

# Code of Conduct

Version 2, October 2020



## Preamble

Our Code of Conduct is a guide for our entire Scherzinger Pumpen GmbH & Co. KG enterprise and therefore applies equally to each of us.

It is specifically addressed to the management, the executive personnel and all of our employees. It represents, on one hand, the demand placed on ourselves to comply with the values and guidelines outlined within and likewise indicates the significance of responsible conduct towards our business partners, clients and our employees.

## Obligation of the Company Management

Scherzinger considers itself obliged to act in an economically, socially and environmentally responsible manner. The company strives to conduct its business competently founded on ethically moral grounds and to uphold fair competition in all markets in which it is active. This consists of adherence to the relevant regulations and the acceptance of cartel prohibition as well as restrictions of competition. We would like to avoid, by all means, the acquisition of undue advantages over our clients, suppliers or competitors.



## **Team Spirit, Constructive Cooperation**

We are constantly questioning existing solutions and developing new ideas for the benefit of our clients. For this purpose, we encourage constructive cooperation among our employees. Your interests and your demands of us are decisive for our work and further development. Only through consequent teamwork can we be successful in diverse areas of business.



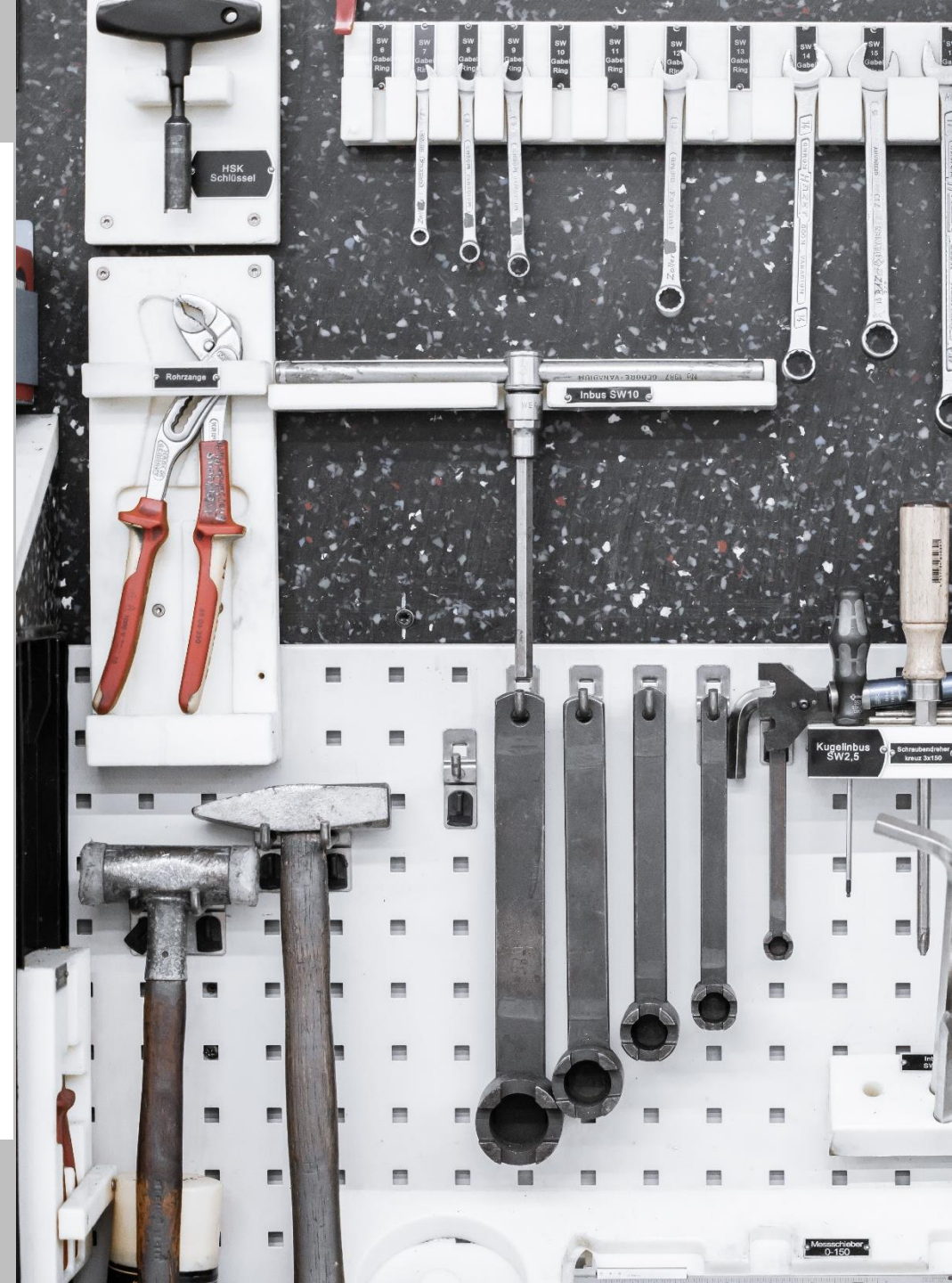
## Cooperation Standards

We expect of all of our employees that they always conduct themselves in accordance with the highest professional standards. If employees violate existing guidelines, regulations or policies in the course of their employment or through their conduct, the personnel concerned should anticipate disciplinary measures.



## Open Communication

We learn from mistakes and do not cover up misconduct. If employees report an actual or supposed instance of misconduct in good faith, we do not tolerate any attempts at intimidation or repression of the instance. For us, “in good faith” means that the employee is convinced that his/her account represents the truth.



## Dialogue with Cooperation Partners

All business information of our partners and their business secrets are principally treated with sensitivity and confidentiality. Required documents are created, stored and, where applicable, returned or deleted appropriately at the end of the cooperation period.



## Client Orientation

We always act fairly and honestly towards our clients and business partners. We only enter business relations when these values are mutually maintained. We take the requests, needs and expectations of our clients and business partners into account to ensure a customized implementation in products, services or other processes. Our highest priority is to build a long-term and stable relationship with our clients and business partners based on trust.



## Acceptance of Gifts, Donations

Our employees do not request or accept any personal advantages from clients or suppliers which influence or could influence their own conduct regarding their employment with the company.

If gifts are offered by third parties, acceptance of these is only permitted if this gesture is a general common practice or can be recognized as a courtesy or favor (promotional gifts with the logo of the company presenting the gift, such as calendars or pens).



## Offering of Gifts, Donations

Gifts from us are likewise only permitted to be offered within the customary framework of the business relationship and in a materially appropriate scope.

In such an instance, the recipient must not associate any obligation to this which would influence his/her business decisions.

In principle, Scherzinger Pumpen GmbH & Co. KG does not donate to political parties, individual persons or organizations who contradict the objectives of our company philosophy or would damage our reputation.

The allocation of donations is always transparent.



## Bribery and Corruption

We do not tolerate any form of corruption or bribery.

We ensure through control mechanisms that bribery, theft, embezzlement, fraud, tax evasion or money laundering are prevented.

Our employees are prohibited from accepting any favors or granting them (cash, travel opportunities, gifts, etc.) that are associated with improper advantages (order placement, project contract, etc.).

Our business partners are also obliged to avoid conflicts of interest that may involve a risk of corruption.



## Data Privacy Protection

We handle all the personal data of our clients, business partners and employees with the greatest care. Our employees also undertake to meet all data security measures suitable for the protection of our IT system against both internal and external data theft. In the company, this particularly concerns misused passwords as well as unauthorized downloading of files, specifically of inappropriate material from the Internet.

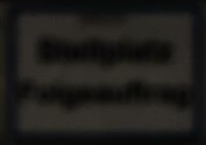


## Environmental Protection

Protection of the environment and the climate is a very important concern of ours. Our employees are thus encouraged to treat all natural resources used by our company (e.g. energy, water, land) with care. Of our employees, we expect responsible conduct in the production and distribution of our products and/or our services.

For the protection of our employees, we comply with all laws and regulations concerning the health and safety of the workplace.

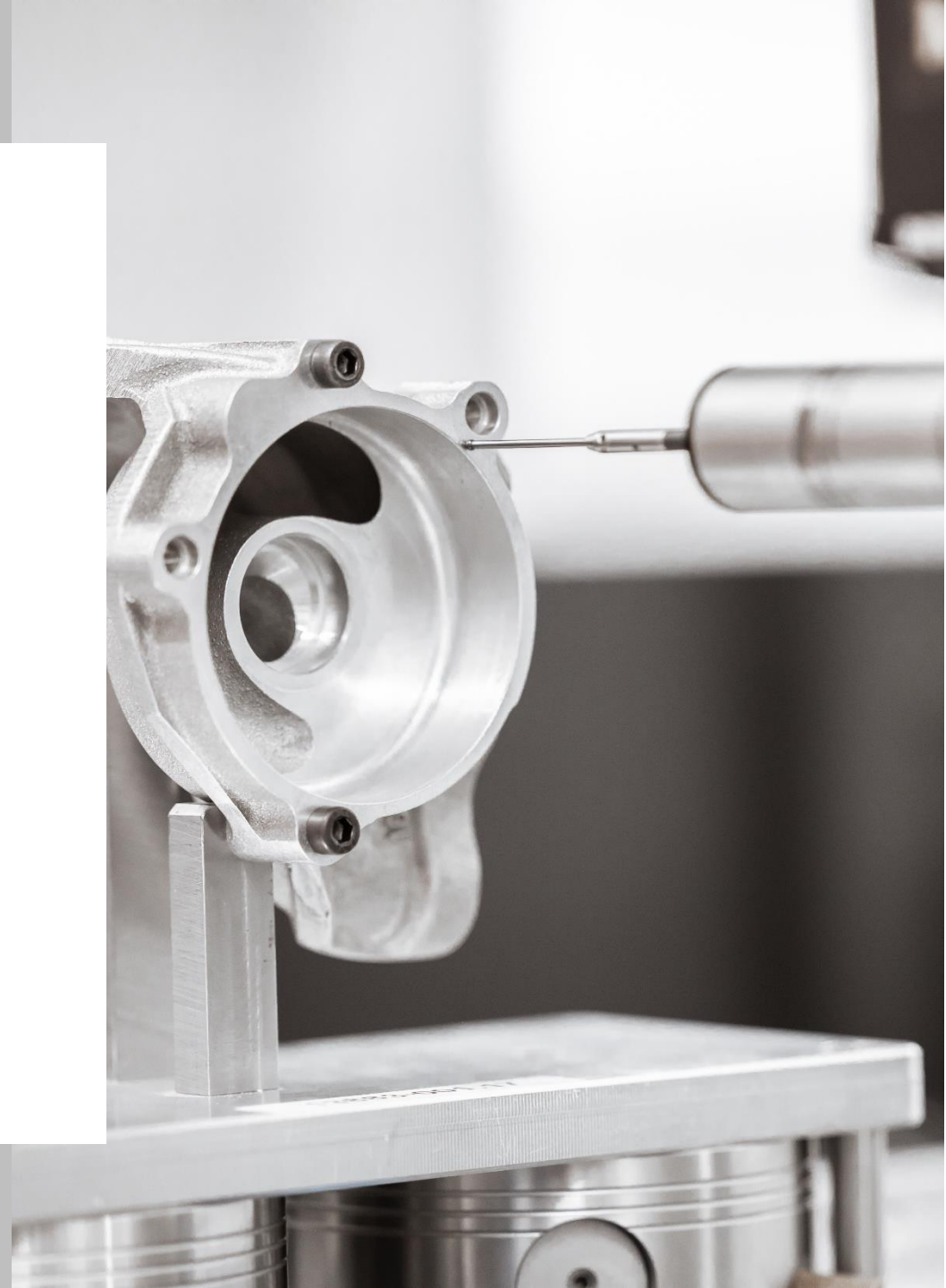
For this purpose, measures are regularly taken to create a healthy and hazard-free work environment for our employees.



## **Compliance with Applicable Law (1)**

We obligate our management to become familiar with and comply without exception to the laws, provisions and regulations relevant to their areas of accountability.

Our management, in particular, bears a considerable responsibility in the compliance with and implementation of the Code of Conduct.

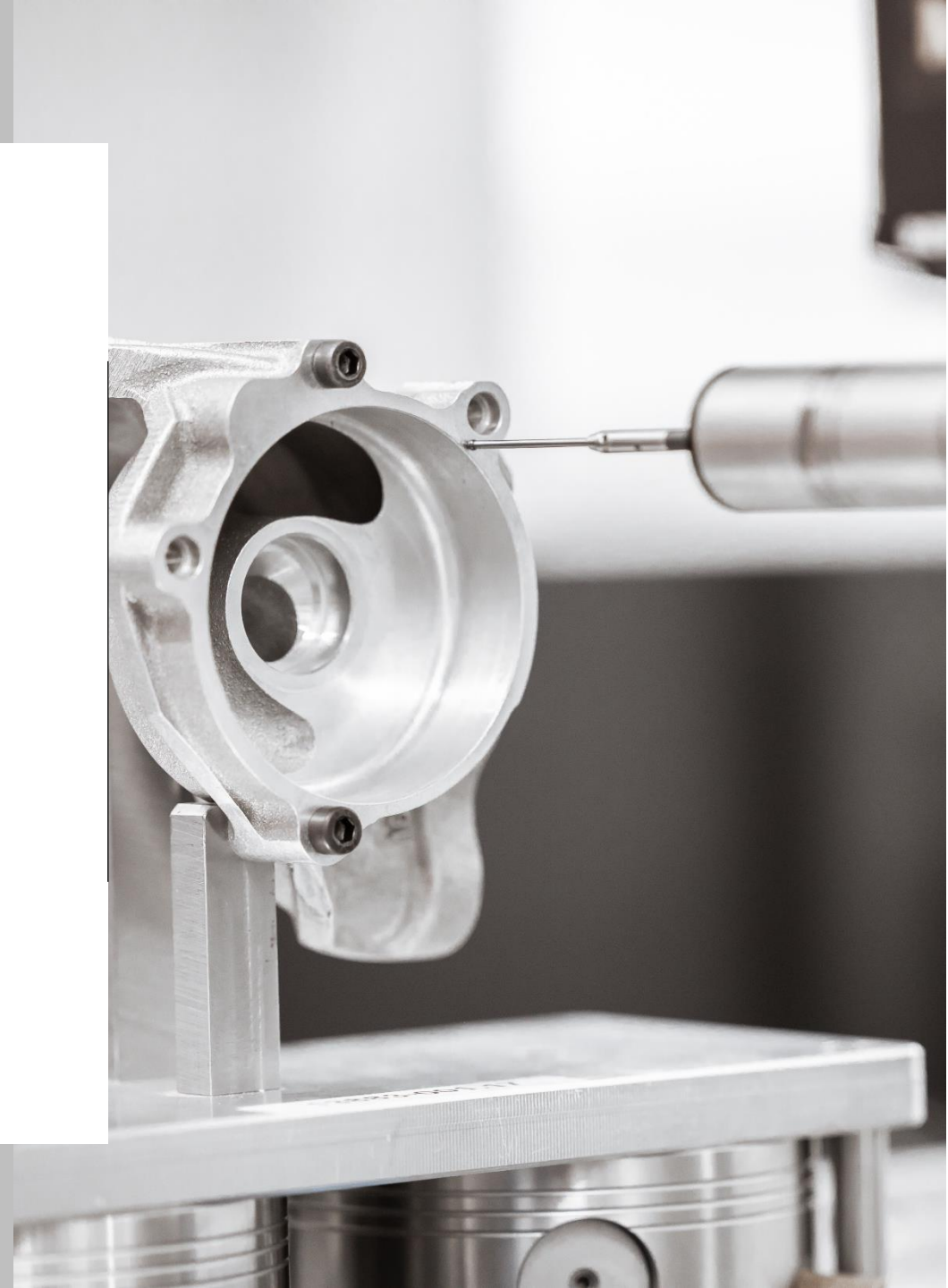


## Compliance with Applicable Law (2)

Similarly, the business practices of our business partners and their suppliers must take the applicable laws into account.

This particularly applies to imports, exports and domestic merchandise trade, technologies as well as services but also the movement of payments and capital.

Our business partners must also likewise eliminate infringements on an economic embargo and provisions related to trade, import and export control, such as, for example, the financing of terrorism.



## Fair Competition

We are committed to fair competition and adhere to the relevant laws and regulations. We refrain from arrangements regarding prices, conditions and strategies with competitors, suppliers, other businesses and distributors who impede fair competition. We do not participate in any anti-competitive boycotts.



## Prohibition on Discrimination

Any form of discrimination is principally prohibited. This is regardless of whether it is based on nationality, ethnicity, age, gender, sexual orientation, marital status, pregnancy, disability or a religion or beliefs.

Promotions and recruitments always occur free of discrimination.



## Conduct with Internal Company Affairs

We place great value on the fact that the manufactured products, the tools used and the intellectual property of the company are handled with care and responsibly.



## Protection against Child Labor and Forced Labor

We strictly reject any form of child or forced labor without exception and expect the same of our business partners. School-age children (younger than 16 years) are only permitted to be employed if the statutory provisions of the respective country of our supplier would allow this.



## Implementation and Enforcement

Scherzinger Pumpen GmbH & Co. KG obliges itself to undertake all necessary efforts to fulfill the principles and values described in this Code of Conduct:

Furtwangen, October 9, 2020

Matthias Derse – Managing Director/CEO

