

Code of Conduct

Dear Colleagues,

the Siewert & Kau Group maintains a corporate culture that is aligned with business ethics, integrity, law and order.

Our reputation with customers, suppliers, service providers and competitors is the basis for our joint and sustainable success. Every day, we have to reassess and decide whether our behaviour is right or wrong. In a global world characterised by increasingly complex legal regulations, informed and responsible business-related action is becoming increasingly more demanding. At Siewert & Kau, we work together responsibly as a team in modern and agile structures. This demands a high level of commitment and personal integrity from all of us. We all stand with our actions in the internal and external perception for Siewert & Kau and must be aware of this at all times.

It is our central concern that all employees at Siewert & Kau comply with the national and respective laws of the countries in which they work.

Correct ethical behaviour and compliance with the legal provisions applicable to our company and to activities in and related to our company must be observed at all times.

Our Code of Conduct is binding in its guidelines for all employees, regardless of their position, and for all those who work with Siewert & Kau.

Violations of the rules of our Code of Conduct and/or of laws or other legal regulations shall be considered breaches of duty. These can cause serious economic damage and harm Siewert & Kau's reputation in the long term. All employees should ensure that such breaches of the rules do not occur and, in case of doubt, they can contact us in accordance with the following reporting procedure.

Thank you for your support!

Management

Björn Siewert

Holger Kau

Oliver Kau

Validity, compliance and implementation of the Code of Conduct

Whistleblower system

As a company, Siewert & Kau takes reports and pointers toward possible violations very seriously and investigates them for the purpose of clarification. Employees and other whistleblowers (e.g., contractors, customers or suppliers) are hereby encouraged to report violations or suspicions of possible violations of applicable legal provisions, internal guidelines or regulations via the whistleblower procedure provided for this purpose. This procedure is designed to provide whistleblowers with a safe and secure way to report violations or suspected violations of applicable laws, regulations, internal policies or rules.

- This procedure is designed to provide a safe and secure way for whistleblowers to report ethical concerns and violations of laws and internal policies or regulations with the company.
- Reports can be made by email, telephone or in person, and also anonymously if desired.
- Protection from adverse action: employees who report to the best of their knowledge in accordance with Whistleblower Protection Act are safe from (employment) legal or professional disadvantages.
- Confidentiality: the identity of the whistleblower is treated with confidentiality. This does not apply if Siewert & Kau is expressly obliged to do so by law or by the competent authorities. In such a case, only the persons investigating the report will learn the identity of the reporting person.

The whistleblower does not suffer any disadvantage as a result of using the whistleblowing procedure, insofar and as long as he does not violate any legal provisions. Reports under our whistleblower system should be made to the best of your knowledge, whether anonymously or by mentioning one's name.

Where employees make a report which is not substantiated by the subsequent investigation, Siewert & Kau will not take any disciplinary or other action against them unless they have intentionally or maliciously made incorrect reports.

Our reporting channels:

Tel.:	+49 2271-763-388
E-mail:	compliance@siewert-kau.de
Personal:	Compliance Office (in the lounge)

As soon as a report is received, a corresponding confirmation is sent. The Compliance Team then checks the report. It is possible that queries will be raised because additional information is needed.

For this reason, the whistleblower should keep an eye on his or her chosen means of communication. In the event of an anonymous report, all necessary information should be provided so that a review can be carried out.

Violations and sanctions

Under no circumstances will violations of applicable law or the Code of Conduct be tolerated by employees, regardless of their position, or by business partners of our company. Violations of

applicable laws and the provisions of this Code of Conduct may result in appropriate disciplinary action, up to and including termination of employment.

Dealing with colleagues

No tolerance of discrimination

Siewert & Kau does not tolerate any discrimination based on race, gender, age, nationality, ethnicity, skin colour, political opinion, sexual orientation, religious conviction, social origin, physical constitution or other personal characteristics. This applies in particular to dealings with employees and business partners and to the hiring, promotion or dismissal of employees.

No tolerance of harassment

Siewert & Kau does not tolerate any form of personal harassment - this includes, in particular, bullying, unwanted sexual advances, unwanted physical contact, indecent offers or a working environment marred by offensive jokes, remarks and humiliation. Our employees always treat each other and our suppliers, service providers and customers with respect.

Conduct towards business partners

Avoiding conflicts of interest

Conflicts of interest can arise when one's own private interests, work duties or the interests of Siewert & Kau interfere or appear to interfere. All employees behave fairly in their work environment and avoid any conflict between private interests and Siewert & Kau's business interests or the interests of our customers.

We ask you to always ensure that your own position and/or your own opportunities to act at Siewert & Kau are never exploited or used for personal gain. To avoid possible conflicts of interest from the outset, subsequent assignments/activities in particular may only be carried out if they have been approved in writing or in text form in advance by the management or its representatives:

- Assignments to related persons (e.g., life partners, spouses, relatives, friends) or to their companies,
- assignments to companies in which related persons work,
- secondary employment for competitor companies,
- secondary employment for business partners or related persons.

Zero tolerance for active and passive corruption

Siewert & Kau has the highest standards in avoiding and combating corruption of any kind and unconditionally complies with the applicable anti-corruption laws.

Our employees will never offer, promise or grant benefits to contacts and decision-makers at our business partners or their relatives in order to influence behaviour or business decisions that are favourable to Siewert & Kau. Similarly, our employees will never offer, promise or grant such personal benefits to themselves or to third parties if this could create or even give the impression that our employees can be or are influenced in business decisions at and for Siewert & Kau. We are not bribable and will always actively counter any other impression.

All business transactions must be fully and properly documented in accordance with legal requirements.

Because it can also happen in business transactions with third parties that our suppliers or service providers can also be our customers, purchasing and sales are clearly separated at Siewert & Kau. In this way, we avoid potential conflicts and incentives for unfair advantages or promises of advantages from the outset. All employees in purchasing and sales are obliged to observe this organisational separation internally in their daily work.

Dealing with gifts, invitations and entertainment

Siewert & Kau procures and sells goods and services on the basis of high product and service quality, especially in customer support. We must not create the impression that our decisions regarding the procurement and provision of goods and services have been made because we or individual employees have given or received, or have been promised, gifts, favours, hospitality or other benefits, the purpose or result of which was or was intended to be unfair preferential treatment.

Donations/ Sponsorship

Only the management board can take decisions regarding donations or sponsoring. In the case of possible requests for donations or sponsoring made personally to our employees, they are advised that they are not permitted to make any decisions in this regard at Siewert & Kau.

Prevention of money laundering

Siewert & Kau has established risk-appropriate precautions to prevent money laundering and the financing of international terrorism in accordance with the law and the requirements of the regulatory authorities. Money laundering is a process whereby funds from unlawful sources are introduced into lawful financial channels or lawful funds are diverted for unlawful purposes.

To prevent Siewert & Kau from becoming unintentionally involved in money laundering activities, the legal regulations and in particular the "know your customer" principle ("KYC") must be followed. Accordingly, the identity of the respective customer or business partner must always be established. If even the appearance of illegality remains, the transaction must be rejected.

Antitrust directives and competition law

The antitrust and competition laws are designed to promote a fair and open market by prohibiting certain agreements and sharing of information with competitors. Prohibited agreements include price fixing or bid rigging, territory or customer sharing, boycotting customers or suppliers, and tying arrangements. Siewert & Kau does not engage in illegal restrictive agreements and practices, in particular agreements on prices, conditions and market sharing with competitors. Before employees deviate from standard agreements or any procedures provided for in the cooperation agreements, they clarify with the management board that this will not entail any illegal effects under competition law.

In contacts with competitors and business partners, employees will never discuss internal matters at Siewert & Kau, such as prices and terms of sale or financing, costs, market overviews, organisational procedures or other confidential information from which competitors or business partners could derive competitive advantages, without prior clarification with the management.

Conduct in and towards the company

Compliance with data privacy

Siewert & Kau collects, processes and uses personal data only if it is necessary for specified, explicit and legitimate purposes.

Siewert & Kau protects the personal data of its employees and business partners entrusted to it and processed in connection with its business activities, as well as the privacy of individuals, by careful and responsible handling and by taking the necessary technical and organisational measures against unauthorised use. As part of their duties at Siewert & Kau, all employees are obliged and responsible to treat such personal data with appropriate confidentiality and to handle it responsibly in all business processes. Personal data may only be processed under the conditions of the applicable data privacy regulations for the intended purposes and by the respective authorised persons.

Secrecy and confidentiality obligations

All Siewert & Kau employees are obliged to maintain secrecy about internal company processes and data, about company and business secrets and about all other matters that have been classified by the management as confidential or requiring secrecy. Business documents must be protected against the possibility of inspection by unauthorised persons, both internally and externally.

Occupational safety and health

In the interest of the health and safety of all employees and customers, all Siewert & Kau employees comply with all applicable occupational safety laws, regulations and standards. They constantly make themselves aware of the rules that apply in their area of responsibility and work. Routine often leads to specifications that serve to protect employees going unheeded. Identified potential sources of danger should be passed on immediately after recognition via the known reporting channel. We will check these and rectify them immediately wherever necessary.

Company assets

Siewert & Kau will ensure that employees, company property and property entrusted to it by customers and business partners are protected against loss, theft or misuse.

Siewert & Kau's IT facilities and systems (e-mail, Internet and other communications equipment) are used only for legitimate business purposes. Private use is excluded. Please note that e-mails are also business documents which must be retained and may be used as evidence in court or otherwise made public. Siewert & Kau may access employees' e-mails and Internet activities to the extent permitted by law and if required for security or operational reasons. Siewert & Kau's IT should therefore be used responsibly by employees in accordance with the rules. The use of IT facilities and systems for private purposes is prohibited for all employees, both in the company and when working from home, as well as for mobile work.

Fiscal compliance

As Siewert & Kau does business in a large number of countries, we are subject to supervision by various tax authorities. Compliance with and adherence to all tax procedures and tax laws and regulations are of central importance to Siewert & Kau.

Foreign trade and export control / trade controls

Foreign trade

Employees working for Siewert & Kau are required to comply with all applicable national and international laws and regulations at all times.

Siewert & Kau requires all suppliers, customers and service providers to act with integrity and in accordance with the law.

Export control/trade controls

Siewert & Kau sells goods and services in a large number of countries and always observes the relevant legal standards of national and international law for export control. All Siewert & Kau employees are required to comply with all applicable import and export control regulations, customs requirements, trade controls and embargoes in the course and context of their work for Siewert & Kau.

U.S. Foreign Trade

U.S. company products, such as software and services, are subject to U.S. export controls in addition to country-specific trade requirements. They may not be shipped to sanctioned or excluded persons or countries unless cleared by the U.S. government.

Specifically, when purchasing Dell Technologies® products, software and services, our customers represent that they understand and comply with U.S. export controls, as well as the additive restrictions and continuing export laws and regulations of all other countries.

In addition, our customers must have all necessary licenses and other requirements to use, import, export, transfer or re-import Dell Technologies® products, software and services.

We are prohibited from cooperating with any company or person that violates any applicable embargoes, boycotts or other requirements of the United States or any other country.