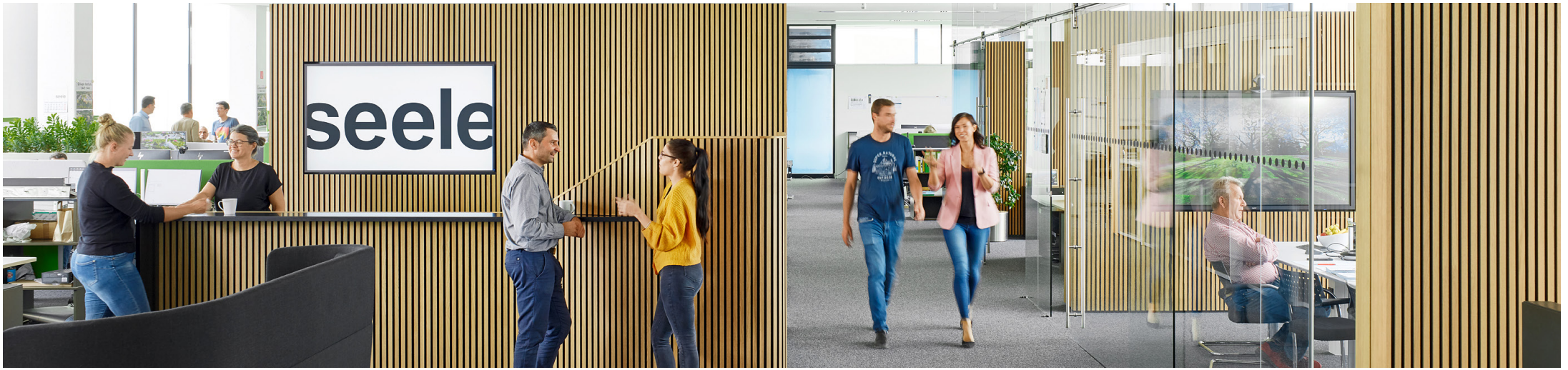
seele

code of conduct



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preamble

Dear Customers and Business Partners,
dear Sir or Madam,

We, the seele group of companies, 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 seele and its employees, who can thus play an innovative and sustainable role in the ongoing development of the joint success of the seele group of companies 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 business partners and employees are made aware of this code of conduct, which represents the guidelines for conscientious working practices at seele. Reviews at regular intervals will ensure that this code of conduct always remains up to date and reasonable.

The seele group of companies places its trust in each one of its employees and expects them to live up to their own expectations and recognise the need for correct conduct at all times. In doing so, the managers of the seele group of companies will support each individual employee.

cornerstones

Integrity and exceptional expertise guarantee our success and our credibility. It is therefore a matter of course for all seele's employees and suppliers that legislation and regulations must always be adhered to – nationally and internationally. Under no circumstances will seele tolerate any exceptions to this rule. Transgressions will be dealt with in the form of disciplinary consequences, up to and including termination of the employer-employee relationship. In order that employees do not violate these cornerstones, seele 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 seele group of companies 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 seele 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 credibility 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
seele 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 seele 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
seele 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, seele 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 seele and that it is vital to avoid situations in which there is a conflict between personal or financial interests and the interests of seele.

For example, seele employees may not work simultaneously for competitors, may not pursue activities competing with those of seele, 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 seele employees and all members of seele management. The members of 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 personality of every single employee. No employees are discriminated against at seele. 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 tolerated.

fairness and competition

seele 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. seele 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 seele 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.

seele 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 seele 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 if we build high-quality projects and carry out our work efficiently.

Efficiency includes various facets at seele. On the one hand, efficiency at seele 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. seele 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

The seele group of companies 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 natural resources and employ methods that conserve them.

seele 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 eco-friendly conduct. Active communication keeps our employees up to date and encourages them to behave in an environmentally sustainable manner.

implementation and communication

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

Infringements against the code of conduct are to be reported to a direct superior, management, or the external ombudsman. Customers and business partners with information regarding infringements may contact the management or our ombudsman in confidence at any time. All information received will be treated confidentially. No person supplying information will be disadvantaged as a result of providing that information.

The code of conduct is reviewed at regular intervals to check that it is up to date. Employees can make suggestions for the ongoing development of the code of conduct to their superiors, management and the ombudsman.

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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 on 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 an obligation to confidentiality, e.g. lawyers.

Discrimination
Discrimination is disadvantaging or vilifying persons without factual justification. This applies in particular when the gender, sexual orientation, ethnic origin, race, religion 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. I.e. 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 termination in the case of severe violations. Reasons for immediate termination could be, for example, the unauthorised private use of company property, the acceptance of bribes, infringement of industrial safety requirements, discrimination or insults.

Diversity
Diversity stresses the differences between employees and emphasizes this in the 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.