Sedus Stoll
Group

Code of Conduct

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

Version 3.0, August 2026

Note: In the following text, the name “Sedus Stoll Group” refers to the companies Sedus Stoll AG, Sedus Systems GmbH, S³ Advice GmbH, Klöber GmbH and the ten international subsidiaries.

Note on the use of gender-inclusive language
Please note, we use a gender-neutral form throughout this document rather than listing masculine, feminine and diverse forms separately. Of course, all texts refer equally to all gender identities.

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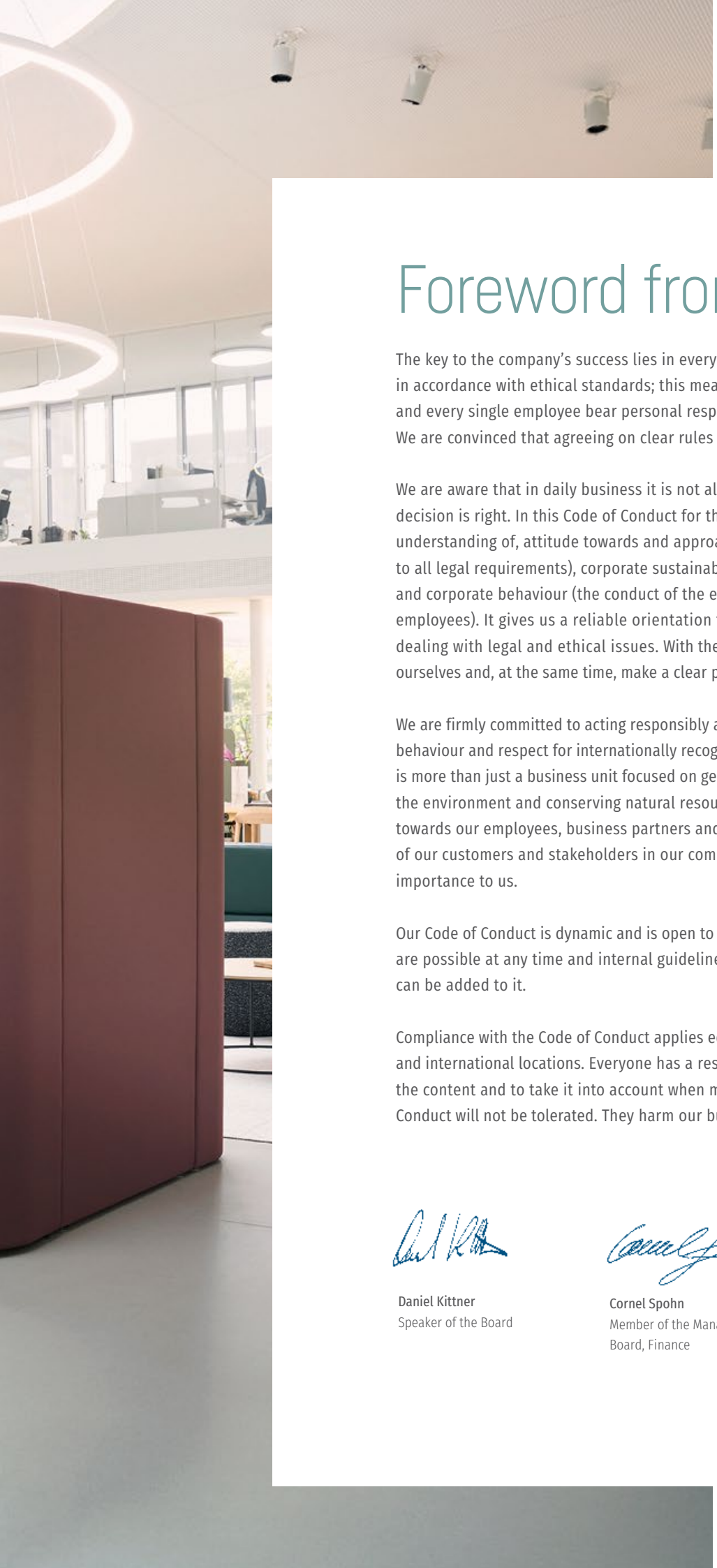

Foreword from the Board

The key to the company's success lies in everyone behaving with honesty, integrity and in accordance with ethical standards; this means that the Management Board, leaders and every single employee bear personal responsibility for upholding these principles. 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. In this Code of Conduct for the Sedus Stoll Group, we set out our shared understanding of, attitude towards and approach to compliance challenges (adherence to all legal requirements), corporate sustainability (responsibility for sustainability) and corporate behaviour (the conduct of the entire company and the behaviour of its 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. The Sedus Stoll Group is more than just a business unit focused on generating turnover and profits. Protecting the environment and conserving natural resources, demonstrating social responsibility towards our employees, business partners and the public, and maintaining the trust of our customers and stakeholders in our companies and products are of the utmost importance to us.

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 at domestic and international locations. Everyone has a responsibility to familiarise themselves with the content and to take it into account when making decisions. Violations of this Code of Conduct will not be tolerated. They harm our business and, consequently, all of us.

Daniel Kittner
Speaker of the Board

Cornel Spohn
Member of the Management Board, Finance

Jens Kastning
Member of the Management Board, Technology

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

As an internationally active group of companies in the office furniture sector with a focus on regional sourcing, we are exposed to human rights and environmental risks. 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 both abstract and specific risks within our business areas and across our supply chain. Both direct and indirect suppliers are taken into account here. 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 ongoing process, we assess the effectiveness of the measures implemented. The results are documented and stored according to the requirements. Ultimately, all activities are included into the annual report 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: the 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 Stoll Group is committed as a participant. This is supplemented by the requirements of the Supply Chain Due Diligence Act and the SA8000 standard, under which Sedus Stoll AG and Sedus Systems GmbH were certified in 2023.

1. RISK MANAGEMENT
The responsibilities have been defined. This is coordinated by a single person and agreed upon by a multidisciplinary committee.

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

3. PREVENTATIVE AND REMEDIAL MEASURES
In order to optimise our supply chain, we define both preventative and corrective measures.

4. EFFECTIVENESS TEST
Every measure is followed up and checked for effectiveness.

5. COMPLAINT MANAGEMENT
Centralised complaints handling points have been set up and publicised for the Sedus Stoll Group and its individual sites.

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

Corporate principles

The Sedus Stoll Group's corporate principles are binding for all employees and form the basis of our philosophy and values. They guide and inspire our day-to-day work, which is 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 work environment is changing – and with it, the responsibilities of office furniture manufacturers. The Sedus Stoll Group is moving towards the future alongside its customers and partners by not only recognising change but also actively shaping it – through innovations both big and small. In this way, the Sedus Stoll Group not only encourages physical and mental activity in everyday office life, but also becomes a source of movement in its own right.

2. Create proximity to the customer

Sedus, Klöber and S³ Advice are brands that also inspire people on an emotional level. By ensuring that customers feel fully understood and respected, and that our staff explain how their wishes and needs relate to their personal goals, we create real benefits through our products and services.

3. 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 requires employees to play a consistent part in the company's success.

4. Offer quality down to the last 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. In this context, both direct and indirect environmental requirements are taken into account beyond the boundaries of our organisation. 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. Within the network of relationships, 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 a reality.

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 act with foresight and focus, seizing opportunities and avoiding risks for our customers, staff, the company and the environment. This creates trust and loyalty – the hardest currency in all times.

9. Social responsibility

The Sedus Stoll Group fulfils its social responsibilities both internally and externally. 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. Fulfilling a role in society

The Sedus Stoll Group always acts fairly and responsibly. 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 its core values concerning human rights, labour standards, environmental protection and anti-corruption.

Our responsibility as a member of society

1

- Human rights and working conditions
- Equal opportunities and equal treatment
- Environmental protection
- Animal welfare
- 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. Respect and protection of human rights are fundamental principles at the Sedus Stoll Group. 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 and the privacy and 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 culture of appreciation and mutual trust by respecting others’ individuality, always acting openly and honestly, and promoting and encouraging individual and cultural diversity. We value the diversity of our colleagues.

1.2.1 Environmental protection at Sedus

As an expert in office furniture and a pioneer in technology, the Sedus brand has set standards again and again throughout its more than 150-year history – particularly 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 emerging debate 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.

Since January 2026, the administrative and production sites of Sedus have been carbon-neutral. This achievement complements the ongoing reduction measures as part of the move towards long-term climate responsibility. To this end, all processes were reviewed and subsequently optimised so that greenhouse gas emissions now have only a minimal impact on the climate. This challenge did not only affect the production processes. It required a high level of sensitivity to environmental issues – something the company has long possessed – and a completely new, bold 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. At the same time, we continue to look to the future. The target for 2030 is clearly defined: the aim of reducing direct emissions by 50% will continue to be pursued through technical changes, efficiency measures and the systematic expansion of renewable energy sources.

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 staff to manage waste responsibly by prioritising waste prevention and reduction, and by favouring reusable materials wherever 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.

1.2.2 Environmental protection at Klöber

At Klöber, sustainability is an integral part of the company's philosophy and starts right from the product developments. Under the guiding principle of 'the art of sitting', Klöber combines healthy seating and aesthetic design with the responsible use of resources. The aim is to reduce the use of new raw materials to the absolute minimum and, instead, to use as many high-quality recycled materials as possible. The focus is always on quality, durability and timeless design.

Product development
Klöber consistently pursues an approach aimed at reducing the use of primary raw materials, utilising certified materials and incorporating recycled materials as an integral part of the value chain. The company is making an active commitment to environmental and climate protection by promoting the circular economy. One example of this is the CoMeet seat shell in taupe, which is made from 100% post-consumer polypropylene. The use of recycled polypropylene supports the circular economy whilst also contributing to a significant reduction in CO_2 emissions.

Production and Procurement
Klöber also relies on resource-efficient processes in its production. At the Owingen site, production is based on the principle of conserving resources as much as possible. This is ensured through energy-efficient manufacturing processes, continuous process optimisation and the responsible use of materials.

Another key aspect of Klöber's approach to environmental responsibility is its production, which is largely organised in-house – from prototype development right through to final assembly. This makes it possible to keep transport distances short, organise coordination processes between development and production efficiently, and reduce environmental impact. At the same time, Klöber is committed to close partnerships with responsible suppliers, giving preference to regional suppliers and ensuring transparent supply chains.

Environmental standards and certifications
Furthermore, Klöber is committed to complying with recognised environmental standards and certifications. These include environmental labels for products, such as the Blue Angel, the use of green electricity, and a certified environmental management system.

1.3 Animal welfare

A responsible approach to living beings is an integral part of the values of the Sedus Stoll Group. Compliance with all national and international legal standards on animal protection and animal welfare is a fundamental requirement for every member of the company. This includes the "Five Freedoms of Animal Welfare", as defined by the World Organisation for Animal Health.

1.4 Donations and charity

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

The main shareholders of the Sedus Stoll Group are the Stoll VITA Foundation (60.95%) and the Karl Bröcker Foundation (32.45%). 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, and 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

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- 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

2.1 Conflicts of interest

We always take care to keep our personal and private interests separate from those of the company, and when making business decisions, we act in the best interests of the Sedus Stoll Group. 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, any secondary business activities must be declared to the employer. Should the secondary employment exceed the scope of marginal employment or be carried out for competitors, customers or suppliers of the Sedus Stoll Group, the employer's prior consent is required.

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 the Sedus Stoll Group that would enable the company to exert influence over their business operations are not in the company's interests.

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 must not offer, promise or grant unauthorised benefits to public sector officials, either at domestic or international level, or to decision-makers in private-sector companies, with a view to securing conduct or a decision favourable to the Sedus Stoll Group. 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.

The 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 the stated aim of the Sedus Stoll Group to maintain business relationships only with reputable business partners whose activities comply with legal requirements and whose funds 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 staff members. 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

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

The Sedus Stoll Group 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.

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

2.5 Fair and free competition

The Sedus Stoll Group is committed to free competition as a fundamental 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. The Sedus Stoll Group is committed to a systematic and comprehensive approach to sustainability management. 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 value of over 5,000 euros. 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

In line with our corporate principles, alongside customer satisfaction, our top priority is to minimise risks to our partners, the company, our supply chain, our employees and the regions in which we operate. We therefore carry out a proactive risk analysis to protect the health of our staff, our business, the local community, all stakeholders in our supply chain and the environment, and to ensure a secure supply to our customers. We involve our suppliers in this. To ensure this is upheld at all times in the day-to-day running of the business, the Sedus Stoll Group carries out an ongoing human rights and environmental risk assessment to identify potential and actual impacts throughout 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 defining objectives, preventive and remedial measures, and is given weight in the ongoing entrepreneurial decision-making process.

2.8 Product conformity and safety

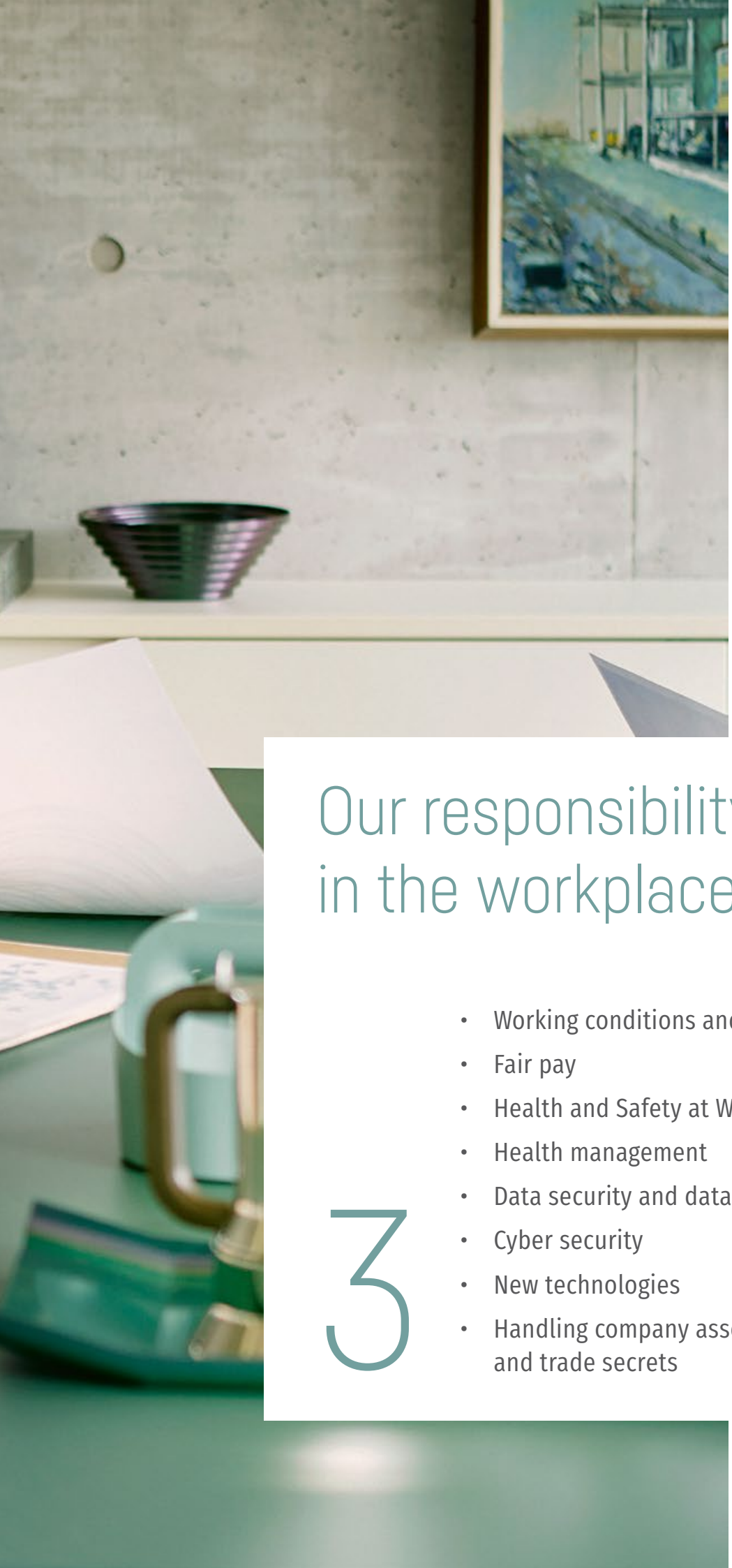
Every day, many people use our products when working in the office, in meetings or in intermediate zones. The Sedus Stoll Group is responsible for minimising, as far as possible, any health and safety risks arising from the use of these products.

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 reflect the current 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.

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



Our responsibility in the workplace

3

- Working conditions and further training
- Fair pay
- Health and Safety at Work
- Health management
- Data security and data protection
- Cyber security
- New technologies
- Handling company assets and trade secrets

3.1 Working conditions and further training

“We do what we say, and say what we do” – this is the eighth point of the corporate principles of the Sedus Stoll Group. 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 staff can work towards our corporate goals in a motivated, competent and responsible manner.

We strive to be an attractive employer that challenges and supports its staff. We set clear objectives and create the scope for our staff to make their own decisions within their areas of responsibility. We aim to build up the next generation of employees ourselves, and continuously invest in education and training. The health and safety of our staff is a matter of great importance to 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 our employees’ needs into account. We recognise that every individual has unique personal commitments and responsibilities that need to be balanced with their work. Our flexible working hours policy is designed to ensure that our staff can achieve a good work-life balance. We are committed to creating an inclusive and supportive working environment in which all staff have the opportunity to carry out their duties successfully, whilst taking their individual circumstances into account. The health and safety of our staff is a key priority for us.

Responsible cooperation with employee representatives is also a matter of course at the Sedus Stoll Group. In addition to the works council committees, there is an elected representative for people with severe disabilities and a youth and trainee representative. In addition, Sedus Stoll AG and Sedus Systems GmbH have made it possible for their staff to seek help from a social worker anonymously. This free, external counselling service offers everyone the chance to seek support with stressful issues, whether at work or in their personal lives.

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 for creating a positive and productive working environment. When determining salaries, 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, which is why we ensure that our employees can understand the criteria and mechanisms used to determine their salaries. 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 Health and Safety at Work

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 commitment to safety at its sites, the Sedus Stoll Group successfully obtained certification for its occupational health and safety management system in accordance with DIN EN ISO 45001 in November 2019 and renews this certification annually.

In addition, managers from departments at the sites are given advice from occupational safety specialists in their respective departments so that possible risks are recognised in a timely manner and eliminated. An additional occupational safety tool is the occupational safety committee. The committee meets quarterly to discuss current occupational safety issues and identify opportunities for improvement. The committee comprises specialists for occupational safety, the safety officer, the works council, the company doctor, the environmental officer and a representative from management.

The help of all employees is needed to identify and eliminate potential hazards quickly. Within this framework, it is important to report accidents which were narrowly avoided. Only then can real accidents be avoided in the future.

Through regular in-house briefings and training sessions, or through seminars organised by the employers' liability insurance association or other institutions, staff are made aware of and receive further training on various aspects of health and safety at work, such as how to respond in emergencies and first aid, working safely, and ergonomics. Staff with specific responsibilities undertake regular further training.
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. The contractors confirm receipt and must instruct their staff accordingly. The supervisor will give a short briefing on location.

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 health and safety of our employees when handling hazardous substances. We therefore expect our suppliers to adopt procedures that also take environmental, health and safety considerations into account. We are committed to strictly complying with all relevant laws, regulations and best practices regarding the handling, storage and transport of hazardous materials.
We are committed to continuously improving safety standards relating to hazardous substances and to keeping our staff up to date with new developments and best practice.
We create a working environment in which the safety and well-being of our staff are our top priority.

3.4 Health management

“Fit in your free time – fit at work” – this motto underpins the Sedus Stoll Group’s Workplace Health Management programme, which is overseen by a working group and a steering committee. The fields where action has been taken include sport and exercise, healthy eating, medicine and prevention. Specific initiatives include, for example, flu vaccinations, screening programmes, exercise sessions as a healthy break, health days and, specifically for apprentices, road safety training courses.

The wide range of services offered by our Workplace Health Management scheme is designed to encourage employees to take part. The programme is not set in stone, but is being further developed to take staff preferences 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.

The company’s staff and guests are traditionally 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 seasonal availability and the perishability of locally grown fruit and vegetables. As far as possible, organically produced food grown locally is used as raw materials and ingredients (including meat). We make every effort to convey this philosophy to all companies in the Sedus Stoll Group.

3.5 Data security and protection

Data security is of paramount importance to the Sedus Stoll Group. It has a significant influence on our 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 through appropriate technical and organisational measures. We collect, process and use personal data carefully and in compliance with the applicable legal requirements. The Sedus Stoll Group 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). Should any questions or problems arise in this context, we provide our staff with expert internal or external resources to help resolve them. We diligently attend regular training sessions on safety topics.

3.7 New technologies

When dealing with new technologies, transparency and openness are of the utmost importance. All parties involved must be informed about the use of AI systems and their operating principles. The protection of personal data is our top priority, and we ensure that all data is handled securely and in accordance with the law. Our AI systems work fairly and impartially; discriminatory practices are not tolerated. We are responsible for the activities of our AI and ensure that monitoring and control are maintained. Sustainability and efficiency are key aspects, as is the maintenance of ethical and moral standards.

3.8 Handling of company assets and trade secrets

All employees must ensure that – within the limits of their respective areas of responsibility – the company's assets are managed prudently and responsibly. The use of company property for private or personal purposes is generally prohibited and requires the explicit approval of management, unless specific rules permitting such use are already in place.

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

- Binding Nature and Scope of Application
- Whistleblowing system
- Human Rights Representative

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 on all employees, leaders, and members of the Management Board of the Sedus Stoll Group, including all subsidiaries in Germany and abroad.

We want to achieve our goals and always act correctly and with integrity. This places an obligation on our leaders 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. Our leaders are therefore obliged to organise work processes in such a way as to give staff the time and opportunity to familiarise themselves with the regulations, to answer any queries or ensure that they are answered, and to arrange training for employees where a clear need arises. It is the responsibility of every employee to ensure that they are familiar with the regulations that apply to their personal circumstances and their area of work.

Each company within the Sedus Stoll Group ensures that, when implementing the Code of Conduct, it complies with the laws and regulations applicable in its respective country, as well as with cultural norms within that context. 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.

The Sedus Stoll Group takes a firm stance against deliberate, unlawful misconduct and breaches of the law, in accordance with statutory provisions, and does so consistently, regardless of the rank or position of the person involved within the company.

4.2 Whistleblowing scheme

Only by complying with laws and internal regulations can we protect our company, our employees and our business partners from harm. Misconduct must therefore be identified at an early stage.

In the event of any uncertainties or questions regarding the Code of Conduct and compliance, the first point of contact for employees and leaders is always their immediate line manager. 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 leader, 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. Once a report has been received, it is assessed for materiality. Where there are indications of a high risk to the company, the matter is investigated. 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. Furthermore, we place great importance on fairness in our whistleblowing scheme – both in our dealings with whistleblowers and with employees who are the subject of an allegation. The principle of proportionality is always observed. In each individual case, we assess which measures are appropriate, necessary and proportionate.

Further details are provided in the Sedus Whistleblower Policy, which can be found in ‘FLOW’.

4.3 Human Rights Representative

Responsibilities: Complaints Procedure

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

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 breaches of human rights or environmental rights within the company's own operations or along the supply chain, the complaints mechanism can be used by both employees and external whistleblowers to report breaches of the rules – anonymously, confidentially and securely.

In the event of any form of discrimination on the grounds of race, nationality, territorial or social origin, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, trade union membership, political views, age or any other potentially discriminatory situation, the reporting office should be contacted.

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. Furthermore, we place great importance on fairness in our complaints procedure – both in our dealings with whistleblowers and with employees who are the subject of an allegation. The principle of proportionality is always complied with. In each individual case, it is examined which consequences are suitable, necessary and appropriate.

Contact details

If there are specific indications of high-risk legal infringements or breaches of regulations in connection with the Sedus Stoll Group, the external employee advice service can be contacted using the following details:

Heiko Probst
Graduate Social Education Worker (BA), Systemic coach
Phone +49 176 4263 9777
Email: info@hp-training.com

If there are specific indications of human rights or environmental violations posing a risk in connection with the Sedus Stoll Group, the internal contact point is available:

Simon Roquette
Human Rights Representative for the Sedus Stoll Group
Phone: +49 77 51 84-486
Email: Menschenrechtsbeauftragter@sedus.com

Sedus Stoll
Group

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