

Code of conduct

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Scope:

This Code of Conduct applies to all employees of Schwarz GmbH, unless deviating regulations are made in detail. Where the provisions of the Code of Conduct are not applicable, for example due to special legal provisions or other framework conditions, they must be adapted mutatis mutandis to local conditions.

This Code of Conduct is an integral part of every service contract. It is available to all stakeholders and interested parties on www.schwarz-aero.com. Employees can view it at any time on our server or request it from the management.

Violations of legal regulations, internal guidelines, regulations and instructions as well as provisions of this Code of Conduct may have corresponding consequences.

Objective:

Due to its international activities, Schwarz GmbH is subject to a wide range of social, political and legal requirements. This applies not least to internationally recognised human rights in accordance with the "International Charter of Human Rights" of the United Nations and the "Declaration on Fundamental Principles and Rights at Work" of the International Labour Organization (ILO).

Violations of the many different requirements, in particular those of the legal system of a country, can cause considerable damage to the company, both financially and non-materially.

The aim of this Code of Conduct is therefore to ensure legally compliant and ethically sound action by all employees in the company. In this sense, this Code of Conduct forms the basis for all business actions and decisions within Schwarz GmbH.

Implementation:

The management bears the highest responsibility for taking into account the interests and needs of employees, partners and customers. Based on this, it sets internal standards, creates liveable framework conditions and ensures that they are adhered to.

Managers fulfil an important role model function in the implementation of values and guidelines in everyday business life. Each individual employee is responsible for compliance with and implementation of the Code of Conduct. This refers to private conduct if it is related to Schwarz GmbH, in particular actions that could damage the reputation of Schwarz GmbH.

Country-specific and cultural customs must be taken into account. When interpreting the rules, common sense is the yardstick. Scope for design can be used as long as this is compatible with the legal framework and our values and does not cause any damage to Schwarz GmbH.

Support is provided at all times by the management. Often, however, it already helps to ask yourself the following questions:



- Am I acting in accordance with legal and corporate policies and values?
- How will others perceive my actions?
- What impact could my actions have on the reputation and reputation of the company?

It is simple entrepreneurial and human values that guide us.
The focus is on two factors: people and the success of our company.

Human values:

Appreciation for customers and colleagues, but also for our work and our task, is the basis. The team spirit builds on this and is a special feature of the entire company. The work in the team of Schwarz GmbH should give pleasure, trigger satisfaction and success. The human being comes first.

Entrepreneurial values:

Our customers can rely on our services 100%. That is why we are committed to performance and success. Because without performance there is no success. Without success, no company. As a team, we put joint success above the success of the individual.

The passion to find the best solution and to be a reliable partner for our customers distinguishes us. This claim applies both externally and internally.

Guidelines:

The following guidelines complement and concretize our values. They are intended to support every employee in reliably complying with legal and operational requirements and guidelines in their everyday lives.

Fair working conditions:

Labour law and the resulting regulations must be fully complied with. No one shall be discriminated against, favoured, harassed or excluded on the basis of their race, ethnic origin, sex, religion or belief, disability, age or sexual identity. Likewise, bullying or sexual harassment is expressly prohibited.

The rules of the ILO Convention* on the prevention of child labour must be observed not only by Schwarz GmbH, but also by all partner companies. In addition, Schwarz GmbH does not tolerate human trafficking or slavery or so-called "modern slavery" and ensures that all direct employees and persons in the supply chain are treated in accordance with all applicable legal standards.

Every employee has a right to be protected against discrimination and harassment. Every employee who is involved in or observes a conflict must inform the management. The notification can be made informally, in person, by telephone, by e-mail or by letter.



***ILO:**

The ILO's international labour and social standards are legal instruments developed by member groups (governments, employers and workers) that establish fundamental universal principles and rights at work . On the one hand, they are conventions (or protocols) as legally binding international treaties that must be transposed into national law by the Member States. In addition, the ILO makes recommendations that serve as non-binding guidelines.

For more information: <https://www.ilo.org>

General behavior:

How people at Schwarz GmbH treat each other has a decisive influence on the image of our company – both internally and externally. We all have the chance to create a positive impression every day and should take advantage of this opportunity. Because every single employee represents our company and acts as an ambassador of Schwarz GmbH. Thus, it is incumbent on all employees to be professional and friendly with external contacts in order to live up to our values and our customer promise.

Different personal lifestyles, cultural diversity, different ages, etc. enrich our company, but can also cause tensions in certain constellations. This is all the more so when there is a high workload and time pressure. With this in mind, all employees of the company are encouraged to make their contribution to a smooth cooperation through sensitivity, openness and professionalism. A polite, appreciative tone is required in all conversations. Degrading of any kind is to be avoided.

Criticism:

Naturally, there are different views on management decisions or the behavior of superiors or colleagues in a company. Constructive criticism is valuable and expressly desired, because it shows new perspectives and can thus be an occasion for further development and improvement. However, criticism must always be expressed in an appropriate, constructive manner and within an adequate framework. Insults, personal attacks or destructive statements, on the other hand, do not contribute to improvement and therefore have no place at Schwarz GmbH.

Expression:

Meetings, workshops, training courses, etc. require appropriate planning and preparation in order to bring the desired success. In order to use resources in a targeted manner, appointment requests (Outlook or by other means) must be answered in a timely manner. If an acceptance or rejection is not yet possible (with reservation) or if the circumstances change, contact the organizer of the appointment must be made immediately. On the agreed date, all participants arrive punctually and accordingly prepared in order to be able to use the meeting effectively.



Written correspondence – internal and external:

All employees – both in correspondence and in e-mail correspondence, in internal communication as well as in external communication – must pay attention to a professional, factual and friendly way of expression. E-mail distribution lists must be designed with a sense of proportion. In principle, only people who actually need to be informed of a matter should be taken into account. A wider dispersion – as well as the sending of unnecessary messages – should be avoided in order to avoid an excessive flood of e-mails.

Clothing:

If you are interested in a serious and professional corporate identity, Schwarz GmbH expects its employees to wear well-groomed clothing appropriate to the respective field of activity. Correct clothing is considered a sign of respect for customers, colleagues, superiors. In the production area, the clothing must also meet safety, health and hygiene requirements.

Alcohol and drugs:

All employees are strictly prohibited from being under the influence of alcohol or drugs during working hours. The consumption of alcohol or drugs on the premises of Schwarz GmbH (buildings, open spaces, parking lots, etc.) is also strictly prohibited – during work breaks and before or after work; Exception: corporate events. Should an employee be found in an influenced condition during working hours or on the company premises, labour law measures may be taken.

Smoke:

Smoking is only permitted outdoors at Schwarz GmbH.

Secrecy:

For all trade and business secrets as well as all confidential documents of Schwarz GmbH or third parties, e.B. customers, suppliers and other contractual partners, there is an obligation of absolute secrecy. The information contained therein is to be used exclusively for the purposes of the employer. The same applies to other data and circumstances which, by their nature, require confidential treatment. Confidential treatment includes not only the failure to actively disclose such information in any form, but also the protection or access to such data by unauthorized persons. This duty of confidentiality exists both during the upright employment relationship and indefinitely thereafter. In this context, please also note separately agreed non-disclosure agreements (e.B. NDA, service contract, employment contract).



Backup and documentation:

All employees are obliged to secure their work equipment as much as possible and to document their work results in a comprehensible manner. The absolute minimum requirement is the regulations issued by aviation authorities as well as other requirements, such as those from contracts with customers and other business partners.

In general, the following applies:

- Documents and data must be protected against unauthorized access/insight.
- Desks, cabinets, offices must be kept locked as far as they are lockable.
- IT devices and systems must be secured by passwords and their regular changes.
- Documents and documents may only be carried outside the company premises for official reasons and only with appropriate permission.
- Records and files must be kept complete, clear and comprehensible in order to ensure representation.

In addition, it shall be ensured that:

- Transactions relating to accounting and accounting are fully and correctly documented and booked.
- Business books and associated documents of all business transactions are reproduced in full and the company's assets are reported correctly.
- Letters and consignments with the note "personal" are actually only opened by the addressee.

Health and safety:

Schwarz GmbH regards occupational safety not only as a legal obligation, but – as well as the health of its employees – as an essential element of its corporate culture. A central prerequisite for anchoring this commitment in the company in the long term are – among other measures – regular workplace evaluations and comprehensive instruction.

The involvement of employees is generally of particular importance in this context. Because every employee is responsible for occupational safety and health protection in his or her area. Accidents at work in particular must be prevented by all appropriate means. To this end, all employees must ensure that the necessary care is always maintained despite increasing routine. All existing protective devices must be used and must not be circumvented under any circumstances. Likewise, every employee has the task of keeping his workplace tidy and clean – clean desk principle. Irregularities, defects or incidents must be reported to the supervisor immediately. If, despite all efforts, an accident has occurred, the aim of first aid is to keep the consequences of injury as low as possible. This presupposes that all measures of the rescue chain are carried out quickly and properly.



Corporate property:

Every employee is responsible for ensuring that company assets are protected from theft, carelessness and waste. In particular, company property of any kind must be treated with care in order to avoid unnecessary contamination, damage or destruction. Likewise, assets and operating resources of Schwarz GmbH may only be used for operational purposes. Private use is generally prohibited, unless otherwise defined in the following.

Production materials and utensils:

The carriage of tools or other utensils is strictly prohibited and will be reported as theft without exception. It is also strictly prohibited to take consumables or waste materials with you without the permission of your superior. When dealing with any reject components, the applicable regulations must be complied with.

Telephone:

Private telephone calls (landline and mobile phone) are to be limited to the break times – unless they are emergencies or a short information request. The moderate private use of company telephone sets is permitted until revoked. A revocation of this authorization can take place in particular, but not exclusively, if the private use of the telephone assumes a disproportionately high extent. Since telephone calls to or from abroad are usually associated with high costs, such calls in particular must be kept to a minimum.

Internet:

The private use of Internet and Wi-Fi during break times is permitted until revoked. Outside the break times, private use that goes beyond short information requests is to be avoided. The visit of paid pages or pages with prohibited or offensive content is prohibited without exception. In the event of misuse, the authorisation for private use for the person concerned may be revoked at any time.



Conflicts:

Business decisions must not be guided by private interests and relationships. Possible conflicts of interest must therefore be disclosed directly to the respective superior. The notification can be made informally, in person, by telephone, by e-mail or by letter. Social and societal commitment is expressly welcomed by Schwarz GmbH. We like it when our employees get involved in social associations or institutions, e.B. in aid organizations. However, private commitment must not prevent the proper fulfilment of official duties. In order to ensure this, any self-employed or dependent secondary employment must be notified in advance in writing to Schwarz GmbH.

Gifts and invitations:

Small gifts and attentions among business partners are an expression of mutual appreciation and serve to build and maintain long-term business relationships. The same applies to invitations to a restaurant or similar. However, their value must be within a reasonable range, and no consideration should be expected under any circumstances. And this must also be perceptible to the recipient. Gifts and invitations to public officials are particularly sensitive and therefore usually prohibited. When accepting gifts and invitations, a healthy sense of proportion must always be maintained. The acceptance of gifts that suggest an influence due to their value or nature is not permitted. In this context, too, the following applies: Even the appearance of any dishonesty or incorrectness must be consistently avoided.

Ban on cartels:

Schwarz GmbH feels committed to fair competition as a central element of a functioning market economy. We therefore do not tolerate any prohibited agreements or cartels. In this sense, any coordination with competitors in order to set prices or conditions of sale, to divide markets, to restrict production or to influence tendering or procurement procedures is prohibited. Any exchange of confidential information must also be strictly refrained from. The following applies: Even the appearance of such behavior must be consistently avoided.

Corruption:

Schwarz GmbH does not tolerate any corruption or transactions associated with prohibited donations. In this sense, any kind of donation that could exert an unlawful influence on the decisions or actions of persons involved, in particular also of public officials, must be refrained from. The following applies: Even the appearance of such behavior must be consistently avoided. If you have any questions or uncertainties, please always consult with the management.



Export control:

Export control is an internationally applied legal instrument for managing the cross-border exchange of technology, goods and services relevant to security policy. Due to our activities in the aircraft industry, we are subject to numerous European, American and other government regulations, which we must implement and comply with accordingly. The focus is on systems and processes to avoid the transfer of controlled and protected technologies to unauthorized persons or countries. Particularly affected are technologies that can also or only be used for military purposes. In addition, illegal business relationships with sanctioned persons or organizations should be avoided. We are also committed to working with our customers to meet government requirements regarding the processing of so.B.e., blood diamonds, tin, tungsten, cobalt, etc.). Please observe the applicable regulations and always consult the quality department in case of any doubts.

Environmental protection:

Our commitment to a careful approach to the environment means a twofold responsibility for our company: On the one hand, our products should make a valuable contribution to conserving resources. For example, composite components in aviation bring about a significant reduction in weight while maintaining or improving the performance of the respective aircraft. This enables the operating airlines to significantly reduce fuel consumption and emissions.

On the other hand, our internal processes should also meet the highest standards in terms of environmental protection. In this sense, Schwarz GmbH attaches great importance to the careful use of raw materials. The deliberate use of all operating resources from electricity to water and heat makes just as important a contribution here as well as well-thought-out waste management, which at the same time ensures compliance with all legal obligations. In order to increase our recycling rates and reduce the final disposal of waste, it is our concern to constantly question and optimize material cycles from production to disposal.

Every employee is responsible for environmental protection in his or her area of work. This includes, in particular, the obligation to comply with the relevant laws, regulations and standards, based on ISO 14001. In addition, all employees are obliged to make maximum use of the available means for waste separation.



Quality

The long-term satisfaction of our customers is our ultimate goal, uncompromising quality of our products and services the essential basis for this. In order to meet the highest requirements here, Schwarz GmbH has created a quality management system in accordance with EN9100, introduced it in a binding manner and subjected it to certification by an external organisation. The management manual of Schwarz GmbH defines the objectives and the quality policy in detail and claims to be understood, observed and implemented by all employees of the company. Each employee is personally responsible for mandatory compliance in his or her area.

Our quality principle clearly and unambiguously describes our goal: We want to develop, manufacture and supply high-quality components that guarantee our customers the safe operation of their aircraft over their entire service life. An essential element of this strategy, which is supported by management and employees alike, is continuous improvement through innovative new developments and continuous optimization.

Reporting of violations

All employees are called upon to raise any violations of this Code of Conduct in an open, appreciative manner in order to work together towards improvement. The first point of contact will usually be the supervisor. Upon completion of the audit, appropriate steps may be taken (depending on the nature and severity of the infringement).

Sanctions

Die Schwarz GmbH is interested in constructive, cooperative cooperation and relies primarily on the understanding and commitment of its employees in the implementation of this Code of Conduct. In the event of violations of applicable regulations, however, corresponding consequences cannot be waived. The framework for any consequences under labour law is provided by the applicable law. Depending on the severity of the specific violation, warnings can be issued in written or oral form, in very serious cases there may be dismissal or dismissal. In addition, there are any claims from a criminal or civil law point of view, e.B. claims for damages that arise Schwarz GmbH expressly reserved.

