

SIEGENIA GROUP

Code of Conduct

Introduction

Companies are places where people work together, ideally pursuing a common goal and voluntarily putting their personal interests aside to achieve this common business goal.

Sooner or later, a company develops certain ways of behaving that are typical for that company: its company culture. It determines – often without being explicitly written down – how people behave, what they can do and what they should avoid.

The bigger a company becomes and the more people there are – in various positions, with a range of responsibilities and points of contact among other employees and among customers, suppliers and other interested parties – working to achieve the company's goals, the more important it becomes to define both desirable and undesirable behaviour in a way that is easy for everyone to understand.

It goes without saying that this conduct must always remain within the bounds of the law and the recognised ethical and moral principles of our society. It stands to reason that our actions should be guided above all by sound judgement and respect for others.

SIEGENIA is a fourth-generation family-run company that enjoys successful partnerships with customers, suppliers and stakeholders in many countries around the world, based on mutual respect. As such, the behaviours described in the following Code of Conduct always serve as our first point of reference. Guided at all times by our values and guiding principles.

Best regards,

Wieland Frank

Managing Partner
of the SIEGENIA GROUP

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Conduct in a business environment

1. Compliance with the law

Background

The success of the company is critically dependent on all employees, managers and directors acting with honesty and integrity and in an ethical manner. Ethical and law-abiding conduct builds trust among employees and business partners alike.

We uphold our values and guiding principles and conduct ourselves accordingly.

SIEGENIA principle

As a medium-sized family business, SIEGENIA considers compliance with the law to be of the utmost importance. At our various sites around the world, we are committed to acting in accordance with both national and international requirements. This enables us to establish and develop trust and a sense of dependability.

Our employees therefore receive regular training and guidance to ensure that they act in accordance with the law.

We investigate all reports of legal violations. Measures are introduced to address these violations and, if necessary, appropriate disciplinary action is taken.

Where local or other regulations are stricter than the principles set out in this Code of Conduct, the stricter regulations shall apply.

2. Confidentiality and protection of company assets

a. Confidentiality

Background

Trade and company secrets, technical expertise and intellectual property constitute the basis for successful business practices. Unauthorised disclosure of this information could result in significant damage to SIEGENIA and put the company at a considerable competitive disadvantage.

SIEGENIA principle

SIEGENIA has extensive measures in place to protect confidential information. Both SIEGENIA employees and our business partners are subject to confidentiality obligations. In particular, business partners are not permitted to disclose to third parties, without authorisation, any information obtained in the course of a planned or existing business relationship with SIEGENIA. This does not apply to publicly available information. Steps must be taken to prevent damage resulting from the misuse of company information.

All SIEGENIA employees receive regular training and awareness sessions on this topic.

b. Company assets

Background

SIEGENIA's tangible and intangible assets help its employees to achieve the company business objectives. This forms the basis for successful business activities.

SIEGENIA principle

SIEGENIA places great importance on the responsible handling of company assets of all kinds (e.g. products, work equipment, IT equipment or intellectual property). They should not be used for any purposes unconnected with the company.

SIEGENIA employees must be familiar with and abide by the applicable SIEGENIA guidelines (e.g. work instructions, process descriptions).

3. Conflicts of interest

Background

In the course of their day-to-day work, SIEGENIA employees' private interests may conflict with the interests of SIEGENIA. Conflicts of interest may arise, for example, as a result of secondary employment or the establishment of companies with competing business activities.

If SIEGENIA employees put their personal interests before SIEGENIA's interests, this can result in damage to SIEGENIA.

SIEGENIA principle

Our employees' personal interests are respected and protected. We do, however, want to avoid any conflicts between private and business interests. Business decisions should be made based on objective criteria.

If SIEGENIA employees become involved in a conflict of interest, they must contact their manager or the Compliance Officer. Appropriate measures are then taken to avoid or resolve any conflict of interest. These measures ensure that the interests of the company and its employees are aligned as closely as possible.

SIEGENIA employees are also required to abide by the terms of their employment contracts.

4. Data protection & IT security

Background

The protection of personal data and privacy is the basis for a relationship built on trust. There are extensive legal regulations governing the protection of personal data and how it is handled, such as the EU General Data Protection Regulation (GDPR), the German Federal Data Protection Act (BDSG), the data protection laws of the federal states (e.g. DSG NRW) and foreign data protection regulations (e.g. Chinese data protection law).

Personal data includes, for example, a person's name, salary, address, personnel number, car registration number, etc. and therefore includes any data that can be directly or indirectly linked to a natural person.

The collection, storage, processing and any other use of personal data may only be carried out with the consent of the data subject, or if it is covered by a contractual relationship or some other legal framework.

SIEGENIA principle

At SIEGENIA, extensive measures are in place to ensure that the personal data of employees, customers, suppliers and other parties affected is protected.

An external company data protection officer and an internal data protection coordinator have been appointed at group level. The most recent external appointment can be viewed in inSIght and at www.siegenia.com/en. Data protection enquiries should be addressed to the SIEGENIA data protection coordinator for more effective coordination.

All employees must comply with the company's internal regulations regarding data protection and IT security. In addition to personal data, other sensitive information sent for example, via email, MS Teams and other communication channels must also be appropriately protected according to the level of risk associated with the information.

The use of unauthorised hardware and software and other IT applications is not permitted. Additional information can be found in the relevant IT guidelines, company agreements and local guidelines.

SIEGENIA continuously improves its IT security measures to protect against damage caused by criminals, such as cyber attacks. Employees are given regular training on data protection and IT security.

5. Corruption and bribery

Background

Corruption and bribery are prohibited by law and can result in fines being imposed on SIEGENIA and criminal proceedings being brought against the employees involved. Furthermore, corruption and bribery erode trust in commercial transactions, adversely and unlawfully influence decision-making autonomy and distort free competition.

SIEGENIA principle

SIEGENIA does not tolerate any form of corruption and/or bribery. Employees are prohibited from giving or accepting gifts, invitations, hospitality, personal benefits and other gratuities intended to influence their business conduct. Employees who give or accept such gratuities may face consequences under employment law and possibly even criminal prosecution.

Such gratuities are harmless when they are related to advertising activities or serve the purpose of strengthening business relationships or promoting products or services. In these cases, too, the appearance of a gratuity being given in return for a service or to influence conduct must be avoided. The gratuities must be of an appropriate value.

Donations and sponsorship activities are permitted, provided they are not used to gain unlawful commercial advantage.

Detailed information can be found in the SIEGENIA regulations relating to the acceptance of donations.

If in doubt, advice should be sought from the Compliance Officer.

6. Fair competition

Background

Competition and anti-trust law protects free and fair competition and serves the interests of all market participants, including the end consumer.

Relationships and agreements with competitors, suppliers, distributors or retailers that restrict free competition are strictly prohibited by law. These include price fixing, the allocation of customers or sales territories between competitors, anti-competitive boycotts and other restrictive practices.

SIEGENIA principle

SIEGENIA operates on the basis of a market economy and free and fair competition. Business decisions are made independently and without any illegal exchange with competitors. Where SIEGENIA occupies a dominant market position, it does not abuse this.

Anti-trust guidelines are in place for attendance at external events (e.g. trade fairs, industry gatherings, etc.), which must be observed by all employees.

If employees are unsure whether certain conduct would violate competition or anti-trust laws, they should contact their manager and/or the Compliance Officer. As soon as they become aware of any actual violations of competition law, they must immediately cease the offending conduct and report it to the Compliance Officer.

7. Export controls, sanctions and embargoes

Background

The free movement of goods is subject to numerous prohibitions, restrictions and other supervisory measures within the framework of export controls. It is prohibited to do business with individuals or companies that appear on a sanctions list. Doing business with sanctioned individuals or companies can have serious legal consequences.

SIEGENIA principle

SIEGENIA takes appropriate measures to prevent business from being conducted with sanctioned individuals, companies and organisations and to prevent support for terrorist activities. Due care is taken to ensure compliance with applicable economic embargoes and import and export control regulations.

8. Prevention of money laundering

Background

Money laundering is when funds or other assets that originate directly or indirectly from criminal activity are introduced into the legal economy, thus obscuring their origin. Companies of all sizes can be exploited by criminal individuals and/or organisations for the purposes of money laundering. Severe penalties can be imposed, even if you are ignorant of the situation. Even unintentional involvement in money laundering can result in severe penalties for all parties involved.

SIEGENIA principle

The company's goal is to conduct business only with reputable partners whose business activities are in compliance with the law. We take reasonable steps to verify the identity of our customers and other business partners. Our aim is to ensure transparent payment processes. Incoming payments are assigned to the corresponding services.

We provide our employees with regular training and guidance on how to prevent money laundering.

9. Product safety

Background

Countless people use our products and services every day. It is of the utmost priority that we minimise the risk of adverse effects on and threats to the health and safety of our customers, end users and other third parties to the best of our ability.

SIEGENIA principle

SIEGENIA supplies products of excellent quality and upholds the highest safety and quality standards to ensure that its products do not pose any health risks. We only sell safe products that do not pose a risk to health, life or property. SIEGENIA is committed to producing its products in compliance with the applicable product safety regulations and standards. SIEGENIA is certified according to DIN EN ISO 9001:2015.



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Conduct towards employees

10. A fair working environment

Background

Equal opportunities and mutual respect are the basis for free and open interaction between SIEGENIA employees. This helps to foster an efficient, creative and tolerant working environment.

SIEGENIA principle

SIEGENIA places a high value on equal opportunities for all employees and the equal treatment of all employees at all management levels. In addition, mutual respect forms the basis of our working relationships. Discriminatory or offensive conduct will not be tolerated and will be dealt with swiftly. We are committed to the SIEGENIA values and guiding principles, as well as the applicable country-specific employment laws and regulations. We scrutinise our actions to ensure that they are always in line with these values and regulations.

11. Occupational health and safety

Background

The health and safety of our employees is of the utmost importance to SIEGENIA. Risks that could jeopardise the health and well-being of our employees or lead to accidents are minimised as far as possible.

SIEGENIA principle

All legal measures for occupational health and safety in the workplace are complied with to the best of our ability. We continuously review and monitor those areas where we can further improve occupational health and safety. In addition, we constantly review our health promotion measures and adjust them as needed to continuously improve the health, performance and job satisfaction of our employees.

12. Human rights

Background

Human rights are enshrined in the United Nations Universal Declaration of Human Rights and the European Convention for the Protection of Human Rights and Fundamental Freedoms. These reflect the expectations of the international community and thus of companies and their employees.

SIEGENIA principle

SIEGENIA respects the human rights and personal rights of our employees and of all employees throughout the entire supply and value chain. We do not accept any human rights violations and will take immediate action if any such violations occur.

In particular, we do not tolerate child or forced labour, discrimination against employees, unsafe working conditions or negative environmental practices. We respect all country-specific rights regarding freedom of association and collective bargaining.

We require our suppliers to comply with our Code of Conduct for Suppliers, which can be found on the SIEGENIA homepage under 'Company'. Our stance on human rights is set out in the SIEGENIA Policy Statement on Human Rights Strategy. This can be found on the SIEGENIA homepage under 'Company'.

13. Environment and sustainability

Background

Efficient and environmentally friendly production and distribution of products is the basis for successful economic activity and is an important factor in SIEGENIA's competitiveness.

SIEGENIA principle

SIEGENIA complies with applicable environmental standards and requirements. We are constantly improving the efficiency of the resources and energy used in the production and distribution of our products. We use resources responsibly throughout the entire production process. In addition, we intend to continue to promote climate and environmental protection by means of internal projects.

Protecting the climate and the environment is part of our corporate responsibility. SIEGENIA is certified according to DIN EN ISO 14001:2015 and DIN EN ISO 45001:2018. Our goal is to be climate neutral by 2028.

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Whistleblowing system

Internal whistleblowing system

If there is any indication or reasonable suspicion of a compliance violation, this can be reported via the SIEGENIA whistleblowing system without disclosing the identity of the individual reporting the violation. Further information can be found in inSight under 'Service – Reporting channel under the Whistleblower Protection Act'.

Examples of a possible compliance violations include, but are not limited to:

criminal acts such as fraud, theft, embezzlement and breach of trust
violations of foreign trade law, sanctions and embargoes
violations of anti-trust law
violations of data protection law and confidentiality obligations
violations of human rights or anti-discrimination rules
violations of this Code of Conduct
or similar serious violations

All employees and managers are urged to report any indications or suspicions of such violations.

External whistleblowing system

SIEGENIA also provides external parties with the opportunity to report potential compliance violations, including human rights abuses, environmental risks and breaches of duty, without disclosing their identity.

The SIEGENIA whistleblowing system and further information on it can be found on the SIEGENIA homepage under 'Company'.

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Compliance contact

If you have any questions about the SIEGENIA Code of Conduct or other compliance guidelines, you can contact the Compliance Officer in person, by telephone or in writing at any time.

The Compliance Officer is also available to advise you on any compliance-related matters. Any potential compliance violations can also be reported directly to the Compliance Officer. All queries and information provided will be treated in confidence.

SIEGENIA Compliance Officer

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