

Code of Conduct
CODE OF CONDUCT

Preface

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Our Code of Conduct serves as a guideline for Scholz Promotion Service GmbH and thus applies equally to everyone. It is specifically directed at senior management, executives, all our employees, and our business partners. It represents our commitment to uphold the values and principles outlined herein and signals responsible behavior towards our business partners, customers, and employees.

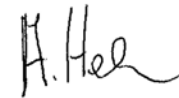
Commitment of Corporate Management

Scholz Promotion Service GmbH is committed to acting economically, socially, and environmentally responsibly. The company strives to conduct its business competently and on an ethical and moral basis, ensuring fair competition in all markets in which it operates. This includes compliance with applicable laws and acceptance of antitrust prohibitions and competition restrictions.

Implementation and Enforcement

Scholz Promotion Service GmbH is committed to making the necessary efforts to adhere to the principles and values described in this Code of Conduct.

Stuttgart, 18.01.2024



Alexander Helm
Management

Guidelines for the Code of Conduct

Team Spirit and Constructive Collaboration

We continuously question existing solutions and develop new ideas for the benefit of our customers. To this end, we promote constructive teamwork among our employees.

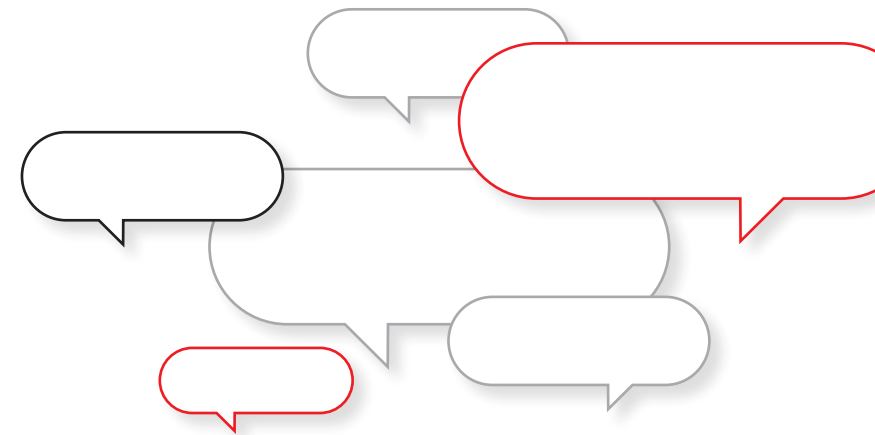
The interests and requirements of our customers are crucial for our work and development. Our success in collaboration stems from the diversity of our employees and their commitment to the business fields.

Open Communication with Employees

We maintain open, objective, and fair communication. We do not cover up misconduct. If our employees report actual or suspected misconduct in good faith, we do not tolerate any attempts at intimidation or reprisals against them. „In good faith“ means that our employees believe their report is truthful, regardless of whether a subsequent investigation confirms their version or not.

Standards of Collaboration

We expect all our employees to always act according to the highest professional standards and the company's guidelines. If employees violate existing guidelines, rules, or regulations through their actions or behavior, senior management and supervisors are required to take appropriate measures.



Dialogue with Cooperation Partners

All business information of our partners and their trade secrets are handled sensitively and confidentially. Necessary documents are created, stored, or destroyed properly after the end of the cooperation. Detailed regulations are also governed by employment contracts and company instructions.

Customer Orientation

We treat our customers and business partners fairly and honestly. We understand the wishes, needs, and expectations of our customers and business partners to ensure targeted implementation in products, services, or other processes. Our primary goal is to build long-term and stable relationships with our customers and business partners based on trust.

Acceptance of Gifts and Donations

Gifts to our Employees:

Our employees do not solicit or accept personal benefits from customers or suppliers that could influence their behavior regarding their duties for the company. Gifts from third parties may only be accepted if they are customary and recognized as courtesies or favors. For gifts exceeding the usual value, senior management or supervisors must be informed. If this is not possible, these gifts must be rejected.

Gifts by our Employees:

Gifts from us must also only be offered within the usual scope of the business relationship and in a materially appropriate amount. The recipient must not be able to associate any obligation that would influence their business decisions.

Donations:

Scholz Promotion Service GmbH does not donate to political parties, individuals, or organizations whose goals contradict our corporate philosophy or harm our reputation. Donations are always made transparently.



Data Protection

We handle all personal data of our customers, business partners, and employees with the utmost care. This results in corresponding legal requirements, which are part of employment contracts or company instructions.

Scholz Promotion Service GmbH has appointed an external data protection officer for monitoring and control.

Bribery and Corruption

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We do not tolerate any form of corruption and bribery, regardless of whether it damages our company's assets or those of third parties. We implement control mechanisms to prevent bribery, theft, embezzlement, fraud, tax evasion, or money laundering.

Our employees are prohibited from accepting or granting any favors (cash, trips, etc.) that are linked to an improper advantage (contract award, project approval, etc.). Our business partners are also required to avoid conflicts of interest that pose a corruption risk.

Environmental Protection

Environmental protection and climate protection are important concerns for us. Our employees are required to handle all natural resources used in our company (e.g., energy, water, etc.) responsibly. We expect our employees to act responsibly in the production and distribution of our products and/or services. We comply with all laws and regulations related to health and safety at the workplace to protect our employees. Measures are taken to create a healthy and hazard-free working environment for our employees.

Compliance with Applicable Law

We require our employees to familiarize themselves with and comply with the laws, regulations, and rules relevant to their area of responsibility without exception. Each participant bears a high responsibility in fulfilling the Code of Conduct.

The business practices of our business partners and their suppliers must also comply with applicable laws. This particularly concerns import, export, and domestic trade of goods, technologies, or services, as well as payment and capital transactions.

Violations of economic embargoes and regulations of trade, import, and export control must also be excluded by our business partners, as well as terrorism financing.

Fair Competition

We are committed to fair competition and adhere to applicable laws and regulations. We behave competitively in all respects and do not participate in any anti-competitive boycott.

Handling Company Internals

We emphasize the careful and responsible handling of the company's products, work tools, and intellectual property.



Prohibition of Discrimination

All forms of discrimination are strictly prohibited. This applies regardless of nationality, ethnic origin, age and gender, sexual orientation, marital status, pregnancy, disability, religion, or belief. Promotions and new hires are always made free from discrimination.

Protection from Child or Forced Labor

We strictly reject child or forced labor without exception and expect the same from our business partners. School-age children (under 15 years) must not be employed, even if the legal requirements of the respective country of our supplier would allow it.



Supplementary Information to the Guideline:

All employees are required to follow the rules of the Code of Conduct and proactively contribute to improvement.

This guideline and the rules of the Code of Conduct are controlled as documented information in our management system, i.e., regularly reviewed and adapted to relevant requirements of interested parties as needed.

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