



CODE OF CONDUCT

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FOREWORD BY THE SCHAKE MANAGEMENT

For five generations, we have been a family-owned company and a trusted manufacturer and solution provider of robust, safe and durable construction and traffic infrastructure.

Together, we develop, manufacture and combine our customized, modern products with innovative digital services to create powerful integrated and individual infrastructure solutions that inspire our customers in their daily work..

As an owner-managed family business, sustainable business practices are a matter of course for us and part of our daily operations, just as compliance with applicable laws and regulations and the assumption of responsibility for society and the environment.

We seek to align our actions with the values of the Christian faith and are guided by national and international principles and conventions. In order to meet the diverse challenges of our daily work, we have defined fundamental principles and guidelines for our company in this Code of Conduct, in full compliance with applicable legal requirements.

Our core values are always the benchmark for our actions. They apply to all employees of SCHAKE, regardless of their position.



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Corporate principles and entrepreneurial responsibility

General principles

As a family-owned company now in its fourth and fifth generation, our long-standing economic success is based on values such as credibility, respect and appreciation for others, as well as integrity in everyday business. This also includes compliance with internal and external regulations and applicable laws. In this context, SCHAKE aligns itself with international frameworks such as:

- » The Ten Principles of Sustainable Business of the UN Global Compact
- » The Core Labour Standards of the International Labour Organization (ILO)
- » The United Nations Guiding Principles on Business and Human Rights (UNGPR)
- » The Principles for Preventing Corruption published by the International Chamber of Commerce (ICC) and Transparency International
- » The OECD Guidelines for Multinational Enterprises

We are aware of our social responsibility and consistently strive for sustainable success that takes economic, environmental and social aspects into appropriate account. Accordingly, our aim is to combine economic success with added value for people, society and the environment, in line with the United Nations Sustainable Development Goals. This Code of Conduct plays a central role in this effort.

The management of SCHAKE assumes responsibility for implementing the principles outlined below. How we as a company seek to fulfill this responsibility is described in the following sections.



We protect the environment and the climate

At SCHAKE, we are aware of the environmental impact of our business activities and are committed to making our products and processes more efficient and resource-friendly. We follow the precautionary principle of the United Nations and set ambitious targets to reduce energy consumption and emissions. SCHAKE strives to minimize the use of resources and to utilize alternative energy sources.

We always comply with environmental laws. Our company adapts to the challenges of climate change and integrates environmental compatibility, climate protection and resource efficiency into its business activities. All employees are required to operate sustainably and to handle natural resources with care.

We are a fair employer

We value fair and respectful interaction. Our employees are encouraged to express their opinions freely and to work in an environment characterized by trust and mutual respect. Working hours and remuneration are based on applicable standards. Open communication and honest feedback are important to us, as they form the foundation for successful collaboration.

We are committed

As a company, we take responsibility for our surroundings. This includes supporting social projects and local initiatives – whether through donations, sponsorships or personal involvement. We consider it important to make a positive contribution to a fair and livable society.





We benefit from diversity

Respectful and tolerant interaction in the workplace is essential to us and forms the basis for successful cooperation with our colleagues as well as with our business partners. At SCHA-KE, we are convinced that diversity within our team is a key factor in our growth and success. Therefore, we actively promote diversity and ensure equal treatment for all employees.

Different ideas, perspectives and skills enhance the quality of our work and contribute to long-term success. In particular, with regard to our ambition to expand our business activities globally, we see our internationally diverse workforce as a great asset and opportunity.

We want everyone to work safely and stay healthy

Promoting a strong safety culture is a high priority for us. We are committed to the highest safety and health standards for all our employees as well as for everyone who works for or with us. Our workplaces and personal protective equipment meet the highest standards. In addition, we strengthen our employees' awareness of risks and strive to prevent workplace accidents by carrying out our work in a safe manner and free from harmful substances that could impair our performance.



How we behave within the company

We treat everyone with respect

Discrimination, insults, intimidation and any form of bullying have no place in our company. All employees are encouraged to report such incidents to their supervisor. Regardless of position, we promote openness and honesty in communication. Conflicts and disagreements should always be resolved fairly and objectively.

We protect company property

The property and assets of SCHAKE are essential to achieving our business objectives and must therefore be handled with the utmost care by all employees. This applies to both tangible and intangible assets of the SCHAKE Group. We expect our employees to respect company property and assets. Private use of company property is generally prohibited unless explicitly agreed otherwise.





We always pay attention to safety and health

All employees are required to actively contribute to the creation and maintenance of a safe and healthy working environment. This includes strict compliance with all safety regulations and rules. Employees must ensure that the provided protective equipment is used properly and that they inform themselves about potential health risks in the workplace. It is essential to stay regularly informed about applicable safety measures and rules of conduct. In addition, all employees are obliged to immediately report any safety deficiencies or violations of safety regulations that are identified. Such incidents must be reported without delay to the responsible departments within the company in order to ensure that corrective action can be taken as quickly as possible.



All employees represent the company

As an integral part of the SCHAKE Group, every employee represents the company in a wide range of situations, both in a professional context and beyond. This includes interactions with customers and suppliers, business travel, as well as conduct in private life. Employees must therefore always be aware of their representative role and ensure that the reputation of SCHAKE is not jeopardized by careless actions or inappropriate statements, whether in personal conversations or through the use of social media channels.

Managers in particular play a central role, as they act as role models and embody the company's values and standards. Their behavior and communication should consistently reflect these values and convey a positive image of SCHAKE. Through considerate and respectful conduct, they make a decisive contribution to maintaining and strengthening the company's corporate image.



How we conduct business in our daily operations

We act with integrity and are not improperly influenced

SCHAKE does not tolerate any form of corruption or bribery, whether active or passive. Even the appearance of impropriety or the granting of undue advantages must be avoided. The offering, granting, requesting or accepting of benefits of any kind is prohibited if such actions improperly influence decision-making processes. This applies both to dealings with business partners and to interactions with authorities and other public institutions. Violations of applicable laws in this area may result in significant penalties for SCHAKE as well as for individual employees. Particular caution must be exercised

with regard to benefits granted to public officials. Accordingly, SCHAKE follows the principle that its employees do not grant benefits to public officials. Sponsorships and donations must be appropriate and transparent in order to avoid any appearance of corrupt behavior. Business judgments and decisions must under no circumstances be influenced by gifts or advantages. For this reason, we do not request or expect gifts or invitations from our business partners at any time.



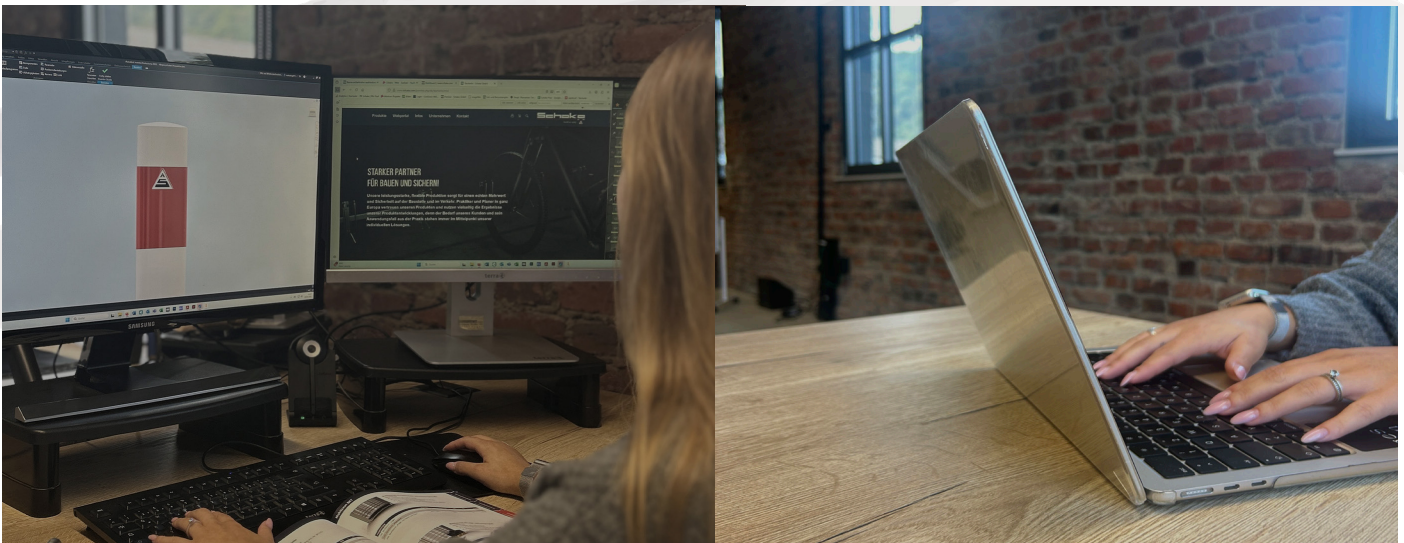
We compete fairly

We respect the principles of the market economy and fair competition. We comply with national and international laws and act ethically at all times. All SCHAKE employees are required to comply with applicable antitrust and competition laws. Agreements or practices that aim to or result in the restriction of competition are prohibited. This includes, in particular, coordination with competitors regarding prices or offers, the exchange of confidential information, and the allocation of orders, customers, markets or territories. Unfair business practices such as misleading statements, disparaging or false claims about competitors, as well as the improper influence of business decisions, are also prohibited. In cases of doubt, supervisors should be consulted.

We are loyal to the company

All employees must avoid situations in which their personal or financial interests conflict with their duties and responsibilities toward the SCHAKE Group.

SCHAKE expects loyalty to the company from all employees. Business decisions must be made exclusively in the best interests of the company and must not be influenced by private interests. Any secondary employment, self-employment, private investments or family relationships that could give rise to the appearance of a potential conflict of interest must therefore be disclosed to the supervisor. Conflicts of interest exist whenever the nature or extent of an involvement is capable of influencing actions taken in the course of an employee's duties at SCHAKE in any way.





We do not engage in unlawful business practices

We neither actively nor passively participate in money laundering, nor do we tolerate it in any form. We conduct business only with reputable partners who comply with applicable laws and use funds from legitimate sources. We strictly adhere to the applicable laws and regulations for combating money laundering. Even unintentional involvement in money laundering may result in criminal consequences for all parties involved. We therefore encourage all employees to remain vigilant if there are any doubts regarding the integrity of natural or legal persons with whom a contractual relationship is to be established.

Furthermore, we are committed to complying with all tax laws and regulations in the countries in which we operate.



We protect our data and the data of third parties

Our data and information are valuable assets whose protection and confidentiality must always be ensured. The EU General Data Protection Regulation (GDPR) establishes data protection as a fundamental European right. Accordingly, we strictly comply with applicable data protection laws and regulations, as well as with the internal rules established at SCHAKE for protecting the data of employees, customers and other third parties. The protection of personal data is of the highest priority. Any concerns or deficiencies must be reported immediately to the supervisor or the responsible data protection officer. We ensure the protection of all business-related information as well as the data of our business partners and treat such information confidentially. In addition, we ensure compliance with statutory retention and deletion periods.



Complaints procedure and whistleblower system

SCHAKE is committed to ensuring that all employees have the opportunity to report suspected misconduct that is not in line with our values and ethical principles and that could seriously endanger our organization or the well-being of individuals. It is not necessary to provide concrete evidence in order to raise a concern; however, all reports should be made in good faith. We guarantee that no individual who reports misconduct or participates in investigations will be subject to retaliation or reprisals. We encourage all employees to address and report violations of this Code of Conduct in order to uncover misconduct and safeguard the long-term success of SCHAKE as well as the well-being of employees and other stakeholders.

To facilitate the reporting of legal violations, SCHAKE has established a whistleblower hotline and a whistleblower portal. Through these channels, employees can report work-related violations. All reports received are treated anonymously and forwarded to a law firm for further review, ensuring that all concerns are handled seriously and confidentially.

Whistleblower hotline:

From abroad: +49 69 9999 8839
From Germany: +49 800 3800 999

Reports can be submitted securely, confidentially and, if desired, anonymously by telephone from Monday to Friday between 9:00 a.m. and 5:00 p.m., in German or English.

Whistleblower portal:

<https://app.whistle-report.com/report/60a99678-9ad0-485c-8400-7ccc5f46804>



The whistleblower portal is accessible around the clock from any internet enabled device. Data protection and anonymity are ensured, and technical tracking of reports is not possible. All reports of potential violations are carefully reviewed and treated with strict confidentiality.