our internal regulations to avoid conflicts of interest and corruption (*see also to 2.1. Offering and granting benefits - avoiding active corruption*).

WE

- › avoid exerting influence on politics and do not use company funds to make donations with a political component.
- › strictly comply with the law and, in cases of doubt, consult the Group Compliance Team or the Legal Department before entering into contractual agreements with public officials or public authorities.



Example



A local politician contacts you by mail seeking sponsors for the youth organization of his political party. In return for the SSI SCHAEFER Group's financial support, the youth organization would promote the SSI SCHAEFER Group, e.g. at various events through product placements or the like. How do you respond to the politician's request?




I answer the politician in a friendly manner and decline to sponsor the youth organization since the SSI SCHAEFER Group does not make any donations with a political component. If this would have been a request from the president of a local sports club asking the SSI SCHAEFER Group to sponsor their soccer team, I would have initiated the internal approval process for donations and sponsorships.

DIVERSITY



6. WE VALUE DIVERSITY AND STAND FOR SAFE AND FAIR WORKING CONDITIONS



The SSI SCHAEFER Group has a worldwide presence and operates across national borders.

Fair and respectful interaction with each other as well as with customers and business partners forms the basis of our corporate activities.

6.1. RESPECT FOR HUMAN RIGHTS

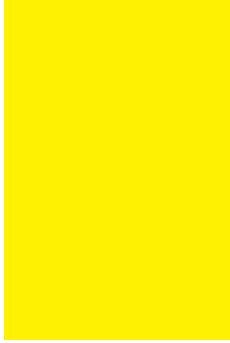
We fully respect internationally recognized human rights. We attach particular importance to the protection of human dignity and observe not only personal rights and freedoms but also judicial, economic, cultural and social rights. We categorically reject child labor, forced and involuntary labor and all other forms of modern slavery.

WE

- › observe internationally recognized human rights.
- › do not tolerate child, forced or involuntary labor.

EXAMPLES OF OTHER POSSIBLE VIOLATIONS OF HUMAN RIGHTS:

- Employees not being allowed to leave the premises after work;
- Personal documents being confiscated or valuables being held back when employees attempt to leave the premises;
- Employees not having the option to terminate their employment under the notice periods specified by law or in their employment contracts;
- Late payment, reduction of salary or threats of penalties that tie an employee permanently to the company.



6.2. EQUAL TREATMENT AND ANTI-DISCRIMINATION

The diversity of our employees is our strength. Their individual ideas, talents and abilities enable us to fulfill the specific requirements of our customers worldwide and exceed their expectations on a regular basis. We therefore respect people independent of their origins and their different characteristics, abilities and opinions, and create a working environment in which we treat each other fairly and in which the free development and advancement of all is encouraged. Discrimination, harassment (sexual or any other kind, e.g. by intimidation, hostility, humiliation, insult, social exclusion, disadvantage, degradation or any other disparagement) as well as any statements or behavior that may foster aggressiveness or hostility in the workplace will be subject to disciplinary action.

We always make personnel decisions (such as hiring, incentives, retention and promotion) on the basis of objective criteria such as competence, performance and conduct at work, but not on the basis of irrelevant personal characteristics such as ethnic or national origin, gender, age, physical characteristics, social origin, disability, union membership, religion, belief, marital status, sexual orientation or gender identity. Exceptions to this rule exist only on the basis of legal provisions.

WE

- › treat each other fairly and respectfully and do not discriminate against anyone.
- › do not tolerate discrimination or harassment (sexual or any other type) or any behavior that may foster aggressiveness or hostility in the work place.
- › only consider job-related characteristics in making personnel decisions.

Example 1



At lunch, a colleague tells you that an applicant in his department was rejected due to her skin color. Objectively, she was the most suitable of all the applicants for the position. What do you do?



On these topics, I can confidently contact the Human Resources department and inform them of the situation. The Human Resources department investigates and handles the matter and takes appropriate steps. Alternatively, I can contact the Group Compliance Team to report the incident.

Example 2



A colleague has lived in Germany for only a few years and therefore speaks German with a noticeable accent. You observe that two other colleagues make fun of his accent in his presence. What do you do?



If the situation allows, I try to intervene, e.g. by pointing out to the two colleagues that their behavior is discriminatory and disrespectful and asking them to refrain from doing so in the future. My supervisor, the Human Resources department and the Group Compliance Team are also available to me as contacts in this regard.

6.3. HEALTH AND SAFETY

The safety and health of all our employees is of the utmost importance to us. For this reason, we are actively committed to minimizing accidents, occupational hazards and other health impairments by ensuring safe working conditions, integrated occupational safety as well as adequate health protection in the operational processes. The SSI SCHAEFER Group always complies with the applicable laws and regulations on health and safety.

The consumption, sale or possession of illegal drugs during working hours and generally on the premises of the SSI SCHAEFER Group is strictly prohibited and will be subject to disciplinary measures. In addition, the consumption of alcohol on the company premises is also prohibited; exceptions apply only during special company events. Employees working under the influence of alcohol or drugs or abusing prescription medication will not be tolerated. The applicable laws must also be strictly observed in all business activities conducted outside the company premises.

If an employee has problems with alcohol or drug addiction, he or she can talk to his or her supervisor or the Human Resources department in confidence so that a joint solution can be worked out.

WE

- › comply with the applicable laws and regulations on occupational health and safety and do not put ourselves or others at risk by disregarding these regulations.
- › do not consume drugs or alcohol during working hours or generally on the premises of the SSI SCHAEFER Group.

Example



You discover that a machine in your department obviously has a technical defect. What do you do?



I make sure that the machine is taken out of operation and inform my direct supervisor about the defect. I do not try to fix the technical defect myself unless I am specifically trained and instructed to do so.



ENVIRONMENT





SEI SCHÄFER

7. WE ARE COMMITTED TO ENVIRONMENTAL PROTECTION AND USE RESOURCES WISELY

One of the core values of the founding family, on the basis of which we conduct our business every day, is taking a long-term view. For this reason, it goes without saying that we assume responsibility for the environmental compatibility and sustainability of our products, services and locations and strive to reduce emissions and lower our energy consumption.

For this purpose, we comply with all environmental protection laws and our internal regulations, particularly those regarding chemicals, hazardous and non-hazardous waste and wastewater as well as air and noise emissions. If we detect contaminants or environmental threats, we immediately inform our direct supervisor and, if possible, initiate the necessary protective measures ourselves.

WE

- › use natural resources responsibly and minimize unavoidable environmental pollution.
- › observe all applicable environmental laws and internal regulations on environmental protection. In the event of contamination or other hazards or even if we are uncertain about the existence of such a hazard, we immediately take adequate protective measures and inform our direct supervisor.

Example 1



In a few minutes, you will attend a two-hour meeting in another building. Currently, your computer, the lights and the heat in your office are on. What do you do before leaving the office?



I switch my computer to energy-saving mode or turn it off, check that all windows are closed and turn off the lights before leaving the office.

Example 2



On the way to a meeting, you notice that a gooey liquid is seeping from a container for toxic waste and spreading on the floor. What do you do?



I secure the area, contact my direct supervisor on site and report the situation. The supervisor initiates the defined procedure for dealing with such a situation. By no means do I ignore the situation or rely on someone else to report the situation.

QUALITY





8. WE EMPHASIZE THE QUALITY OF OUR PRODUCTS

As a globally operating Group, quality management (QM) plays a major role at SSI SCHAEFER. Distributed across more than 70 locations, an international team of QM employees develops cross-company quality requirements and goals. The focus is always on ensuring a continuous flow of information within the SSI SCHAEFER Group and the constant improvement of our processes and procedures.

SSI SCHAEFER stands for commitment – first and foremost to our customers. For this reason, the company uses various industry standards as a guideline. The fact that great importance is attached to achieving quality requirements and expectations is evidenced by obtaining certifications in accordance with internationally applicable standards.

Through these measures, we guarantee the consistently high quality of our products as well as their conformity and safety.

WE

- › ensure the consistently high quality of our products. If doubts arise about the safety or conformity of a product, we act proactively and raise the matter with our supervisor or the contact person for product safety and quality assurance.



Example



You work in production for the SSI SCHAEFER Group and discover that some end products do not meet internal quality standards. What do you do?



I comply with the internal quality standards and initiate the corresponding reporting process. If I have any questions or if I am uncertain, I contact my supervisor.

FINANCE



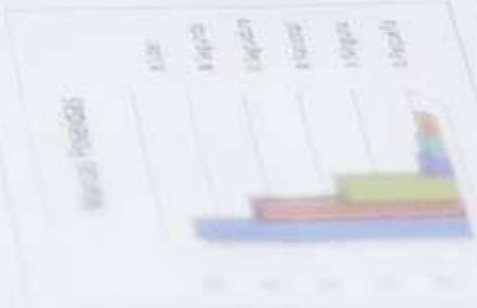
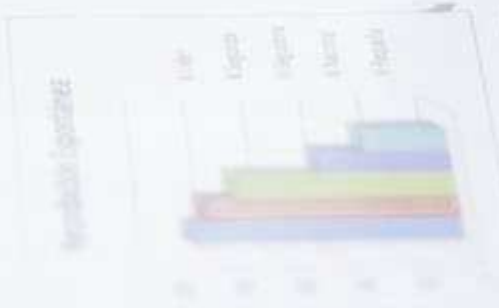


9. WE KEEP PROPER BOOKS AND RECORDS AND COMPLY WITH THE REQUIREMENTS OF FINANCIAL REPORTING AND TAX LAW

Around the globe, we develop innovative concepts for our customers and have the opportunity to actively shape the future of intralogistics.

As a result, we are increasingly the focus of public interest. By consistently complying with all applicable laws and regulations on financial reporting as well as all tax provisions, we can make a significant contribution to strengthening the basic trust of the financial authorities, the public and our contractual partners in the SSI SCHAEFER Group.

Conversely, however, irregularities and errors not only cause the trust placed in us to be shaken, but can also have other consequences, such as serious financial damage to our business.



9.1. CORRECT REPORTING AND BOOKKEEPING

The integrity of our business and financial records is of great importance to our day-to-day operations, since these records reflect our current economic situation and are therefore an essential basis for our business decisions. For this reason, we also ensure that all data, information and documents that we create or are responsible for are accurate and correct.

In addition, due to various legal requirements, we are obliged to comply with the principles of proper accounting and other financial reporting rules. We must ensure that we prepare our financial reports on time and in compliance with the relevant national and international accounting standards. By no means may we include false or misleading statements in our financial reports since this could falsify the financial report or present facts in a distorted manner, which may constitute the criminal offense of fraud. As a precaution, we always practice the concept of the segregation of duties and apply the two-person rule as part of our risk management and internal controls. This shared responsibility for key processes prevents unilateral action and thereby helps to mitigate the danger of fraud and errors.

WE

- › ensure that all information we prepare or publish is accurate and complete and adhere to the general principles of proper bookkeeping and the legal framework for financial reporting.

Example 1



Your supervisor asks you wait until the next quarter to record her hotel accommodation charge for her last business trip. She justifies this request by stating that numerous expenses related to business trips have already been booked this quarter and that she wants to meet the budget targets for this quarter. Is this okay?



No, my supervisor's request is not okay. Expenses must be recorded in the period in which they were incurred. If we deviate from this, our records would not be truthful and complete.

Example 2



You work in Accounting within the SSI SCHAEFER Group and are responsible for setting up new vendors in the system. Since many of your colleagues are currently on leave, your supervisor would like some assistance in posting and paying invoices. Is this okay?



No, this is not okay since it would be contrary to the principle of segregation of duties and the two-person rule. Setting up new vendors, posting invoices and making payments on those invoices must be carried out by different persons.



9.2. TAX LIABILITY AND TAX COMPLIANCE

In addition to our obligations in the field of financial reporting, we are also aware of our social responsibility in fulfilling our tax obligations.

As part of the worldwide activities of the SSI SCHAEFER Group, we are obliged to consistently comply with the tax regulations of all countries in which we operate, as well as all relevant international legal provisions of tax law. Therefore, we design our internal structures and processes in such a way that taxes can be determined, recorded and paid to the appropriate tax authority in full, correctly and on time by each of the companies of the SSI SCHAEFER Group.

Example



A customer asks you to rename the services performed by SSI SCHAEFER Group in an invoice since this would result in a tax advantage for the customer. Is this okay?



No, the customer's request is not okay. Services must always be described and invoiced as they are actually provided.

WE

- › comply with the applicable tax regulations of the countries in which we operate as well as relevant international tax legislation.

ASSETS



10. WE PROTECT THE ASSETS OF THE SSI SCHAEFER GROUP



The assets of the SSI SCHAEFER Group, which have been acquired over generations, are essential for the performance and success of the SSI SCHAEFER Group.

For this reason, we all have to ensure that the assets of the SSI SCHAEFER Group are handled responsibly and are protected in particular against loss, damage, waste and abuse.

10.1. HANDLING OF TANGIBLE ASSETS

Tangible assets include all equipment of the SSI SCHAEFER Group, such as office equipment, computers and mobile phones, consumables, machinery and systems, inventories as well as buildings and land. In order to preserve their economic value, we handle these assets responsibly and carefully.

Under no circumstances do we tolerate fraud, theft, misappropriation, embezzlement, willful damage or other misuse. It is prohibited to use company equipment or company vehicles for private purposes or to make them available to third parties without prior approval.

WE

- › handle the material assets of the SSI SCHAEFER Group, in particular the company equipment, with care and responsibility.



10.2. HANDLING OF INTANGIBLE ASSETS

The intangible assets of the SSI SCHAEFER Group, such as its reputation, inventions, intellectual property, registered and unregistered copyrights, patents as well as know-how and company secrets that have been recorded or developed are of enormous economic value. For this reason, we always exercise due care in dealing with the intangible assets of the SSI SCHAEFER Group, protect them against unauthorized access and never use them without appropriate authorization.

Furthermore, we use the intangible assets of the SSI SCHAEFER Group only for business purposes on behalf of the Group, which categorically excludes any unauthorized private use of the intangible assets as well as participation in insider trading.

We also apply this level of care to the intangible assets of our business partners *(also see to 4. We observe requirements for data protection, confidentiality obligations and requirements for IT security).*

WE

- › always handle the intangible assets of the SSI SCHAEFER Group, as well as the intangible assets of our business partners, with due care.



Example



You left the SSI SCHAEFER Group a few days ago and are now working for a competing company. In your opinion, a lot of the information you obtained during your time at the SSI SCHAEFER Group could be of interest to your new employer. Are you allowed to pass this information along to your new colleagues?



No, I must not pass along information from my time at the SSI SCHAEFER Group, particularly if this information is confidential. I have to observe my confidentiality obligations, even after ending my employment relationship with the SSI SCHAEFER Group.

10.3. HANDLING OF ELECTRONIC RESOURCES

Electronic resources, such as electronic devices and systems, form an important interface between tangible and intangible assets of the SSI SCHAEFER Group. For this reason, we only use electronic devices and systems that are administered and maintained by the SSI SCHAEFER Group (unless we are otherwise specifically authorized to do so) and always use such devices and systems with care. We always safeguard and protect our passwords and user IDs, and we always follow our internal processes when downloading and opening attachments or software from unknown sources and take due care when using electronic resources in public (*also see to 4. We observe requirements for data protection, confidentiality obligations and requirements for IT security*).

When using electronic assets of the SSI SCHAEFER Group, we observe both the applicable laws and the guidelines of the group. As with tangible and intangible assets, the private use of electronic resources is therefore limited and incidental. We never use the Group's electronic resources to send or view inappropriate content, to conduct business outside of the SSI SCHAEFER Group or for personal gain.

WE

- › handle the electronic resources of the SSI SCHAEFER Group responsibly and always exercise due caution when using electronic resources in public.



Example



On your way to a business meeting, you want to use the time during the train ride to prepare for your upcoming appointment. To do this, you want to read through the email history again at your leisure and note down various key points in order to be prepared for any questions the business partner may have. Is this okay?



It is admirable that you want to use the train ride to prepare for your appointment. In order to not pose a problem, you must make sure that you only use your electronic device with an active VPN connection and that nobody can look at your screen and read along.

10.4. LIMITATION ON PRIVATE USE

The assets of the SSI SCHAEFER Group are placed at our disposal to enable us to perform our official duties on behalf of the SSI SCHAEFER Group. Therefore, the SSI SCHAEFER Group may monitor and disclose the use of its assets, including electronic resources, to the extent permitted by local law.

Accordingly, we recognize that when we use SSI SCHAEFER Group assets, we do so only in connection with our business activities and do not expect any privacy or anonymity, even when using the Group's electronic resources.

WE

- › use the assets of the SSI SCHAEFER Group to fulfill our assigned work and do not expect privacy in this respect.

DEVIATIONS

In certain exceptional cases, it is possible to deviate from the standards set forth in this Code of Conduct. Any such deviations, however, always must be approved in advance by:

- (i) the respective local management board and, in addition
- (ii) the management board of Fritz Schäfer GmbH & Co KG.

Such approval may also be granted for a series of similar individual cases. It must be documented in writing or by email and a record must be kept by the business unit requesting the deviation from the individual standards of the Code of Conduct.

WHISTLEBLOWING SYSTEM

Purpose

The purpose of the whistleblower system is to prevent or reduce damage to the SSI SCHAEFER Group and its employees. With regard to the use of the whistleblower system in the SSI SCHAEFER Group, the Group Compliance Team ensures the following:

- Reliable processing of all reports of actions, grievances and/or risks that could harm the SSI SCHAEFER Group and/or its employees;
- Protection of whistleblowers from sanctions related to the information they provide;
- Protection of SSI SCHAEFER Group employees from general performance and behavioral control, as well as from false accusations.

The whistleblower system is an Internet-based tool that can be used either anonymously or in one's own name by employees as well as external persons (e.g. customers, suppliers or other third parties) to report actions, grievances and/or risks that could harm the SSI SCHAEFER Group and/or its employees. In particular, the whistleblower system serves to receive reports on the topics regulated in this Code of Conduct, for example:

- Corruption,
- Fraud / embezzlement / theft,
- Money laundering / financing of illegal activities,
- Competition law violations,
- Violations of environmental, health and safety regulations,
- Bullying / discrimination / harassment.

In addition, it is possible, also anonymously or in one's own name, to submit inquiries on various Compliance topics, such as the contents of this Code of Conduct. Reports on general performance and behavior monitoring are expressly not desired.



How it works

The whistleblower has the option of accessing the whistleblowing system via the link <https://www.bkms-system.com/ssi-schaefer>. By calling up this page, the whistleblower is automatically guided through the whistleblowing process. The system already performs a spam filtering and an initial plausibility check of the information. If, despite the plausibility check, the whistleblower system receives inadmissible or irrelevant information that relates to facts outside the subject areas listed above, it will be deleted manually or forwarded to the appropriate department.

After submitting a report, the whistleblower receives a reference number. With the help of this reference number, the whistleblower can later legitimize himself if necessary and has the option of setting up an electronic postbox, anonymously or in his own name, which can be used for further communication in the context of the whistleblowing process, for example in the event of any queries. Information received via the whistleblower system is processed by the Group Compliance Team of the SSI SCHAEFER Group with the greatest possible discretion and care. After completion of the investigations, individual case-related measures are initiated and/or accompanied by the Group Compliance Team, if necessary.

As part of the processing, the whistleblower will be informed by the Group Compliance Team via his electronic postbox, on the one hand, about the receipt of his or her report and, on the other hand, about the conclusion after the processing of the report has been completed. In addition, the whistleblower may be contacted via the electronic postbox in the event of any queries.

WHISTLEBLOWING SYSTEM

Protection of whistleblowers against reprisals


Whistleblowers who act in good faith or for ethical and/or moral reasons are not informers. On the contrary, with their information they help to prevent damage to the SSI SCHAEFER Group and all its employees and also help to preserve social values and the rule of law. For this reason, whistleblowers are always protected against unjustified discrimination.

Information provided can lead to individual measures, which have far-reaching consequences for the employees of the SSI SCHAEFER Group affected by the information. Affected employees are therefore protected against unjustified disadvantages if the content of the information provided turns out to be untrue.

Whistleblowers who do not act in good faith or not for ethical and/or moral reasons, but misuse the whistleblowing system, are excluded from this protection. Misuse of the whistleblower system is itself considered a violation of the Code of Conduct and will therefore also be prosecuted and appropriately sanctioned.

Data protection

The whistleblower system is operated on special servers in a high-security data center in Germany. This is secured by an actively controlled firewall and only the services required for the application and maintenance are installed on the servers. The administration and maintenance of the servers is the sole responsibility of the external provider, Business Keeper AG. Business Keeper AG has no right to inspect the contents of the whistleblowing system, in particular the communication between the whistleblower and the Group Compliance Team. Data transmission from the whistleblower to the server as well as from the Group Compliance Team to the server is carried out using TLS technology, which is known as `https://`. The security standards used for the whistleblower system follow the recommendations of the German Federal Office for



Information Security (BSI). All connections, i.e. those of both the whistleblower and the Group Compliance Team to the servers of the whistleblowing system are protected from third-party access by standardized methods.

The protection of the whistleblower's personal rights is ensured by a protected multi-stage login procedure with a pseudonym/user name and password chosen by the whistleblower. With the help of individual encryption, reporting data, postbox data and processing data are protected from access by third parties.

IMPRINT

The latest version of the Code of Conduct can be found at www.ssi-schaefer.com/en-de/company/compliance.

For reasons of readability, the masculine form is used when naming persons. Naturally, all statements apply equally to persons of either sex.

© SSI SCHÄFER | Fritz Schäfer GmbH & Co KG | Group Compliance
Fritz-Schäfer-Strasse 20 | 57290 Neunkirchen | Deutschland

State 03/2021

