

## CODE OF CONDUCT AND ETHICS

For employees, customers, and business partners of  
S.K.H. Schaltanlagenbau und Industriemontage GmbH

The Code of Conduct and Ethics of S.K.H. Schaltanlagenbau und Industriemontage GmbH (hereafter referred to as “S.K.H. GmbH”) states the principles, expectations, and prerequisites to be respected, followed, and observed by our employees, irrespective of the legal systems of other countries involved, as well as the standards to be respected, followed, and observed by the customers and business partners of the company and their employees and business partners.

The Management of S.K.H. GmbH expressly declares that they will meet this requirement applying to itself and to company staff with regard to internal and external relations, namely to adhere to ethical principles in business life, based on national laws and international treaties. The more stringent rules should always take precedence, whether these are laid down by national legislation or our ethical guidelines. These obligations are not only intended to ensure that our actions comply with applicable laws and regulations but also to secure and maintain the trust of our customers, employees, suppliers, and other partners in the long term.

Every day, the requirements of our customers define our thoughts and actions in global business life. As a result, the interaction between staff members and business partners of S.K.H. GmbH requires compliance with legal regulations and self-regulatory ethical guidelines that also facilitate a healthy environment. The company management of S.K.H. GmbH is responsible for the communication of these requirements to every individual employee and for their compliance with the guidelines. Reaching this objective depends on several pillars and joint efforts. We ask our employees to carefully read the present Code of Conduct and expect them to base their daily conduct on the use of these guidelines.

January 2024



Martin Wratzlawek

## COMPLIANCE WITH LAWS

### **Antitrust and competition laws**

S.K.H. GmbH instructs its employees and subsuppliers to comply with all applicable antitrust and competition laws to guarantee free and fair trade. Knowledge, understanding, and compliance with the applicable legal system is assumed or conveyed.

S.K.H. GmbH prohibits competitive agreements and instructs company employees to refrain from any kind of agreements with competitors relating to prices, discounts or sales conditions, production limitations, market or customer sharing, coordination of quotations, or boycott of customers and suppliers.

It is strictly forbidden to coordinate activities or enter into agreements with third parties if such activities or agreements could restrict competitors' access to the market or hinder free competition and distort price levels and market shares.

### **Sanctions and export control laws**

All applicable laws that prohibit business relationships with sanctioned countries, organizations, or individuals must be observed. S.K.H. GmbH instructs its employees to strictly comply with all legal regulations relating to the import and export of goods and services.

### **Money-laundering act**

S.K.H. GmbH ensures that legal regulations pertaining to money laundering be complied with in all business transactions.

### **Antibribery and anticorruption laws**

Antibribery and anticorruption laws must be observed in all cases.

### **Benefits**

S.K.H. GmbH prohibits both the attainment of unreasonable business advantages through benefits of any kind to persons or organizations and the acceptance of such offers. S.K.H. GmbH tolerates neither active corruption by offering nor passive corruption by accepting bribes, benefits, gifts, or promises to obtain a privilege for the company in the form of orders, employment, or other favorable decisions, or for oneself in the form of obtaining benefits or abusing the position.

With respect to gifts and invitations to customers or from suppliers, S.K.H. GmbH believes that this is acceptable only to the extent that such gifts or invitations are reasonable, infrequent, and offered transparently on occasions that are not likely to affect the course of a business transaction or decision that may influence the activities of S.K.H. GmbH. Gifts and invitations must never be linked to a specific purpose. Invitations to restaurants must be in connection with special occasions and be within reasonable bounds.

### Donations

S.K.H. GmbH does not make donations to obtain unjustified benefits, or in countries where they are illegal. Donations must always be made altruistically and in compliance with the law, especially with regard to tax legislation.

### Transparency

The proper keeping of business records and documents is obligatory and ensures the transparency of all internal and external business transactions.

S.K.H. GmbH prohibits the acceptance or issuance of invoices that do not comply with the services provided and any other action that does not correctly, completely, and accurately reflect the accounts and activities of the company. Any kind of payment without disclosing the payer or recipient of the payment, or payment that is made under a false or invented name is prohibited. There must be proof of the actual provenance and purpose of every amount.

## SUSTAINABILITY AND HUMAN RIGHTS

### Sourcing of materials from crisis areas

Even though S.K.H. GmbH does not maintain production facilities and first and foremost considers itself a service provider, we require that upon procurement of all elements of our products and services, the use and source of the materials be disclosed upon request. As we do not maintain production facilities, our company does not use minerals such as gold, tin, tungsten, or tantalum.

### Environmental sustainability

S.K.H. GmbH gives great importance to reducing the exploitation of resources. Besides compliance with applicable environmental laws, the evaluation and monitoring of the environmental footprint of business activities are expected. The use of substances that are hazardous for humans and nature is to be avoided.

All resources, waste, and emissions must be kept to a minimum. If possible, materials are to be recycled and hazardous substances must be stored or disposed of safely and properly.

We have appointed an employee to ensure that in all departments, only sustainable materials are used, for instance for cleaning our premises. For the procurement and management of our car fleet and office equipment, we take into account both economic and ecological factors.

**“Considering the end of everything you do –  
that’s sustainability.”**

– Eric Schweitzer –

### Respect of human rights

All applicable human rights standards must be respected. S.K.H. GmbH is committed to the Declaration of Human Rights adopted by the United Nations and to social and labor standards, especially the internationally agreed core labor standards of the International Labour Organisation (ILO). It is mandatory to comply with the existing laws on the prohibition of child and forced labor, on minimum wages, social-security benefits, overtime, working time, and working conditions. The employment of minors is subject to the strict regulations and definitions of the Youth Employment Protection Act. S.K.H. GmbH provides its employees with remuneration and other benefits that are at least at the level of equivalent national economic sectors. Pursuant to the applicable legal regulations, membership in trade unions or workers' associations must be permitted to every employee.

It goes without saying that forced labor as well as harassment, mobbing, and discrimination based on gender, racial or ethnic origin, religion, physical disability (we promote inclusion), or any other legally protected characteristic are prohibited. For this reason, healthcare, protection in the workplace, equal rights, fairness as well as protection against discrimination with regard to ethnic origin (protection of indigenous peoples), gender (women's rights, rights of diverse people), and age are of the greatest importance to us. Any incidents of human rights violations, such as racist posts by employees on the internet, that become known to the company management may result in the immediate termination of the work contract.

**“All human beings are born free and equal in dignity and rights.  
They are endowed with reason and conscience and should act  
toward one another in a spirit of brotherhood.”**

– Extract of Article 1 of Universal Declaration of Human Rights –

## HANDLING OF INFORMATION

### **Protection of data and trade secrets**

Any data and confidential information about S.K.H. GmbH and/or its business partners are to be treated with the utmost care. Confidential information, whether communicated in person or in electronic form, is subject to a nondisclosure agreement that regulates the processing and potential transfer to third parties of contractual, proprietary, and internal corporate matters. The nondisclosure agreement must be signed by subsuppliers of S.K.H. GmbH upon contract conclusion and is included in the employment contract of S.K.H. GmbH staff.

S.K.H. GmbH prohibits the unauthorized use, distribution, or processing of information that is considered confidential and belongs to the company or to third parties, as well as the theft of intellectual property (plagiarism). This applies in particular to ideas, know-how, financial information, technical and sales practices or offers, and company-related and/or private information about business partners.

All employees of S.K.H. GmbH are bound to secrecy regarding this information, even after they have left the company. The fraudulent obtaining of such confidential information is strictly prohibited.

## COMPLIANCE IN THE COMPANY

### **Health and safety**

All laws relating to health and safety must be observed, including valid occupational health and safety guidelines. The provision of a safe and healthy workplace, individual protective equipment, and a medical concept on providing assistance to injured individuals is obligatory. At the very beginning of an employment relationship, we hand out a folder to new employees containing the most important health and safety information. In addition, all employees have easy access to the relevant current legislation. Before they start work, we take new employees on a tour of the premises and inform them about general safety-relevant aspects, such as emergency exits, fire extinguishers, first-aid kits, and assembly points.

At regular intervals, an external safety officer trains our employees on how to comply with all safety-relevant regulations. In addition, we ensure the best possible health protection in the workplace for our staff through company medical care. Before starting work on construction sites or external premises that represents a high safety risk, employees are instructed by a qualified supervisor/representative on the special hazards and on safety protection. Our in-house first aiders provide first-aid care within the company and on construction sites.

### Conflicts of interest

All business relationships are expected to be based on integrity and sound judgment. Therefore, immediate disclosure of any conflicts of interest is mandatory. Family ties or other close personal relationships between employees of S.K.H. GmbH and suppliers must be reported to prevent any potential influence on business decisions the supplier could take advantage of.

### Reporting of incidents and retaliatory measures

For S.K.H. GmbH, the freedom of expression is a valuable asset founded on the Basic Law of the Federal Republic of Germany. However, S.K.H. GmbH does not tolerate any abuse of this freedom by employees or business partners who comment in writing or verbally in a discriminatory, insulting, or threatening manner on people whose opinions they do not share because of their gender, age, skin color, culture, ethnic origin, sexual identity, religious affiliation, ideology or due to a disability.

These and any other violations of this code must be reported to the company management of S.K.H. GmbH. Should the subsequently introduced corrective actions not be effective, depending on the situation, consequences extending to the suspension or termination of an employment or business relationship might ensue.

All employees as well as business partners of S.K.H. GmbH can send information, questions, violations, or any other remarks by mail to [codeofconduct@skh-gmbh.com](mailto:codeofconduct@skh-gmbh.com). All information provided will be treated with strict confidentiality. If reprisals can be expected, incidents may also be reported anonymously.

Our internal reporting office for the submission of confidential information for the protection and promotion of a transparent working environment of integrity (in accordance with the Whistleblower Protection Act) can be reached at any time at [whistle@skh-gmbh.com](mailto:whistle@skh-gmbh.com).