



C | O | D | E OF CONDUCT

Connections that create value®



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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 and environmentally responsible business practices. Environmental and climate protection considerations are systematically integrated into our decision-making processes, and we continuously strive to use resources responsibly and efficiently.

Our objective is to prevent or reduce environmental impacts, minimize waste, increase the use of renewable energy sources, and appropriately consider the effects of climate change in our business decisions.

We take responsibility for protecting the environment and promote sustainable practices across all areas of our business.

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Connections that create value®



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.“

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.

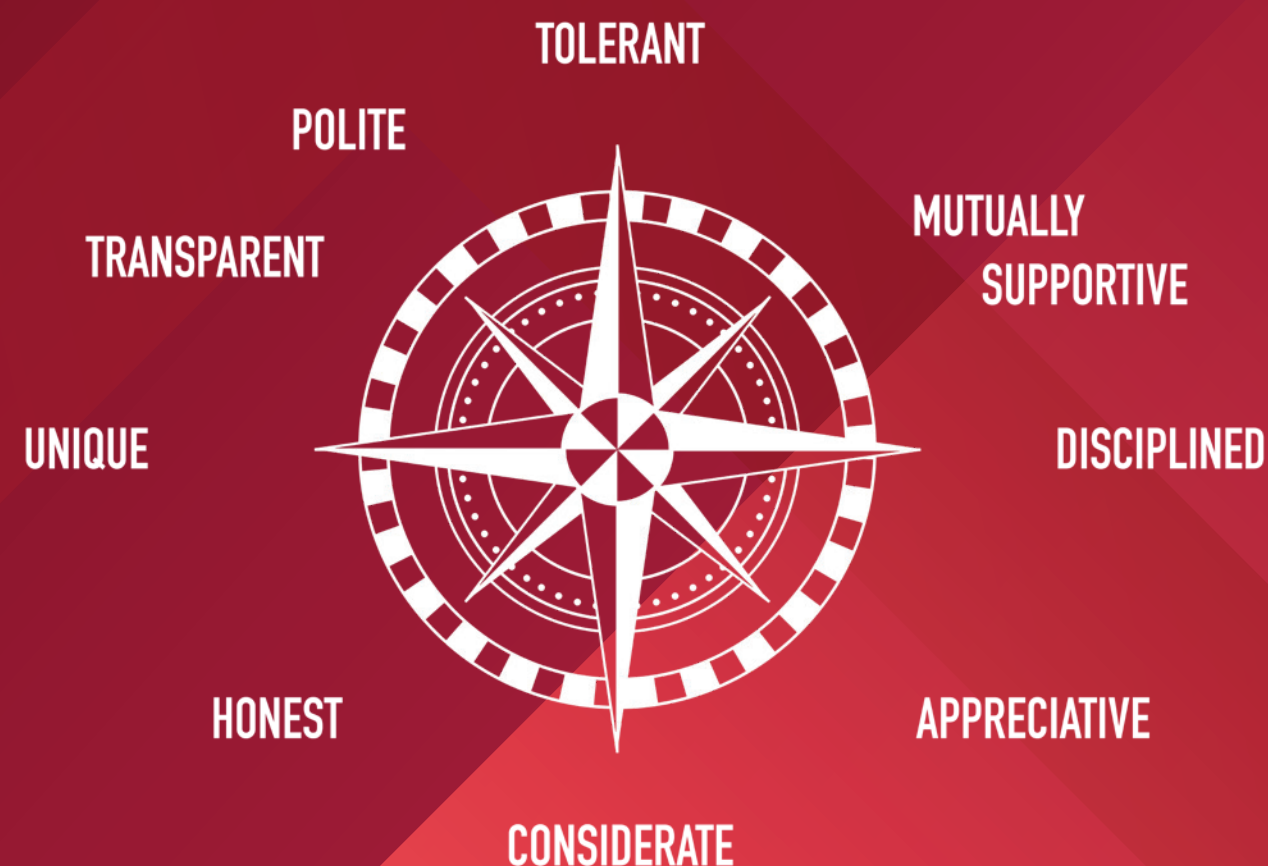
This Code of Conduct forms the foundation for our ethical behavior and business relationships. It serves as a guide for all employees and our business partners, ensuring that our daily actions align with our values, legal requirements, and the highest ethical standards.

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.

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.

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.

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.

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.

1.5 Environmental and Energy Responsibility

Schwer Fittings is committed to the responsible use of energy, water, and materials. We continuously monitor our consumption, invest in energy-efficient production equipment, and continually optimize the use of materials throughout our operations.

Environmentally responsible practices are embedded in our corporate objectives. Specific environmental and sustainability targets are defined on a regular basis, relevant measures are systematically reviewed, and progress is assessed as part of the annual management review.

The detailed framework for our environmental objectives, measures, and performance indicators is set out in the Management Policy of Schwer Fittings GmbH and in our environmental management system in accordance with ISO 14001.

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

1.6 Climate Change

We actively contribute to climate protection by continuously reducing energy consumption, promoting short and regional transport routes, and implementing resource-efficient and low-emission production processes.

Climate-related risks and opportunities are systematically evaluated within our management system and considered in our strategic business planning and decision-making.

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 internationally recognized human rights standards as fundamental and non-negotiable rights inherent to every individual. Our company rejects all forms of forced labor, slavery, child labor, and any violation of fundamental human rights.

2.2 Prohibition of Forced and Compulsory Labor

We oppose all forms of forced labor, modern slavery, and any comparable practices. All work must be voluntary and performed without the threat of punishment. Employees must have the freedom to terminate their employment at any time in accordance with applicable laws and regulations.

Furthermore, we do not tolerate any unacceptable treatment of workers, including psychological or physical abuse, harassment, humiliation, or intimidation.

2.3 Fairness and Responsibility towards our Employees

As a company headquartered in Germany, stringent labor and employee protection laws is a fundamental part of our corporate responsibility.

We provide fair and appropriate compensation and, under no circumstances, pay below the applicable minimum wage requirements.

We ensure that our employees are not required to work excessive hours and receive their entitled vacation and rest periods.

We respect our employees' right to establish and join organizations of their choice, engage in collective bargaining, and participate in lawful strikes. Members of employee representative bodies shall not be discriminated against or disadvantaged because of the establishment of, membership in, or participation in such organizations.

Employee representatives are granted access to workplaces in accordance with applicable legal requirements to ensure that they can exercise their rights in a lawful and peaceful manner.

A positive working environment is, in our view, an essential prerequisite for the success of any organization.

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

Employees are assigned tasks according to their qualifications, skills, and capabilities to ensure the safe and successful performance of their duties.

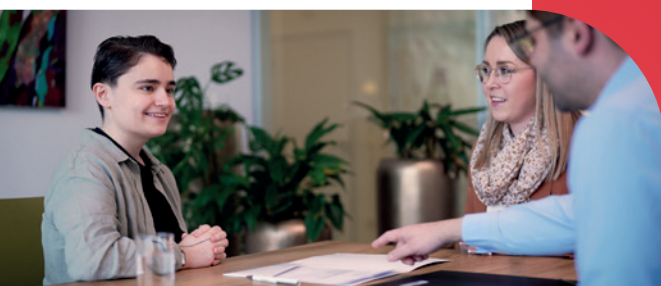


When designing workplaces and work processes, we consider not only professional requirements but also the physical and psychological demands placed on employees and promote a healthy working environment.

Our success is built on our expertise. Therefore, we support employee development, teamwork, and well-being through internal and external training opportunities, joint activities, and fitness programs.

Employees are encouraged to raise concerns openly. Confidential and anonymous reporting channels are also available.

Our website provides an internal reporting channel under the section “Whistleblower Protection Act,” through which confidential reports can be submitted.



We investigate all reports received and, where possible, take appropriate corrective action to address identified issues.

2.4 Occupational Health and Safety

We are committed to providing a safe and healthy working environment. Through the establishment and implementation of appropriate occupational health and safety management systems, necessary preventive measures are taken to protect employees from accidents and work-related health risks.

Our employees receive regular training and instruction on occupational health and safety topics.

2.5 Social Responsibility and Community Engagement

We are part of the communities in which we operate and support initiatives that contribute positively to society. We support charitable organizations and community events in our region. We also support educational institutions through student research projects and other research and training activities.

We firmly believe that no other field has such a positive impact on personal development, team spirit, health promotion, and social cohesion as sport. Therefore, we actively support grassroots and community sports initiatives.

We encourage and support the voluntary engagement of our employees, for example by granting leave for emergency response duties with rescue and relief organizations.

2.6 Ethics and Integrity

Ethical, fair, and lawful conduct is a fundamental part of the corporate culture of Schwer Fittings. Our actions are guided by integrity, transparency, and a sense of responsibility.

Our ethical principles:

We act at all times in compliance with applicable laws, standards, and internal rules and policies.

Bribery, corruption, improper benefits, and other unfair business practices are not tolerated.

Decisions are made objectively, transparently, and independently of personal interests.

Conflicts of interest must be disclosed without delay and managed appropriately.

We communicate openly, honestly, and respectfully with customers, business partners, and colleagues.

Ethical conduct is also a leadership responsibility. Managers have a special obligation to act as role models, communicate these values, and actively promote compliance with them.

Violations of this Code of Conduct, legal requirements, or internal policies may be reported confidentially through the established reporting channels or the whistleblowing system.

All reports are reviewed objectively and carefully. Individuals who report concerns in good faith are protected against discrimination, retaliation, or any other form of adverse treatment.



3 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 safety of our products are central components of our business 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.

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

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

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

3.4 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.

We also expect responsible, legally compliant, and sustainable business practices throughout our supply chain. Suppliers are assessed against defined quality, environmental, and compliance criteria.

Environmental certifications, material sourcing, resource efficiency, and compliance with applicable legal requirements (e.g., REACH and RoHS) form an integral part of our supplier evaluation process.

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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Focus in details®