



SMF CODE OF CONDUCT

CODE OF CONDUCT AND PERSONAL COMMITMENT

09.02.2023

[List of contents](#)

Foreword.....	3
1. General principles	4
2. Respect and deference.....	5
2.1 Recognition of Human Rights.....	5
2.2 No child labour or forced labour	5
2.3 Compliance with the Minimum Wage Act	5
2.4 Tolerance and equality of opportunity.....	5
2.5 Trust and appreciation.....	5
2.6 Freedom of association and right to enter into collective bargaining	5
3. Safe and good working conditions	6
3.1 Health and Safety at work	6
3.2 Transparency of hours worked and pay.....	6
3.3 Compatibility of work and personal life.....	6
4. Minimalisation of pollution.....	7
4.1 Protection of the environment	7
4.2 Handling hazardous substances	7
4.3 Reduction in resources used, waste and emissions produced	7
5. Application of high standards of business ethics and morals	8
5.1 Transparent business relationships	8
5.2 Avoiding conflicts of interest.....	8
5.3 Donations	8
5.4 Fair competition.....	8
6. Handling information.....	9
6.1 Production and exchange of information	9
6.2 Confidentiality and secrecy	9
6.3 Protection of information and cyber security	9
6.4 Handling personal data	9
7. General information	10
7.1 Compliance with the Code of Conduct	10
7.2 Responsibilities	10
7.3 Publications	10

Foreword**We provide our clients with a digital head start**

This is our mission at SMF and we do everything we can to achieve it. Our objective is to have a sustainable and responsible business policy – long-term.

For this we need to have a standard set of principles which we have laid down in the following SMF Code of Conduct. In addition to compliance with the law, several other points may appear to be self-explanatory to you. The aim of this code is to substantiate them.

We intend to set a good example. In our day-to-day dealings with each other, and in our work with customers, service providers and business partners. To this end we are committed to taking into close account the impact of what we do on our employees, the Company and the environment, and to intervene when we identify need for improvement. The code of conduct helps us every day to work towards achieving our goals in the best possible way.

This code of conduct is designed to apply for all of us: staff, management and members of the executive board at SMF GmbH. The regulations listed here are binding and it is the responsibility of every single person to abide by them and in doing so to set a good example.

We are calling upon our customers, service providers and business partners to help us to comply with measures and implement the principles – to enable us to work together better over the long-term.



Wieland Feuerstein, Christoph Laarmann, Henrike Simbach, Engelbert Turczyk and Thomas Engels (from l to r)

Signed SMF management

1. General Principles

How we go about things on a day-to-day basis at SMF is based upon our four guiding principles, which describe who we are, and what we stand for. We are guided by them because they have brought us to where we are today.

Passion for technology: we love what we do. Our passion for technology drives us on to develop high-quality solutions. We intend to generate added value long-term and ensure that our customers can rely upon us.

Informal atmosphere: We trust each other. We celebrate success and overcome obstacles together. In doing so we support each other and stick together, because we are a team.



Joint responsibility: We aim to achieve our business goals in harmony with the environment and society. We are open to, and value, the ideas and wishes of our counterparts. We think outside the box and are happy to share our knowledge.

Success through diversity: Tolerance, respect and fairness shine through our work. We are a Company of different individuals which accepts everyone as they are. This diversity is our strength, since this means that every one of us is able to make a unique contribution to the success of the Company.

We at SMF ensure that our business policy is sustainable and responsible over the longer term. A development is sustainable for us in those cases in which it is guided by current needs, and at the same time ensures that future generations will not be restricted. We observe the principles of the UN Global Compact.

Our business objective is to secure the existence of the Company over the longer term and to achieve financial independence. In doing so, we assume responsibility for the people working for the Company, customers and other stakeholders, as well as the general public and the environment.

We feel obliged to keep a close eye on the impact of what we do on Company employees and the environment and to take action as required.

2. Respect and Deference

2.1 Recognition of human rights

We recognise the United Nations Universal Declaration of Human Rights and we shall ensure that the Company is not involved in violations of human rights. It goes without saying that degrading conduct is unacceptable for us. Further, it is self-evident for us that the Basic Law, the constitution of the Federal Republic of Germany, is the basis for living together.

2.2 No child labour or forced labour

We shall not tolerate any child labour, forced labour, or other involuntary work, as defined by the conventions C 138 and C 182 of the International Labour Organisation (ILO).

2.3 Compliance with the Minimum Wage Act

We undertake to comply with the minimum wage act of the respective country in force at any time.

2.4 Tolerance and equality of opportunity

Tolerance, respect and fairness are important to us when carrying out our work. This means that we shall not accept language or conduct designed to humiliate, be condescending, insulting, or otherwise disrespectful at any time.

Everyone will be treated with respect and dignity. Based on the principle of equality of opportunity and the General Equal Treatment Act (AGG), no one will be harassed, abused or subjected to discrimination with regard to his/her sex, race, religion, age, family status, or family background, their skin colour or disability or harassed or abused physically, psychologically, sexually or verbally.

We are a Company consisting of different individuals and we accept everyone as they are. This diversity is our strength since this enables everyone to make a unique contribution to the success of the Company.

2.5 Trust and appreciation

Trust, appreciation and respect are absolutely essential if constructive and honest candour is to be achieved within the Company and they underpin how we treat each other. It is important that the management sets a good example of our values and represents Company development. The management manages staff carefully to ensure their good health by observing that they maintain a good work-life balance.

2.6 Freedom of association and the right to enter into collective bargaining

We respect the freedom of association of the Company's employees and their right to enter into collective bargaining in keeping with the laws and conventions of the ILO as applicable.

3. Safe and good working conditions

3.1 Health and Safety at work

SMF ensures that its employees have a workplace compliant with health and safety requirements, as laid down by law and local or trade-based regulations. Our employees have unrestricted access to drinking water and sanitary facilities.

In addition to this, we have taken steps to ensure that there are adequate fire prevention systems in place as well as suitable lighting and ventilation. If necessary, employees will be provided with personal protection equipment free of charge. In such cases they will be provided with training in the correct use of protective equipment and familiarised with the general safety regulations.

3.2 Transparency of working hours and wages

All employment contracts for new employees comply with the laws in force. Employees will be awarded employment contracts in which working hours and wages will be stipulated.

The working hours should be consistent with the applicable laws. All remuneration will be paid out without delay and in accordance with the applicable laws in force. In addition to fixed salary components, employees shall be offered financial incentives in operational areas of the business as appropriate, such as, for example, variable salary components.

3.3 Compatibility of work with personal life

We operate in the digital world and we support forward-looking working methods. These include personal responsibility for working flexitime, the working from home option, as well as flexible methods based on maternity leave. This means that we place the compatibility of family life and work in the spotlight. We support compatibility with a work-life-balance established on the pillars of personalised part-time working arrangements, flexible allocation of working hours, and if at all possible, employees working for local customers, and days to be taken off as holidays for the personal convenience of employees.

4. Reductions of resources used, pollution and emissions

4.1 Protection of the environment

We recognise that our business activities will give rise to pollution. Consequently we ensure that we adopt a responsible approach when dealing with environmental considerations. We are continually working on seeking solutions to reduce environmental pollution, increase energy efficiency and drive forward with climate protection.

To this end, we are developing a specific environment policy; we are implementing this and in the course of our business activity we comply with all applicable environmental protection laws and regulations. Our relevant principles are laid down in our SMF environmental directive on sustainable procurement.

4.2 Handling hazardous substances

We maintain high health and safety standards for all work and we are well-prepared to take any necessary measures in response to any possible emergencies.

When handling chemicals and other substances classified as hazardous if they are released into the environment, we ensure that they are handled, moved, stored re-used or disposed of safely.

4.3 Reduction in the quantity of resources used, waste and emissions produced

The on-going improvement in the efficiency in the use of resources is an important element of operational management. Waste of all types as well as all emissions into the air, water or soil are reduced to a minimum, noted and monitored.

All of us ensure that the input of natural resources is, wherever possible, reduced to a minimum and environmental pollution is reduced by reducing the volume of waste produced and recycling as much waste as possible. When working together with customers, service providers and business associates, each individual employee is beholden to also bear in mind ecological as well as social criteria in addition to economic considerations.

5. Application of high standards of business ethics and morals

5.1 Transparent business relationships

We cultivate a trusting and professional approach to dealing with our customers and business associates; an approach brooking no unfair allowances of any kind as a result of corruption, bribery, fraud or blackmail. Gifts, payments or other benefits which could be capable of leading a person astray to act contrary to their duties will not be offered or accepted by us. Cash payments will not be accepted as a matter of principle either.

At SMF we demonstrate a high degree of business ethics which is why we are only interested in entering into business relationships benefitting both parties.

5.2 Avoiding conflicts of interest

Our personal relationships and interests will never be detrimental to, or influence at all our business decisions and activities. This is why we avoid situations simply having the potential to create the impression of such a detrimental impact.

5.3 Donations

Our donations will be made in consultation with the SMF Management and notification thereof will be transparent.

5.4 Fair competition

Doing business in accordance with market economy principles and fair competition. This means that those arrangements made with the competition which are relevant to the market are forbidden. In addition, we have no interest in trying to influence policy with political parties or authorities. We expressly undertake to obey the statutory regulations governing insider trading, money-laundering activities, and the protection of third party property and our own intellectual property.

6. Handling information

6.1 Production and exchange of information

All types of documentation and reports will be drafted correctly to reflect the truth. This will apply not only for internal, but also for external information.

6.2 Confidentiality and secrecy

By signing a separate “Confidentiality undertaking in accordance with the GDPR”, our employees undertake to maintain confidentiality when processing personal data.

All employees at SMF GmbH are obliged to remain silent about trade and business secrets and other internal matters. Their obligation to remain silent shall continue even after their contract of employment has ended.

6.3 Protection of information and cyber security

We abide by all the directives, requirements and guidelines concerning the protection of information and cyber security in force and we have implemented appropriate controls governing the exchange of confidential information. Confidential information is not to be shared either in social media or on public platforms.

6.4 Handling personal data

We take the security of the personal data of our employees, customers, service providers and other business contacts very seriously and we comply strictly with the regulations of the data protection laws.

All data which we log and process for the purposes of our business dealings is always handled by us with the greatest care, and in a highly confidential manner. To this end we have drawn up our own [data protection statement](#).

7. General information

7.1 Compliance with the Code of Conduct

The SMF Code of Conduct applies not only for SMF GmbH, but also for the subordinate companies. It is binding on all employees, the management and members of the board of management. It also covers the work carried out in the other companies.

7.2 Responsibilities

The executive board at SMF is responsible for the publication and implementation of the Code of Conduct. It will instigate the necessary steps to implement the principles and stipulations therein by taking suitable measures. The executive board at SMF will also undertake to monitor compliance with the Code of Conduct on a regular basis.

In addition to this, each individual person will be urged to report actual and impending breaches against the principles drafted here to the management or via the SMF compliance procedure. Such reports are always handled in strict confidence and will not have any detrimental consequences for the person reporting actual or impending breaches.

7.3 Publications

The code of conduct is accessible to all on the Company website www.smf.de We are all obliged to keep up to date with the internal Company regulations and to obey them.

This document shall be subject to constant review and amended as necessary. The persons to contact with regard to all matters are the following members of the management team: Thomas Engels, Wieland Feuerstein, Christoph Laarmann, Henrike Simbach and Engelbert Turczyk.

Dortmund, dated 27.04.2022