



## Code of Conduct

Declaration of Principles and  
Code of Conduct for the Sedus Stoll Group

**Note**

In the following document, the name Sedus or Sedus Stoll Group refers to the companies Sedus Stoll AG, Sedus Systems GmbH, Sedus Digital GmbH, Klöber GmbH and the nine foreign subsidiaries.

**Note on the use of male/female/diverse form**

Please note that, for reasons of readability, we have refrained from using masculine, feminine and diverse forms throughout this document. Of course, all texts refer equally to all gender identities.

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# Foreword from the Board

Sedus is one of the leading all-round providers of office furniture and workplace concepts. As a particularly value-oriented company, we ensure that our comprehensive product portfolio is exclusively “Made in Germany”, and stands for sustainability like no other.

The key to our company's success lies in honest, high-principled and ethical behaviour on everyone's part, i.e. the Board of Directors, the managers and every single employee bears a personal responsibility. We are convinced that agreeing on clear rules strengthens an organisation.

We are aware that in daily business it is not always easy to recognise which action or decision is right. This Code of Conduct for the Sedus Stoll Group summarises our company-wide understanding of, attitude towards and handling of compliance challenges (compliance with all legal requirements), corporate sustainability (responsibility for sustainability) and corporate behaviour (conduct of the entire company and the behaviour of employees). It gives us a reliable orientation for our daily work and supports us in dealing with legal and ethical issues. With the Code of Conduct, we set a standard for ourselves and, at the same time, make a clear promise to the public.

We are firmly committed to acting responsibly and respectfully in terms of law-abiding behaviour and respect for internationally recognised human rights. Sedus is more than merely a business organisation that is only concerned with generating turnover and profits. We place the utmost importance on the preservation of the environment and the conservation of natural resources, social responsibility towards our employees, business partners and the public, and the trust of customers and stakeholders in our company and in our products.

Our Code of Conduct is dynamic and is open to new standards of behaviour. Changes are possible at any time and internal guidelines as well as labour contract agreements can be added to it.

Compliance with the Code of Conduct applies equally to all employees, both in Germany and in other countries. Everyone has an obligation to familiarise themselves with the contents and to take them into account when making decisions. Violations of this Code of Conduct will not be tolerated. They harm our company and, therefore, us all.

Daniel Kittner  
Speaker of the Board

Cornel Spohn  
Director of Finance

## Approach of the Sedus Stoll Group to implementing human rights and environmental due diligence obligations

As an internationally operating office furniture manufacturer with a focus on regional procurement, we are exposed to risks related to human rights and the environment. Holistic management helps us to continuously monitor these risks and to prevent or minimise them by implementing various measures.

The multi-level risk management system identifies abstract and specific risks within our business area and along our supply chain. Both indirect and direct suppliers are taken into account. We then define priorities and determine measures for risk avoidance and minimisation. The risk assessment is carried out by the Human Rights Officer. The latter is supported by the Social Performance Team (SPT) and the upper management. Furthermore, complaints addressed to the Human Rights Officer are included in the assessment. Preventive and remedial measures are defined below.

At the end of the continuous process, we check the effectiveness of the defined measures. The results are documented and stored according to the requirements. Ultimately, all activities are included in annual reporting on the human rights situation of the Sedus Stoll Group.

In addition to internal practices, we are committed to having our human rights and environmental impact reviewed by third parties. For this purpose, we use a socially responsible management system with certification according to the internationally recognised social standard "Social Accountability 8000" (SA8000), in which the rights of employees, their workplace conditions and fundamental human rights are taken into account in the company's business activities. The key requirements of SA8000 relate to child labour, forced labour, health and safety, freedom of association, discrimination, discipline, working hours, pay and the management system to safeguard these aspects.

This Code of Conduct takes into account the following international standards: ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights and the ten principles of the UN Global Compact, to which the Sedus Group is committed as a participant. This is supplemented by the requirements of the Supply Chain Act and the SA 8000 standard, the certification of which Sedus was awarded in 2023.

**1. RISK MANAGEMENT**

We have defined the responsibilities, which are coordinated by a single person and agreed upon in a multi-disciplinary committee.

**2. RISK ANALYSIS**

Risk analysis is carried out on a recurring basis as well as on an event-specific basis.

**3. PREVENTIVE AND REMEDIAL MEASURES**

In order to implement optimisations in our supply chain, we define both preventive and remedial measures.

**4. EFFECTIVENESS TEST**

Every measure is followed up and checked for effectiveness.

**5. COMPLAINT MANAGEMENT**

We have established central complaints offices for the group and individual locations and informed our employees about them.

**6. REPORTING**

We report at least annually on our approach to due diligence, its effectiveness and our identified priority issues.

# Corporate principles

Sedus corporate principles are binding for all employees and form the basis of our philosophy and values. They guide and direct our daily actions, characterised by high standards. What drives us is the consistent commitment to people and to healthier working conditions in the office.

## 1. The will to move

The world of work is changing – and with it, the responsibility of office furniture manufacturers. Sedus is taking the road to the future together with its customers and partners by not only recognising change, but actively helping to shape it – with innovations both large and small. In this way, Sedus not only promotes physical and mental movement in everyday office life, it also becomes a movement itself.

## 2. Create proximity to the customer

Sedus is a brand that also moves people emotionally. By making our customers feel understood and respected, and by having our employees declare customers' wishes and needs to be their personal objectives, Sedus products and services create tangible benefits.

## 3. Deliver innovation through motivation

In an environment in which knowledge is shared and multiplied in a goal-oriented way, there is an inspiring interaction of motivation and innovation. This gives rise to the necessary competences to be able to offer “productive well-being” in ever new ways inside and outside the company. This calls for the consistent participation of employees in the success of the company.

## 4. Offer quality down to the smallest detail

Our products are used millions of times each day. We meet the resulting responsibility with top performance – at every level. Our process-oriented management system makes it possible to effectively combine quality and efficiency and to inspire our customers in a variety of ways.



## 5. Have a strong focus on sustainability

Many talk about it – we act on it. Certifications prove it: Sustainability is part of our corporate culture. We consider both direct and indirect environmental requirements which go beyond the limits of our business. This is demonstrated, among other things, by the durability of our products, environmentally friendly materials and the reduction of emissions to a minimum.

## 6. Network successfully

An idea can only become great if many people are committed to it. In the Sedus business network, these include not only employees and sales agents, but also suppliers. We, therefore, select them carefully. Together, we can make our vision of innovative office furniture and our understanding of sustainability come true.

## 7. Be independent

Our foresight in action and our financial basis secure our existence and growth, our entrepreneurial flexibility and our independence in the long term.

## 8. Be reliable and consistent

We do what we say and say what we do. We always take forward-looking and target-oriented action, exploit opportunities and avoid risks for customers, employees, the company and the environment. This creates trust and loyalty – the hardest currency in all times.

## 9. Social responsibility

Sedus takes its social responsibility seriously, both within the company and beyond. This includes extensive company health management and events which promote culture. The main shareholders, two charitable foundations, support this approach through their own projects both in Germany and abroad.

## 10. Fulfil our role in society

Sedus acts fairly and responsibly at all times. We are committed to individual self-realisation and the functioning of society as a whole. Operating successfully around the globe requires complying with the laws and binding obligations of each country. We are committed to the principles of the United Global Compact and support the core values concerning human rights, labour standards, environmental protection and anti-corruption.





## Our responsibility as a member of society

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- Human rights and working conditions
- Equal opportunities and equal treatment
- Environmental protection
- Donations and charity

## 1.1 Human rights, working conditions, child labour, equal opportunities

It is part of our mission to put people at the centre of our business activities. We ensure that our actions strictly comply with the law and ethical principles. For Sedus, observing and protecting human rights are the highest fundamental principles. We reject any forced or child labour. We embrace our social and environmental responsibilities.

In 2017, Sedus Stoll AG signed the accession declaration to join the United Nations Global Compact, thereby committing itself to the ten principles for responsible corporate governance. As proof of its ongoing commitment for the core values relating to human rights, labour standards, environmental protection and anti-corruption, Sedus Stoll AG submits an annual progress report "Communication on Progress".

We respect the dignity of every human being, the privacy and the personal rights of every individual. Tolerance of dissent and commitment to the principles of democracy as well as the rule of law are the foundation of our work – not only towards colleagues, but always and everywhere.

We do not tolerate discrimination or harassment of any kind, whether based on ethnic, national or social origin, age, colour, gender, disability, marital status, political or religious views or sexual orientation.

We create a climate of appreciation and mutual trust by respecting others in their individuality, always acting openly and honestly, and promoting and encouraging individual and cultural diversity. We value the diversity of our colleagues.

We are committed to a collegial working environment and strongly oppose any kind of harassment. We assume responsibility by addressing misconduct in a very tangible way.





## 1.2 Environmental protection

As an office furniture expert and technological pioneer, Sedus has continued to set standards throughout its 150-year company history – above all, in the areas of ergonomics, design and sustainability. This led to the development of standards that have gained global significance.

Since as early as the 1950s, Sedus has been practising active environmental protection, at a time when the term did not even exist. It is on these foundations that Sedus embarked on the embryonic discussions about ecology back in the seventies, in the same matter-of-fact way that it currently engages in the topic about sustainability.

People and the environment are part of the corporate DNA at Sedus. Looking to the future means building on the good and setting new goals. Given the finite nature of natural resources, Sedus consistently pursues the concept of a recycling economy. This entails a holistic view of the life cycle, from the use of materials to energy, from the usage of recyclable materials to recycling.

It is not only the big steps, but often the many small ones that bring us forward when it comes to environmental protection. In the meantime, we have worked hard to draw up ecological assessments for all Sedus products and have introduced certification in accordance with the highest possible standards. These include ISO 9001 (Quality Management), ISO 14001, ISO 45001 (Occupational Health and Safety), 50001 (Energy Management) and PEFC (Programme for the Endorsement of Forest Certification). We will continue to provide these certifications in the future – because they are becoming increasingly important in the sale of products and are regularly required in tenders.

Our new and ambitious goal is to become climate neutral by 2025. All operations and processes are currently reviewed and subsequently optimised so that greenhouse gas emissions only have a minimal impact on the climate. This is a challenge which does not only apply to production processes. It requires a high sensitivity to environmental issues – which has long existed in the company – and a completely new, courageous approach in which everything is put to the test. Starting with the materials used and their supply sources, to production methods and energy consumption, all the way to the recyclability and reuse of our products.

### **Waste management**

We are committed as a company to promote and implement responsible waste management in order to protect the environment and support sustainable practices. To achieve this, we are committed to disposing of waste properly in accordance with applicable laws and regulations and to using recycling opportunities wherever possible. We encourage our employees to be conscious of waste by prioritising waste prevention and reduction and favouring reusable materials where practicable. By making these efforts, we strive to minimise our ecological footprint and make a positive contribution to society and the environment.

### Packaging

We recognise the importance of sustainable packaging and are committed as a company to promoting and implementing responsible packaging practices. Our aim is to minimise the use of environmentally harmful materials in packaging and instead switch to environmentally friendly, recyclable and reusable alternatives wherever it is technically feasible and economically viable. We are committed to raising awareness and encouraging our suppliers and partners to adopt sustainable packaging practices. Furthermore, we promote conscious consumer behaviour by informing our customers about the proper disposal of packaging materials and encouraging them to support reuse and recycling.

## 1.3 Donations and charity

As a responsible member of society, Sedus supports education, science, culture, social causes, sport and the environment through donations in cash and in kind within the scope of its legal and economic possibilities. We do not make donations for commercial gain. All donations must be in line with the applicable legal system.

The main shareholderes in Sedus Stoll AG are the Stoll VITA Foundation (60.6 %) and the Karl Bröcker Foundation (32.3 %). The assets of the foundations and thus the financing of their activities essentially consist of investment profits. The Stoll VITA Foundation is dedicated to the promotion of education, public health care, scientific research and the promotion of environmental protection and nature conservation, landscape conservation as well as animal husbandry and plant breeding. "Future for Children" is the guiding principle of the Karl Bröcker Foundation. It supports kindergartens, schools, medical and therapeutic facilities with a focus on educational and therapeutic projects. Furthermore, the foundation promotes scientific research into diseases affecting children.









## Our responsibility in business transactions

- Conflicts of interest
- Prohibition of corruption
- Money laundering
- Accounting and financial reporting, taxes and duties
- Fair and free competition
- Suppliers and procurement
- Risk management
- Product conformity and safety

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## 2.1 Conflicts of interest

We always aim to separate personal and private interests from those of the company and, when making business decisions, we act in the best interests of Sedus. Activities in our group of companies may not be used to gain private advantages. Business partners may not be favoured out of private interest.

To avoid conflicts of interest, secondary employment requires prior consent of the respective manager. This applies in particular to any secondary employment for competitors, customers or suppliers of Sedus.

Secondary employment is any activity in which work is made available to a third party beyond the scope of the main employment – irrespective of whether it is paid. This also includes self-employed secondary employment.

If a conflict of interest arises, we disclose it in good time and agree on a further course of action with our manager.

Equity investments in competitors or business partners of Sedus that enable entrepreneurial influence are not in the interests of the company.

## 2.2 Prohibition of corruption

In order to maintain the trust of our clients, we refrain from any form of corrupt behaviour and avoid even the mere appearance of it. We make business decisions in the interests of the company for objective and comprehensible reasons and always behave transparently, correctly and fairly towards our business partners.

We may not offer, promise or grant advantages to members of the public sector in Germany or in other countries or to decision-makers in private-sector companies without prior approval in order to achieve behaviour or a decision that is favourable to Sedus. We pay particular attention to this when it comes to gifts and invitations to business lunches and events. If we are asked to grant unauthorised benefits by members of the public sector or decision-makers in private-sector companies, we will inform our manager.

Furthermore, we do not accept gifts or other benefits that could influence our decisions or are directly related to a business decision. Small and customary gifts of a reasonable value of up to 40 euros per year, such as small promotional gifts, invitations to a business dinner, or occasion-related gifts (for example, birthday, Christmas, anniversary) remain unobjectionable – as long as they are not money or money-like gifts. If we are unsure whether we are allowed to accept a gift, an invitation to a business dinner or an event, for example, we consult our manager on the decision.

Public sector is an important customer of our company. In this regard, we pay particular attention to the regulations governing the award procedures for public contracts and, in particular, the rules on the avoidance of unlawful influence.

## 2.3 Money laundering

Money laundering refers to the process of disguising the origin of funds from criminal activities, such as terrorism, drug trafficking or bribery by infiltrating “dirty money” into the legal financial and economic circuit to give them the appearance of legality and conceal the actual origin or identity of the owner.

It is a declared objective of Sedus to only maintain business relationships with reputable business partners whose activities are in accordance with legal regulations and whose financial resources are of legitimate origin. We do not support money laundering and take all necessary measures to prevent it within our sphere of influence. This requires the attention of all employees. Suspicious forms of payment, transactions or behaviour by clients, advisors and business partners must be reported.

We immediately allocate incoming payments to the corresponding services and record them in the accounts. We ensure transparent and open payment flows.

## 2.4 Accounting and financial reporting, taxes and duties

Compliance with all national and international laws is part of responsible corporate governance for the Sedus Stoll Group. Proper accounting and financial reporting are a matter of principle for us. An essential element of the Sedus internal control system is to ensure the integrity of financial reporting. Each of us is responsible for contributing to an up-to-date, complete and factual handling of business transactions.

Sedus always acts in full compliance with local tax and customs regulations, as well as internationally binding guidelines and in accordance with domestic tax laws and the OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations.

Sedus is actively involved in the international exchange of goods and services and supports free world trade. We follow existing trade controls and comply with import and export control regulations and economic embargoes.

## 2.5 Fair and free competition

Sedus is committed to free competition as a key component of the market economy – as it promotes efficiency, economic development and innovation.

In all business agreements and all business relationships with third parties, we respect the legal requirements to ensure free competition. This applies in particular to agreements with competitors and other third parties if these agreements may affect competition. We do not participate in price agreements or prohibited coordination of market behaviour between competitors. We are committed to fair dealings with our business partners and competitors and do not abuse existing room for manoeuvre.

We also do not disseminate false information about the products and services of our competitors or attempt to gain competitive advantage in any other unfair way. We expressly reject competitive espionage as a means of unfairly obtaining information about our competitors. We like to benchmark ourselves against our competitors and always comply with the rule of law and ethical principles.



## 2.6 Suppliers and procurement

We nurture trusting and fair business relationships with our suppliers. Equally, we expect our suppliers to treat us with the same respect and integrity that we show them.

Good and close cooperation with our suppliers is crucial in order to produce the best products according to high environmental and social standards. Sedus runs a systematic and all-encompassing sustainability management programme. In this context, we also expect our suppliers to meet specific requirements in relation to sustainable business conduct. Along with Sedus Stoll Group's general supplier guideline, a separate supplier guideline on sustainability was prepared in 2018. It was signed in 2019 by all suppliers with an order volume of more than EUR 5,000. Our sustainability policy is based on international standards and laws, such as the Supply Chain Act or the ILO Declaration, the OECD Guidelines and, in particular, the United Nations Global Compact. The necessary compliance with human rights is specified in the directive and required in the terms and conditions of purchase. Suppliers undertake to ensure compliance with these guidelines, applying these same obligations to their sub-suppliers. We only take on new suppliers if they have made all the required disclosures and they are able to prove the necessary certifications and quality, or compliance with the applicable standards in the relevant fields.

Purchasing operates in accordance with the laws and regulations of the countries in which we operate. Often suppliers are also customers. We do not take unfair advantage of this and always separate the procurement and sales sectors.

## 2.7 Risk management

Following our corporate principles, our most important concerns are customer satisfaction and the avoidance of risks for our partners, the company, our supply chain, our employees and the regions in which we are active. Therefore, we manage risks in a forward-looking manner to protect the health of our employees, the business, the local public, all parties in our supply chain and the environment as well as to secure supply to our customers. We involve our suppliers in this. To ensure that this is the case at all times in day-to-day business, Sedus carries out a continuous human rights and environmental risk analysis to identify potential and actual impacts along the entire supply chain. Both the company's own business sector and direct suppliers are taken into account. Within the abstract risk analysis, we take into account country and industry risks. In the specific risk analysis, we analyse human rights and environmental risks.

The entire risk analysis forms the basis for the derivation of objectives, preventive and remedial measures, and is given weight in the constant entrepreneurial decision-making process.

## 2.8 Product conformity and safety

Every day, many people use our products when working in the office, in meetings or in intermediate zones. Sedus has a responsibility to eliminate any risks to health and safety resulting from the use of these products as far as possible.

It is not only a legal obligation, it is also our commitment to comply with the legal and official regulations and current standards that apply to our products. Our products correspond to the respective state of the art and are developed and tested in accordance with the legal requirements and standards.

This is continuously and systematically ensured by our structures as well as constant product monitoring in the market.

We do not compromise here. We ensure that appropriate measures can be initiated in good time in the event of any deviations that may occur.

With our actions, we ensure that potential hazards from our products are counteracted and that applicable regulations are complied with. If we detect deviations, we report them to the manager or the responsible department so that appropriate measures can be initiated.



## Our responsibility in the workplace

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- Freedom of association, working conditions and training
- Fair pay
- Occupational safety
- Health management
- Data security and data protection
- Cyber security
- Handling company assets and trade secrets



### 3.1 Freedom of association, working conditions and training

“We do what we say and say what we do” – is stated in point eight of the Sedus corporate principles. For good reason, because each individual in the company will only work actively and successfully if working conditions, qualifications and management are optimal. We create an environment in which our employees can work towards our company objectives with motivation, expertise and a sense of responsibility.

We strive to be an attractive employer which fosters happiness and encourages its employees. We agree on clear goals and create freedom that enables our employees to make their own decisions within their area of responsibility. We aim to build up the next generation of employees ourselves, and continuously invest in education and training. Safety and the health of our employees is an important concern for us.

Within the scope of our operational possibilities, we support the expansion of professional skills equally for all with suitable training and further education measures.

We promote a working environment that supports flexible working hours, where possible, and takes into account the needs of our employees. We recognise that each individual has unique personal commitments and responsibilities that need to be balanced with work. Our flexible working time policy is designed to ensure that our employees can achieve

a good work-life balance. We strive to create an inclusive and supportive work environment where all employees have the opportunity to successfully complete their tasks while taking into account their individual circumstances.

Responsible cooperation with labour representatives is also a matter of course at Sedus. Besides workers' councils, Sedus also has a designated person of trust for the severely disabled and representatives for young employees and trainees. Furthermore, Sedus Stoll AG has also made it possible for employees to use the services of a social worker anonymously. This free external counselling offers everyone the chance to get support when faced with stressful professional and private difficulties.

### 3.2 Fair pay

The right to fair pay is recognised for all employees. Remuneration and other benefits are at least in line with the respective national and local legal standards or the level of national economic sectors/industries and regions.

We believe that fair pay is a fundamental principle in creating a positive and productive working environment. When determining salary, we take into account various factors, such as qualification, experience, area of responsibility and performance. We strictly avoid discrimination based on gender, origin, religion, sexual orientation or other personal characteristics. Transparency is important to us, so we make sure that our employees can understand the criteria and mechanisms for salary calculation. We continuously advocate for fair pay for our workforce. Fairness in pay is a central component of our corporate culture and reflects our commitment to respectful and responsible cooperation.



### 3.3 Occupational safety

To guarantee our safety at all times, workstations and the working environment are checked annually as part of inspections – including with the Management Board and the production management – and in close, proactive cooperation with the Regional Council and the relevant professional associations. As confirmation of its safe actions at its sites, Sedus successfully had its occupational health and safety management system certified in accordance with DIN EN ISO 45001 in November 2019, and is able to demonstrate this every year.

In addition, managers from departments at the sites are given advice by their own specialists on occupational safety so that possible risks are recognised in a timely manner and eliminated. An additional occupational safety tool is the occupational safety committee. In this body, current issues from the field of occupational safety are discussed and optimised on a quarterly basis. The committee comprises specialists for occupational safety, the safety officer, the works council, the company doctor, the environmental officer and a representative from management.

To quickly identify sources of risk and eliminate them, we count on the help of our employees. Within this framework, it is very important to report accidents which were narrowly avoided. Only then can real accidents be avoided in the future.

Our employees are sensitised to various aspects of occupational safety, such as what to do in emergencies and administer first aid, and given appropriate further training in regular internal instructions and training or in seminars at professional associations or other institutions. Staff members with mandates undergo further training on a regular basis.

For external companies, there is a corresponding guideline that is handed out to the respective company with the contract. The guideline deals with general occupational safety topics, but also with behaviour as well as emergency measures at the site. Contractors acknowledge the receipt thereof and are to instruct their employees accordingly. On site, there is a short orientation by the supervisor from Sedus.

We are all required to comply with the applicable occupational health and safety regulations and never to endanger the health of our colleagues or business partners. Within the scope of our authority, we take all reasonable and legally required measures to ensure that our workplace is always a safe place to work.

We attach great importance to the safety and health of our employees with regard to the handling of hazardous substances. Therefore, we expect our suppliers to apply procedures that also take into account environmental, health and safety aspects. We are committed to strictly complying with all relevant laws, regulations and best practices regarding the handling, storage and transport of hazardous materials. We strive to continuously improve safety standards related to hazardous substances and keep our employees informed of new developments and best practices. We create a working environment where the safety and protection of our employees is a top priority.

### 3.4 Health management

“Fit in your free time – fit at work” – this motto characterises “Occupational Health Management” at Sedus, which is managed by a working group and a steering group. The fields where action has been taken include sport and exercise, healthy eating, medicine and prevention. The offers include (for example) influenza vaccinations, spinal health training, screening offers, corrective exercises as a healthy work break, health days and – specially for trainees – driving safety classes and a trainee fitness day.

The diversity of the offers made as part of our occupational health management should encourage employees to participate in the scheme. The programme is not static; it is continually developed, taking the wishes of our employees into account. In cooperation with the health insurance scheme AOK, we receive an annual health report. Using comparisons and the resulting findings, appropriate measures are defined to help us to continuously improve in this area. Furthermore, workstations are regularly checked to see whether they could have a detrimental impact on the health of our employees. If this turns out to be the case, appropriate technical/ organisational action is taken.

Traditionally, employees and guests of the company are provided with healthy food. Wholefood nutrition has been part of Sedus Stoll AG for decades. As early as 1966, Christof and Emma Stoll established a company canteen based on an anthroposophical belief, in which knowledge of modern nutrition is taken into account. This tradition is continued today in the company restaurant, “Oase”. Improving quality of life lies at the heart of this work, as does encouraging awareness of health and the environment and making suggestions for changes to living and eating habits. The menu is based on the seasonally varying offers and the perishability of local fruit and vegetables. As far as possible, ecologically produced food grown locally is used as raw materials and ingredients (including meat).

### 3.5 Data security and data protection

Data security is of paramount importance to Sedus. It has a significant influence on business success and public image. We protect company data as well as personal, customer and employee data against unauthorised access and unauthorised or improper use, loss and premature destruction with all available suitable and appropriate technical and organisational means. We collect, process and use personal data carefully and in compliance with the applicable legal requirements. Sedus is committed to protecting personal data to the best of its ability.

### 3.6 Cyber security

Our daily work is closely linked to information technology and our processed data represent significant assets. It is imperative to protect them as best as possible against a variety of cyber risks. This includes, among other things, misuse, theft, destruction and the impairment of data processing by malware (viruses).

Every individual is encouraged to pay attention to IT security on a daily basis and to take appropriate security precautions according to his or her capabilities (including the use of secure passwords). If questions or problems in this context arise, we provide our employees with qualified internal or external resources to solve them. We diligently attend regular training sessions on safety topics.



### 3.7 Handling company assets and trade secrets

All employees must ensure that – limited to the respective area of activity – the company's assets are handled carefully and responsibly. The use of company property for private or personal purposes is generally prohibited and requires the explicit approval of management, unless a corresponding regulation already exists in the individual case.

When using company-owned equipment, such as telephones and computers, for business purposes, employees must comply with internal regulations. We ensure that our confidential information does not reach unauthorised third parties and handle the data of our business partners just as responsibly.





## Responsibilities

# 4

- Liabilities and scope of application
- Whistleblowing
- Human Rights Officer

## 4.1 Liabilities and scope of application

Misconduct and violations of behavioural requirements with regard to integrity and respect as well as violations of legal provisions and guidelines can have serious consequences not only for the individual personally but also for the entire company.

This Code of Conduct is binding for all employees, managers, directors and Board members of the Sedus Stoll Group, including all German and foreign subsidiaries.

We want to achieve our goals and always act correctly and with integrity. This places an obligation on our managers to ensure that employees are aware of and comply with the Code of Conduct. Our Code of Conduct cannot provide an exhaustive account of the legal requirements. For this reason, our managers are obliged to organise their work processes in such a way as to give employees the time and opportunity to take note of the regulations, to answer queries or arrange for them to be answered, and to arrange training for employees if there is an identifiable need to do so. It is the responsibility of each employee to ensure that they are familiar with the regulations that apply to their personal situation and professional field of activity.

In implementing the Code of Conduct, each company in the Sedus Stoll Group respects the laws and regulations applicable in its country and, within this framework, cultural customs. Ethical and legally sound behaviour is the responsibility of each individual. However, the environment must support this by not valuing business results more than acting with integrity.

Sedus punishes deliberate, unlawful misconduct and violations within the framework of the legal provisions consistently and without regard to the rank and position of the acting person in the company.

## 4.2 Whistleblowing system and contact details

### Whistleblowing system

Only if laws and internal regulations are complied with, can we prevent damage to our company, our employees and our business partners. Misconduct must, therefore, be recognised at an early stage.

In case of uncertainties and questions regarding the Code of Conduct and compliance, the first contact person for employees and managers is always the respective direct supervisor.

If there is a suspicion that relevant rules of conduct or legal provisions are not being observed, the works council is another trustworthy contact.

We have set up a whistleblowing system to fairly and appropriately follow up on indications of violations that pose a high risk to the company. The system enables employees as well as external whistleblowers to report breaches of rules – in an anonymous, confidential and protected environment. The reporting channels are to be used when other channels of communication, such as through a manager, have proven to be less effective or are inappropriate or unsuitable.

High-risk violations include, for example, corruption, antitrust law and money laundering offences as well as violations of technical specifications or breaches of environmental regulations. After receipt of the information, it is assessed for materiality. In the case of indications with a high risk for the company, the case is examined. The person in question shall be given the opportunity to state their position. As long as a violation has not been proven, the presumption of innocence applies. Incriminating and exculpatory facts are equally included in the investigation. The highest level of confidentiality is ensured. In addition, we emphasise fairness in our whistleblowing system – both in relation to whistleblowers and employees who are affected by an allegation. The principle of proportionality is always complied with. In each individual case, it is examined which consequences are suitable, necessary and appropriate.

**For further information, see The Sedus Whistleblower Guidelines.** You can find it under "[MySedus](#)" or "[MyKlöver](#)"

## 4.3 Human Rights Officer

### Responsibilities Grievance mechanism

The Board of Directors for the Sedus Stoll Group is ultimately responsible for compliance with human rights in its own business area and along the supply chain. The Board of Directors appoints the Human Rights Officer for the operational implementation of the topic and for the regular and ad hoc reporting on the results of the continuous risk assessment, information from the grievance mechanism and the effectiveness of the defined measures.

Two anti-discrimination officers have been appointed at each Sedus Stoll Group location who can be contacted in the event of any suspected violation. They pass this information on to the Group Human Rights Officer and regularly consult with each other (Social Performance Team).

In the event of a violation of human and environmental rights within the company's own business unit or along the supply chain, the grievance mechanism can be used by both employees and external whistleblowers to report violations – in an anonymous, confidential and protected environment.

In case of any form of discrimination based on race, nationality or territorial or social origin, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, trade union membership, political views, age or any other possible discriminatory situation, it is recommended to contact the respective officer.

When complaints are received, the case goes through an internal process. The person in question shall be given the opportunity to state their position. As long as a violation has not been proven, the presumption of innocence applies. Incriminating and exculpatory facts are equally included in the investigation. The highest level of confidentiality is ensured. In addition, we emphasise fairness in our grievance mechanism – both in relation to whistleblowers and employees who are affected by an allegation. The principle of proportionality is always complied with. In each individual case, it is examined which consequences are suitable, necessary and appropriate.

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## Contact details

In the case of concrete indications of violations of law or rules with a high risk for Sedus, you can contact the external Employee Advisory Service at:

### Heiko Probst

Graduate Social Education Worker (BA), Systemic coach

Phone: +49 7741/8335344

Email: [h.probst@huber-probst.de](mailto:h.probst@huber-probst.de)

In the case of concrete indications of violations of law or rules with a high risk for Sedus, you get in touch with the internal point of contact.

### Simon Roquette

Human Rights Officer for the Sedus Stoll Group

Phone: +49 7751/84-486

Email: [Menschenrechtsbeauftragter@sedus.com](mailto:Menschenrechtsbeauftragter@sedus.com)

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