

SCHLETTER

CODE OF CONDUCT

**OF THE SCHLETTER
GROUP**

VERSION 2.0

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CODE OF CONDUCT

OF THE SCHLETTER GROUP

1. THE SCHLETTER GROUP

The Schletter Group (also referred to herein as “Schletter”) stands for durability, flexibility, resilience, and top-notch quality in metalworking. These are the standards we set for our products and systems.

From our inception as a family business working in the trade in the 1960s, we have continued to grow and evolve for decades. Today, we are a worldwide group of companies with some 600 employees and a global network of sales and service companies, and a leading manufacturer of solar installation systems.

The organizational management of the Schletter Group is subject to comprehensive and stringent ethical and legal standards. Corporate governance and compliance are not just required by law – they are also prerequisites that go without saying when it comes to doing business sustainably.

This code of conduct sets out binding overall conditions for our worldwide activities and defines the ethical behavior of every employee within the framework of the global compliance management system. The goal is to prevent situations that could cast doubt on the honesty of our conduct or diminish confidence in our services.

2. TRUST THROUGH HONEST, COMPLIANT BUSINESS CONDUCT

Now and going forward, we can only achieve these aims if everyone involved participates. This is why the code of conduct sets out binding requirements for all employees.

Employees must observe all laws and regulations that are relevant in their working fields, along with internal instructions, guidelines, and directives.

Employees are required to conduct themselves honestly and fairly within their work environment and to prevent any and all conflicts between personal interests and the business interests of Schletter or the interests of our customers.

All employees are expressly encouraged to contact the compliance contact person or their supervisor if they notice that someone is not following the rules. This can help keep small issues from turning into big problems. No employee who submits a report with honest intentions should fear any discrimination or retaliation – not even if the report turns out to be unfounded. Reports can also be made anonymously.

Managers should serve as role models. They are responsible for their own conduct and that of employees and for proper compliance with all procedures that have been established within their sphere of responsibility to prevent reputational and legal risks.



3.

RESPECTFUL INTERPERSONAL DEALINGS; PROHIBITION OF DISCRIMINATION; DEVELOPMENT ACCORDING TO PERFORMANCE AND POTENTIAL

Respectful interpersonal dealings are another key element on which our success is founded. We value candor, and are willing to learn from mistakes.

Schletter has zero tolerance for any form of discrimination or harassment in the work environment, whether due to age, disability, origin, sex or gender, political views, trade union involvement, race, religion, or sexual orientation.

The key criteria for the development of our employees are tapping into performance and recognizing potential.

4.

HUMAN RIGHTS AND WORKERS' RIGHTS

We respect internationally recognized human rights and social and labor standards. This includes the United Nations (UN) Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration) of the International Labour Organization (ILO) (xxx). We support compliance with all of these standards, and categorically reject all forms of forced and child labor.

We acknowledge the rights of all employees to form trade unions and bodies representing employees on a democratic basis within the scope of domestic regulations.

The right to fair compensation is recognized for all employees. Pay and other benefits must be at least in keeping with the relevant national and local legal standards or the level of the national economic sectors/industries and regions. Specifications on working hours and occupational safety and health regulations are also observed.

5.

PROTECTION OF PERSONAL DATA AND CONFIDENTIAL INFORMATION; REQUESTS FOR INFORMATION FROM GOVERNMENT AGENCIES

We ensure strict compliance with the applicable regulations and agreements on the protection of personal data and confidential information. Confidential information and documents concerning customers, Schletter, or employees must be protected through appropriate means against access by third parties and uninvolved employees alike.

Personal data must not be collected, processed, or used except where necessary and where there is a relevant legal basis or the data subject has consented. The use of data must be transparent to data subjects. Their rights of access to information and rectification and, where applicable, to object and to have their information blocked and erased must be observed.

When enacting technological safeguards to prevent unauthorized access to data and information, a reasonable standard in line with the state of the art must be observed. To this end, Schletter has issued further data protection and information security guidelines, which are expressly incorporated by reference.



Schletter cooperates with all public agencies and supervisory authorities with jurisdiction. Any and all communications in this regard must be conducted exclusively through the employees designated to serve in this role.

6. COMMUNICATION TOWARD BUSINESS PARTNERS AND THE PUBLIC

All announcements and reports by Schletter, whether to business partners or the public, must be complete, honest, accurate, prompt, and understandable. This applies in particular to information and advertising materials concerning our products.

Only authorized employees are permitted to provide information about Schletter, our products, or our business partners to business partners or the public.

7. SOCIAL NETWORKS

Anyone who comments in a public discussion or on social networks on topics touching on the company or our business partners should be aware that this constitutes the actions of a private individual and should keep the interests of the company and its business partners in mind. It must be taken particularly into account that statements made by e-mail or in social networks are typically made spontaneously and not in any particular form, but then are still fixed in place and remain visible for the recipient or the wider public on the Internet for a long time.

8. NO CONFLICTS OF INTEREST WITH BUSINESS PARTNERS

Schletter strives to establish and maintain lasting business relationships that benefit both sides with its business partners.

With this in mind, each and every employee must take care to ensure that the interests of our business partners are taken fairly into account. The interests of individual business partners must not be prioritized to the detriment of other business partners.

9. COMPLAINTS FROM BUSINESS PARTNERS

Complaints from our business partners are a source of valuable information, helping us to improve for our core business. Handled correctly, they offer an opportunity to solidify or reestablish relationships.

Schletter takes care to ensure that all significant complaints from our business partners are handled fairly and understandably right away.

10. PERSONAL CONFLICTS OF INTEREST

If employees experience a conflict between their personal interests and professional tasks or the interests of Schletter or our business partners, it



can tarnish the image of the employees in question and/or Schletter as a whole.

Employees should therefore take care to avoid any such situations, in the interests of the company and the employees themselves. Specific rules and requirements:

- Employees are not permitted to engage in any secondary employment or similar activity that adversely affects the amount of time they spend on their duties under their employment agreement or impacts Schletter's competitive interests. Any secondary employment or similar activity must be reported to the employee's supervisor and the HR department beforehand. Volunteering for a limited amount of time does not need to be reported.
- Employees are not permitted to acquire or hold any financial stake in any company where this circumstance could affect the employee's professional decisions or those of Schletter (exception: publicly listed stock corporations).
- Awarding of contracts or placement of orders with family members, life partners, or other related parties of employees must be reported to the supervisor and Compliance beforehand where this circumstance is known. The same applies to transactions with companies in which family members hold direct or indirect stakes.
- Wherever possible, there should be no direct lines of reporting between children, parents, spouses, or life partners.
- Employees are not permitted to take on any positions of entrepreneurial responsibility (e.g., director or officer, managing director, board member, member of the supervisory or advisory board) with any business partner or competitor without prior approval from the executive management after the matter is reported to Compliance.

Wherever there is any doubt, the Schletter Legal and Compliance department must be consulted. The key factor here is how the matter would be viewed by a third party. The mere appearance of a personal conflict of interest is harmful.

11.

GIFTS, BUSINESS MEALS, EVENTS

Gifts, business meals, and events for information, representation, or entertainment purposes can be a legitimate way to build and support business relationships. However, they must never serve to obtain unfair business advantages or be so extensive in scope or of a particular nature such that they might raise questions about the professional independence and judgment of those involved.

Employees can protect themselves from misunderstandings by observing the following procedures and aids to decision making:

- There are no objections to hospitality for a direct business-related reason or to dining invitations within a reasonable scope.
- There are no objections to giveaways.
- In principle, there are no objections to gifts with a market value of EUR 40 or less (rough guideline) unless they are given immediately before the signing of a contract or negotiations, or to a person's home address or in any other non-transparent manner.
- Cash and cash equivalents such as checks or gift certificates are never allowed.
- Invitations for representative purposes or where the event is mainly or partly for entertainment are permitted only after a separate review of whether the matter is customary business practice and appropriate and if representatives of the host are present, participation is not repeated frequently, and the costs of travel and lodgings are not assumed by the business partner issuing the invitation.

Particular caution must be exercised when dealing with public officials. The relevant employer's rules on gifts and invitations must be observed in all cases.

In case of doubt, Compliance must be consulted.



12.

DONATIONS AND OTHER SOCIAL INVOLVEMENT MEASURES

The executive management decides on donations and other social involvement measures.

These activities must not serve to directly obtain unfair advantages from business partners. In general, we make donations and engage in other social involvement measures purely in the company's interests. We do not provide any financial gifts, particularly donations or sponsoring measures, to political parties in Germany or other countries, organizations that maintain close ties with or are similar to political parties, individual officeholders or candidates for political office, where this could give rise to even the mere appearance of unfair influence.

13.

ZERO TOLERANCE FOR CORRUPTION; SPECIAL CAUTION WITH PUBLIC OFFICIALS

Our success on the market is based on strong performance, flexibility, and dedication to service. It must not be obtained through unfair gifts or perquisites. Our business partners rely on our employees' professional judgment.

Schletter has zero tolerance for any form whatsoever of giving or taking bribes or accepting or granting other benefits or perquisites. Anyone who violates the rules on gifts and invitations in Section 10 is at risk of criminal prosecution for corruption. Merely promising or requesting unfair advantages, gifts, or perquisites can constitute a criminal act.

Giving benefits or perquisites to public officials can constitute a criminal act in the form of accepting or granting benefits or perquisites for the simple reason that it is done with an eye to the person's public position. The actual exercise of the person's public duties need not be unfairly influenced.

In addition, anyone who is tasked with performing public duties can be a public official; the definition is not limited only to government officials and civil servants.

14.

PREVENTION OF MONEY LAUNDERING AND FINANCING OF TERRORISM

Schletter complies with all statutory obligations to prevent money laundering and does not participate in money laundering. Each and every employee is urged to have any unusual financial transactions, particularly those involving cash, that could give rise to any suspicion of money laundering reviewed by the relevant finance, legal, or compliance department in case of doubt.

15.

PROTECTION OF COMPETITION

Schletter does not participate in illegal anticompetitive agreements or behaviors, particularly price fixing or arrangements on terms or market allocation with competitors.

Before employees deviate from standard contracts or the procedures stipulated in cooperation



agreements, it is necessary to clarify the matter with the legal department to prevent any impermissible impacts under the law of competition.

In the case of contacts with competitors and business partners, employees of Schletter do not speak without prior arrangement about purely internal matters, such as pricing or financing terms, costs, market overviews, organizational processes, or other confidential information from which competitors or business partners could derive any competitive advantage.

16. PROTECTING COMPANY ASSETS AND NATURAL RESOURCES

Schletter's assets and operating facilities and equipment, business records, tools, supplies, and other working materials must not be misused for personal purposes or provided to third parties for their use if so doing could adversely affect the interests of Schletter.

When performing their work, employees should strive to protect natural resources and ensure that the business activities of the Schletter Group have as little impact on the environment as possible by conserving materials, planning with an eye to conservation of energy, and reducing and recycling waste. When selecting subcontractors, advertising materials, and other external services, all employees should take not only economic aspects, but also ecological and social criteria into account.

17. OCCUPATIONAL SAFETY

Processes, operating sites, and operating materials must conform to the applicable statutory and internal specifications on occupational safety, protection of health, fire prevention, and environmental protection.

Each and every one of our employees is charged with promoting occupational safety and health in their work environment and required to abide by the rules and regulations on occupational safety and health. All managers are obligated to instruct and support their employees in living up to this responsibility.

The same safety standards apply both to employees of the company itself and to those of subcontractors acting on behalf of the Schletter Group. This must be taken into account when selecting and working with these parties.

18. CONSEQUENCES OF VIOLATIONS

Violations of these rules can result in significant reputational harm and legal disadvantages for the employees in question, their colleagues, and Schletter, up to and including fines, criminal charges, and restrictions on official permits and authorizations.

Beyond that, violations that constitute violations of an employee's obligations under their employment agreement can also lead to disciplinary measures affecting the employee's employment with Schletter.



19.

EMPLOYEES' OBLIGATIONS TO REPORT VIOLATIONS (WHISTLEBLOWING)

Each and every employee is obligated to abide by the rules in force within the company on the matter of whistleblowing, in the then-current version thereof.

20.

TRAINING

To raise awareness of compliance, Schletter provides numerous training options for employees on a mandatory basis and offers voluntary training on various topics. Training activities are updated and analyzed on an ongoing basis as part of a master training plan.

Our managers have a particular function as role models, and their actions are measured according to this code of conduct. They are the first points of contact in case of questions relating to understanding the rules, and they ensure that everyone is familiar with and understands the code of conduct. All employees and third parties (customers, suppliers, etc.) can also feel free to contact **compliance@schletter-group.com** with any further questions relating to the code of conduct.

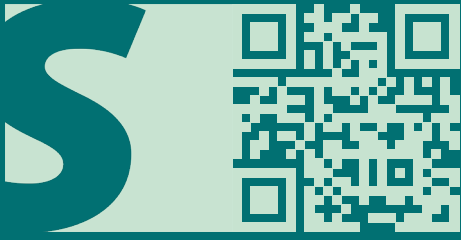


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07.11.2023

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