

Compliance Code of Conduct
for employees and business partners of the Schürholz Group

Compliance with all laws, including internal regulations and ethical principles, is a mandatory and essential requirement for all of the Schürholz Group's business processes.

Cases of corruption and violations of ethical principles or compliance regulations in various well-known companies have prompted the Schürholz Group to draw up its own compliance code of conduct in order to provide binding guidance to all Schürholz employees.

Like all other companies, the Schürholz Group is obliged to comply with certain national and international laws, regulations, and ordinances. This Code of Conduct is intended to present the most important rules and guidelines for employee conduct in a clear and concise form.

In addition to complying with laws and regulations, another important aspect of avoiding conflicts of interest is the uniform and binding regulation of how we deal with our business partners. This also helps to prevent possible sanctions for non-compliance with rules and laws. These rules of conduct are also intended to provide a binding basis for social and fair interaction with and between our employees.

These guidelines serve as a basis for orientation for all employees in their daily work. Appropriate training courses are designed to raise employee awareness of the relevant issues and give them the confidence to make the right decisions in "gray areas" and avoid criminal liability. These guidelines apply to all employees of the Schürholz Group.

For the Schürholz Group's business partners, this Code of Conduct serves as a guideline within business relationships.

1. Dealing with employees

The Schürholz Group expects all business partners to comply with the fundamental employee rights of the applicable national legal system. In addition, Schürholz expects recognition of the United Nations "Universal Declaration of Human Rights," the principles of the UN Global Compact, and the core labor standards of the International Labor Organization (ILO), taking into account the country-specific laws applicable at the various locations. The Schürholz Group also expects all business partners to ensure that they are not complicit in human rights violations through their actions or omissions.

We promote a culture of diversity and inclusion. Discrimination based on gender, age, race, skin color, religion, sexual orientation, disability, or other protected characteristics is not acceptable in our company. We offer equal opportunities to all employees and ensure that everyone can work in a respectful and supportive environment.

1.1 Child labor

We do not tolerate or accept any form of illegal child labor within our company.

1.2 Discrimination and harassment

The Schürholz Group rejects any form of discrimination and harassment and will prevent discrimination in the hiring of employees as well as in promotion or the granting of training and further education measures. No employee may be discriminated against on the basis of gender, skin color, age, nationality, religious affiliation, social background, disability, or sexual orientation. This applies to the entire supply chain of the company.

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1.3 Forced labor

The Schürholz Group rejects any form of slavery, forced labor, or human trafficking.

1.4 Freedom of association

The Schürholz Group respects freedom of association and the right to form interest groups. Within the framework of national laws and regulations, we grant all employees the right to represent their interests.

1.5 Remuneration and working hours

Schürholz complies with the applicable legislation on working hours. Our employees receive remuneration in accordance with the applicable laws.

1.6 Ethical recruitment:

Recruitment processes at the Schürholz Group are fair, non-discriminatory, and transparent. It is not permitted to charge employees fees for placement services or recruitment procedures.

1.7 Women's rights

The Schürholz Group promotes equality for women. Discrimination based on gender is actively avoided. Measures to protect against gender-based violence are supported and implemented.

1.8 Rights of minorities and indigenous peoples

The rights of minorities and indigenous peoples are respected. Projects in sensitive regions are only carried out with their free, prior, and informed consent, taking traditional rights into account.

1.9 Business partners

The Schürholz Group expects all business partners to also comply with the rules described in sections 1.1 to 1.8 on the basis of the applicable national legislation. If, in exceptional cases, this is not possible, the responsible contact person at Schürholz must be informed immediately in writing, stating the reasons.

2. Health and safety

The Schürholz Group expects its business partners to comply with the applicable legislation on health and safety at work. Business partners shall support the safety and health of their employees through appropriate measures, such as preventive and consistent occupational safety and a safe and healthy working environment. We encourage our business partners to introduce a company health management system. Schürholz has already introduced such a management system and certified it according to ISO 45001.

3. Environmental protection

As a company in the automotive supply industry, we strive to conserve raw materials and energy and to use legally permitted materials that do not pose a health or environmental hazard.

The Schürholz Group expects its business partners to comply with the applicable environmental laws, regulations, and standards. Furthermore, business partners are expected to establish and implement an appropriate environmental management system (e.g., in accordance with ISO 14001). Schürholz has already introduced such a management system and certified it according to ISO 14001.

3.1 Land, forest, and water rights

The Schürholz Group is committed to respecting and protecting the rights of local communities, indigenous peoples, and other stakeholders with regard to land, forest, and water. Specifically, this means:

3.1.1 Respect and compliance

All activities affecting access to land, forests, or water resources must comply with applicable laws and international standards, including the UN Guiding Principles on Business and Human Rights.

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3.1.2 Free, prior, and informed consent (FPIC)

The free, prior, and informed consent of affected communities must be obtained before any use or alteration of land, forest, or water resources.

3.1.3 Avoidance of expropriation

Expropriation and forced resettlement are strictly rejected. If the use of resources is necessary, it shall only be carried out on the basis of fair and equitable compensation, determined in agreement with the affected parties.

3.2 Protection of biodiversity

The company's activities must not lead to the destruction of forests or the pollution of water sources.

3.3 Transparency and accountability

The company is committed to transparency in the use of land, forest, and water resources. Complaints and concerns from affected communities are taken seriously and addressed in a timely manner.

3.4 Greenhouse gas emissions:

Emissions are systematically recorded, evaluated, and continuously reduced. The Schürholz Group pursues a decarbonization strategy in line with international climate targets.

3.5 Energy efficiency and renewable energies:

Efficient technologies for reducing energy consumption are promoted. The share of renewable energies is actively increased.

3.6 Water quality and consumption:

Water resources are used responsibly, and wastewater is treated and disposed of in an environmentally friendly manner.

3.7 Air quality:

Air emissions are reduced to a minimum. Legal limits are strictly adhered to.

3.8 Chemicals management:

Hazardous substances are stored, used, and disposed of in accordance with strict safety regulations.

3.9 Sustainable resource management

Resource efficiency, circular economy, and reusability are central principles of material procurement and use.

3.10 Waste prevention, reuse, and recycling

Waste prevention is a top priority. Reuse and recycling are supported and implemented in all areas of the company.

3.11 Animal welfare and biodiversity

The Schürholz Group is committed to preserving biological diversity. Animal welfare is taken into account in all corporate decisions.

3.12 Noise emissions

Noise emissions are minimized through technical and organizational measures, especially in residential areas and sensitive regions.

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3.13 Land use and deforestation

Land use takes ecological, social, and legal criteria into account. Deforestation is actively avoided and replaced by sustainable procurement measures.

3.14 Soil quality

Soil quality is preserved through protection against erosion, avoidance of contamination, and resource-conserving management.

3.15 Business partners

The Schürholz Group expects all business partners to also comply with the rules described above in sections 3.1 to 3.14 on the basis of the applicable national legislation. If, in exceptional cases, this is not possible, the responsible contact person at Schürholz must be informed immediately in writing, stating the reasons.

4. Conduct in the business environment

4.1 Prohibition of corruption, extortion, and bribery

Corruption is prohibited by international conventions (e.g., the principles of the UN Global Compact and the UN Conventions against Corruption) and national laws. Schürholz does not tolerate any form of bribery or business conduct that could give the impression of undue influence or interference, either among its employees or its business partners.

Schürholz also expects its business partners to prevent and not tolerate any form of extortion.

Schürholz expects its business partners, within the scope of their business relationship with Schürholz, neither to offer third parties any advantages of any kind, either directly or indirectly, nor to obtain advantages for themselves or others, either directly or indirectly. Nor do they allow themselves to be promised any advantages that constitute an illegal act under the applicable anti-corruption laws.

The Schürholz Group also expects its business partners not to tolerate any form of illegal payments, especially in business dealings with public officials and authorities in Germany and abroad. They must also ensure that their own employees behave and act with integrity.

4.2 Use of private or public security services

Security services are used with due regard for human rights and the rights of the communities concerned. The following principles apply to both the Schürholz Group and its business partners in this regard:

4.2.1 Respect for human rights

Security services, whether private or public, must respect human rights without restriction. Any abuse of force, intimidation, or arbitrary measures are prohibited.

4.2.2 Selection of security services

The company only works with security services that meet strict human rights standards and train their employees accordingly. Preference is given to working with security services that have committed themselves to complying with the Voluntary Principles on Security and Human Rights.

4.2.3 No discrimination

The use of security services must not lead to discrimination or unjustified persecution of communities or individuals.

4.2.4 Transparency and oversight

The company ensures transparency in the commissioning and use of security services. Complaints about security personnel are thoroughly investigated and appropriate measures are taken in the event of violations.

4.3 Invitations and gifts

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When dealing with gifts or invitations, business partners shall take great care to avoid any appearance of dishonesty or impropriety, both in general and in particular in connection with their activities for the Schürholz Group. The Schürholz Group expects its business partners not to misuse invitations and gifts to exert undue influence. Invitations and gifts to Schürholz employees or persons close to them shall only be granted if the occasion and scope are appropriate, i.e., they are of low value and can be considered an expression of locally accepted business practice. Similarly, business partners shall not demand any inappropriate advantages from Schürholz employees.

4.4 Avoiding conflicts of interest

The Schürholz Group expects its business partners to make decisions relating to their business activities with Schürholz solely on the basis of objective considerations. Conflicts of interest with private or family matters or other economic or other activities, including those of relatives or other related persons or organizations, must be avoided from the outset.

4.5 Free competition

The Schürholz Group expects its business partners to behave fairly in competition and to comply with the applicable legal provisions of antitrust and competition law. In particular, business partners shall not participate in agreements with competitors that violate antitrust law, nor shall they abuse any market position they may have.

4.6 Money laundering

The Schürholz Group expects its business partners to comply with the relevant legal obligations for the prevention of money laundering, not to participate in money laundering activities, and to support the international fight against money laundering.

4.7 Data protection and data security

Personal and business-critical data shall be processed exclusively for specific purposes, stored securely, and protected against unauthorized access.

4.8 Financial responsibility

Financial transactions are documented completely and transparently. Balance sheet fraud and any form of deception are prohibited and will be prosecuted.

4.9 Plagiarism and intellectual property

The Schürholz Group and its business partners respect the intellectual property of third parties. Innovation should be encouraged and plagiarism strictly avoided.

4.10 Export control and economic sanctions

All relevant export control regulations are complied with. Business with sanctioned countries or parties is prohibited.

5. Confidential handling of information

To protect personal information, data, and projects, business partners must store them securely and protect them from access by third parties.

The Schürholz Group expects its business partners to comply with all relevant legal regulations on data protection and to collect, process, and use personal data only under the conditions of the applicable data protection regulations.

Business partners may only use information obtained from Schürholz for authorized purposes and in an appropriate manner. All business partners of Schürholz undertake not to disclose any confidential data or trade secrets of Schürholz to third parties without authorization or to use them for their own purposes.

Confidentiality agreements concluded in individual cases take precedence.

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6. Supplier relationships

The Schürholz Group works with its suppliers in a spirit of partnership that complies with applicable laws and guidelines. Schürholz expects its business partners to communicate all of the principles and requirements described here to their subcontractors and suppliers and to take them into account when making their selection. Business partners encourage their subcontractors and suppliers to comply with the standards described in this Business Partner Code when fulfilling their contractual obligations.

7. Compliance with the Schürholz Compliance Guidelines

The Schürholz Group reserves the right to review its business relationship with any business partner in the event of deviations from the Schürholz Group Compliance Code of Conduct. In doing so, the Schürholz Group follows the principle of proportionality, meaning that Schürholz carefully examines in each individual case which consequences are appropriate, suitable, and necessary. This may lead to the immediate termination of the business relationship and the assertion of claims for damages.

8. Reporting violations

The business partner must report any suspected violations of regulations, laws, and the Schürholz Group Compliance Code of Conduct by Schürholz employees. In the event of violations, the compliance officer of Schürholz GmbH & Co. KG must be notified.

All information reported will be carefully reviewed and treated confidentially. An anonymous reporting channel is available. All reports received will be reviewed internally or, if necessary, externally.

Compliance Officer at Schürholz GmbH & Co. KG
Industriestraße 9
58840 Plettenberg
Tel.:
Fax:
info@schuerholz-group.com

Internal reporting office in accordance with the Whistleblower Protection Act:

ANKIN

Law Firm
Friedberger Anlage 27
60316 Frankfurt
www.ankin.de/hinweisformular

9. Implementation and monitoring

- Training on the compliance code of conduct is provided on a regular basis.
- Violations may result in disciplinary measures.
- Compliance is reviewed at regular intervals.

10. Concluding remarks

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Compliance with this code of conduct is the responsibility of all parties involved. The Schürholz Group is committed to actively exemplifying and further developing the standards set out in this document.

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