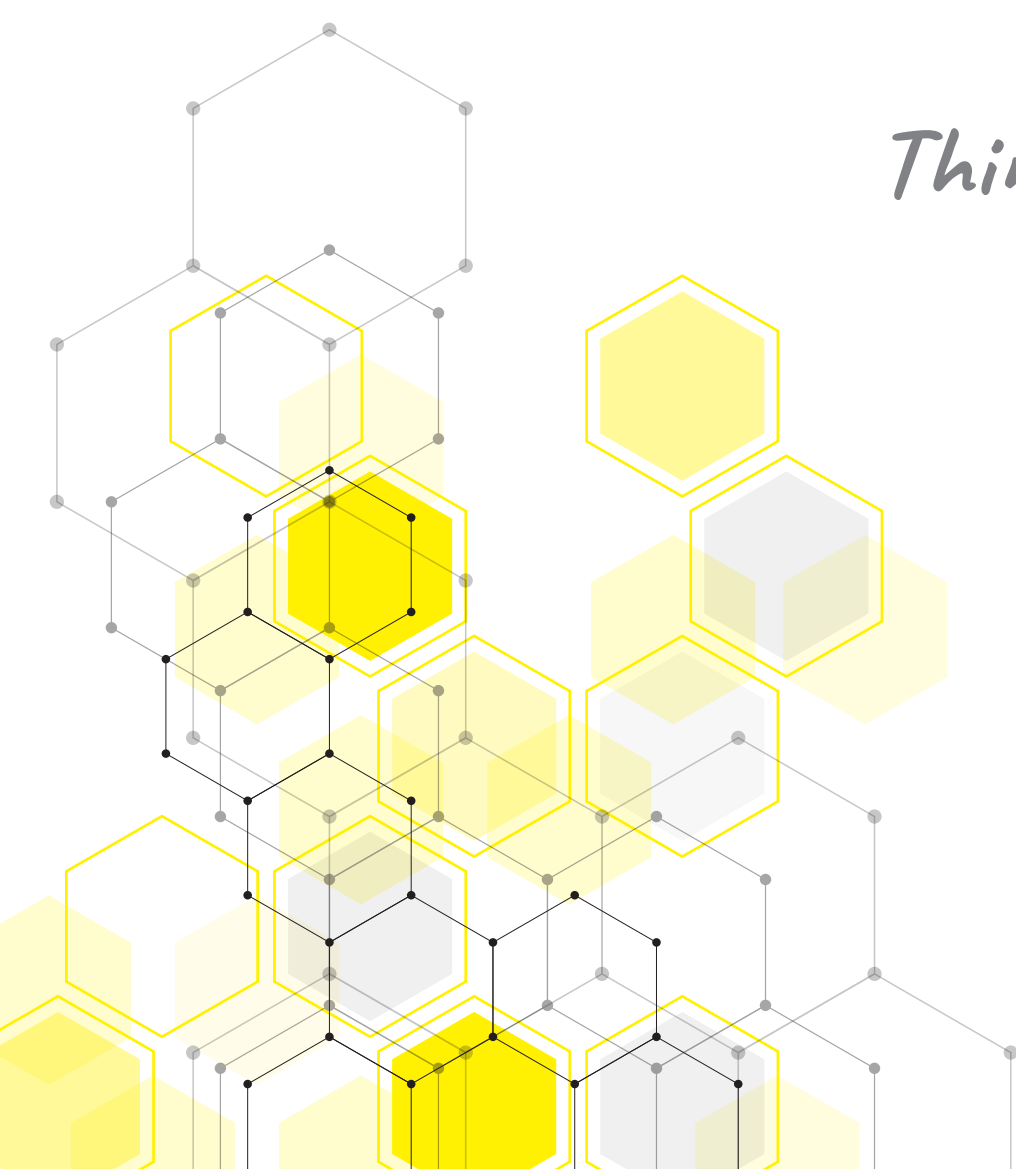




CODE OF CONDUCT

for Business Partners

Think Tomorrow.



Code of Conduct for Business Partners

The SSI SCHAEFER Group (hereinafter referred to as SSI SCHAEFER) is an experienced and high-performance solution provider in the area of internal material flow, on whose sense of responsibility and integrity customers and employees can always rely. Our Business Partners contribute significantly to this, which is why a common understanding of values is an essential basis for the cooperation of SSI SCHAEFER with Business Partners.

The requirements and principles of conduct of this Code of Conduct therefore form the basis for SSI SCHAEFER's cooperation with natural and legal persons who sell goods to SSI SCHAEFER or provide services for SSI SCHAEFER (hereinafter collectively referred to as Business Partners). Business Partners of SSI SCHAEFER must consistently comply with these principles for the duration of the cooperation and also ensure the compliance by third parties used to perform business activities for SSI SCHAEFER.

This Code of Conduct supplements the contractual agreements between SSI SCHAEFER and its Business Partners. If the provisions of the Code of Conduct and an individual contractual agreement contradict each other, the respective provisions of the individual contractual agreement take precedence.

The Code of Conduct for Business Partners of the SSI SCHAEFER Group includes the following principles of conduct:

General principles of conduct:

The activities of SSI SCHAEFER are subject to a wide range of legal regulations. Compliance with the principle of strict legality has top priority for SSI SCHAEFER, which is why violations of applicable law, as well as incitement to a violation, will not be tolerated. This applies in particular even if common behavior or business practices in a country demand otherwise and this is supposedly tolerated by the local authorities and the public. Accordingly, we expect our Business Partners to comply with the respective applicable laws as well as the requirements and principles of conduct of this Code of Conduct within the scope of their business activities for SSI SCHAEFER and to ensure that third parties used for contract fulfillment also comply with them.

Special principles of conduct:

01

FAIRNESS

SSI SCHAEFER is committed to fair competition in its markets

SSI SCHAEFER convinces due to the quality of its products and services. For this reason, we do not shy away from fair competition, reject any form of market manipulation and consistently comply with the laws for the protection of competition. Accordingly, we expect our Business Partners to behave fairly in competition and to comply with the respective applicable laws for the protection of free competition. In particular, Business Partners of SSI SCHAEFER undertake to comply with the legal requirements of antitrust and competition law and not to participate in prohibited agreements or cartels.

In addition, SSI SCHAEFER is obligated to comply with foreign trade law. We therefore expect our Business Partners to comply with the applicable trade and export control regulations and, in particular, to subject all (potential) Business Partners to a sanctions list check. Only persons who are not listed on relevant sanctions lists may be used in the cooperation with SSI SCHAEFER. In addition, our Business Partners take appropriate measures to prevent money laundering and terrorist financing.

02

INTEGRITY

SSI SCHAEFER values integrity and does not tolerate corruption

Customers and Business Partners can always rely on the sense of responsibility and integrity of SSI SCHAEFER. This is based, among other things, on the fact that SSI SCHAEFER does not tolerate any form of corruption and refrains from doing business that is in any way connected with bribery or corruption. We expect our Business Partners to behave with integrity and to comply with the applicable legal regulations for the prevention of corruption. In particular, Business Partners of SSI SCHAEFER undertake not to engage in active corruption and to prevent passive corruption. SSI SCHAEFER Business Partners only use consultants or intermediaries to the extent permitted by law and in accordance with the following principles; (i) factuality, i.e. only a service rendered is remunerated and (ii) appropriateness, i.e. said remuneration must be reasonable in relation to the service rendered. Our Business Partners do not tolerate any form of unlawful tangible and intangible benefits (including the offering thereof) to public officials or persons comparable to them (regardless of whether directly or indirectly via third parties). Unlawful material and immaterial contributions of any kind from our Business Partners to political parties, their representatives and to elected officials and candidates for political offices are also not tolerated. Donations are made by our Business Partners only on a voluntary basis and without expectation of any consideration in return. Sponsorship of individuals, groups or organizations will not be used to gain unlawful business advantages.

03

INTERESTS

SSI SCHAEFER makes decisions based on objective considerations

SSI SCHAEFER is successful as a family business and has an excellent reputation. This is due, among other things, to the fact that we strictly separate our private interests from the interests of SSI SCHAEFER and make business decisions exclusively on the basis of objective criteria. Accordingly, we expect our Business Partners to make decisions based on objective considerations and not to be guided by personal interests in an unacceptable manner.

04

CONFIDENTIALITY

SSI SCHAEFER observes data protection and information security

When developing innovative products and solutions, SSI SCHAEFER cooperates across divisional and national borders. Compliance with data protection requirements as well as confidentiality obligations and information security requirements are always a priority for us. Accordingly, we expect our Business Partners to ensure that SSI SCHAEFER's confidential information is kept secret and intellectual property is protected. This also applies after termination of the business relationship. In particular, Business Partners of SSI SCHAEFER undertake to comply with all applicable data protection laws.

05

DIVERSITY

SSI SCHAEFER values diversity and is committed to safe and fair working conditions

SSI SCHAEFER is active in over 70 countries worldwide. Fair and respectful dealings with each other always form the basis of our entrepreneurial activities. For this reason, it is a matter of course for SSI SCHAEFER to comply with internationally recognized human rights, not to tolerate child labor, forced labor or involuntary labor, and not to tolerate any discrimination or harassment (sexual or otherwise). Likewise, we do not condone any behavior that may incite aggression or hostility in the workplace. SSI SCHAEFER expects the same behavior from its Business Partners. In particular, Business Partners of SSI SCHAEFER undertake to comply with the basic employee rights based on the applicable national legislation, as well as according to the definitions of the international conventions of the United Nations (UN) and the International Labor Organization (ILO), and also to comply with the applicable laws and regulations on occupational health and safety. Furthermore, our Business Partners undertake to comply with all applicable laws, regulations and the resulting due diligence obligations with regard to the procurement of minerals and materials from conflict regions and high-risk areas ("Conflict Minerals") that may contribute to human rights violations, corruption, the financing of armed groups or similar negative effects.

06

ENVIRONMENT

SSI SCHAEFER is committed to environmental protection and the careful use of resources

One of the core values on which SSI SCHAEFER bases its business is long-term thinking. For SSI SCHAEFER, it is therefore a matter of course to take responsibility for the environmental compatibility and sustainability of its products, services and locations, as well as to strive for emission reduction and lower energy and water consumption. To this end, SSI SCHAEFER consistently complies with all environmental protection laws, especially with regard to chemicals, hazardous and non-hazardous waste and wastewater, as well as air and noise emissions. We expect the same from our Business Partners. In particular, Business Partners of SSI SCHAEFER undertake to comply with all applicable environmental laws and regulations, to minimize environmental hazards and pollution, and to use resources responsibly.

07

QUALITY

SSI SCHAEFER attaches particular importance to the quality of its products

As a globally operating Group, quality management plays a major role at SSI SCHAEFER. The focus is always on the continuous improvement of our processes and procedures and the achievement of quality requirements and expectations. SSI SCHAEFER makes this objectively visible through certifications according to internationally applicable standards. We apply the same standards to our Business Partners and expect them to supply us only with goods and services that meet the agreed quality requirements. Under no circumstances do Business Partners supply counterfeit goods to SSI SCHAEFER. With regard to product safety and conformity, Business Partners always comply with legal requirements and agreed standards.



Violation of the Code of Conduct:

The requirements and principles of conduct of this Code of Conduct are an essential part of the cooperation with our Business Partners, which is why any violation of this Code of Conduct constitutes an impairment of the business relationship between SSI SCHAEFER and the business partner. For this reason, SSI SCHAEFER reserves the right to check compliance with the Code of Conduct at any time and in an appropriate manner. The business partner shall name a responsible contact person for this purpose. The announcement of the review will be made in due time and SSI SCHAEFER undertakes to communicate the result of the review to the business partner in a timely manner. Without prejudice to further rights, SSI SCHAEFER reserves the right to demand clarification of the facts and initiation of countermeasures in the event of any identified or suspected violations of this Code of Conduct. If the business partner demonstrably fails to initiate suitable improvement measures within a reasonable period of time or if the violation is so serious that a continuation of the business relationship becomes unreasonable for SSI SCHAEFER, SSI SCHAEFER reserves the right, without prejudice to further rights, to terminate the contractual relationship concerned without notice or to withdraw from the contract concerned.

Creation of reporting possibilities about unlawful behavior

Our Business Partners must promote and establish communication channels for their employees to file complaints or report possible unlawful conduct without fear of reprisal, intimidation or harassment. Each communication shall be treated confidentially. Business Partners must investigate and, if necessary, take action based on the reports. They must notify SSI SCHAEFER of any legal action, administrative investigation, or criminal prosecution that could affect their work for SSI SCHAEFER or damage their own or SSI SCHAEFER's reputation. If at any time a Business Partner or one of its employees believes that an employee of the SSI SCHAEFER Group has violated these principles, the Business Partner or its employee should raise its concerns with the SSI SCHAEFER Group Compliance team. If you are unsure or have any questions, please contact your relevant contact person at SSI SCHAEFER.

SSI SCHAEFER Business Partners can also use the SSI SCHAEFER Group whistleblower system at <https://www.bkms-system.com/ssi-schaefer> to report violations of this Code of Conduct and other grievances. Our Business Partners are encouraged to report in particular (potential) violations of internationally recognized human rights and other dangers to the life and health of people and the environment via the whistleblower system. It is irrelevant whether the dangers arise directly from SSI SCHAEFER's business activities or are associated with them in an indirect way. Individuals who report concerns or (suspected) violations or hazards in good faith, even if they ultimately prove to be unjustified, do not have to fear reprisals, as 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>

Declaration of consent

We hereby agree to the provisions of the Code of Conduct for Business Partners of the SSI SCHAEFER Group and undertake to comply with them within the business relationship with SSI SCHAEFER.

Place, date

Company

Name

Position, department

Signature

