

White Paper | Compliance

Code of Business Conduct at SEEBURGER



Table of Contents

Binding guideline	3
Our values	4
People and Culture	6
Data, AI, Social Media and Intellectual Property	7
Business Partners and Economy	8
Society and Nature	9
Compliance organisation	10
Contacts	11
Imprint	11


Binding guideline

The Code of Conduct is the ethical and value-based foundation for acting with integrity and in compliance with the rules within the SEEBURGER Group. It is a **binding guideline** for all employees in all our companies – worldwide.

Together, we take responsibility for our collaboration, our working environment, the environment, sustainability and society. We treat each other and all other people with respect, fairness and as equals. We are all role models.

We are convinced that in order to gain the trust of our stakeholders in our company, our products, services and innovations, it is crucial that all of us – employees, board members and managers – behave honestly at all times.

In all areas of work and functions, we therefore always make decisions in accordance with our corporate values, applicable national and international laws, regulations, and internal voluntary commitments.

 Compliance with our Code of Conduct is the personal responsibility of all of us.



Our values

Innovation, appreciation, trust, sustainability and teamwork.

We live these values – every day. We are a very important part of our corporate culture. On the one hand, our culture evolves based on our behaviour, and on the other, it shapes us.

Dream Big – Innovation

Creating a climate for innovation means being open to the different, the new, the unexplored. This includes self-critically scrutinising what we have achieved so far and not only developing our own ideas, but also allowing our natural curiosity for the ideas of others. Everyone benefits from this, everyone as an individual, we as a team and therefore the entire company.

Be Awesome – Appreciation

By appreciation, we mean not taking anything or anyone for granted, but also valuing the everyday as precious. By this we mean the value of our colleagues, our customers and our business partners, the value of ideas, the value of contributions, the value of proposed solutions and the value of services.

Have Confidence – Trust

Trust is closely linked to appreciation. Only if we trust each other can we give each other enough space to realise our potential and creativity. Trust should not only be practised along the hierarchy of the company, but should exist between all employees in general. Only with the feeling of being able to rely on each other can a climate of openness be created, which is necessary to unleash the power of the team and utilise it effectively for the benefit of all.

Embrace It – Sustainability






All three facets of sustainability – ecological, economic and social – are of great importance to us. We want to apply this value to all areas of our work – to decisions that influence satisfaction within the working community, good relationships with our customers, our image, our culture and our company’s balance sheets, and of course our use of resources and raw materials.

Stronger Together – Teamwork

Direct interaction with others nourishes and stabilises us and allows us to grow. We need meeting spaces to inspire each other and develop together.

Enthusiasm and motivation thrive in a healthy, high-quality environment and respectful, appreciative, open and joyful interaction. A sense of togetherness, recognising our role in a community and being inspired by the ideas of others is the basis of our work. When we win, we win together. When we lose, we lose together.

[> More about our corporate culture](#)

	 <p>Dream Big</p>	 <p>Be Awesome</p>	 <p>Have Confidence</p>	 <p>Embrace It</p>	 <p>Stronger Together</p>
VALUES	Innovation is deeply rooted in our DNA.	Appreciation goes a long way.	Trust is our key to success.	Sustainability comes naturally.	Teamwork gets us further.
PRINCIPLES	We are open to new ideas, create room for change and strive for continuous improvement.	We meet other people with respect, openness, attention and friendliness.	We count on the reliability, competency and good intentions of all of us.	We align personal and ecological needs with actions for our long-term success.	We pull together and collaborate to achieve greatness.

Sustainability is a core value at SEEBURGER



Connect



Automate



Innovate

People and Culture

Human rights

Respect for human rights is a key concern for us. Recognising the inherent dignity and equal and inalienable rights of all members of the human community forms the basis of freedom, justice and peace in the world.

We respect human rights as described in the United Nations Universal Declaration of Human Rights. ([Universal Declaration of Human Rights – United Nations – Regional Information Centre for Western Europe \(unric.org\)](#)). We reject the violation of these rights, including those of our business partners.

Equal opportunities

Our aim is to create a prejudice-free working environment and to ensure that all employees – regardless of age, ethnic origin and nationality, gender and gender identity, physical and mental abilities, religion and ideology, sexual orientation and social background – are valued. Diversity Charter ([About the initiative – For diversity in the world of work \(charta-der-vielfalt.de\)](#)). At our company, everyone has the same opportunities to develop and flourish. Any discrimination is unacceptable.

Dealing with each other

We treat each other with trust, openness and empathy. The same applies to dealing with our customers and other business partners. Abuse of power in any form has no place at SEEBURGER. We are in favour of a collegial working environment. We take responsibility by addressing misbehaviour and supporting each other.

Conflicts of interest and relationships

We act solely in the interests of the company and are not guided by personal interests. We must disclose any potential conflict of interest. For example, if we have a close personal relationship with a supplier, a customer or an employee who reports to us. We only engage in secondary employment with the prior consent of our employer.

Working conditions, occupational health and safety

We guarantee fair working conditions and offer a wide range of health-promoting measures. We create a working environment in which everyone can perform at their best and maintain their physical and mental health. We do not work under the influence of alcohol or drugs.

Resources

We use company property and resources carefully and responsibly. In particular, we do not use them for illegal or unauthorised private purposes. We do this because of our social and ecological responsibility, out of respect and obligation to our shareholders and because it is in our own interests to work in a company that operates sustainably.

Data, AI, Social Media and Intellectual Property

Handling data

We handle data responsibly and, building lasting trust among our employees, customers and business partners. We keep confidential company information secret. This obligation continues to apply even after termination of the employment relationship.

Data protection and information security

In all business processes, we guarantee the protection of privacy, the protection of personal data and the security of all business information in compliance with legal requirements and the state of the art. SEEBURGER is certified in accordance with TISAX and ISO 27001, the international standard for information security management. Achieving and maintaining ISO 27001 certification is part of our commitment to protecting the information entrusted to us. We undergo an independent audit every year by an accredited third-party company.

Artificial intelligence

In the course of digitalisation, artificial intelligence (AI) will have an ever-greater influence on our products, services and processes in the future. We are committed to responsible handling, safety and reliability as well as ethical aspects in the use of artificial intelligence.

Social media

The use of social media requires a high degree of responsibility due to the rapid dissemination of posts. We are all responsible for ensuring that our activities on social media are in line with our company values and the applicable laws. Our activities on social media can have a negative impact on the reputation of the SEEBURGER Group. Therefore, we should always ensure that our posts and interactions are positive and professional. We must avoid becoming involved in online discussions or disputes that affect our company.

Even seemingly private statements can be associated with the company and cause lasting reputational damage. The right to freedom of expression applies to statements made by employees. In the case of public expressions of opinion in which we are **recognisable** as SEEBURGER employees, we take care to identify personal views as such.

Intellectual property

We ensure that our intellectual property is protected from misuse. We recognise the intellectual property of third parties.

Business Partners and **Economy**

Competition and antitrust law

We adhere to the rules of fair competition within the framework of the legal requirements. We are aware that, in particular, the allocation of territories or customers, agreements or the exchange of information on prices/price components, supplier relationships and their conditions, capacities or supply behaviour among competitors are not permitted. The same applies to the exchange of information on market strategies and investment strategies. We know that not only written contracts, but also verbal agreements are not permitted.

Business relations

We make agreements with customers and suppliers completely and unambiguously and document them, including all subsequent amendments and additions. We select suppliers exclusively on a competitive basis after comparing the price, quality, performance and suitability of the products or services offered.

Corruption

We do not tolerate any form of corruption. Corrupt behaviour by employees or business partners is punishable by law and leads to distortions of competition as well as financial and reputational damage for SEEBURGER. Benefits such as gifts, invitations and business meals are only permitted within an appropriate framework and may only be granted or accepted in accordance with internal guidelines and applicable laws.

Money laundering prevention and economic sanctions

As a globally active company, we comply with national and applicable international economic sanctions and support the international community in the fight against money laundering and terrorist financing. We all comply with the above-mentioned requirements as part of our own responsibility. This includes, in particular, the current sanctions list. We organise our business processes in such a way that any form of economic crime is prevented.

Export control

Compliance with foreign trade regulations is fundamental for us as a globally active company. Foreign trade regulations must also be observed for intangible goods and services.

Accounting and financial reporting

We comply with the legal requirements for proper accounting and financial reporting.

Society and **Nature**

Sustainability

SEEBURGER has been a member of the United Nations Global Compact (GC) ([Homepage](#) | [UN Global Compact](#)) since 2010. Based on ten universal principles and the Sustainable Development Goals, the UN Global Compact pursues the vision of a more inclusive and sustainable economy for the benefit of all people, communities and markets, today and in the future.

As a company, we want to fulfil our environmental responsibility and make an active contribution to environmental and climate protection. To achieve this, we consider sustainable corporate development to be essential. Accordingly, we are committed to contributing to the careful use of all resources and the avoidance of emissions and energy consumption with the aim of reducing our environmental impact.

Volunteering

Volunteering holds society together. As a company that takes its responsibility towards the community seriously, we welcome and support the voluntary work of our employees, including by granting them time off work.

Donations and sponsorship

For us, business success is inextricably linked to social responsibility. Our company is actively committed to society and the communities in which we operate. We support charitable initiatives and projects that are in line with our corporate values and contribute to the positive development of society.



Compliance organisation

The „Governance, Risk and Compliance“ department is responsible for the global management of the compliance management system at SEEBURGER. Compliance is an integral part of our corporate culture. The compliance organisation oversees the company’s compliance management system and covers significant compliance risks for the Group.

We can all help to protect the trust that our customers and employees place in us. This means not only adhering to the rules, but also recognising violations at an early stage, reporting them and thus preventing potential misconduct. We provide various reporting channels for people to give us information: Contacting the compliance organisation directly, the HR department or anonymously via the SEEBURGER Group’s Integrity Line.



Contacts



Global Chief Compliance Officer and Group Data Protection Officer

Dr. Zsófia Körmendi

✉ z.nagynekoermendy@seeburger.com

Integrity Line

SEEBURGER: [Report an issue](#)

Compliance Team

✉ governance_risk_compliance@seeburger.com



Co-CEO

Michael Kleeberg

✉ m.kleeberg@seeburger.com

Imprint

SEEBURGER AG Global Governance, Risk and Compliance

Edisonstrasse 1
75015 Bretten, Germany
www.seeburger.com





www.seeburger.com

Disclaimer

This publication contains general information only. SEEBURGER does not provide any professional service with this publication, in particular no legal or tax consulting service. This publication is not suitable for making business decisions or taking actions. For these purposes, you should seek advice from a qualified advisor (e.g. lawyer and/or tax consultant) with regard to your individual case. No statements, warranties or representations (express or implied) are made as to the accuracy or completeness of the information in this publication, and SEEBURGER shall not be liable or responsible for any loss or damage of any kind incurred directly or indirectly in connection with any information contained in the presentation.