



# Code of conduct



## Prologue

The SGS Group unites a group of internationally operating companies in the field of industrial services. Since its foundation in 2004, the SGS Group can look back on an eventful and successful past. Our worldwide customers place high value on competence, adherence to schedules and flexibility.

Not only the economic, social and ecological environment is subject to change, but also the demands on our services.

To continue the SGS Group's successful path, we are clearly committed to our social responsibility as an international business partner and employer. Shared values, a clear commitment to integrity, ethical principles, compliance with legal requirements and respect for human and personal rights have always been the basis for meeting the growing global demands and living up to our reputation as a trustworthy business partner.

Dear Colleagues,

With this updated documentation of our common Mission Statement and a binding Code of Conduct, we wish to jointly reaffirm our commitment to lawful conduct and thus to the responsibility of each individual for the successful further development of the SGS Group. Everyone makes a valuable contribution to this, for which we would like to express our sincere thanks.

### SGS Industrial Services GmbH

for the SGS Group

  
**Christian Gittmaier**  
Managing Director  
Key Account Management

  
**Andreas Hofinger**  
Managing Director  
Operations

  
**Sandra Ponsold**  
Managing Director  
Finance

SGS Industrial Services offers industrial assembly and project services through its worldwide subsidiaries and partners.

## Our responsibility

We all have our future and that of the next generation in our hands, and our desire is to leave behind health, prosperity and an environment worth living in for ourselves and our families.

For this reason, responsible thinking and action are firmly anchored in our corporate culture. Not only the economic, social and ecological environment of our services is subject to constant change, but also the demands on our services are constantly changing.

## Our mission

We relentlessly strive to provide a service experience that is delightful from start to finish. We do so through a highly trained team that can take on nearly any industrial service challenge, anytime and anywhere on planet earth. This team is powered by proven tools and processes that enable safety and fast workflows.

## Our values

These are the values that SGS Group share:



## Area of application

Acting lawfully, with integrity and responsibility, is essential to the business success of the SGS Group. Conversely, behavior that violates laws and regulations can significantly damage the reputation of the SGS Group, lead to economic losses and, finally, result in significant criminal consequences for each individual and the company.

As a common guideline for our decisions and actions, this Code of Conduct sets binding standards for responsible conduct towards business partners and the public, as well as within the SGS Group, based on the values of the SGS Group. It is intended to raise awareness of legal risks, serve as a guide and thus help to avoid violations of applicable law.

Every employee and manager of the SGS Group is required to comply with the law, the provisions of this Code of Conduct and the SGS Group's policies and procedures derived from this Code of Conduct.

In this Code of Conduct, we commit ourselves, among other things, to the equal treatment of all persons. However, to improve the readability of this joint Code, we refrain from using gender-specific language. References to both genders always include both men and women.



## Compliance with legal regulations

We comply with applicable local, national and international laws and regulations. As an international group, we pay attention to country-specific regulations and keep abreast of industry- and site-specific laws and regulations.

SGS Group managers are required to inform their national and international employees about specific regulations and to monitor compliance. In this way, we ensure successful international business development.



## Human and labor rights

We respect the dignity and personal rights of all people with whom we come into contact. The SGS Group is committed to equal opportunity in all business areas and markets and does not tolerate discrimination based on age, gender, language, ethnic origin, culture, political opinion, religion, sexual orientation, wealth or other standard of living, or any other individual characteristic.

Employees must immediately report and prevent human rights violations. We do not tolerate child labor or forced labor.

### **Prohibition of forced labor**

SGS does not use or support slavery, servitude, forced or compulsory labor or human trafficking. All employees are free to terminate their employment upon reasonable notice as required by local law or contract.

### **Prohibition of child labor**

SGS does not employ workers under the age of 15, or under the age of 14 in countries that qualify for the developing countries exception under ILO Convention 138.

SGS does not employ workers under the age of 18 for hazardous work as defined by ILO Convention 182.

### **Equal treatment and respect for fundamental rights**

SGS treats its employees with dignity and respect and does not discriminate because of gender, age, religion, marital status, sexual orientation, political opinion, national or ethnic origin, social background, disability or similar characteristics.

SGS does not tolerate unacceptable treatment of individuals, such as mental cruelty, sexual harassment or discrimination. Any form of harassment or discrimination, whether physical or verbal, will not be tolerated.

### **Working hours, wages and employee benefits**

We promote a work environment that is respectful, tolerant and recognizes the value and dignity of each individual. This includes fair compensation in accordance with applicable laws. When deploying personnel across borders, SGS complies with all applicable legal requirements, particularly with respect to minimum wages.

All SGS Group employees are expected to behave in a courteous, respectful and tolerant manner towards each other and external contacts. Bullying and other behaviors that may violate the dignity of others are strictly prohibited.

Personnel decisions such as hiring, promotion or other actions must always be made free of discrimination and personal opinion.

### **Health, Safety and Environment (HSE)**

In all its activities, the foremost aim is to ensure the health and safety of its employees and their associates in accordance with the SCCp-VAZ 2021 and ISO 45001:2018 standards, and to comply with environmental protection regulations (internal and customer regulations). This can only be achieved if management, operational executives and operational personnel make a proactive and consistently focused commitment to the continuous improvement of occupational safety and health protection, and to the permanent strengthening of the HSE concept.

Therefore, the following principles apply to the entire company:

- Offering and providing cost-effective services.
- Using approved and standardized materials and equipment.
- Maintaining the health of employees and all colleagues who work with SGS Group.
- All safety and health matters will always be given priority.
- Management itself has the special responsibility of initiating and conducting regular safety training sessions to increase safety awareness.
- Accidents/incidents are investigated properly to make a proactive contribution to both accident prevention and health protection through subsequent training and instruction.
- Compliance with environmental regulations.

To meet these objectives and principles:

- We will aspire to design work procedures that reduce, to an acceptable minimum, any adverse health effects to employees and other personnel, as well as environmental and material damage.
- Employees will be made aware that accidents can be avoided when their safety awareness and behavior in the workplace is continuously evolved through regular training and further education.
- Steps will be taken regarding the protection of air, water, soil, flora and fauna against adverse effects.
- Employees should make their contribution to the improvement of occupational safety and health protection through foresight, forethought and constructive suggestions to remedy deficiencies.
- Employees will be obligated to make a decisive contribution to their own safety as well as operational safety by independently complying with the applicable statutory and official regulations, provisions, instructions and standards in their respective areas of activity.
- Where new knowledge gained from SHE topics, on welding techniques, assembly and installation services of all kinds are put into operational practice as quickly as possible.



## Environmental protection

To protect the environment, we strictly comply with local environmental regulations, our customers' specifications and the SGS Waste Management Policy.

The economical and efficient use of natural resources is another important contribution to environmental protection. SGS strives to continuously develop its environmental protection concept and to avoid harmful influences in the long term.

The development of a holistic "sustainability concept" to meet social responsibility for climate protection at a high level is a priority for the SGS Group.



## Fair business practices

The SGS Group is clearly committed to the rules of fair competition and strictly rejects any distortion of competition.

Unfair agreements or other violations of the rules of fair competition or applicable laws must be avoided without exception.

### **Prohibition of corruption**

Irrespective of the significant criminal consequences for companies and individuals, SGS uncompromisingly distances itself from any form of corruption. Attempts at bribery must be strictly rejected and active attempts at bribery must be avoided. We expect the same behavior from our business partners.

Benefits, such as invitations, may only be accepted to an extent that does not exceed the limits of customary business practice and the recipient's normal standard of living. In addition, such benefits must always be for a legitimate business purpose and may never be given in exchange for an improper advantage.

### **Conflict of interest**

The SGS Group has clearly established in its business policy that personal economic interests must be clearly separated from the interests of the company. Transactions that may give rise to a conflict of interest must be disclosed to the appropriate line manager.

### **Money laundering**

SGS does not accept, promote or support business that violates anti-money laundering or anti-terrorist financing laws.

### **Suppliers**

SGS suppliers and service providers bear a great responsibility for the high quality and timely completion of projects. Therefore, all suppliers and partners of the SGS Group must comply with the SGS Code of Conduct. In the event of proven violations by contractors, the business relationship with the company in question must be reviewed and, if necessary, terminated. Internal SGS work instructions shall assist the purchasing department in the procurement or ordering of products and services.

Dealings with suppliers should always be fair.

For a good business partnership, both parties should strive for a good and cooperative business relationship. There will be no winners in a business relationship with a lot of accusations and demonstrations of power. For example, a supplier should not be immediately and permanently blocked because of a defective delivery. It is better to work together on process improvements. With this mindset, lasting and successful customer-supplier relationships can be built and maintained.

However, it must also be understood that good suppliers are a prerequisite for one's own success. SGS always tries to assess the supplier's strengths and limitations. Long-term thinking is required, not short-term actions. It is also important to implement good suggestions from the supplier.



### **Privacy**

The protection of personal data is a high priority for the SGS Group. Compliance with national and international legislation on the responsible and honest handling of data entrusted to us is mandatory for all employees and officers of the SGS Group. In this context, employees are trained to question all actions and operations related to the processing of personal data according to the principles of good faith, transparency, purpose limitation and lawfulness.

### **Protection of physical and intellectual property**

We protect the intellectual property of the SGS Group and our clients. We treat as confidential and protect from access by third parties any confidential information that becomes known to us during our business, even outside our immediate sphere of activity. We agree not to use such information to pursue personal interests or to benefit third parties.



We use company property only for business purposes, handle it with care and prevent misuse, including illegal or otherwise inappropriate use.

When using social media, we are careful not to disclose confidential or sensitive information and are aware of our responsibility for the Company's reputation.



### **Whistleblower System**

An open and trusting culture of communication at eye level ensures that concerns are raised in good time, grievances are identified earlier and misconduct is therefore less frequent. We communicate fully, comprehensively, promptly and with the aim of giving the other party a clear and true picture of the facts.

Every employee is encouraged to raise concerns and point out misconduct. In doing so, a trusting environment is designed to ensure that employees are free to openly express "good faith suspicions of misconduct." Defamation or reports motivated by personal sensitivities are to be strictly avoided.

Intimidation or other harassment of any kind against employees who report suspected misconduct in good faith must be strictly avoided and will not be tolerated.

Appropriate reports can be directed to the e-mail address below:  
[hinweis@sgs-industrial.com](mailto:hinweis@sgs-industrial.com)

Reports received will be treated confidentially and carefully investigated. Employees who report proven or suspected violations of laws, the Code of Conduct or other internal policies and regulations will not be subject to negative consequences unless their own conduct is affected.

The SGS Group also relies on an open error culture. Errors are openly reported, analyzed and new, improved alternative courses of action are derived from them.



### Integral behavior

If we can answer the following 4 questions regarding an action with “yes”, we are sure to behave according to the rules.

- Is my behavior / action consistent with the values of the SGS Group?
- Am I sure that my behavior / action will not harm the reputation of the SGS Group?
- Am I sure that I will not disclosure confidential information or sensitive data when talking to friends or family?
- Am I sure that I am not violating any applicable law?