

FAIRO

Our guidelines for compliance
and social responsibility

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**WORKING
TODAY FOR
A BETTER
TOMORROW**

Fair Play when dealing with people
Fair Play when using ecological resources
Fair Play for work safety
Fair Play in the areas of law and ethics



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To improve the readability of texts, we will choose to use either the masculine or feminine form of personal nouns. In no way is this intended

to discriminate against the other respective sex. Women and men should therefore feel that they are being addressed on equal terms.



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FORE WORD

The Scheuch Group is valued worldwide as a reliable and fair partner. The main pillars of our company are our innovative spirit, an appreciative approach to customers, business partners and staff members, respect for the environment and a clear focus on goals and results. We have stood for these values since our inception in 1963, and they have made us what we are today: an internationally respected company in the field of environmental technology. With more than ten locations worldwide, we are always close to our customers and can flexibly respond to their needs.

The growth of our company also brought changes to its structures. This created, among other things, challenges to our social coexistence. With these fair play guidelines, we want to create a foundation that expresses our conception of fairness, transparency, responsibility, tolerance, social commitment, economic action and sustainability. We are doing this because of our conviction

that it is ethically right – and also because we believe it is sensible on an economic level.

These guidelines are the benchmark for collaborating with all the members of the Scheuch Group. As the representatives of management, the supervisory board and the works council of Scheuch Group, we will do everything in our power to ensure that the standards set by these guidelines are met sustainably and by all parts of the group.

We are conscious that we need to set a good example, and we would like to invite all of our staff members to join us in our efforts.


In addition, this policy is brought to the attention of all business partners. It is expected that you will respect and comply with the provisions set forth in this document in all of your business dealings with the Scheuch Group.



Dipl.-Ing. Stefan Scheuch, Managing Director,
Scheuch Management Holding GmbH



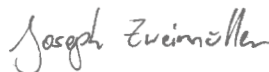
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As an international company, we want to create lasting values that will benefit all of us – our customers and business partners, our staff members and, last but not least, the Scheuch Group.

RULES OF THE GAME

” *We also know that the roots for the international growth of the Scheuch Group will remain in the Ried/Aurolzmünster region in the future.*

Extract from the Scheuch ownership strategy



THE FAIR PLAY GUIDELINES

OUR OBJECTIVES

Trust, respect and upholding our values are the basis for further growth and success in the 21st century. Our customers, business partners and staff members have our word on this. It is not enough to simply offer good products and services: the companies and staff members of the Scheuch Group must also act as role models. The guidelines are intended as a code of conduct for the staff members of the Scheuch Group. And they comply with national and international standards and are aligned with the ETI Base Codes and the OECD Guidelines for Multinational Enterprises.

APPLICATION

The guidelines apply to all workers, staff members, managers, trainees and managing directors of all Scheuch Group companies worldwide. In addition, they also apply to all other contractors, consultants, representatives and authorised agents acting on behalf of the Scheuch Group (i.e. employees of the Scheuch Group). The Scheuch Group includes all companies which are the property of the parent company and which are under the authority and controlling influence of this parent company.

Violations of the basic fair play guideline principles by staff members and suppliers of the Scheuch Group are prohibited. If we learn about such violations, we will deal with the personnel concerned to stop them from occurring again. If the polluter fails to comply or if measures taken to mitigate negative impacts are not effective, we will be forced to suspend the business relationship.

As different laws and regulations apply in the countries where the Scheuch Group operates, the guidelines can be supplemented or adapted in order to incorporate national and local laws, as well as customs and conventions of the country in question. However, these individual additions and adaptations must also comply with the Scheuch fair play guidelines.

All individual adaptations and additions to the fair play guidelines must be authorised by the central body, i.e. the management of Scheuch Group.

COMPLIANCE WITH OUR CODE

The guidelines summarise the binding principles of conduct of the Scheuch Group, and should help every staff member as a decisionmaking guide to appropriately conduct business transactions. Scheuch Group staff members must ensure that their conduct and decisions made in the course of such business transactions comply with this code of conduct. Only then can the Scheuch Group fulfil its legal, social and business responsibilities.

Our employees and business partners are required to report any violations of this code of conduct via our whistleblower system. Violations can also be reported anonymously via the whistleblower system.

Preserving the ethos of a family-operated company for the next generation is a key objective when it comes to company development.

FAIR PLAY

FAIR PLAY

The Scheuch Group is committed to providing **equal opportunities to its staff members**. Our goal is to create a work environment where each individual's skills may be expressed in the best way possible in their work without discrimination or harassment.

We are intent on building a relationship of mutual **respect and trust** with our stakeholders, so that they can also benefit from our investments and commitment.

We are striving to maintain the Auroldmünster site in the future, as well as working with local suppliers and business partners to strengthen the infrastructure in the regions in which we operate.

ADHERING TO LAWS AND GUIDELINES

The Scheuch Group is active on a wide range of markets around the world. Our company's highest priority is to uphold our self-imposed fair play guidelines. They include all the values that shape the foundations of our company.

The following values are particularly important to us when working with staff members and business partners: fairness, transparency, responsibility, tolerance, social commitment as well as economic and sustainable action. This is also very important for our environment.

We comply with applicable laws and other internal and external regulations in all our business transactions and decisions. The fair play guidelines are intended to support staff members of the Scheuch Group in this endeavour and to help them make decisions in their day-to-day work with peace of mind.

» **Scheuch does not tolerate any legal violations!**

In addition to adhering to laws and regulations, we respect other people and cultures and take their ethics and values into consideration while we work.

1: Benefits include, for example, gifts, invitations, interest-free loans or special conditions for purchases

2: "Occasional" defines an action that occurs irregularly (usually only once a year and per contact person)

3: Gifts of "small value" include ballpoint pens, marketing and promotional items, and wines which do not exceed a value of 100 euros per person per year



CORRUPTION AND BRIBERY

The sustained success of the Scheuch Group is based on our staff members' high customer focus and on the quality of our products and services.

» **We do not benefit from privileges of any kind, nor do we display behaviour that might give the impression that we are subject to any inappropriate exertion of influence.**

Our staff members are not allowed to either directly or indirectly offer or accept **benefits**¹. This is also and especially true when they deal with authorities and officials.

Exceptions to this rule are **occasional**² **gifts** or other contributions **of small value**³ to business partners, who do not hold any office. These gifts can include, for example, marketing and promotional items and Christmas gifts, provided that these are customary and legal in the country in question. These exceptions apply only in accordance with the respective national legal provisions. Each staff member is responsible for checking in advance if it is permitted by law to offer or receive gifts and contributions.

» **Under no circumstances are staff members permitted to offer or accept money or benefits of a monetary value.**





CHILD LABOUR AND HUMAN RIGHTS

A fundamental element of modern societies is respect for human rights. The Scheuch Group respects these rights in connection with the conduct of its business and does not tolerate any violations in this respect.

Our company rejects any form of forced or child labour. The company may only employ persons who have reached the minimum age required by law in the respective country. The business partners of the Scheuch Group are obliged to check this age limit to prevent the employment of younger staff members. The minimum age for employment is based on compulsory education, whereby the age of 15 years may only be undercut in accordance with ILO agreements.

All national standards for the protection of children and young workers must also be observed. Children must not be exploited for economic gain. They must be prevented from doing work which is dangerous, compromises their education or endangers their health. This also includes work that can endanger their physical, mental, spiritual, moral or social development.

Scheuch Group business partners are also required to prohibit forced labor and modern slavery. This includes any labor that is required of any person under penalty of law and for which they have not voluntarily made themselves available.

In addition, all business partners must enable their employees to join a trade union or employee representa-

tive body or to join other trade unions. All employees of Scheuch's business partners must be guaranteed access to the whistleblower system on the Scheuch website.

RESPECT AND TOLERANCE

» **Our tolerance ends where the rights of others are impinged upon.**

The Scheuch Group treats all people respectfully and does not discriminate against or harass them in any way. We are proud of the diversity of our staff members, who contribute a great deal to our international success.

We respect the dignity, privacy and personal rights of all people. In accordance with our values and the laws of the respective countries, we do not tolerate any form of discrimination on the basis of colour, sex, religion, age, nationality, social and ethnic background, language, marital status, disability, worldview, sexual orientation or political or trade-union involvement.

» **Scheuch does not tolerate any form of discrimination, harassment or bullying at work!**

This rule refers mainly to offensive verbal, physical, visual or sexual conduct or actions, regardless of whether these are aimed at individuals or at groups of people.

” *Our greatest asset is formed by our values, respect and tolerance towards all people. Creating an environment based on our values – efficient business activities, responsibility, transparency, fairness, tolerance and sustainability – is one of our fundamental.“*

Extract from the Scheuch ownership strategy

HANDLING DATA AND INFORMATION

In order to sustainably ensure our success and our competitive edge, we must protect our expertise, intellectual property, strategies and business information.

It is very important to us that unauthorised persons are not able to access our technical knowledge (patents, plans, instructions and other business secrets). We protect confidential information which has been entrusted to us by customers, suppliers and other business partners as carefully as our own data.

This also includes the careful handling of personal data. We take care that the personal data of our employees, customers, suppliers and other business partners is only processed in compliance with the statutory provisions and the Scheuch data protection guidelines. Sensitive data is only collected, stored and processed by us to the extent that this is absolutely necessary to fulfill our legal obligations. It is essential that internal, statutory or contractually agreed confidentiality obligations as well as other legal obligations in connection with data protection are observed. Any unauthorized disclosure of confidential information and/or protected personal data can cause significant damage to the Scheuch Group and its business partners.

» **Confidential information comprises technical information that is not accessible by the public, as well as any operational and business results.**

In particular, Scheuch Group staff members are forbidden from disclosing insider information about Scheuch Group companies to third parties and from using this knowledge to, for example, make financial transactions, or to buy or sell securities admitted to trading on a stock exchange or organised market. Staff members are also forbidden from providing any recommendations in this regard as well.



SAFETY AT WORK

The health and safety of our staff members is a major concern for us and an integral part of our business activities. We are constantly working to improve work processes and the safety of our production facilities. We want to ensure the highest possible safety standards during the manufacturing of our products.

We also expect our business partners to be aware of this and behave accordingly. Appropriate measures must be taken in order to minimise the risk of accidents or damage to health during the work process.

This includes at least complying with all national regulations relating to working conditions and employee health and safety in the countries in which the business partners operate. Under no circumstances, however, does Scheuch tolerate working conditions at business partners that contradict UN human rights.

COMMUNICATION, SOCIAL SECURITY AND RESPONSIBILITY

We operate an open and honest communication policy with shareholders, customers, staff members, business partners, authorities and the public. A prerequisite for this is proper and truthful internal documentation and reporting. Our relationship with our staff members and business partners is based on trust.

Competent staff members are our asset – they secure our future. We believe that it is essential to continue investing in this strength. Our internal knowledge management ranges from manuals and guidelines to our own training and continuous development programmes. With this advantage, we are able to secure the jobs at our sites and provide our staff members and their families with financial security.

Our employees are required to point out violations of the Scheuch Fair Play Principles to business partners. If influencing the business partner in this way has no effect, our employees must escalate these violations internally, e.g., via the whistleblowing system.

” *The business focus of the Scheuch Group is to develop technologies and procedures in order to protect people, society and the environment.“*

Extract from the Scheuch ownership strategy



SUSTAINABLE USE OF RESOURCES

Not only does Scheuch manufacture products for a better environment, but also promotes this environmental protection in its own company. Our stated goal is to minimise the negative impact on soil, water and air as much as possible.

» We care for our environment because the welfare of future generations is important to us.

The protection and long-term preservation of natural resources is of central importance to the Scheuch Group. We place a great deal of trust in our staff members and assume that they have always considered the consequences on the society and environment when making business decisions.

We also expect our business partners to implement their business practices in an environmentally conscious and sustainable manner. Business practices that pollute or harm the environment or the well-being of future generations, even though mitigation measures can be implemented with reasonable financial resources, are unacceptable to the Scheuch Group.

The Scheuch Group also expects its business partners to comply with national environmental legislation and applicable environmental agreements. The latter include, in particular, the Minimata Convention on Mercury, the Stockholm Convention on Persistent Organic Pollutants, and the Basler Convention on Hazardous Waste.

In addition, the Scheuch Group is clearly committed to combating and mitigating climate change and expects its business partners to strategically plan or implement measures in this regard.

Fair play is indispensable for our company in order to be perceived as a reliable partner and to have long-term success. These guidelines will support us on this journey – as a guide for economic success, but also as a guide for successful cooperation in the workplace.

CON CLUSION

scheuch

TECHNOLOGY FOR CLEAN AIR

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