
Schmidt & Schmidt

Code of Business Conduct and Ethics

Doing the right thing to build trust

2024

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Dear Colleagues,

Our company has undergone many changes, but one thing remains constant: our commitment to sustainable and ethical business practices. This is how we have earned and maintained the trust of our clients and suppliers.

Earning trust takes time, but it can be lost in an instant. In our business, it is crucial to remember this in all our actions and decisions. When faced with difficult decisions, we must rely on our strong values and principles to guide us in making the right choices.

Maintaining our values and trust with clients and suppliers is a responsibility that falls on each of us.

Please take the time to read through this important document. And remember – if ever in doubt about what is the right thing to do, speak up and seek guidance!

Thank you all for your dedication and for building trust by doing the right thing.

*Alexej Schmidt
Managing Partner*

Introduction

Our Code of Conduct is grounded on our Values and Principles. It sets standards for our employees to overcome ethical challenges or situations and promotes a culture of compliance, accountability, and trust, especially when facing difficult choices.

Everything begins with a simple proposition: we always act in good faith and comply with the law. Not only is this the right thing to do, but it also protects our company from regulatory risks, enhances our operations, and reflects our integrity as a business to our clients, partners, and the communities.

This Code is supplemented by detailed internal policies tailored to specific regions and company activities.

Our Core Values

Take responsibility

We take responsibility and recognize that what we do today will have a significant impact on the lives of people and society tomorrow.

We are aware of our responsibility to our employees and their families and strive to contribute to their well-being. Our colleagues play an important role in the success of our company.

We are ethically adamant and honest, inspire confidence by saying what we mean, matching our behavior with our words and taking responsibility for our actions.

Provide value

We understand the needs of our clients by developing, promoting and delivering services that take into account the fundamental and long-term needs of our clients: building trust in business partners, creating transparency in society and increasing economic mobility.

We create value for our clients and investors by always moving forward and delivering results. And we keep our word, always doing what we promise.

Stay agile

As we get bigger and develop, we evaluate what works well and what we need to change to get better, which allows us to remain flexible in a rapidly changing world.

A scientific and analytical approach in making managerial decisions, as well as a focus on solving problems, are important for us.

We are constantly rethinking the way we work improving the performance of our company to free up resources that we can invest in innovation as well as to help increase value with safe, reliable and efficient technology solutions.

To Whom Does the Code Apply?

Everyone, from managing partners to interns and volunteers, must adhere to this Code of Conduct. Each employee is personally responsible for maintaining the high ethical standards set out in the Code and for helping to prevent, detect, and respond to violations. Moreover, our managers at all levels must provide guidance and support to ensure their subordinates make ethically sound decisions and act honestly.

The company's leadership is personally committed to the Code of Conduct and acknowledges that our values and principles are central to the company's sustainable growth and the creation of a healthy work environment.

The company expects its suppliers to adhere to commonly accepted ethical values, particularly honesty, trust, and respect for human dignity, and supports them in doing so as much as possible, urging them to do the same in their supply chains.

Consequences of Non-Compliance with the Code

We act honestly because it is the right thing to do. It also demonstrates our commitment to high standards and protects us from accusations of wrongdoing. Even seemingly minor violations of this Code of Conduct can have serious consequences for the company or individual employees, from reputational damage to fines or even imprisonment.

Depending on the circumstances, employees may face a range of consequences for violating the Code, up to and including termination.



Respect for the Law

Respecting the Law

Our company complies with the laws and regulations of the countries in which it operates. This also applies directly to national, European, and international norms.

Observing Employee Rights

Freedom of assembly and association is recognized to the extent permitted by law. The company complies with applicable labor standards regarding fair compensation and maximum working hours. Of course, this also includes complying with all provisions of the law regulating general minimum wages.

In general, the company ensures fair working conditions.

Preventing Financial Crimes

Financial crimes represent violations of existing laws. They cause enormous social and economic harm to the lives they affect and thus jeopardize people's futures. Our company is intolerant of financial crimes. We take all necessary measures to prevent, detect, and respond appropriately to such phenomena.

Financial crimes include, but are not limited to, corruption, bribery, money laundering, terrorism financing, fraud, tax evasion, and falsification of accounting records.

Compliance with Economic Sanctions

We comply with all applicable international trade control measures, including economic sanctions and export controls.

What is International Trade Control?

International trade control refers to laws governing the cross-border transfer of goods, technologies, and services. These laws include economic sanctions, which are legal measures restricting where and with whom we can conduct business, and export controls, which are laws imposing specific legal requirements, such as government licensing for international transfers of certain goods, technologies, and services.

Export controls often apply to highly regulated industries, such as aerospace and defense, nuclear energy production, or software with advanced encryption capabilities.

We take laws and regulations concerning trade and other sanctions, customs control, import and export control, money laundering, and terrorism financing very seriously.

Why is it Important?

The main goal of economic sanctions is to change the behavior or foreign policy of another state, protect human rights, prevent the use of military force, or prevent the proliferation of nuclear or weapons of mass destruction.

Our Expectations

- Each employee is expected to comply with all applicable international trade control measures, including economic sanctions and export controls.
- Any employee who learns or suspects that a colleague or business partner is not complying with the law or intends to violate the law must immediately contact their supervisor.
- The company expects its suppliers to provide qualified and timely export control and foreign trade data and to implement adequate security standards in the supply chain as part of global customs security programs.



Protecting Employees, Information, and Our Business

Maintaining accurate Records

Each employee is responsible for maintaining complete, accurate, and timely records.

What is a Record?

Almost any set of information we create while performing our work — from emails reflecting financial or sales information to sales forecasts and presentations to official documents and reports such as accounting records and regulatory documents — is a company record.

Why is it Important?

We rely on the integrity of our records for internal purposes, such as strategy development and forecasting, to provide important information to our shareholders and partners, and to fulfill our reporting obligations to stakeholders. Properly documenting our work helps each of us perform at our best. All employees must be honest and accurate when creating records and include all relevant and necessary information promptly so that our records are complete and accurate and based on proper accounting principles.

Any books and records that we create or work need to be **accurate, complete, timely, and truthful.**

Failure to do so jeopardizes our business, damages our reputation, and can lead to legal violations.

Our Expectations

All employees must:

- Always accurately and promptly document necessary information related to transactions and never intentionally alter or omit information to create an inaccurate representation of transactions.
- Refuse to record false information and promptly report any suspicious transactions or requests to record false information to their supervisor.
- Retain all documents and records per the company's accounting processes, policies, and rules, especially all documents subject to or expected to be subject to litigation.

Protecting and Properly Using Company Assets

We act as owners of the company and do not jeopardize our future by losing our assets due to theft, misuse, or negligence.

Why is it Important?

- We vigorously protect our assets — both physical and intangible. Intangible assets — our brand, reputation, intellectual property, and confidential information — deserve protection just as much as our equipment and computers.
- We feel the same responsibility for the company's assets as we do for personally owned assets
- Intellectual property that we create or use to perform our work should never be shared with anyone who does not need to know.
- We treat the intellectual property of other companies with the same care. We never use it without permission.

Protecting Confidential Information

We protect the company by investing in security and safeguarding confidential information.

What is Confidential Information and Information Security?

Most of the information we create and use in our work is either intended for internal use only or will be disclosed publicly only at certain times and for specific purposes. Confidential information can take various forms, including trade secrets, research, financial forecasts, and consumer data.

Almost all the information we generate is stored digitally in our DMS system. Information security is the practice of protecting information by limiting any unauthorized or otherwise inappropriate access, disclosure, destruction, alteration, or copying of such information.

Why is it Important?

Any disclosure of confidential information outside the company — and for some types of information, even within the company — is strictly controlled to best protect the interests of our firm, partners, consumers, and colleagues. It is crucial that we follow best practices in information security to provide adequate protection for these interests. It is also important to remain vigilant against unintentional disclosures of confidential information, which can cause as much damage as intentional disclosure or theft.

Our Expectations

All employees must:

- Keep commercial and production secrets and other information available due to employment relationships confidential, including from family members or friends. This applies to information about business partners and clients that is not publicly available. The obligation to maintain trade secrets remains in effect after the termination of employment.
- Protect confidential information from unintentional disclosure by never creating, obtaining, or using confidential information where it can be overheard or viewed.
- Protect confidential information from theft by using only company-provided tools and software, and by creating and maintaining passwords in accordance with our policies and standards.
- Adhere to our policies and standards regarding IT infrastructure and information security, as well as the disclosure of information on social networks or other channels.

Additional Information

ISO 27001 - Information Security Management

Protecting Personal Data

We protect the personal information of consumers, partners, and employees.

What are Personal Data?

Personal data is any information that directly or indirectly identifies and describes a person. This personal information can relate to consumers, colleagues, business partners, or third parties. Protecting personal data is a person's right to know and influence how and why their personal information is collected and processed.

Why is it Important?

Trust from customers and partners is crucial for our business. Handling personal data with care and respect is necessary to build trust, protect our company's reputation, and achieve strategic goals. Additionally, almost everywhere we do business, personal data protection laws apply. Non-compliance with these laws can result in fines, lawsuits, or criminal prosecution against the company and individual employees.

Our Expectations

All employees must:

- Process, disclose, or otherwise use protected personal data only for permitted purposes and only within their job duties. The obligation to maintain the confidentiality of personal data continues even after leaving the company.
- Ensure that personal information is not disclosed to unauthorized internal or external parties.
- If in doubt, ask your supervisor how to handle personal information.
- Immediately report any known or suspected unauthorized use or disclosure of personal data.

Additional Information

[Privacy policy](#)

[GDRP](#)

[BDSG](#)

[Федеральный закон "О персональных данных"](#)

Occupational health and safety

Each team member has a responsibility to help create a healthy and safe work environment.

What are Occupational Health and Safety?

Health is more than just the absence of illness.

We believe it is necessary to create a work environment with compassion and sensitivity and to constantly care for our mental, emotional, physical, and social health to support and improve well-being. We understand that an empathetic work environment is more sustainable, engaged, healthy, and conducive to collaboration.

Why is it Important?

Well-being is key to our success. If we do not take steps to stay healthy and live balanced lives, we cannot do our best work or fulfill our promises to colleagues and clients. We encourage everyone to achieve a balance between work, personal life, and health to ensure we use the best versions of ourselves to do our best work.

Our Expectations

We do not compromise the health and safety of our employees. We conduct business sustainably, safely, and healthily.

We strive to provide a healthy and safe working environment for our employees, partners, and clients. We strive to comply with all applicable occupational health and safety legal requirements. Occupational health and safety management standards are implemented and maintained in all our offices.

Our Expectations

We expect employees to take responsibility for their safety and that of others. Employees should also report any unsafe working conditions, including any colleagues who appear to risk their safety or that of their colleagues, to their supervisors, HR department.

Company management is overall responsible for ensuring the correct policies, procedures, and safety measures are applied, including ensuring every employee has access to appropriate information and training.

Our Expectations

We strive for effective implementation and continuous improvement of our occupational health and safety management system and guarantee that:

- Our company develops a culture where all employees and stakeholders take responsibility for their health and safety and others.
- Appropriate resources will be provided to fulfill our occupational health and safety obligations.
- All workplace health and safety risks will be actively assessed, managed, monitored, and mitigated.
- Employees and contractors will be provided with relevant information, training, and supervision.

Our Expectations

- Employees can report workplace safety issues through their immediate supervisors or provided channels.
- The company's occupational health and safety goals and policy will be assessed and updated annually to promote continuous improvement.

The company will provide an effective occupational health management system that will support continuous review and improvement per the ISO 45001 standard.

Additional Information

[Allgemeine Unterweisung zum Arbeits- und Brandschutz](#)

[Directive 89/391/EEC - OSH "Framework Directive"](#)

[The OSH Framework Directive](#)

[What is Environmental Safety?](#)

[Environment policy: general principles and basic framework](#)

[ISO 45001:2018 Occupational health and safety management systems](#)

Using of Social Media

We always strive to protect our brand and reputation

Why is it Important?

We engage in constructive online dialogues and use common sense when posting on external or internal social networks.

Participation in online communities, including social networks, blogs, wikis, podcasts, and virtual worlds, allows us to demonstrate an innovative nature. Online discussion helps us promote our values, build stronger relationships, and strengthen our reputation.

Our Expectations

We expect employees to use common sense when posting online about our company, colleagues, or their work. Always protect our confidential information. Employees are responsible for any content they post and cannot speak on behalf of the company without prior approval.

Our Expectations

All employees must:

- Be polite when using the company's social networks and never post disrespectful, offensive, or discriminatory content.
- Provide sufficient context to help readers understand your statements correctly.
- Obtain proper approval before stating the company's position or on a company-related topic. Do not make statements that others may perceive as speaking on behalf of the company.

Our Expectations

All employees must:

- Protect confidential information.
- Not disclose anything that could violate the privacy of our employees or clients.
- Protect the company's intellectual property.
- Be mindful of their personal lives and respect the privacy of others.

Additional Information

Social Media Guidelines

Risk Management

A holistic, conservative and consistent approach to risk management.

What is Risk Management

Risk management is the process of making and implementing management decisions aimed at reducing the likelihood of adverse outcomes and minimizing possible project losses caused by its implementation.

Why is it Important?

Active risk management helps us deliver on our strategy, deliver quality service, and ensure sustainable growth and business continuity. Throughout our long way, we have taken a conservative and consistent approach to risk, which allows us to provide services responsibly.

Our company faces many risks. Some we accept as part of doing business, but others we must avoid to protect our clients, colleagues, business, and investor interests.

Our Expectation

- Be aware of risks, identify the most significant risks, and then make more informed decisions.
- Create thoughtful and reliable risk management plans, plan activities to reduce and mitigate potential damage.
- Manage risks uniformly.
- Remember: risk management is simply part of our job.
- Maintain sufficient control to ensure that you only take the right type and size of risk for the safe development of our business and per our risk appetite.
- Inform management of any unrecognized risks that become known to you.

Additional Information

ISO 31000:2018 Risk management — Guidelines

ISO 31022:2020 Risk management — Guidelines for the management of legal risk

ISO 20700:2017 Guidelines for management consultancy services



Conflicts of Interest

Employee Loyalty

The company expects its employees to be loyal. This ensures that employees do not find themselves in situations where their personal or financial interests conflict with those of the company or its business partners.

Company employees must immediately report any personal interests that may exist concerning their work to their supervisors.

Side Activities and Participation in Other Companies

Employees of the Company are prohibited from managing or working in a company that competes with our company. This also applies to the participation of close relatives or life partners.

Cooperation with Regulators

Our company is committed to maintaining respectful and cooperative relationships with governments, regulators, and supervisors. This commitment applies to all interactions, including regular communications, specific requests, examinations, and investigations. We aim to provide diligent and timely responses that are accurate and transparent.

Always feel empowered to ask questions or raise concerns if something doesn't seem right.

Holding Business Partners to Our Standards

We strive to collaborate with business partners and others who share our values and adhere to the same high standards. To achieve this when establishing new or enhancing existing business relationships, we recommend the following steps:

- **Engage Procurement Early:** Involve the Procurement function at the earliest stage to ensure alignment with our goals.
- **Uphold Core Principles:** Ensure that integrity, fairness, impartiality, and discretion are fully respected throughout the selection process.
- **Conduct Comprehensive Due Diligence:** Perform thorough due diligence on potential business partners to assess their suitability and alignment with our values.
- **Ensure Commitment to Compliance:** Require business partners to commit to our Code of Conduct and other key standards and regulations.



Free and Fair Competition

We compete fairly because we aim to succeed based on the quality of our services, not through unfair business practices.

What Are Antitrust and Competition Laws?

Antitrust and competition laws are designed to protect consumers and promote fair competition. They prohibit coordinated actions among market participants that fix or artificially inflate prices, divide markets, or otherwise restrict trade. These laws also apply to anticompetitive actions at any point in the supply or distribution chain, not just among competitors. Both formal contracts and any other communication or agreement that restricts competition fall under these laws.

Why is it Important?

We take pride in our ability to compete and succeed on a level playing field. We comply with all antitrust and competition laws, sharing their goal of ensuring fair competition. Violations of these laws can have severe consequences, including negative publicity, reputational damage, significant fines, and imprisonment for those involved.

Competition and Antitrust Law

Our company complies with the rules of fair and open competition and does not enter into any agreements that improperly influence competition.

Competition and Antitrust Law

Company employees must comply with fair competition rules. In particular, any agreements and coordinated conduct with competitors on the following topics are prohibited:

- Prices and price components
- Terms
- Customers
- Delivery areas
- Quotas and capacities
- Coordinated market exits
- Voting on planned innovations
- Boycotts

Participation in Tenders

If a contract is awarded based on an official tender invitation, the company will not discuss or coordinate bids with other bidders. This applies to both public and private tenders and regardless of whether it is a public or private procurement procedure.

Bribery and Corruption

The company openly opposes any form of corruption domestically and abroad and avoids even the appearance of attempting to influence business decisions through unfair business practices.

No employee may use the company's business relationships for personal gain or that of others or to the detriment of the company. This means no employee provides or accepts unauthorized private benefits (e.g., money, property, services) in business transactions that may influence the relevant decision.

Every company employee must seek advice or assistance if they have suspicions or legal doubts about the existence of corruption. Managing partners offer advice and assistance..

Business Dinners and Gifts

Invitations, such as business dinners or events that are in line with accepted business practices and are reasonable, may be given or accepted if they do not serve to provide improper advantages.

The same applies to accepting or giving gifts. If there is any doubt about the existence of an objective reason or the usual nature of the benefit, the employee should first consult with the managing partner.

This point is internally regulated comprehensively and substantively.

Government Officials

Any offerings to public officials and other government representatives, even indirectly through third parties, are prohibited regardless of their value.

Parties and Elected Officials

Applicable laws are followed regarding donations to parties and political organizations and elected officials and candidates for political office.

Consultants and Agents

Engaging consultants, agents, and other intermediaries must not be used to circumvent the ban on corruption.

Donations and Sponsorship

Donations are made only voluntarily and without expecting anything in return. Donations and sponsorship services should not aim to covertly promote decisions in the company's interests.

Donations must be transparent. The recipient of the donation and its specific use must be known. It must be possible to specify the reason for the donation and its intended use at any time.

Payments similar to donations are not allowed. Payments similar to donations are those that only seem to be fees for services, but their cost clearly exceeds the value of the service.

Money Laundering

The company has zero tolerance for money laundering. All employees are required to strictly adhere to anti-money laundering laws. Additionally, any suspicious payments or transactions that may indicate money laundering must be immediately reported to the compliance officer or supervisor.

Tax Law, Customs Law, and Foreign Economic Activity

The company prepares tax declarations truthfully.

Our Expectations

All employees must:

- **Adhere to All Laws:** Always follow antitrust and competition laws. Due to their complexity, seek guidance from the Legal or Compliance Team whenever there's a risk of violation.
- **Avoid Unlawful Practices:** Never restrict competition unlawfully. This includes making agreements, colluding, sharing information, or coordinating with any competitor, business partner, or third party to fix or inflate prices, divide markets, or limit competition.
- **Consult Before Changes:** Seek Legal advice before revising or amending any business customer trade terms, especially regarding customer segmentation or pricing.

Our Expectations

- **Prohibit Resale Price Maintenance:** Remember that antitrust and competition laws generally prohibit resale price maintenance and similar practices aimed at setting minimum retail prices.
- **Report and Cease Unlawful Interactions:** Immediately end any interaction with a competitor, business partner, or third party that might violate antitrust or competition laws, and promptly report it to the Compliance Team.



Supporting Sustainable Development

Prohibition of Discrimination

Discrimination against employees and third parties is not allowed. The company strongly opposes unacceptable treatment of employees, particularly sexual or verbal harassment.

What is Discrimination and Harassment?

Discrimination is any unfair or prejudiced treatment of a person based on their actual or perceived association with a certain characteristic such as race, skin color, age, abilities, sexual orientation, religion.

Harassment is verbal or physical behavior that demeans or shows hostility or aversion to a person. In the workplace, this includes any behavior that unreasonably affects or interferes with a person's ability to do their job or creates an intimidating, hostile, or offensive work environment.

Why is it Important?

All employees have the right to work in a safe, fair, and respectful environment that provides equal opportunities and prohibits discrimination. Only by maintaining a positive, inclusive workplace can we all benefit from the full potential of our colleagues' abilities, creativity, and talent.

We do not tolerate discrimination or harassment from any employee or partner in any form.

Our Expectations

All employees must:

- Observe the obligation of absolute intolerance to discrimination, harassment, and sexual harassment, and demonstrate leadership and express their disapproval whenever they witness behavior that they believe violates this obligation.
- Be sensitive to behavior that may be acceptable to those around them.
- Report any instances of discrimination or harassment, including sexual harassment, to the HR department or company management.

Human Rights

The company respects and supports internationally recognized human rights. In this context, we also maintain an ongoing dialogue with our suppliers.

Child Labor

We refuse to tolerate the use of child labor in the supply chain.

Children must not be engaged in any hazardous work or work that is incompatible with their personal development.

Equal Opportunities

The company promotes equal opportunities for its employees.

Environmental and Climate Protection

Environmental and climate protection and efficient use of resources are important corporate goals for us. In both developing new services and operating production facilities, we ensure that any subsequent impact on the environment and climate is minimal, and our services contribute positively to environmental and climate protection.

Every employee is responsible for conserving natural resources and contributing to environmental and climate protection through their personal behavior.

Consumer Interests

Our company is dedicated to upholding consumer protection regulations and safeguarding consumer interests.

Additional Information

<https://www.europarl.europa.eu/factsheets/en/sheet/71/environment-policy-general-principles-and-basic-framework>

https://en.wikipedia.org/wiki/Environmental_policy

Social Responsibility

Social responsibility is an integral part of value-oriented corporate governance and a key factor in sustainable corporate success.

Social Commitments

The company contributes to the socio-economic development of the country and the region in which it operates.

Compliance



Communication

The company familiarizes its employees with the content regulated by this Code of Conduct and explains the resulting obligations. The company communicates the principles of the Code of Conduct to its business partners.

Policies and Procedures

The behavioral requirements set out in this Code of Conduct are part of the employment contract for company employees and must therefore be observed.

The company takes all necessary steps to implement the core values contained in this Code of Conduct through appropriate organizational measures and training, as well as relevant guidelines and processes in all areas of activity.

The company is committed to regularly monitoring compliance with the Code.

How to Report Violations?

We encourage employees and partners to report possible misconduct and ethical breaches confidentially and, if desired, anonymously.

Speak up - Speak openly

We continue to foster a "speak up" culture. Following our principles, we encourage open and honest communication, supporting and protecting people who report issues. We do not condone or tolerate any acts of retaliation against those who speak up.

We understand that it takes courage to report a concerning incident. That is why the company management creates a culture of trust where employees feel genuinely encouraged to be open and speak their minds without fear of consequences.

We encourage individuals to report issues confidentially and, if desired, anonymously. Problems are investigated proportionally and independently. Action is taken when necessary.



Open Door Policy

We are always ready to listen to our employees personally or through digital communication. Because trust and open communication are important to us.

How to Report Violations?

Each company employee is responsible for helping to prevent, detect, and respond to potential violations of this Code of Conduct. This includes the firm expectation that employees will report any time they believe a violation of the Code of Conduct has occurred or may occur.

Protection Against Retaliation

Any employee who reports their reasonable suspicions of a violation or potential violation of our Code of Conduct is protected from any form of retaliation, regardless of whether the suspicion is justified. Conversely, any employee who takes or attempts to take retaliatory action against a colleague who has reported or intends to report a suspected violation of the Code of Conduct, including through pressure or threats, not to report a suspected violation, may be subject to disciplinary action.

Our Expectations

If you are aware of a violation or potential violation of our Code of Conduct, take one of the following actions immediately:

- Contact senior company management.
- Submit a report - anonymously, if you wish.

The same applies if you believe you are under pressure, threatened, or otherwise retaliated against for reporting or intending to report a suspected violation of the Code of Conduct.

Where to Seek Advice?

Whenever company employees have doubts about the applicability of any part of our Code of Conduct or have questions about how the Code of Conduct might affect their business decisions, they are encouraged to seek advice from their supervisor.

Senior management is always ready to help you make any decision, no matter how big or small, and work confidently, creatively, and collaboratively to find the right solution.

10 Principles of the Global Compact

Our commitment to ethics, human rights and sound corporate governance is our business strategy and is essential to protecting our employees, customers and financial results. This is the basis on which we build trust. That is why we especially want to reaffirm our commitment to the Ten Principles of the UN Global Compact.

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

10 Principles of the Global Compact

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Embracing the Code

Doing the right thing isn't always easy. When you face challenging decisions, let our Code be your compass, guiding you to stay true to our values.

Together, let's play a crucial role in building trust in business partners, fostering transparency in society, and enhancing economic mobility. By making wise choices and instilling confidence in our customers and communities, we can shape a brighter future.

"We build trust ." – Let's dedicate ourselves to this mission with passion, every single day.



Alexej Schmidt
Managing Partner

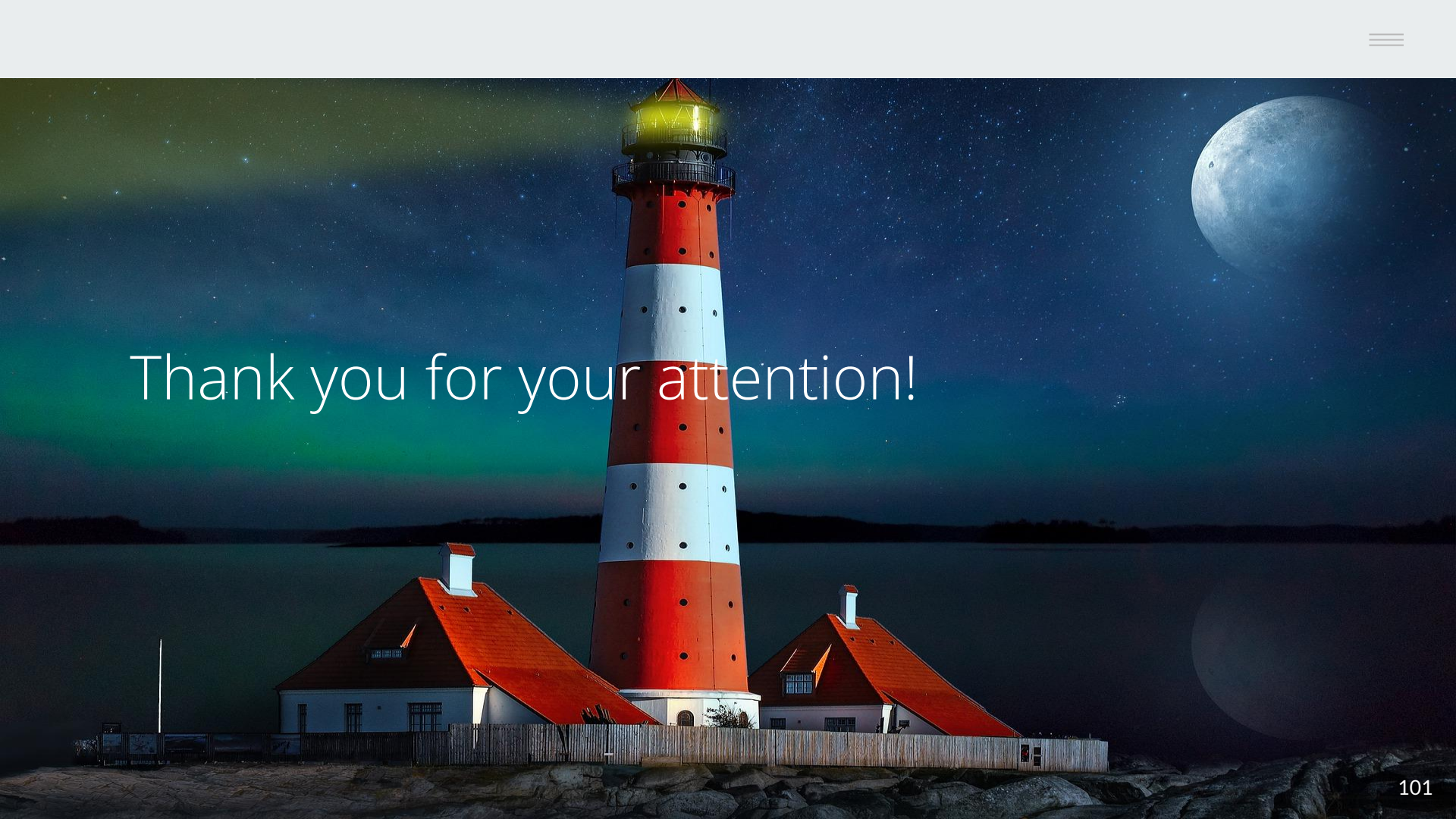
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Thank you for your attention!