

Sasse Group Code of Conduct



Introduction

Sasse Group and its affiliated companies are committed to conducting business in an ethical, legally compliant and socially responsible manner. We provide a safe and ethical working environment for all employees and partners and ensure that they are treated with respect and dignity. In doing so, we all take responsibility for how our company is perceived.

This Code of Conduct is a binding guideline for ethical, social and legally compliant behaviour for all employees, regardless of whether they perform their duties as permanent employees, freelancers, temporary workers or otherwise. This Code of Conduct, in addition to the applicable laws, ordinances, regulations and guidelines, sets out the minimum standards that deserve the special attention of all employees as a team and as individuals.

The characteristics that make up a family business should serve as a guide here: mutual trust, direct communication, appreciation of every contribution to the common success. This Code of Conduct is supplemented by a comprehensive list of detailed internal guidelines, e.g. on information security, data protection, conduct in customer properties, etc. In addition, we encourage our employees to follow international and industry "best practices".

1. Corporate governance

We are committed to complying with all applicable laws and regulations and this Code of Conduct, even if it sets a higher standard without contradicting legal requirements. We adhere to the principles of the United Nations Global Compact, the United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the 1998 International Labour Organization Declaration on Fundamental Principles and Rights at Work, in each case in accordance with national laws and practices as set out below.

Human rights and fair labour practices

Sasse Group complies with all applicable laws and mandatory industry standards regarding minimum wage, working hours including overtime, rest breaks and paid holidays.

Employees are free to join a trade union or employee representative body of their choice without threat or intimidation. Sasse Group recognises and respects the right to collective bargaining in accordance with applicable laws.

2. Working together with respect

Sasse Group promotes an inclusive work environment and values the diversity of its employees. We are committed to equal opportunities, do not discriminate, and do not tolerate discrimination or harassment of any kind.

Our employees are selected and promoted on the basis of their qualifications and skills. We condemn any kind of discrimination, for example through disadvantage, harassment, bullying, defamation - also in social networks - and promote respectful cooperation in a spirit of partnership.

We regularly and clearly communicate the values that are most important to us to our employees. They are an integral part of all discussions between managers and employees. We guarantee equal opportunities and equal treatment, regardless of ethnic origin, skin colour, gender, disability, world view, religion, nationality, sexual orientation or social origin. This also applies to political attitudes, insofar as these are based on democratic principles and tolerance towards those who think differently.

3. Health and safety

Sasse Group has implemented an occupational health and safety management system at a high level appropriate to our business. We comply with applicable health and safety regulations in close coordination with our principals and the rules that apply in their field.

We provide a working environment that is safe and conducive to the health and safety of employees, protects third parties and prevents accidents, injuries and work-related illness. This includes regular workplace risk assessments, training on health and safety issues and the implementation of appropriate hazard control and precautionary measures.

We are mindful of the diverse psychological stresses that can arise from the daily work and the individual situation of employees. We make careful use of the possibilities of occupational integration management in order to protect the performance and long-term employment of all employees.

4. Data protection and IT security

We strictly comply with applicable data protection laws (such as the GDPR), in particular with regard to personal data of customers, consumers and employees. We comply with all legal and contractual requirements for data protection and information security when collecting, recording, hosting, processing, transferring, using or deleting data. We do not disclose data and information obtained through our business relationships or affiliations that is not known to the public.

In particular, we recognise the obligation to protect the confidentiality, integrity and availability of information and data provided to us. All employees are obliged to treat and protect information and data of our customers and of Sasse Group, in particular business and trade secrets and intellectual property, with the utmost care, regardless of their economic value, to use them only for their intended purpose and to protect them from disclosure and other infringements.

The data protection and data security training offered by Sasse Group is mandatory for all employees.

5. Fair competition

Sustainable and lasting business cooperation for the benefit of all can only exist with fair competition and strict compliance with the legal system. Therefore, Sasse Group undertakes to comply with all applicable competition, trade, sanctions and customs laws and regulations, including prohibitions and restrictions, and not to take any actions that violate antitrust law. We do not make sham offers, engage in discussions with competitors on prices, capacity or non-competition, nor do we collude to share customers, territories or production programmes.

We understand the principle of the "honourable businessman" as the basis of our behaviour in social and economic interaction. Honesty and a sense of responsibility characterise our thoughts and actions. Our agreements with customers and suppliers are complete and unambiguous;

subsequent changes and additions are documented. This also applies to arrangements for the payment of bonuses, credit notes, commissions, advertising or subsidies for sales promotion. We select our suppliers solely on a competitive basis after comparing price, quality, reliability, performance and suitability of the products or services offered. Sasse Group adheres to. Our beneficial owner(s), employees, agents and other subcontractors, consultants or suppliers used by Sasse Group are not on any applicable sanctions list.

6. Business relations

Sasse Group rejects any form of corrupt behaviour. Employees are obliged to comply with all applicable national and international anti-corruption laws and regulations. Our employees reject extortion, bribery, kickbacks and bribes of any kind under all circumstances, both in their dealings with public officials and with persons in the private sector. Similarly, they will not directly or indirectly offer, provide or accept anything of value to improperly influence an (official) act or to gain an improper advantage in order to obtain or retain business.

Within Sasse Group, any form of fraud or asset-damaging acts, in particular embezzlement, theft or tax evasion, is prohibited, regardless of whether assets of Sasse Group or of third parties are involved. We are strongly committed to complying with all laws relating to the prevention, detection and reporting of money laundering activities and conduct our business relationships only with customers and business partners who are engaged in legitimate business activities and use legitimate financial resources. Sasse Group maintains business records and reports in accordance with applicable laws and regulations to demonstrate compliance.

7. Conflicts of interest

A conflict of interest is a personal or financial interest, business or personal activity or relationship, past or present employment or commitment that may interfere with the ability to perform professional duties and responsibilities independently and objectively. Such conflicts of interest include critical relationships such as consanguinity, marriage, partnership, involvement in or investment in business partners or competitors. Employees must promptly disclose any actual or potential conflict of interest related to their job so that the conflict of interest can be resolved.

8. Environmental and climate protection

Sasse Group attaches particular importance to the sustainability of its actions. This means first of all minimising the impact of its business activities on the environment. Therefore, we support and give preference to facilities, procedures, solutions, equipment and processes that help to reduce environmental impact. Sasse Group complies with all applicable environmental laws, regulations

and standards and has implemented an effective system to identify and eliminate potential threats to the environment.

We are aware that our activities always have an impact on the environment, especially on the climate. We actively address this knowledge by, for example, setting climate protection targets and monitoring them. We also regularly report relevant data on environmental and climate protection in a standardised manner. In doing so, we adhere to the DNK standard (Link einfügen). Within the framework of our Corporate Social Responsibility (CSR), the guidelines of the UN Global Compact and the Sustainable Development Goals (SDG) are our benchmark.

Sasse Group complies with all applicable laws and the resulting due diligence obligations with regard to the procurement of materials from conflict regions and high-risk areas that may contribute to human rights violations, corruption, the financing of armed groups or similar negative effects.

9. Business continuity planning

Sasse Group is prepared for potential disruptions to its business (e.g. natural disasters, terrorism, supply chain disruption, communicable disease outbreaks, epidemics or pandemics, information security issues, cyber attacks). This preparedness includes business continuity plans that protect customers, employees and the environment from the impact of potential serious disruptions that may occur in our area of operations.

Implementation of the Code of Conduct

All employees are obliged to comply with this Code of Conduct. This also means that employees keep themselves informed on an ongoing basis about the topics relevant to their tasks, in particular about the applicable guidelines and principles as well as their amendments, updates and supplements. This Code of Conduct does not repeat or refer again to existing regulations, such as the corporate guidelines of Sasse Group and the Code of Conduct for Business Partners. The provisions and guidelines contained therein shall continue to apply in addition to this Code of Conduct.

If employees have any questions about the Code of Conduct, they can contact their managers or the Human Resources Department at any time. All indications of (possible) violations of the Code of Conduct or applicable national and European law, as well as risks that could lead to violations, must be reported immediately to the manager, the Human Resources Department or the Executive Board. Regardless of the topic and time, Ms Monika Dressler is available to all employees as an ombudswoman, i.e. as a neutral point of contact for questions, conflicts or matters that contradict the meaning of this Code of Conduct. Employees can contact her at

monika.dressler@sasse.de with their concerns. All information will be handled promptly and confidentially; employees who report a (possible) violation in good faith do not have to fear any disadvantages. If necessary, a discussion - naturally confidential - with the HR department is possible at any time. The Human Resources Department is responsible for following up on any information and for taking appropriate sanctions in the event of violations.

Sasse Group regularly monitors, checks and verifies compliance with the requirements of this Code of Conduct. We therefore keep the necessary records to prove compliance with this Code of Conduct. We also strive for continuous improvement, e.g. by setting measurable targets for reducing environmental impact, improving working conditions or diversity and sustainability.

This Code of Conduct reflects the values and commitment of Sasse Group to its customers, society, and the protection of the environment. Sasse Group does not tolerate any violations of the Code of Conduct. Without prejudice to other legal remedies, it reserves the right to take action. Depending on the nature and severity of the violation, measures such as work instructions, warnings up to and including termination of employment may be taken.

A handwritten signature in blue ink, appearing to read "C. Sasse".

Dr. Christine Sasse

A handwritten signature in blue ink, appearing to read "L. Sasse".

Dr. Laura Sasse

A handwritten signature in blue ink, appearing to read "Clara Sasse".

Clara Sasse

A handwritten signature in blue ink, appearing to read "K. Böhmer".

Katja Böhmer