



**scheuch**

# CODE OF CONDUCT

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OUR BINDING REQUIREMENTS  
FOR COMPLIANCE AND SOCIAL RESPONSIBILITY

Code of conduct

- ... when interacting with people
- ... when using ecological resources
- ... concerning occupational safety
- ... concerning law and ethics

## 1. FOREWORD

The Scheuch Group is appreciated worldwide as a reliable and fair partner. The cornerstones of our corporate group are an innovative spirit, an appreciative approach to our customers, business partners and employees, respect for the environment and a clear focus on objectives and results. These have been our values since our establishment in 1963 and they have made us into what we are today: an internationally respected company in the area of environmental engineering. With more than 15 locations worldwide, we are always close to the customer and can meet their needs in a flexible manner.

Growth of the company naturally led to changes in the structures. This also involves challenges regarding social interactions. With this Code of Conduct we would like to establish a basis that expresses our self-perception of fairness, transparency, responsibility, tolerance, social engagement, economic activities and sustainability. We do this based on our conviction of doing what is right ethically – also because we believe it makes economic sense.

Our guidelines are the benchmark for interacting with all members of the Scheuch Group. We, the representatives of management, the supervisory board and the works council of Scheuch Management Holding GmbH, will do everything we can to ensure that the standards defined in this Code of Conduct will be sustainably implemented and practiced in all areas of the corporate group.

We deliberately want to and will set a good example. All employees of the Scheuch Group are obligated to comply with this Code of Conduct.

Furthermore, all business partners will be made aware of this Code of Conduct. They will be required to respect and strictly comply with all the regulations indicated in this document when carrying out all business activities with the Scheuch Group.



Stefan Scheuch, Managing Director, Scheuch Management Holding GmbH



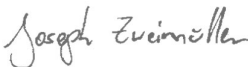
Heinz Autischer, Managing Director, Scheuch Management Holding GmbH



Thomas Eberl, Managing Director, Scheuch Management Holding GmbH



Manfred Neuböck,  
Chairman of the Supervisory Board



Josef Zweimüller,  
Employee-Chairman of the works council



Thomas Mauernböck,  
Worker- Chairman of the works council

To improve the readability of the text, either the masculine or feminine forms of personal nouns will be selected. This in no way implies discrimination against the other gender. Men and women should therefore feel equally addressed.

## 2. RULES OF THE GAME - CODE OF CONDUCT

As an internationally operating company, we want to create sustainable values that benefit us all – our customers and business partners, our employees and ourselves as the Scheuch Group.

*"In Ried/Aurolzmünster region, we also see the roots for the future international growth of the Scheuch Group."*

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Excerpt from the Scheuch ownership strategy

All employees of the Scheuch Group will receive periodic training on anti-bribery, export control, antitrust, and workplace ethics.

### 2.1 OUR OBJECTIVES

Trust, respect and adherence to values are the basis with which we can continue to grow and be successful also in the 21st Century. Here we are committed to our customers, business partners and employees. It is not enough to offer good products and services: The companies and employees of the Scheuch Group must also lead by example. This Code of Conduct is therefore directed toward the employees of the Scheuch Group but is also directed towards to our business partners, who must also comply with the Code of Conduct. It complies with national and international standards and is based on the ETI Base Codes and the OECD Guidelines for Multinational Enterprises.

### 2.2 APPLICATION

This Code of Conduct applies to all workers, employees, managers, apprentices and managing directors of all businesses of the Scheuch Group worldwide. The Scheuch Group includes all companies that are owned by the parent company and over which it can exercise authority and a controlling influence. Furthermore, these binding requirements apply to all other service providers, consultants, representatives and proxies who work on behalf of the Scheuch Group (= employee of the Scheuch Group) as well as to all business partners (suppliers and customers).



Violations against the basic principles of the Code of Conducts by employees, suppliers and/or business partners of the Scheuch Group will not be accepted. If we become aware of such violations, we will urge the person responsible to refrain from doing so and reserve the right to assert claims for damages and to terminate contractual relationships without notice.

As different laws and regulations are in force in the different countries in which the Scheuch Group is operative, this Code of Conduct can be added to or adapted on a country-specific basis, in order to incorporate national and local laws, traditions and customs. However, also these individual additions and adaptations must comply with the Code of Conduct of Scheuch.

All individual adaptations and additions to this Code of Conducts must be approved by the management of Scheuch Management Holding GmbH as a central body of the Scheuch Group.

### 2.3 COMPLIANCE WITH OUR CODE

The Code of Conduct summarizes the binding principles of conduct of the Scheuch Group and provides each employee with a decision-making tool and instructions regarding appropriate behavior during the course of business. All behavior and every decision made by Scheuch Group employees during the course of business must comply with this Code of Conduct. Only in this way can we as the Scheuch Group fulfill our legal, social and business responsibilities. If our employees and business partners become aware of any violation against this Code of Conduct, they are required to report it through our whistleblower system. Reports of violations can also be presented anonymously through the whistleblower system and will be investigated confidentially and promptly.

Scheuch prohibits any retaliation against employees who report suspected misconduct in good faith.

This protection applies under the Austrian/EU Whistleblower Protection Act and the U.S. Sarbanes-Oxley Act (SOX) and Dodd-Frank Act (SEC Whistleblower Rule).

## 3. FAIR PLAY

Preserving the company as a family business for the next generation should be the top priority for corporate development.

The Scheuch Group is committed to **equal opportunities for its employees**. It is our goal to create a working environment in which every individual is able to best develop their skills without discrimination or harassment.

As regards our relationship with our stakeholders, we focus on mutual **respect and trust**. Also our investments and our engagement benefit the Group.

We aim to maintain the current locations also in the future. We work together with local suppliers and business partners and reinforce the infrastructure in the regions in which we operate.



### 3.1 COMPLIANCE WITH LAWS AND GUIDELINES

The Scheuch Group is active in a wide range of markets worldwide. The top priority of our corporate group is our self-imposed Code of Conduct. This includes all values on which our corporate group is based.



When interacting with employees and business partners, fairness, transparency, responsibility, tolerance, social engagement as well as economic and sustainable action are of particular important for us. That applies in particular to our environment.

We observe currently applicable laws as well as any internal and external regulations during our business activities and when making decisions. We also expect the same in particular from our business partners and customers. The Code of Conduct supports employees of the Scheuch Group in this and provides security when making day-to-day decisions.

Scheuch Group complies with all antitrust and competition laws, including the U.S. Sherman Act, Clayton Act, and Federal Trade Commission Act. Employees must not engage in discussions or agreements with competitors regarding pricing, customers, territories, or market allocation. Price-fixing, bid-rigging, and other anti-competitive practices are strictly prohibited.

**» The Scheuch Group does not tolerate violations of the law. «**

In addition to simply complying with laws and regulations, we treat other people and cultures with respect and take their ethics and values into account in our work.

### 3.2 CORRUPTION AND BRIBERY

The sustainable success of the Scheuch Group is based on the high degree to which our employees are customer oriented as well as the quality of our products and services.

**» We do not participate in any form of favors or other behavior that could give the impression of undue influence. «**

Our employees may not receive or offer direct or indirect **benefits**<sup>1</sup>. This applies also and in particular when dealing with authorities and officials, but also business partners.

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<sup>1</sup> Benefits include, for example, gifts, invitations, interest-free loans or special conditions for purchases

An exception to this rule are **occasional<sup>2</sup> gifts** or other donations **of low value<sup>3</sup>** to business partners who do not hold an office.

They include, for example, marketing giveaways or Christmas gifts, as long as they are customary and legally permitted in the respective country. These exceptions apply only according to the limitation of the respective legal regulations. Every employee is responsible for checking in advance if the giving or receiving of gifts and donations is legally permitted.

Scheuch Group employees, officers, and business partners must comply with all applicable Austria/EU and other international anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), U.S. Travel Act, and equivalent international statutes. All payments and transactions must be fully and accurately recorded in Scheuch's books and records in accordance with international and U.S. accounting standards.

**» Offering or accepting money or benefits with a monetary value is not permitted in any case. «**

### 3.3 HUMAN LABOR AND CHILD LABOR

A fundamental element of modern societies is respect for human rights. The Scheuch Group protects this right when carrying out its business and does not tolerate any violation.

Our corporate group rejects all type of forced or child labor. It is only permitted to hire persons who have reached the legal age in the respective country. The business partners of the Scheuch Group are obligated to check this age limit to prevent hiring young employees. The minimum age for being hired is based on compulsory schooling, where it is possible to hire below the age of 15 only with the agreement of the ILO.

Also all domestic standards on the protection of children and young workers must be observed. Children may not be economically exploited. They must be protected against work that is dangerous, that would adversely affect their education or endanger their health. This protection also extends to work that could endanger their physical, mental, spiritual, moral or social development.

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<sup>2</sup> "Occasional" defines activities that occur only irregularly (usually only once per year and contact person)

<sup>3</sup> Of "low value" refers, for example

- in Austria: to a pen, marketing giveaways, gifts of wine that do not exceed a value of **€ 100** per person and year
- in USA: Gifts or meals must not exceed **USD \$50** in value per person per occasion, nor an **aggregate of USD \$200 per year** per recipient. Entertainment or hospitality events may not exceed **USD \$100** per person and must be directly related to legitimate business discussions. No cash or cash equivalents (such as gift cards) may ever be given or accepted. Any item offered to or received from a **government official** requires **prior written approval**, regardless of amount. All such expenditures must be fully and accurately recorded in Scheuch's books and records.

The Scheuch Group also prohibits forced labor, human trafficking, and modern slavery in compliance with EU/international standards and the U.S. Trafficking Victims Protection Act (TVPA). All business partners must adhere to these same obligations.

Business partners of the Scheuch Group are also obligated to prohibit forced labor and modern slavery. This includes any work that is required of any person under threat of punishment and for which they have not voluntarily made themselves available.

Furthermore, all business partners must make it possible for their employees to join a trade union or employee representation or any other labor organization. All employees of Scheuch business partners must be ensured access to the whistleblower system on the Scheuch website.

### 3.4 RESPECT AND TOLERANCE

**» For us, tolerance ends where limiting others starts. «**

At the Scheuch Group, all people are treated with respect and in no way are discriminated against or harassed. We are proud of the diversity of our employees, who contribute significantly to our international success.

We respect the dignity, privacy and personal rights of everyone. In line with our values and in accordance with the laws of the respective countries, we do not tolerate any discrimination based on skin color, gender, religion, age, nationality, social and ethnic origin, language, marital status, disability, ideology, sexual orientation, or political or trade union activity.

**» Scheuch does not tolerate any type of discrimination, harassment, or mobbing at the work place. «**

This rule refers in particular to any type of verbal, physical, visual or sexual behavior or actions, regardless if they are targeted towards individuals or groups.

*"Our values, respect and tolerance. "Our values, respect and tolerance towards all people are our greatest asset. It is very important for us to create an environment in which we live according to our values: economic actions, responsibility, transparency, fairness, tolerance and sustainability."*

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Excerpt from the Scheuch ownership strategy

### 3.5 HANDLING OF DATA AND INFORMATION

In order to sustainably ensure our success and our competitive advantage, we must protect our know-how, our intellectual property, our strategies and our business information.

It is important to us that unauthorized people cannot access our technical knowledge (patents, plans, instructions and other business secrets). We protect the confidential information that customers, suppliers and other business partners entrust us with just as carefully as we protect our own data.



This includes the careful handling of personal data. We make sure that the personal data of our employees, customers, suppliers and other business partners is processed only in compliance with legal regulations as well as the Scheuch privacy policy. Sensitive data is collected, stored and processed by us only if we are required to do so for the fulfilment of our legal obligations.

We also expect the same from our business partners when handling the confidential and personal data of the Scheuch Group.

It is essential that internal, statutory or contractually agreed confidentiality obligations, as well as other legal obligations relating to data protection, are complied with. This is the only way to protect the Scheuch Group's interests, its industrial property rights and its reputation as a trustworthy and reliable company. Any unauthorized disclosure of confidential information and/or protected personal data may cause considerable damage to the Scheuch Group and its business partners.

In addition to GDPR, Scheuch complies with U.S. data-protection and cybersecurity laws, including the California Consumer Privacy Act (CCPA) and Federal Trade Commission (FTC) data-security requirements. Personal information must be collected and processed responsibly and safeguarded in accordance with both EU and U.S. standards.

**» We consider confidential information as non-public technical information as well as all operational and business results. «**

In particular, employees of the Scheuch Group may not provide insider information regarding the companies of the Scheuch Group to third parties or use this advanced knowledge in order to carry out financial transactions or purchase or sell securities, which are admitted to trading on a stock exchange or organized market. No recommendation may be made in this regard either.

Employees of the Scheuch Group are permitted in general to use artificial intelligence for research purposes, for improvement customer service (e.g. translation tools) etc. When doing so, they must comply with applicable law and, when using AI applications and publishing AI-generated content, take particular account of copyright, personal rights, and trademark rights, as well as data protection regulations and any confidentiality obligations. Employees may take and use information from AI systems only after they have checked it for correctness, reliability and its ethical basis. In order to ensure compliance with the legal requirements, all employees

of the Scheuch Group must successfully complete internal training on the topic "Legally-compliant use of AI systems".

### 3.6 OCCUPATIONAL SAFETY

The health and safety of our employees as well as compliance with all labor-law regulations are a special concern for us and an integral component of our business activities. We are continuously working on improving work processes and the safety of our production plants. During the manufacture of our products, we ensure the highest possible level of occupational safety.

In the United States, Scheuch USA Inc., comply with all applicable workplace safety laws and regulations under the Occupational Safety and Health Act (OSHA) and related state programs.

The companies are committed to maintaining safe and healthful working conditions, identifying and correcting hazards, and ensuring that all employees receive appropriate training in equipment use, protective procedures, and emergency response.



Employees are required to immediately report unsafe conditions, injuries, or near-miss incidents to their supervisor or safety representative.

We also expect sufficient awareness and behavior from our business partners. Suitable measures must be identified in order to minimize the danger of accidents or damage to health during the work processes. This includes that at least all national regulations regarding working conditions, minimum wages and employee health are observed in countries where the business partners operate.

In no way does Scheuch tolerate work conditions at business partners that violate UN human rights.

### 3.7 COMMUNICATION, SOCIAL SECURITY AND RESPONSIBILITY

We foster open and honest communication with shareholders, customers, employees, business partners, authorities and the public. This requires accurate and truthful internal documentation and reporting. The relationship with our employees and business partners is based on trust.

Competent employees are our capital, they ensure our future. The further development of this strength is a core issue of our company. Our group-wide knowledge management ranges from manuals regarding guidelines up to individual training and further education programs. With this advantage we can guarantee the jobs at our locations and provide our employees and their families with existential security. Our employees are also required to report business partners who violate the Scheuch Code of Conduct. If this approach has no effect on the

business partner, our employees must escalate these violations internally, e.g. via the whistleblower system.

*"We see the business focus of the Scheuch Group on the development of technical and technological processes that protect society, people and the environment."*

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Excerpt from the Scheuch ownership strategy

**Political Contributions and Lobbying:** Employees must not make or authorize political contributions or lobbying activities on behalf of Scheuch without prior written approval from Group Management or the Legal Department.

Scheuch complies with international/European standards and the U.S. Federal Election Campaign Act and Lobbying Disclosure Act.

### 3.8 SUSTAINABLE USE OF RESOURCES

Scheuch does not only produce products that improve the environment, rather it implements this environmental protection in its own company. Our clear goal is to minimize the impact on the soil, water and air.

**» The well-being of future generations is important for us, this is why we take care of our environment. «**

The protection and long-term preservation of natural resources are of central importance for the Scheuch Group. We place great trust in our employees and assume that they always take the consequences for society and the environment into consideration when making their business decisions.

We expect the same from our business partners, that they implement their business practices in an environmentally-aware and sustainable manner. Business practices that harm or impair the environment or the well-being of future generations, even if mitigation measures can be implemented at a reasonable financial cost, are unacceptable to the Scheuch Group. The Scheuch Group also expects its business partners to comply with national environmental legislation as well as environmental agreements that are in force. The latter include in particular: the Minamata Convention on Mercury, the Stockholm Convention on Persistent Organic Pollutants, and the Basel Convention on Hazardous Wastes.

In addition, the Scheuch Group has taken a clear position on combating and mitigating climate change and expects its business partners to engage in strategic planning or implement measures in this regard.

## 4. IN CLOSING

A Code of Conduct is indispensable in order to be perceived as a reliable partner and have long-term success. These guidelines accompany us on our journey. As guidelines for economic success, but also as instructions for successful cooperation during everyday work and business life.

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