



Intelligent Door Solutions

Garage door systems and hinged doors
Project hinged doors and frames
Industrial door systems
Docking and logistics systems



NOVOFERM GROUP: CODE OF CONDUCT

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CONTENTS

01 FOREWORD BY THE MANAGEMENT	3
--	----------

02 NOVOFERM GROUP: CODE OF CONDUCT	4
---	----------

03 BASIC PRINCIPLES	5
------------------------------	----------

04 SCOPE OF APPLICATION	6
----------------------------------	----------

05 CODE OF CONDUCT WE TAKE RESPONSIBILITY	7
--	----------

- 1. Responsibility towards our customers 7
- 2. Product development 8
- 3. Business operations 8
- 4. Production 8
- 5. Quality assurance 9
- 6. Installation/ maintenance services 9

05 CODE OF CONDUCT WE ARE FAIR	10
---	-----------

- 1. Fair trade 10
- 2. Competition and antitrust law/
Corruption and bribery 11
- 3. Conflicts of interest 12
- 4. Handling company property and the property
of business partners 12
- 5. Money laundering and trade controls 13

05 CODE OF CONDUCT WE ARE OPEN AND TRANSPARENT	14
---	-----------

- 1. Financial reporting 14
- 2. Communication 14
- 3. Dealing with local authorities and partners 14

05 CODE OF CONDUCT WE PROTECT INFORMATION AND DATA	15
---	-----------

- 1. Data protection and information security 15

05 CODE OF CONDUCT WE RESPECT	16
--	-----------

- 1. Health and safety at work 16
- 2. Working conditions and social standards 17
- 3. Against discrimination – diversity and equal
treatment 17
- 4. Family and career 17
- 5. Freedom of association and the right to
collective bargaining 18
- 6. Children and youth work 18
- 7. Human trafficking, forced
and/ or compulsory labour 18

05 CODE OF CONDUCT WE ARE RESPONSIBLE	19
--	-----------

- 1. Global environment and sustainability 19
- 2. Social contribution 19

01 | FOREWORD BY THE MANAGEMENT BOARD



Dear employees,

the reputation of any company is only as good as the behaviour of its employees. Each and every one of us contributes to how our company is perceived by its customers, colleagues, investors and society.

We have drawn up this Code of Conduct to help us act responsibly, appropriately and in compliance with the law in our day-to-day work and especially in critical situations. It forms our common basic understanding of the way in which we want to work together and be successful on the markets, based on applicable law.

The Code of Conduct is binding for all managers and employees throughout the Novoferm Group. Please familiarize yourself with the contents. Most of the topics addressed in our Code of Conduct will be self-evident to you. It combines applicable laws with international

standards, company regulations, corporate guidelines of the Novoferm and SANWA Group as well as obligations arising from the employment relationship with Novoferm.

As committed employees with integrity, you play a decisive role in the success of our company. Responsible action is the prerequisite for long-term economic success. Let us take responsibility together for the future of the Novoferm Group.

Date, July 1, 2024

A blue ink signature of Rainer Schackmann.

Rainer Schackmann
CEO Novoferm Group

A blue ink signature of Jan Hülsmann.

Jan Hülsmann
CFO Novoferm Group

02 | NOVOFERM GROUP: CODE OF CONDUCT



The Novoferm Group Code of Conduct, which is observed by all managers and employees of the Novoferm Group, translates the spirit of our corporate values "Our Mission", "Our Values" and "Business Principles" of the Novoferm Group into practical instructions for action.

We will act in accordance with this Code of Conduct to ensure that the Novoferm Group develops and grows sustainably and gains the trust of Novoferm's key stakeholders. We are all personally responsible for living

our corporate values in everything we do. We therefore create a working environment in which we can openly address questions, concerns and uncertainties.

The Code of Conduct is a binding component of the Novoferm Compliance Manual, which is designed to ensure compliant behaviour in accordance with all applicable laws and internal company guidelines.

03 | BASIC PRINCIPLES



1. The safety of the products we manufacture and the services we provide is Novoferm's highest priority. This applies to the entire value chain, especially for our installers and users of the products.



2. The Novoferm Group will not profit from actions that violate the Code of Conduct.



3. All managers and supervisors of the Novoferm Group will act as role models in complying with the Code of Conduct so that they set a good example to their employees.

04 | SCOPE OF APPLICATION



The Novoferm Group Code of Conduct applies to all employees of all Novoferm Group companies and is available on the intranet and on the Novoferm websites. This Code of Conduct sets out basic standards of conduct for business activities, but does not cover all standards of conduct.

In areas not specified in this Code of Conduct and where we are unsure of what to do, we can invariably rely on the spirit and values of "Our Mission", "Our Values", "Business Principles", laws and social practices and act ethically from our own awareness.

05 | CODE OF CONDUCT WE TAKE RESPONSIBILITY



1. RESPONSIBILITY TOWARDS OUR CUSTOMERS

The Novoferm Group is aware of its responsibility towards its customers and always carries out the provision of products and services as well as other company activities from the customer's perspective.

- Our customers receive appropriate, accurate, fair and comprehensible information for a trusting and mutual cooperation.
- We strive to increase our customers' confidence in us through strict compliance with the Antimonopoly Act, building standards and other laws, regulations, rules, industry guidelines and rules relating to the Novoferm Group's business activities (hereinafter referred to as "laws and regulations") and internal company regulations.
- If we receive information about a potential product-related safety issue, we will immediately investigate the facts and investigate the cause. If it is determined that a safety issue exists, we will report it quickly and accurately to the affected internal and external departments as well as relevant external organizations and take action to ensure the safety of our customers and users and prevent accidents.
- Criticism from our customers is always taken seriously and we at the Novoferm Group do everything we can to investigate the cause, rectify the problem and prevent it from recurring.

05 | CODE OF CONDUCT WE TAKE RESPONSIBILITY

2. PRODUCT DEVELOPMENT

The Novoferm Group develops products as a system provider of door and gate solutions as well as loading systems for private, commercial and industrial use that satisfy all customers.

- When developing and improving products, we comply with the law and the company's product safety regulations, with user safety being our top priority.
- We really listen to buyers and users to gather information from a broad spectrum for feedback on product development.

3. BUSINESS OPERATIONS

Each Novoferm employee will conduct honest, accurate and timely business activities from a customer and supplier perspective, recognising his or her role as a representative of the Novoferm Group.

- We want to keep promises made to our customers and suppliers to improve the relationship of mutual trust and not make promises to customers and suppliers that we cannot fulfil.
- We want to understand customer needs precisely and strive to offer products and services that meet customer requirements.
- We will conduct business fairly with all customers and suppliers.

4. PRODUCTION

The Novoferm Group conducts its production activities on the premise that it can make a contribution to society if its products help its customers to lead a simpler and safer life.

- We strictly comply with laws and company regulations and act in such a way that ensuring the quality of our products is our top priority. At the same time, we strive for improvements in the manufacturing process so that our products can be used safely and work continuously to improve quality.
- We will continuously strive for production improvements and competitive prices. In addition, we will achieve customer-oriented deliveries and fair prices by establishing a flexible production system.

05 | CODE OF CONDUCT WE TAKE RESPONSIBILITY

5. QUALITY ASSURANCE

The Novoferm Group always responds to customer requests and also carries out quality assurance measures to improve customer satisfaction.

- Whether in product development, sales, system design, production, assembly or after-sales service – we pursue safety and convenience and continue to work on improvements by implementing a PDCA cycle to improve quality assurance.
- We strive to strengthen the traceability management of products delivered to customers, to carry out maintenance work so that customers can use our products safely indefinitely and to work on improving product safety.

6. ASSEMBLY/ MAINTENANCE SERVICES

The companies of the Novoferm Group work together and cooperate with installers and service personnel. We install, inspect, maintain and repair products safely and efficiently. We also offer products and services that satisfy our customers.

- To proactively prevent product-related accidents, we follow the installation and inspection methods described in installation manuals and maintenance/ inspection manuals.
- In order to proactively prevent fire accidents and accidents resulting in material damage, we will make every effort to ensure safety and quality in assembly and maintenance services.
- We take preventive measures to avoid accidents at work and fires and expect perfect construction supervision to ensure the safety and well-being of fitters and service personnel.
- We are aware that our installers and service employees are important contacts for the customer and regularly train them in customer friendliness and better installation and service quality.
- We will take the suggestions and opinions of installers and service employees seriously and strive together with them to improve construction quality and advance construction technology.

05 | CODE OF CONDUCT WE ARE FAIR



1. FAIR TRADE

The Novoferm Group complies with the relevant laws in its procurement activities and builds mutual trust with suppliers based on fair and impartial principles. Furthermore, we strive to be good partners to our suppliers as we help each other with the aim of growing together through ongoing business.

- We deal fairly and impartially with suppliers in the procurement of machinery, raw materials and services and do not use any superior position to carry out transactions that are onerous and unfairly disadvantageous for suppliers.
- Whether at home or abroad, we look for opportunities to do business with suppliers that are superior in terms of quality, cost, delivery times, delivery capacity, technical expertise and sustainability, and select suppliers on the basis of fair and appropriate standards.
- We ask our business partners (suppliers) not to participate in human rights violations such as child labour and forced labour and work with them to promote respect for human rights.

05 | CODE OF CONDUCT WE ARE FAIR

2. COMPETITION AND ANTITRUST LAW/ CORRUPTION AND BRIBERY

The Novoferm Group acts as a fair, responsible and legally compliant competitor and is fully committed to complying with applicable competition and antitrust laws in order to gain and maintain the trust of society.

- We comply with all laws and regulations of the countries and regions in which we do business.
- We conduct fair and free transactions with all business partners and do not participate in bid rigging, cartels or other actions that violate competition-related laws and regulations, including actions that could constitute an abuse of a superior position under the Antimonopoly Act.
- We do not engage in insider trading or activities suspected of insider trading.
- We act with common sense with respect to business-related customs and courtesies such as business entertainment and gifts and do not offer or accept offers of benefits that violate laws and regulations, social norms or morality.
- We will not engage in activities such as soliciting business entertainment, gifts, money or other benefits from business partners for our own benefit.
- We do not offer benefits that constitute bribery, such as the granting of hospitality, gifts, money or other benefits to government employees, government officials or persons in a comparable position.
- We ensure good relations with authorities and administrations and will not make illegal or inappropriate donations or contributions that violate relevant laws and regulations, company rules or other relevant rules.
- In conducting our global business activities, we comply with laws and regulations relating to imports and exports and do not engage in indirect imports or transactions through third parties in order to circumvent the application of these laws and regulations.
- We follow standard work rules and other internal company regulations and do not conduct political, ideological or religious activities on company premises. The company name or official position may not be used by employees for such activities.

05 | CODE OF CONDUCT WE ARE FAIR

3. CONFLICTS OF INTEREST

We act exclusively in the interests of the Novoferm Group. To avoid conflicts of interest, private or personal economic interests must always be kept separate from the economic interests of the Novoferm Group. All decisions regarding

third parties must be based exclusively on objective criteria. In the case of activities where a possible conflict of interest could exist, this must always be reported to the superior or the department concerned.

4. HANDLING COMPANY PROPERTY AND OWNERSHIP FROM BUSINESS PARTNERS

The Novoferm Group will make proper use of the company's tangible and intangible assets and endeavour to protect them.

- We use company assets appropriately and efficiently and protect them against loss, theft or unwanted outflow, regardless of whether they are tangible or intangible assets.
- We will not use company assets for personal, non-business purposes.
- We respect intellectual property, including patents, design rights, utility model rights and trademark rights.
- We attach appropriate value to the inventions and creations of employees and endeavour to acquire, manage and effectively use these intellectual property rights.
- We endeavour to prevent infringement of the intellectual property rights of the Novoferm Group and at the same time respect the intellectual property rights of others.



05 | CODE OF CONDUCT WE ARE FAIR

5. MONEY LAUNDERING AND TRADE CONTROLS

Money laundering is an attempt by individuals or organisations to hide the proceeds of their crimes by making those proceeds appear legitimate. Money laundering is against the law and contrary to our corporate values and business principles. Our approved payment and sales practices are designed to ensure that Novoferm resources are not used to violate these laws. They must be followed for all purchases of goods and services and all sales.

- We are always vigilant and careful in dealing with unusual customer transactions, including requests to make payments to or receive payment from a company other than the one Novoferm buys from or sells to.
- We only transact business with customers who are willing to provide adequate information to enable Novoferm to determine whether payments are appropriate.
- The following business transactions may only be carried out with prior authorisation:
 - Making or accepting payments to or from a legal entity that is not a party to the transaction or business activity.
 - The acceptance of cash payments.
 - Shipping orders to customers in a manner that is inconsistent with our standard procedures.
 - Conducting foreign exchange transactions with unauthorised institutions.

05 | CODE OF CONDUCT WE ARE OPEN AND TRANSPARENT



In order to gain and maintain an appropriate understanding and trust from customers, our shareholders and the local community, the Novoferm Group will proactively disclose information when deemed necessary. In addition,

the Novoferm Group will accept assessments and requests from the community and endeavor to incorporate them into its business activities.

1. FINANCIAL REPORTING

Internal control systems are set up to ensure the credibility and appropriateness of financial reports. Care is taken to ensure that accounting and financial reporting

comply with the applicable regulations and standards and are in line with national and international laws and regulations.

2. COMMUNICATION

Relevant company information on financial matters and business operations is disclosed promptly and in accordance with laws, regulations and other directives. We

emphasise clear and open communication. Inquiries about our company or products are forwarded to the relevant departments and answered there.

3. DEALING WITH LOCAL AUTHORITIES AND PARTNERS

An open and cooperative relationship must be maintained with all authorities. Information is provided in a complete,

truthful, timely and comprehensible manner in coordination with the respective responsible party.

05 | CODE OF CONDUCT

WE PROTECT INFORMATION AND DATA



As part of our daily business activities, we collect and process personal data from employees, customers and business partners. We always treat this data confiden-

tially and with the necessary care – not only because this is required by law, but also because we see it as part of our responsibility as a company.

1. DATA PROTECTION AND INFORMATION SECURITY

- We properly manage trade secrets and other information and endeavour to prevent information from being disclosed externally or used improperly.
- We comply with the law on the protection of private information and other laws such as the EU General Data Protection Regulation as well as internal company regulations with regard to personal information that we have received from customers, company employees and business partners and handle it with care.
- We do not misappropriate confidential information of other companies and do not obtain such information by unlawful means.
- We will only use the Company's information systems for business purposes and will not use them for personal purposes.
- When using the company's information systems, we comply with the regulations on information security and other established company regulations.
- We do not talk about important company information in public.
- When we disseminate information via social media, etc., no confidential information or other proprietary information of our company or other companies will be published, regardless of whether we are in a public or private setting.
- We will not disseminate information that constitutes libel, discrimination, defamation or other violations of the rights of Novoferm Group employees or third parties.

05 | CODE OF CONDUCT WE RESPECT



The Novoferm Group is firmly committed to respecting human dignity and recognises the different values of the individual. We respect individual character and personality and go beyond the requirements of the law in avoiding discrimination. We respect the human rights of every individual on the basis of the United Nations Universal Declaration of Human Rights and other international human rights standards. We do not tolerate inappropriate

behaviour, including bullying, defamation, hostile language and threats, or any form of harassment, including sexual harassment, harassment based on the exercise of power and harassment related to pregnancy, childbirth, childcare or caregiving, whether it takes place in or outside the workplace or whether the harassment is physical or psychological.

1. HEALTH AND SAFETY AT WORK

The Novoferm Group will make maximum efforts to ensure health and safety in the workplace and to create a pleasant working environment in which every employee can work with enthusiasm. Every employee should be familiar with the applicable laws, regulations and internal company guidelines on occupational health and safety. Regular training must be carried out by all employees.

- We will maintain work environments with respect for physical and mental health, comply with occupational health and safety laws and regulations, and work to achieve the goal of zero occupational accidents and illnesses.

- We comply with labour-related laws and regulations and take proactive measures to correct excessive working hours.
- We strive to build relationships of mutual trust, value teamwork and strive to create a positive work environment as we work to realise a corporate culture where employees are free to express their creativity.

05 | CODE OF CONDUCT WE RESPECT

2. WORKING CONDITIONS AND SOCIAL STANDARDS

Within the Novoferm Group, the labour laws and international standards applicable in the respective countries apply. Remuneration is appropriate and performance-related, taking into account the respective statutory minimum wages. All applicable laws on wages and salaries must be complied with, including with regard to overtime, statutory benefits, working hours and paid vacation.

As contact persons, both managers and employees contribute to maintaining these standards with their professional and social skills, experience and high level of commitment. The promotion and empowerment of all employees in all matters is a high priority, so that ideal framework conditions are always in place for all concerns of the employees and the Novoferm Group.

3. AGAINST DISCRIMINATION – DIVERSITY AND EQUAL TREATMENT

Any form of discrimination with regard to nationality, ethnic origin, race, language, faith, religion, gender, gender identity, sexual identity, sexual orientation, social status, illness, age, disability, political or other beliefs is not

accepted at Novoferm. Equal opportunities, inclusion and diversity must be upheld as fundamental values of the Group. Fair and respectful treatment is a matter of course for us.

4. FAMILY AND CAREER

The Novoferm Group regards its employees as its most valuable resource and makes various efforts to develop their skills in the best possible way and to help them achieve self-fulfilment. By linking the performance and results of our employees with fair assessment and remuneration, we also help them to develop, motivate themselves and take on challenges.

The satisfaction and intrinsic motivation of every employee are essential for the success of the Novoferm Group. The basis for this is a common foundation of trust in which the respective interests can be harmonised as far as possible. We see this as an opportunity for growth, whereby every challenge should be tackled without fear of failure.

05 | CODE OF CONDUCT WE RESPECT

5. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

The Novoferm Group respects the rights of all employees to freedom of association, to form or join trade unions and the right to collective bargaining or collective bargaining agreements and recognises the rights of trade unions in

accordance with laws and regulations. Neither employees nor their representatives may suffer personal or professional disadvantages.

6. CHILDREN AND YOUTH WORK

Any kind of child labour is prohibited within the entire Group. For the employment of minors, the minimum age of employment must be observed in compliance with the

respective national regulations. This also applies to our contractual partners and their subcontractors.

7. HUMAN TRAFFICKING, FORCED AND/ OR COMPULSORY LABOUR

We will not permit forced labour under any circumstances, including unpaid labour by force, intimidation or threat of punishment, forced labour at wages below the minimum

wage, child labour below the minimum working age and human trafficking. This also applies to our contractual partners and their subcontractors.



05 | CODE OF CONDUCT WE ARE RESPONSIBLE



1. GLOBAL ENVIRONMENT AND SUSTAINABILITY

The Novoferm Group strives to manage its business activities in line with social sustainability and the environment, including global climate change. These efforts will also be reflected in our products and services.

1. Comply with environmental laws and regulations and other requirements and maintain communication with our business partners in the countries and regions in which we operate.
2. We will promote energy and resource conservation, waste reduction and recycling and strive for effective use of water resources in all business processes.

3. We will promote the development of products that contribute to mitigating and adapting to climate change and solving environmental problems, and we will strive to raise the level of our technologies in this regard.

4. We take the initiative to acquire knowledge about environmental issues and raise our awareness for the preservation of the environment.

2. SOCIAL CONTRIBUTION

The Novoferm Group engages in activities in line with our mission and values to make a contribution to society.

1. We strive to make a comprehensive contribution to society by actively and proactively supporting social activities and social commitment.






2. We contribute to the development of the local community through employment and social engagement.

3. Through the ongoing development and provision of our products and services, we will strive to protect people from life-threatening hazards such as fire.



Intelligent Door Solutions

Online on the move for you:

-  www.novoferm.com
-  www.youtube.com/NovofermVideos
-  www.linkedin.com/company/novoferm
-  www.instagram.com/novoferm_de
-  www.facebook.com/novofermDE

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