



C | O | D | E OF CONDUCT

Connections that create value



Marco Schwer

Managing Director / CEO Schwer Fittings GmbH

FOREWORD

Dear employees,

We can only achieve our goals together!

That is why we always align our thinking and actions with teamwork. We always work as a team and strive to continuously strengthen our team spirit. For us, successful and trustworthy collaboration means putting ourselves in others' positions and treating each other with appreciation, honesty, and tolerance.

Honesty is of utmost importance in our daily work. This means that we remain truthful even when it is difficult. If we make a mistake, we openly admit it so that we can correct it together and avoid it in the future.

Whether in person, by phone, or via email – we are committed to maintaining a friendly and respectful tone in our interactions with customers, partners, and colleagues.

We treat our colleagues with respect, even if they have different opinions. We also show our respect through punctuality and adherence to deadlines.

We value and recognize the achievements of every individual, regardless of their function or position. At Schwer Fittings, everyone contributes to the development of our company.

We recognize and appreciate the uniqueness of each team member and business partner. Each person makes a unique contribution to our shared success. Tolerance toward other cultures, ethics, and countries of origin is a fundamental principle for us.

Everyone wants to be valued as an individual and receive constructive feedback on their performance. Therefore, we express criticism openly and constructively to uphold the dignity of the person being criticized and promote respectful interactions.

The knowledge and skills of our team members are our most valuable assets. Our expertise reaches its full potential when we see ourselves as a true community, where everyone is willing to share their knowledge and experience.

At Schwer Fittings, we are committed to sustainable action and environmentally conscious decisions. We strive to minimize our ecological footprint by implementing resource-efficient processes, reducing waste, and utilizing renewable energy sources.

We take responsibility for protecting our environment and promoting sustainable measures across all areas of our business.



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MISSION

„Through first-class quality and excellent service, we achieve sustainable business growth. A long-term partnership with our customers and suppliers is important to us.

Due to smart financial planning and building strong reserves, we secure the future and create a solid foundation to ensure innovation and stability for us and our partners.

We rely on the careful selection and development of our employees, so that together we can identify opportunities and challenges early and master them successfully.

Moreover, we foster an open and respectful workplace culture, which promotes an inspiring and supportive environment for everyone involved.“

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ABOUT THIS CODE OF CONDUCT

We are a globally active company, firmly rooted in the SME sector, owner-managed for generations and based in southern Germany. And we are proud of that!

This results in our responsibility towards our environment, the people we work with and the society in which we operate on a daily basis. We firmly believe that ethical behaviour is not only a legal necessity, but also a moral obligation.

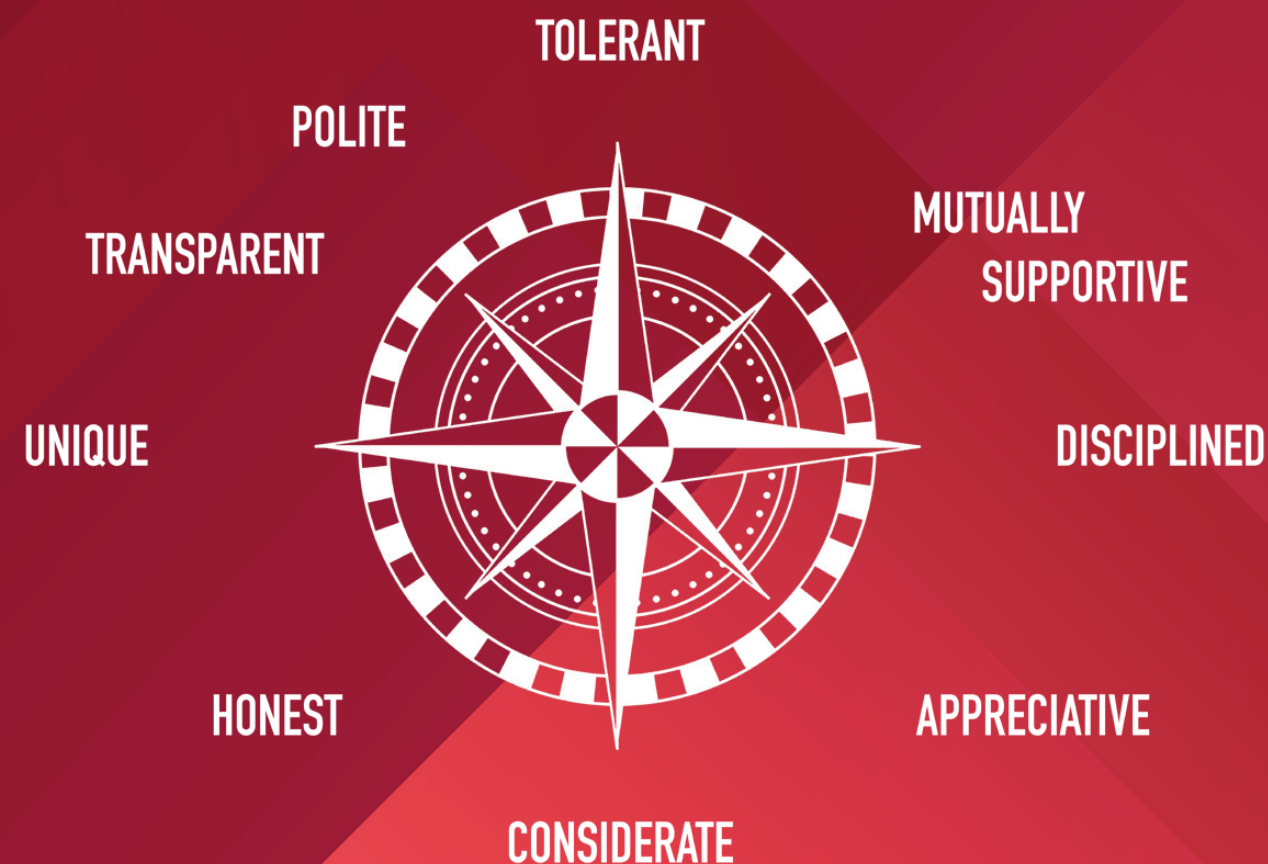
This Code of Conduct forms the foundation for our ethical behavior and business relationships. It serves as a guide for all employees and our business partners, ensuring that our daily actions align with our values, legal requirements, and the highest ethical standards.

We expect everyone to familiarize themselves with this Code of Conduct and apply it in their daily work. Our leadership team bears a special responsibility to act as role models and ensure that this Code is practiced within their teams.

At the same time, we encourage all employees to ask questions and raise concerns if they become aware of potential violations or have uncertainties.



Schwer Fittings is...



Together, we are a strong, ethical, and sustainably operating company that strives not only for economic success but also fulfills its social responsibility!

This Code of Conduct aligns with internationally recognized Environmental, Social, and Corporate Governance (ESG) standards.

ENVIRONMENTAL RESPONSIBILITY

OUR ECOLOGICAL PRINCIPLES

We recognize the importance of environmental protection and sustainable practices for present and future generations. We commit to designing our business activities in ways that preserve the environment and conserve natural resources.

Sustainability is a core component of our corporate strategy and daily operations in all business areas. We continuously seek ways to reduce our ecological footprint and improve our environmental performance.



1.1 Sustainability through product quality

Our products are of the highest quality and designed for long-term use. If defects occur, our products can be repaired whenever possible rather than discarded and replaced.

1.2 Waste and emissions management

We promote recycling, reuse, and waste avoidance throughout our company. This is why we minimize packaging and avoid unnecessary waste-generating materials.

We categorize, monitor, review, and treat emissions (including air and noise emissions as well as wastewater) from our operations and manufacturing processes before we release, discharge or dispose of them.

Additionally, we continuously implement measures to reduce the production of harmful emissions.

1.3 Hazardous substances

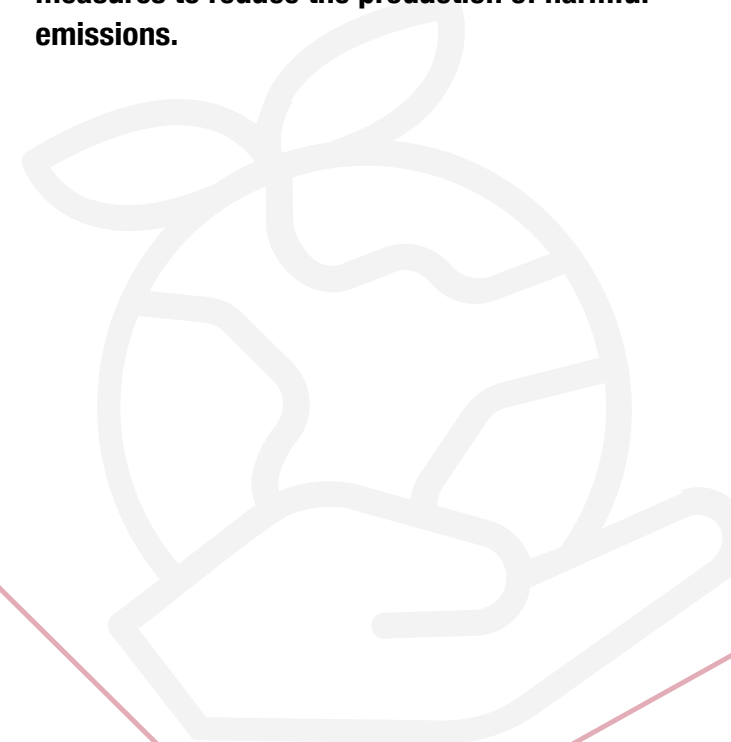
We identify chemicals and other materials that may pose environmental hazards and ensure that they are handled safely at all stages, including transport, storage, usage, recycling, and disposal, to protect both people and the environment.

1.4 Sustainable use of raw materials and natural resources

We aim to develop, manufacture, transport, and dispose of our products in the most environmentally friendly way possible.

To achieve this, we reduce the use and consumption of resources during production and minimize all forms of waste, including water and energy.

This reduction is achieved directly at the source or through various methods such as process modifications, alternative materials, efficiency improvements, recycling, or reuse of materials.



2 SOCIAL RESPONSIBILITY

OUR SOCIAL PRINCIPLES

We recognize our social responsibility and are committed to making positive contributions to society. We believe that our economic success is inextricably linked to the prosperity and sustainability of the communities in which we operate.

Therefore, we strive to act socially responsible in all our activities and positively impact society.



2.1 Human Rights

We respect and promote compliance with international human rights standards as fundamental, non-negotiable rights of every individual. Our company strictly rejects all forms of forced, slave, and child labor.

We respect employees' rights to form and join organizations of their choice, engage in collective bargaining, and strike.

Members of organizations representing employees' interests may not be discriminated against on the basis of their founding, joining or membership of such an organization.

Employee representatives must be granted free access to workplaces to ensure that they can exercise their rights in a lawful and peaceful manner.

We believe that a pleasant working atmosphere is a prerequisite for the success of any company.

2.2 Exclusion of Forced and Compulsory Labor

We oppose forced labor, slavery, and any similar forms of labor. All work must be voluntary and free from coercion. Employees must be able to terminate their employment at any time without fear of punishment. Additionally, unacceptable treatment of workers, such as psychological abuse, sexual or personal harassment, or humiliation, is strictly prohibited.

2.3 Fairness and Responsibility towards Our Employees

As a company headquartered in Germany, we adhere to strict labor protection regulations.

We pay fair and appropriate salaries and never fall below the applicable minimum wage regulations.

We ensure that employees are not subjected to excessive working hours and receive their rightful vacation time.



We therefore do not tolerate discrimination or unequal treatment of employees, for example on the basis of origin, physical condition, gender, religion, age or sexual orientation. We respect the personal dignity, privacy and personal rights of our employees and business partners.

We thrive on our expertise, which is why we encourage and promote both internal and external training for our employees.

We promote internal cohesion and the health of our employees through joint events and fitness programs.



Problems can and should be addressed openly with us, including the possibility of submitting complaints anonymously.

There is an internal reporting center on our website under the heading 'Whistleblower Protection Act', which can be used to submit confidential information. We follow up on the information we receive and rectify any irregularities where possible.

2.4 Occupational safety

We are responsible for a safe and healthy working environment. By setting up and applying appropriate occupational safety systems, we take the necessary precautions against accidents and damage to health that may occur in connection with our work.

Our employees are regularly trained and instructed in safety and health-related topics.

2.5 Community Engagement

We are part of our social environment and support it in socially positive matters. We support charitable organizations and events in our region. We support educational organizations with student research projects and in other areas of research and training.

We firmly believe that no other area has such a positive impact on personal development, team spirit, health promotion and social cohesion in society as sport. This is why we are committed to promoting grassroots sport.

We support and promote the voluntary commitment of our employees, e.g. by giving them time off for emergency missions in rescue organizations.



CORPORATE GOVERNANCE

PRINCIPLES OF CORPORATE MANAGEMENT

We strictly adhere to the applicable national, European and international legal requirements, including antitrust and competition law, customs and import regulations, export controls of national and third countries as well as regulations on economic and military sanctions.

We do not rely only on our own self-assessment, but also have our processes continuously monitored by an independent body. Identified grievances are consistently pursued - including the ones at personnel level.



3.1 Product Quality, Compliance, and Safety

As a renowned German manufacturer, we place the highest value on delivering products and services of the utmost quality and safety.

Conformity with all relevant legal and regulatory requirements and ensuring the safety of our products are central components of our business philosophy.

We regularly train our employees to ensure that they are aware of the latest developments and requirements relating to product conformity and safety. We work closely with our business partners to ensure that they also comply with our high standards in terms of product conformity and safety. Should problems arise with our products despite all precautionary measures, we react quickly, straightforwardly and responsibly.

We forbid bribery and corruption in any form and take care not to become involved in possible money laundering activities.

Our employees may not grant or accept benefits to or from customers, suppliers or other decision-makers in order to receive preferential treatment or to offer the prospect of preferential treatment in return. Our employees are strictly prohibited from giving or receiving gifts of money or excessive gifts.

3.3 Conflicts of Interest

We make our decisions solely on the basis of objective criteria and do not allow ourselves to be influenced by extraneous or private interests or relationships.

3.2 Anti-Bribery, Anti-Corruption, and Anti-Money Laundering

We are aware that bribery, corruption and money laundering cause enormous social and economic damage.



3.4 Confidentiality / Data Protection

We protect the personal data of our business partners, customers, suppliers, and employees. Personal data is collected, processed, and used only in accordance with legal requirements.

We adhere to the data protection regulations and take into account the comprehensive rights of the persons whose data is collected, processed, secured, used and deleted.

3.5 Intellectual Property

We respect intellectual property rights and organize the transfer of technology and know-how transfer in such a way that intellectual property rights and customer information are protected.

3.6 Import and Export Controls

We pay strict attention to compliance with all applicable laws for the import and export of goods, services and information. We also take into account the applicable sanctions lists.

3.7 Conflict Minerals

We reject the use of conflict minerals within the meaning of the European Conflict Minerals Regulation (EU) 2017/821 and the Sarbanes-Oxley Act.

We do not source our raw materials from conflict and high-risk areas and also expect our suppliers to ensure that the materials and raw materials supplied to us do not contain any conflict minerals that finance armed groups and cause human rights violations.

3.8 Review / Audits

We are committed to regularly conducting and participating in audits by independent auditors to ensure compliance with internal guidelines, external regulatory requirements and the ongoing reduction of our environmental footprint.

Audits are an essential tool for evaluating our performance and continuously improving our processes. We expect our employees and business partners to actively participate in audits and support the auditors.

We take the results of audits seriously and take appropriate measures to rectify identified deficiencies and implement improvements. We promote a corporate culture in which audits are seen as positive and valuable tools for improvement.





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