swoboda
technologies

CODE OF CONDUCT

FOR BUSINESS PARTNERS AND SERVICE PROVIDERS OF THE SWOBODA GROUP

VERSION: FEBRUARY 2026

PREAMBLE

The Swoboda Group is a family business operating internationally. Our independence gives us the great flexibility and speed that we need to successfully exploit the dynamics of the market. With innovative technologies and an uncompromising commitment to quality, our teams are shaping the future. We have declared it our goal to continue developing in this way in the years to come. This means being guided by certain values: reliability, expertise, commitment, and forward thinking.

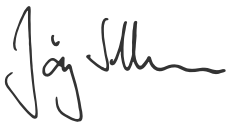
We are committed team players, reliable problem solvers, dynamic idea generators and, at the same time, a quality-oriented guarantor of success.

We enjoy taking on responsibility in all areas. We are particularly proud of technologies that allow us to make a valuable contribution toward creating a safer, more comfortable, and more energy-efficient world. Our stringent requirements regarding innovation, quality, and cost optimization motivate us to consistently do our best across all technological boundaries.

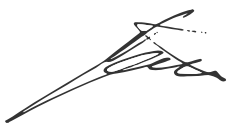
As a company that operates globally, we are also aware of our social, societal, and environmental responsibility. Therefore, the Board and all employees are required to comply with certain legal regulations and ethical principles. The long-term success of our company depends on our ability to convince through quality and performance, as well as deploying cost-effective production methods.

We expect this not only of ourselves, but also of our business partners, especially suppliers and distributors. Consequently, the following provisions form the basis of a good and sustainable business relationship between the Swoboda Group and our business partners along the supply chain; we expect the mandatory requirements set out in these provisions to be complied with.

The mandatory requirements are based on national and international specifications and conventions. They are implemented as part of our daily work in a range of areas: our commitment to human rights and anti-corruption, our guidelines for occupational health and safety, our environmental targets and environmental requirements, our quality standards, and the Code of Conduct for our employees and Board.



DR. JÖRG SCHERNIKAU
CEO/COO



CHRISTIAN GÖSER
CSO

DR. KLAUS SKROBANEK
CTO

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PROTECTING HUMAN AND WORKERS' RIGHTS

DUE DILIGENCE WITH REGARD TO HUMAN RIGHTS

Business partners undertake to respect the rights of employees and third parties as far as they are affected by the company's actions, and to treat people in accordance with guidelines applicable to the international community.

PROHIBITION OF FORCED LABOR AND MODERN SLAVERY

Any deliberate use of forced and compulsory labor, any forms of modern slavery and human trafficking, debt bondage, and involuntary prison labor are strictly prohibited.

PROHIBITION OF CHILD LABOR

The business partner shall make assurances that child labor will not be tolerated under any circumstances within its operations and vis-à-vis suppliers. The partner is obliged to ensure the ILO Conventions or the relevant Chinese laws on the minimum age for employment and on the prohibition of the worst forms of child labor are upheld within the partner's company as a minimum requirement, and, to this end, is obliged to carry out age verifications on employees and applicants.

VOLUNTARY EMPLOYMENT

Employment relationships shall be established voluntarily by employees and terminated within the framework of statutory provisions.

NONDISCRIMINATION AND EQUALITY

Business partners shall not discriminate against employees for any reason. Employees shall be selected, hired, and promoted based on their qualifications and skills. As well as this, the working environment shall be free of harassment and characterized by respect for the individual. Physical or psychologically inhumane treatment, punishment, or threats are not permitted.

PROTECTING HUMAN AND WORKERS' RIGHTS

FAIR WORKING CONDITIONS, REMUNERATION, AND WORKING HOURS

Remuneration shall correspond to the legally applicable minimum rate, or shall be based on industry-specific, customary benefits. The business partner shall ensure that working hours align with the relevant national requirements or international labor standards.

OCCUPATIONAL HEALTH AND SAFETY AND FIRE PREVENTION

Business partners of the Swoboda Group must comply with national occupational health and safety and fire prevention laws. Measures must be implemented at no cost to employees. Business partners shall establish a process that enables the continuous reduction of work-related health hazards and that serves to improve occupational health, safety and fire prevention operations. The business partner shall provide suitable protective equipment and clothing as well as fire protection equipment, fire detectors, and extinguishing devices. Employees shall be provided with comprehensible information about risk minimization measures in the languages relevant to them. Emergency plans and first aid supplies shall be made available in the event of an emergency. Emergency exits, evacuation routes, and assembly points shall be put in place and identified as such. If an occupational accident should nevertheless occur, first aid must be administered in accordance with country-specific regulations.

DECENT FACILITIES AND HYGIENE STANDARD

Taking into account national standards, business partners shall strive to provide a humane environment for workers and to provide toilet facilities, clean drinking water, and the option to prepare and store food hygienically.

PROTECTING HUMAN AND WORKERS' RIGHTS

FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE ACTION

Furthermore, our business partners recognize the fundamental right to form and join trade unions and employee representation bodies. Where this right is limited by local law, alternative means of employee representation that comply with the law shall be encouraged. In this way, Swoboda's suppliers and business partners shall guarantee freedom of association and safeguard collective bargaining processes.

DEPLOYMENT OF SECURITY STAFF

As far as the business partner employs its own security staff to protect its operations, or engages private security service providers, it must ensure that these respect human rights as recognized internationally. The business partner may not hire private security service providers or use public security forces if they disregard human rights.

PROTECTION OF HUMAN RIGHTS DEFENDERS

Where potential risks to human rights defenders arise in connection with value creation processes for products or services, the partner must oppose all forms of intimidation, defamation, and criminalization of human rights defenders, as well as any threats made against them.

PROTECTION OF LOCAL COMMUNITIES AND INDIGENOUS PEOPLES

In addition, the business partner agrees to respect the rights of local communities and indigenous peoples who may be affected by business activities at the partner's sites and to consider the impacts of its business activities on the local area.

IMPLEMENTING ENVIRONMENTAL PROTECTION MEASURES

DUE DILIGENCE WITH REGARD TO ENVIRONMENT AND THE USE OF ENVIRONMENTALLY FRIENDLY TECHNOLOGY

Swoboda and its business partners shall contribute toward protecting people and the environment within the context of their working environment and the performance of their duties and shall work toward developing and distributing environmentally friendly technologies. The relevant laws and regulations must be complied with. This also means taking into account registrations, declarations and, where applicable, approvals in accordance with the legal requirements for various markets.

ECONOMICAL USE OF RENEWABLE RESOURCES, ENERGY, WATER AND RAW MATERIALS

Attention must be paid in particular to the economical and sustainable use of energy, water and raw materials, the use of renewable resources, and the minimization of damage to health and the environment during development phases, when extracting raw materials, in production, in using and reusing products, during the recycling process, and when performing any other activity.

AVOIDANCE OF THE USE OF SUBSTANCES HAZARDOUS TO HEALTH AND THE ENVIRONMENT

Business partners shall avoid the use of substances and materials that are hazardous to health and the environment and shall identify environmentally friendly solutions that are effective in the long term.

IMPLEMENTING ENVIRONMENTAL PROTECTION MEASURES

AVOIDANCE OF WASTE AND ENVIRONMENTALLY FRIENDLY DISPOSAL

In the development, production, use, and recycling of products and other activities, the principles of avoiding waste and disposing of residual waste, chemicals, and wastewater in a safe, environmentally friendly manner must be taken into account.

PREVENTION OF HARMFUL SOIL CHANGES, NOISE EMISSIONS, WATER POLLUTION, AND AIR POLLUTION

The business partner shall not produce, use, store, and dispose of substances and materials that may cause harmful soil changes, water pollution, air pollution, or harmful noise emissions or that may impair the natural basis of life for humans and nature.

REDUCTION OF GREENHOUSE EMISSIONS/DECARBONIZATION

In addition, we expect our business partners to continuously reduce greenhouse gas emissions when preparing products and services, and to contribute to decarbonization by setting targets and taking action to support the Paris Climate Agreement.

SETTING AN EXAMPLE OF RESPONSIBLE BUSINESS CONDUCT

COMPLIANCE WITH LAWS

The Swoboda Group bears responsibility for its own actions as well as for the selection of its business partners. Each business partner of the Swoboda Group and its responsible persons are personally obliged to comply with the laws within the scope of the service and/or type of production to be provided. The Board members and executives of our business partners are also obligated to take all necessary measures to avoid violations of the law in their area of responsibility. Violations of the law that could have been avoided through proper supervision are the responsibility of the business partner. The Board and all employees of the business partner shall behave with integrity when performing their duties, and shall be mindful of the public reputation of their own company and that of the clients vis-à-vis customers and other partners in public. For their part, they shall work to maintain business relationships only with those business partners who have demonstrated that their conduct complies with the relevant regulations.

CONFLICTS OF INTEREST

The business partners shall take appropriate precautions to avoid conflicts of interest. Decisions shall be made exclusively on the basis of objective criteria and free of financial or personal interests. Transactions with companies, including suppliers, service providers, and business partners, in which an employee of the company, his or her spouse, life partner, or close relative is involved or employed in a managerial function may only be carried out if the Board of Swoboda and the business partner have given their consent. This also applies in the event that an employee commissions a business partner of the company privately.

SETTING AN EXAMPLE OF RESPONSIBLE BUSINESS CONDUCT

CORRUPTION, BRIBERY, AND EXTORTION

Business partners shall not tolerate corrupt or extortionate activity or bribery. Any instance in which an individual is taken advantage of or favored by way of a gratuity in connection with the award, acceptance, or performance of a contract is not permitted. A gratuity is any personal benefit to which there is no entitlement. Whether the decision is actually influenced or intended to be influenced by a gratuity holds no bearing. The mere suggestion of influence must also be avoided. Corrupt practices also include so-called facilitation payments for a routine official act. Business partners shall ensure that their employees and business partners neither accept nor grant unauthorized gratuities.

FAIR COMPETITION

Swoboda stands for fair competition. All measures that are likely to tie trade to prices or promote price fixing are not permitted. This also applies to our business partners. It is not permissible to divide up territories or customers, or to exchange information with competitors on supply relationships, conditions, capacities, market strategies, or supply behavior. Business partners shall ensure that exchanges of information deemed sensitive under competition law or any other types of conduct that restrict or may restrict competition improperly do not take place. It is also prohibited to supply products that have not been requested, to refuse to supply on the basis of aiming to establish a strong position on the market, and to charge different prices for the same service in order to exploit customers' willingness to pay to the fullest extent.

SETTING AN EXAMPLE OF RESPONSIBLE BUSINESS CONDUCT

EXPORT CONTROL

The aim of export control is, among other things, to prevent the distribution of weapons of mass destruction and to contribute to the fight against terrorism. Swoboda's suppliers and business partners shall comply with applicable laws governing the import and export of goods, services, and information, as well as relevant export control regulations and economic sanctions.

CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

Swoboda's suppliers and business partners shall comply with all applicable data protection regulations. Personal data pertaining to employees, customers, and business partners shall be processed in accordance with the applicable legal requirements. In addition, business partners must ensure that sensitive data is properly collected, processed, secured, and deleted. Business secrets must be kept secret without reserve, whilst confidential content must not be disclosed or made available in any form without authorization. Third-party knowledge may only be used if it has been lawfully acquired or is known from generally accessible sources. Industrial property rights of third parties (patents, designs, and trademarks) must be respected and may only be used with the permission of the property rights holder. Plagiarism will not be accepted under any circumstances. The business partner must comply with all nationally and internationally applicable laws on the protection of intellectual property. Intellectual property includes registrable property rights, domains, copyrights, and unfair competition requirements. In addition, the partner must ensure that it has all the necessary usage rights in order to avoid infringements of intellectual property rights.

SETTING AN EXAMPLE OF RESPONSIBLE BUSINESS CONDUCT

PROHIBITION OF ILLEGAL CONVERSION OF NATURAL ECOSYSTEMS

The business partner must ensure that its own operations do not contribute to or benefit from the illegal conversion of natural ecosystems. This also applies to illegal deforestation, which is understood to mean the conversion of natural forests primarily into agricultural land. The business partner must also take appropriate due diligence measures with regard to its supply chain.

DUE DILIGENCE WITH REGARD TO RAW MATERIAL SUPPLY CHAINS

Our business partners shall commit to increasing transparency, from the upstream supply chain through to raw material extraction. We expect to receive information on the smelters and refineries used by our suppliers and sub-suppliers upon request. Raw materials sourced from smelters and refineries that do not meet the requirements of the OECD or Chinese Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas must be avoided.

DEALING WITH ARTIFICIAL INTELLIGENCE

Business partners who develop and/or use artificial intelligence must ensure responsible use and handling, explainability, privacy protection, safety, and reliability when applying artificial intelligence. In doing so, they shall follow an approach that ensures that people remain the driving force behind development, and that opportunities and risks are taken into account in equal measure.

SETTING AN EXAMPLE OF RESPONSIBLE BUSINESS CONDUCT

FINANCIAL RESPONSIBILITY AND MONEY LAUNDERING

Compliance with current national and international regulations for proper accounting and financial reporting must be a matter of course for our business partners. This also applies to the retention periods for financial documents and the disclosure of financial information in accordance with applicable laws. In addition, our business partners take measures to identify and eliminate cases or risks of money laundering. They implement suitable preventive measures for this purpose.

ANIMAL WELFARE

The company undertakes to fulfil the nationally applicable laws on animal protection and animal welfare.

SETTING AN EXAMPLE OF RESPONSIBLE BUSINESS CONDUCT

IMPLEMENTATION OF AND COMPLIANCE WITH THE CODE OF CONDUCT

We expect compliance with all the provisions set out in this Code of Conduct not only from ourselves, but also from our business partners along the supply chain. Therefore, we require all partners to establish a professional management system that serves to ensure the values and guidelines set out in this Code of Conduct are implemented and adhered to. This includes creating a policy on working conditions and human rights that encompasses the following topics as a minimum requirement: prohibition of child labor; young workers; wages and benefits; working hours; prohibition of modern slavery; freedom of association and collective bargaining; nondiscrimination and harassment; women's rights; diversity, equality, and inclusion; land, forest, and water rights; and forced eviction.

Employees must receive training and advice to prevent violations of relevant requirements. We continue to expect our business partners to allow employees to report violations of the requirements described in this Code of Conduct without this having a detrimental effect on them. If the Business Partner identifies violations, it is obligated to remedy them within a reasonable period of time. The requirements set out in this Code of Conduct are mandatory for the business relationship between the Swoboda Group and its business partners. If a business partner does not comply with the requirements, the Swoboda Group reserves the right to take appropriate legal action.

REPORTING VIOLATIONS OR ASKING COMPLIANCE-RELATED QUESTIONS

Employees and managers of Swoboda, business partners, suppliers, customers, consultants, and third parties who become aware of abuses or other violations of existing laws, or other principles of ethical conduct in the business environment or along the supply chain are requested to submit an anonymous report via the digital whistleblower system under the link: **www.swoboda.com/messageline**, or to contact the Compliance Officer of the Swoboda Group directly by email at **compliance@swoboda.com**.

If you have any general questions or comments about this Code of Conduct, please contact Swoboda's Compliance Department via the email address above.

SWOBODA.COM/MESSAGELINE

COMPLIANCE@SWOBODA.COM

Swoboda Wiggensbach KG
Max-Swoboda-Straße 1
87487 Wiggensbach
Germany

SWOBODA.COM

swoboda
technologies