



# Code of Conduct

## Preface

Dear colleagues and supplier Business partners, our mission statement describes the values we share and how we want to work together - today and in the future. It gives us a clear goal to achieve in order to secure our company's success in the long term. Based on the central idea "WE are SLR", we can only achieve this goal together. In particular, our values such as personal responsibility, openness and transparency as well as conduct that complies with the law and is ethically correct at all times play an important role here. This Code of Conduct brings together our important basic rules and principles in one document, which are binding for us both today and in the future. It provides a framework for orientation and applies equally to each of us - to the management, to the executives, to each individual employee<sup>1</sup> and to our business partners. It sets a standard for us, and at the same time it is a promise to the environment of responsible conduct toward business partners and the public. Together, we are responsible for the reputation of our company. The misconduct of individuals can cause enormous damage to us all. Therefore, we ask you, dear colleagues, to use this Code of Conduct together with us as a guideline for our daily behavior.

The Management of the SLR Group

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<sup>1</sup> For reasons of better comprehension, the masculine form is used in some places in this Code of Conduct when referring to persons and personal nouns. In the interests of equal treatment, the corresponding terms apply to all genders. The abbreviated form of language is for editorial reasons only and does not imply any valuation.



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## **Conduct in the business environment**

For us, compliance with laws and regulations is an essential basic principle of economically responsible conduct. We comply with the applicable legal obligations and prohibitions at any time. They set the framework within which we conduct our business.

## **Avoidance of conflicts of interest**

At SLR Group, business decisions are made solely in the best interests of the company. Conflicts of interest with private interests or other economic or other activities, including those of relatives or otherwise related persons or organizations, should be avoided from the outset. If they nevertheless arise, they must be resolved in compliance with the law. The prerequisite for this is a transparent disclosure of the conflict.

## **Behavior toward colleagues and employees**

A culture of equal opportunity, mutual trust and mutual respect is of great importance to us. We promote equal opportunities and prevent discrimination in hiring employees as well as in the promotion or granting of training and education measures. We treat all employees equally, regardless of gender, age, skin color, culture, ethnic origin, sexual identity, disability, religious affiliation or world view.

We respect internationally accredited human rights and support their observance. We strictly reject any form of forced or child labor. We recognize the right of all employees to form trade unions and employee representatives on a democratic basis within the framework of national regulations. The right to fair remuneration is recognized for all employees. Remuneration and other benefits correspond at least to the respective national and local legal standards or the level of the national economic sectors/industries and regions.

## **Safety at work and health protection**

Alongside the quality of our products and our economic success, the safety and health of our employees are equally important corporate goals. Occupational safety and health protection are an integral part of all operating processes and are included in the technical, economic and social considerations right from the start – already in the planning phase. To protect our employees, we comply with all laws and regulations relating to health and safety at work. Furthermore, our managers in particular take measures to create a healthy and hazard-free working environment for our employees.

Each of our employees promotes health and safety in their work environment and complies with occupational health and safety regulations. Each manager is required to instruct and support his employees in fulfilling this responsibility. Employees of subcontractors working



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on behalf of the SLR Group are subject to the same safety standards as our employees. This is considered during selection and cooperation.

### **Environment protection**

The protection of the environment and the climate is very important to us. Each of us is required to treat all natural resources used in our company (e.g., energy, water, land) with care. A responsible behavior in the production and distribution of our products and/or our services is expected from employees and managers. We continuously monitor the consumption of resources, in particular electricity, water, gas and land, as well as the volume of waste, and set ourselves ambitious reduction targets. We take concrete operational and non-operational measures to achieve these targets.

### **Bribery and corruption**

We do not tolerate any form of corruption or bribery. We ensure through control mechanisms that bribery, theft, embezzlement, fraud, tax evasion or money laundering are prevented. Our employees are prohibited from accepting or offering favors of any kind (cash, travel, gifts, etc.), especially if an undue advantage is to be associated with them (awarding of contracts, project awards, etc.). Our business partners are also required to avoid conflicts of interest that involve a risk of corruption and to ensure that the applicable anti-money laundering regulations are not violated.

### **Protection of company property**

We always use the company's property and resources properly and responsibly. We protect it from loss, misuse and theft. We use entrusted property only to perform tasks directly related to the success of the company. Our employees are responsible for ensuring that trips related to the achievement of goals are planned and executed economically. The intellectual property of our company is protected in the same way as the material property.

### **Antitrust law**

The SLR Group stands for technological competence, innovative strength, customer orientation and motivated employees who act in a responsible manner. This is the basis of our high reputation and the sustainable economic success of the company in global competition.

SLR is committed to fair competition and observes antitrust and competition law. Fair competition creates incentives for innovation and high product quality for the benefit of consumers. All employees are required to strictly comply with antitrust laws and related internal policies.



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Agreements and even the reaching of a common understanding with anticompetitive content are prohibited between competitors, regardless of their market position. In many countries, even the simple mutual exchange and even the bare unilateral transmission or receipt of competition-relevant information between competitors is prohibited. Meetings with competitors are only possible if there is a justifiable business reason for doing so which is not itself in violation of the cartel. Agreements with other companies - such as suppliers, customers and distributors - may also be subject to antitrust restrictions, especially if SLR or the business partner has a strong market position.

In many countries, companies with a strong position of power are subject to special antitrust restrictions, particularly if the company's position is considered to be dominant. Thus, abuse of a dominant position is prohibited.

If it is unclear whether a situation is permissible under antitrust law, it must be legally examined.

### **Sanctions and Export Control**

SLR Group does not violate any applicable export control laws and regulations or current economic sanctions. We are committed to regularly reviewing compliance with these regulations in our business activities to avoid any action that could place us in violation of sanctions or export controls.

### **Privacy**

We treat all personal data of our customers, business partners and employees with the utmost care. This includes names, addresses, telephone numbers as well as date of birth or information about current health status. Our employees are obligated to take all measures to secure the data, which are suitable to protect our IT system against internal as well as external data theft. This applies in particular to passwords misused in the company and unauthorized downloading of files, especially of inappropriate material from the Internet. The provisions of the German Data Protection Regulation (DSGVO) must be complied with.

### **Implementation and enforcement within the company**

SLR Group is committed to making every effort necessary to comply with the principles and values described in this Code of Conduct / Code of Ethics.

SLR Group's management shall ensure company-wide communication of this Code of Conduct, actively promote understanding of its contents, and ensure implementation and compliance with its provisions. Compliance with the law and adherence to the internal guidelines are to be monitored regularly in all companies of the Group. The method of monitoring is the responsibility of the respective companies.



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Employees are addressed in the event of infringements. Disciplinary measures are taken in particular in the event of repeated violations. These measures can take the form of staff appraisals, warnings or even termination of employment.

## Implementation in the supply chain

We also expect our business partners to implement the principles formulated in this Code of Conduct. The SLR Group will actively demand compliance with these principles from customers and suppliers and will take compliance with these principles into account in the selection and further development of customers and suppliers.

## Becoming aware of violations

If an employee becomes aware of violations of this Code of Conduct or other regulations, he may report this to his supervisor or directly to management. Such information may be provided in person, by telephone or by e-mail to

[SLR-Whistleblowing@taylorwessing.com](mailto:SLR-Whistleblowing@taylorwessing.com)

Anonymous information is also possible.

Business partners may also choose the e-mail route.

St. Leon Rot, 21.10.2022



Management Board

