

sedak

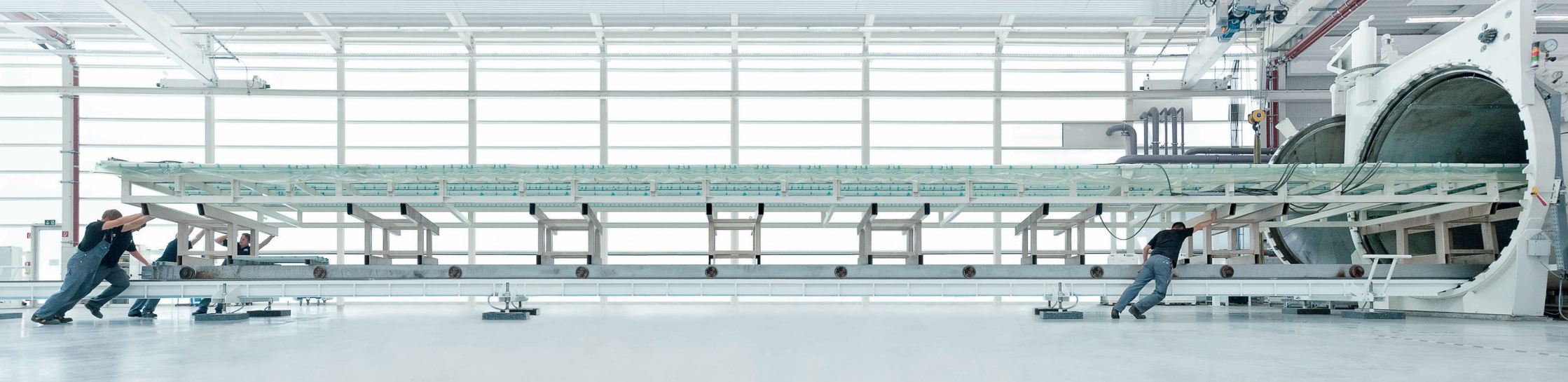
code of conduct





contents

- 5** preamble
- 6** cornerstones
- 7** integrity
- 10** fairness and competition
- 11** clarity
- 12** efficiency and safety
- 13** conserving resources and sustainability
- 14** implementation and communication
- 15** social media
- 16** index
- 18** glossary



preamble

Dear Customers and Business Partners,
dear Sir or Madam,

We, sedak GmbH & Co. KG, implement the visions of celebrated architects and clients worldwide. It is for those architects and clients that we plan, design and build individual and innovative building envelopes and structures. Through innovative product leadership and a profound understanding of the materials used, we regularly set standards in glass, steel, aluminium and membrane architecture.

Our products embody clarity, precision, lightness, efficiency and innovation – qualities that are also reflected in the conduct of our employees. Our aim is to ensure that our activities are always explicit and understandable. This code of conduct serves as the basis for our activities, acts as a guarantee for the stability and security of sedak and its employees, who can thus play an innovative and sustainable role in the ongoing development of the joint success of sedak and its customers.

This code of conduct will help our employees to recognise potential conflicts and risks in everyday business situations, and promote upright behaviour. Active communications will enable us to keep our employees up to date in the future, too, and encourage them to behave accordingly. All employees are made aware of this code of conduct, which represents the guidelines for conscientious working practices at sedak. Reviews at regular intervals will ensure that this code of conduct always remains up to date and reasonable.



cornerstones

Integrity and exceptional expertise guarantee our success and our credibility. It is therefore a matter of course for all sedak's employees and suppliers that legislation and regulations must always be adhered to – nationally and internationally. Under no circumstances will sedak tolerate any exceptions to this rule. Transgressions will be dealt with in the form of disciplinary consequences, possibly even termination of the employer-employee relationship. In order that employees do not violate these cornerstones, sedak helps its employees to recognise potential conflict situations in advance and react in good time.

In addition, we expect our employees to report any infringements of legislation or the regulations specified in this code of conduct to their direct superiors or to our external ombudsman.

Ombudsmann: Attorney-at-Law Wolfgang Schmid
Kanzlei Schmid Frank Rechtsanwälte PartG

Contact: Phone: +49 821 454 08 08
<https://cryptshare.schmid-frank.de/>

Under the link above or on the website www.schmid-frank.de, a whistleblower can use the button „For Whistleblowers“ to communicate anonymously and in encrypted form with the law firm and upload data to the law firm's own server. This is available in several languages.

integrity

The integrity of the sedak and the integrity of every individual employee are key elements in our success. It is because we take and implement the requests of our customers seriously, because our employees support the company and its development, and because we expect the same behaviour from our business partners, too, that sedak has been able to establish the position it holds today. Honesty and dependability with respect to our customers and business partners, i.e. our suppliers, contractors and subcontractors, and among ourselves guarantee our redibility and our ongoing success.

For us, integrity means ...

- Honesty and discretion
- Being able to depend on our statements, decisions and actions
- Sincerity and respect
- Fairness with respect to our customers and clients, in everyday dealings with each other, and with respect to our competitors
- Openness towards the requests of our customers and the opportunities of diversity
- Transparency in our actions and decisions
- Compliance with legislation, guidelines and stipulations

Integrity with respect to customers

We regard ourselves as a service provider. Our services are called upon worldwide because we keep sight of the special needs and interests of our customers. It is they who place their faith in us and it is their orders that form the foundation for

our success. Therefore, we expect that every single employee is aware of the high standards our customers expect from us. It is the conduct of our employees that expresses the high esteem with which we regard our customers.

**Integrity of our business partners –
acknowledgement of the code of conduct**

As a prerequisite for cooperation, we expect our business partners, i.e. our suppliers, contractors and subcontractors, to acknowledge this code of conduct and to implement the regulations it contains. In particular, we expect our contractors to adhere to the following principles:

- Respect for the human rights of all employees and subcontractors
- Renunciation of bribery and corruption
- Compliance with the legislation banning child labour
- Compliance with the legislation dealing with the health and safety of employees
- Compliance with environmental protection legislation
- Implementation of the regulations in this code of conduct within the supply chain
- Compliance with statutory obligations and the payment of all necessary taxes and duties

**Integrity with respect to business partners and the public –
no misuse of insider information**

sedak employees worldwide work with confidential data and on important construction projects. In doing so, they acquire sensitive knowledge, e.g. about the technologies of our business partners or the strategies of our customers. Our employees handle such information confidentially and do not use it to their own advantage or the advantage of their friends or families. For example, employees may not pass on any non-public information or the corporate or business secrets of sedak or its business partners or customers to third parties without permission. Nor may they use such information to transact business in securities or futures markets, so-called insider trading. Compliance with valid data protection legislation also guarantees the confidential handling of information and data.

**Integrity with respect to the company –
avoiding conflicts of interest**

sedak is aware of the contribution that its employees make to its success and supports them in their personal and work-related development. At the same time, sedak expects all of its employees to support the company in the best possible way. This means, in particular, that business decisions are to be taken exclusively in the best interest of sedak and that it is vital to avoid situations in which there is a conflict between personal or financial interests and the interests of sedak.

For example, sedak employees may not work simultaneously for competitors, may not pursue activities competing with those of sedak, and may not hold or purchase direct or indirect stakeholdings in rival companies.

Integrity with respect to employees

This code of conduct applies equally to all sedak employees and all members of the sedak management. The members of the management are aware of their function as role models and take this seriously. To lead always means to set an example.

As a company with global operations, we regard ourselves as open and multi-faceted. We value the individual personality of every single employee. No employees are discriminated at sedak. Infringements involve disciplinary consequences because no form of sexual harassment or other aggression or prejudice on the basis of ethnic origin, religion, culture, age, disability, etc. will be accepted. We do not show any tolerance to attitudes, including gestures, oral expressions, or physical contact, that implements sexual assault, threat, abuse, or exploitation.

sedak undertakes to comply with the labor laws that are up on the bulletin boards. The groups of employees defined in the German laws/ acts JArbSchG (youth protection), MuSchG (maternity protection), and SGB IX (protection of disabled people) are subject to special protection. We respect the internationally recognized human rights and support their compliance. sedak does not tolerate child labor or any exploitation of children and teenagers. Any person under the age of 15 or at the age of compulsory education must not be employed. sedak rejects all forms of forced labor. No employee may be forced to employment either directly or indirectly through violence and/ or intimidation. Employees are only to employ if they make themselves available for employment voluntarily.

We recognize the right of all employees to form labor unions and employee's representations on a democratic basis within national regulations.



fairness and competition

sedak is committed to fair competition. Together with our competitors, we accept the competition for the best ideas and projects, and convince our customers by delivering quality and innovation. We win orders exclusively through superior performance. sedak secures a competitive advantage through innovative products and fair prices. We refrain from any agreements with competitors or customers which impair free competition.

For example, this means that we will tolerate neither bribery nor any other illegal form that may be used by sedak employees to exert a personal influence over decision-makers at customers, suppliers or authorities. We only allow gifts, other benefits or sponsoring in a cultural and personally appropriate context.

sedak employees are not permitted to accept benefits or gratuities. We request our business partners in particular to observe this rule. The acceptance of gifts of low monetary value may be allowed on certain occasions but only where this occurs in the course of normal business practices.

clarity

Our projects are characterised by clarity and transparency. This is reflected in our working practices as well. Decisions and transactions at sedak are carried out on the basis of understandable information and processes. They are recorded fully and properly according to the applicable legislation and internal regulations.



efficiency and safety

We can only maintain our position in the market when we build high-quality projects and carry out our work efficiently.

Efficiency includes various facets at sedak. On the one hand, efficiency at sedak means production that conserves resources, but on the other, guaranteeing the satisfaction of our employees and maintaining their good motivation.

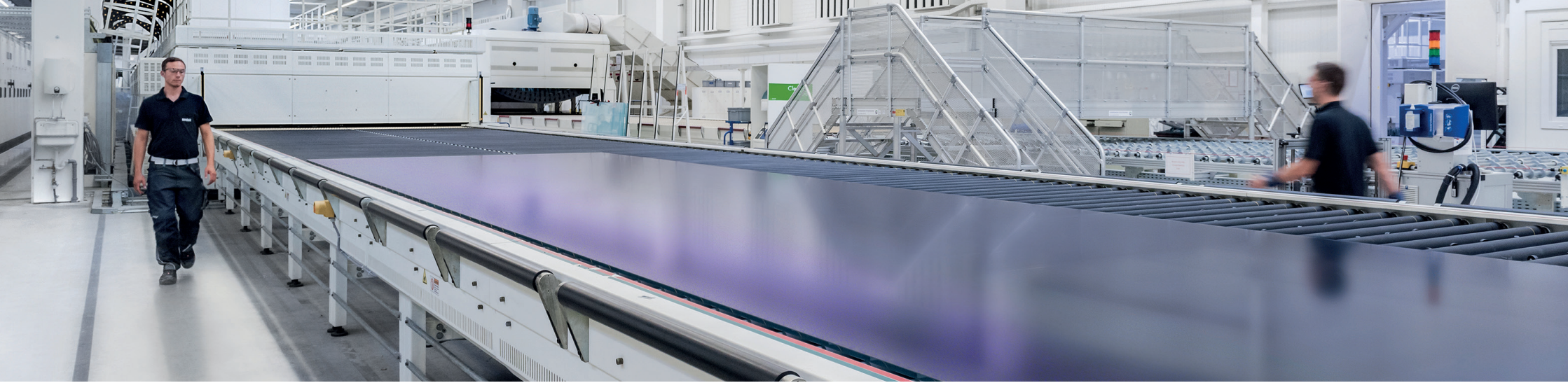
The safety of our employees and business partners is of paramount importance to us. sedak is therefore committed to explaining to its employees the risks involved in production and erection, and to nominating persons responsible for upholding industrial safety. At the same time, all our employees are obliged to contribute to ensuring a safe and healthy working environment by adhering strictly to occupational safety directives and the instructions of those responsible. Furthermore, they are also obliged to report sources of danger and infringements of such directives to those responsible without delay. Deficiencies must also be rectified immediately.

conserving resources and sustainability

sedak recognises the dangers and risks for the environment. We make sure that environmental impact is avoided, natural resources, e.g. in production and erection, are conserved, and requirements regarding environmental compatibility are fulfilled in the development of future processes and working practices.

Environmental aspects and environmental compatibility are also taken into account when selecting suppliers and products. Wherever possible, we use recyclable products that do not deplete the environment and employ methods that conserve natural resources.

sedak is committed to complying with applicable environmental protection laws and regulations and to minimising the impact on the environment. Our employees are made aware of the risks and dangers and the importance of environmentally compatible conduct. Active communication keeps our employees up to date and encourages them to behave in an environmentally compatible manner.



implementation and communication

The general guidelines contained in this code of conduct form the foundation for the conduct of sedak and its employees. These guidelines provide sedak employees with a framework for responsible behaviour. The code of conduct provides them with security regarding the expectations and demands they must fulfil.

Suitable processes have been implemented at sedak in order to guarantee compliance with and the further development of this code of conduct. Employees are informed about the latest edition of the code of conduct. Infringements against the code of conduct are to be reported to the direct superior or the external ombudsman. Customers, suppliers and business partners with information regarding infringements may contact our ombudsman in confidence at any time. Information from employees is treated confidentially. No employee will be disadvantaged as a result of information supplied.

The code of conduct is reviewed at regular intervals to check that it is up to date. Employees can make suggestions for its ongoing development.

social media

Since 2015, sedak has also been presenting itself on social media platforms. Every employee and business partner should feel free to connect themselves with sedak on the platforms and to thus develop the respective page actively.

At the same time it is mandatory for every employee to obey the rules appointed or set by sedak in order to protect not only the company but also its business relations.



index

acknowledgement of the code of conduct.....	8
agreements with competitors	10
basis for our activities.....	5
benefits, employees not permitted to accept.....	10
bribery.....	8, 10
business decisions	9
child labour	8
competition.....	10
competitors	10
compliance with and further development of code of conduct..	14
confidential handling of information	8
conflicts of interest.....	9
cornerstones.....	6
corruption	8
credibility	6
customers.....	5, 7, 8, 10, 14
data protection legislation.....	8
data.....	8
decisions.....	7, 11
disciplinary consequences.....	6, 9, 19
discrimination	9, 18, 19
environmental protection laws and regulations	13
expectations and demands.....	14
foundation for the conduct	14
function as role model.....	9

gratuities, employees not permitted to accept.....	10
high standards our customers expect	8
human rights.....	8
industrial safety.....	12, 19
infringements	6, 9, 12, 14, 18
insider trading	8, 18
integrity.....	6, 7, 8, 9
legislation and regulations	6
management	9
motivation, employees	12
non-public information	8
ombudsman.....	6, 14, 18
potential conflicts	5
prerequisite for cooperation	8
production that conserves resources	12
recyclable products.....	13
requests of our customers	7
risks for the environment.....	13
safety of our employees	12
stakeholdings in rival companies	9
supply chain	8
transparency.....	7, 11

glossary

Compliance

In business jargon, the term compliance is used to designate the observance of legislation and directives, but also voluntary codes within companies.

Ombudsman

“Whistleblowing” systems are intended to allow the anonymous supply of information regarding infringements against legislation or internal corporate guidelines such as codes of conduct. The “whistleblower” is guaranteed anonymity in order to protect that person against sanctions or harassment. Two forms of anonymous reporting are in general use: information can either be made available via special whistleblowing sites in the Internet, or so-called ombudsmen can be used. The latter are usually persons outside the company who can be contacted confidentially and who are members of a profession with a duty of secrecy, e.g. lawyers.

Discrimination

Discrimination is disadvantaging or vilifying persons without factual justification. This applies in particular when the gender, sexual orientation, ethnic or national origin, race, religion, union membership, military status, marital status, pregnancy, medical status, or ideology of a person or persons are used as distinguishing characteristics. Discrimination legislation bans the unequal treatment of persons as a result of certain characteristics.

Insider trading

An insider is someone who has access to information about a security or its issuer before that information is made public. Whoever issues or initiates an order by providing, for example, recommendations regarding the sale or purchase of securities, and in doing so makes use of insider information, is involved in insider trading. According to cl. 14 of the Wertpapierhandelsgesetz (WpHG, Securities Trading Act), insider trading is prohibited in Germany; infringements can be punished with up to five years' imprisonment or fines.

Employment sanctions, disciplinary consequences

Employers can exercise disciplinary consequences if employees infringe legislation or internal corporate directives, e.g. work instructions or a code of conduct. The consequences must be commensurate with the infringement and can range from simple oral admonitions to written warnings, release from duties and even immediate dismissal in the case of severe violations. Reasons for immediate dismissal could be, for example, the unauthorised private use of company property, the acceptance of bribes, infringement of industrial safety requirements, discrimination or insults.

Diversity

sense of a positive value, as an enrichment of the corporate culture. This does not mean focusing on groups with a particular ethnic or social origin, but rather on the entirety of the workforce with its differences and similarities. The differences may be readily visible differences such as gender, ethnic origin, age or disablement, but also subjective differences such as sexual orientation, religion or lifestyle. It is only the plurality of knowledge and skills resulting from the different qualities of every individual that constitutes the potential of the group.

