

Code of Conduct



Dear Team,

At SFC Solutions, our commitment to excellence goes beyond the products we create and the services we provide. It encompasses how we conduct ourselves in every aspect of our business. Our Code of Conduct is a reflection of our core values and serves as a guide to ensure that we uphold the highest standards of integrity, respect, and ethical behavior.

As we navigate the complexities of our global operations, this Code will help us make the right choices, even in challenging situations. It is designed to support you in understanding and complying with the laws, regulations, and company policies that apply to our work. It also reinforces our dedication to creating a positive and inclusive work environment where every employee feels valued and respected.

Integrity is the foundation of our success. We win business because of the quality of our products and the talent of our people, not through unethical practices. Our Code of Conduct emphasizes the importance of transparency, honesty, and fairness in all our dealings. By adhering to these principles, we build trust with our customers, partners, and each other.

Furthermore, our commitment to sustainability and social responsibility is integral to our identity as a company. We strive to minimize our environmental impact and to contribute positively to the communities where we operate. Our Code aligns with the United Nations Declaration on Human Rights and the International Labor Organization standards, underscoring our pledge to uphold these values.

I encourage you to familiarize yourself with the Code of Conduct and to use it as a resource in your daily activities. If you ever face a situation where the right course of action is unclear, remember that you are not alone. Reach out to your Supervisor, the Human Resources Department, or the Legal and Compliance Department for guidance.

Thank you for your commitment to upholding our values and for your dedication to excellence. Together, we will continue to build a company that we can all be proud of.

Sincerely,

Federico DOMINGUEZ

Chief Executive Officer

SFC Solutions

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Purpose and scope

The Code of Conduct aims to ensure that all members of SFC Solutions' workforce act with the highest level of integrity, comply with applicable laws, and build a better future for our company and the communities where we operate.

OUR COMMITMENT

We are dedicated to doing business the right way. Sometimes, this means we need guidance to make the right choices in our daily activities.

The SFC Solutions Code of Conduct helps us navigate decisions when the answers are not clear.

ADAPTING TO CHANGE

Our workplace, like the world we live in, is dynamic. It is constantly evolving and presenting new challenges. The Code of Conduct is a tool that helps us stay on course,

guiding us when we are uncertain about which path to take. It is a valuable resource that reflects our company's values and principles.

GLOBAL STANDARDS

SFC Solutions endorses the United Nations (UN) Declaration on Human Rights and the International Labor Organization (ILO)

standards. Our Code of Conduct is designed to be consistent with these guidelines.

PROCEDURES AND COMPLIANCE

SFC Solutions promotes the continuous development of procedures that provide detailed guidance on the actions and behaviors necessary to ensure compliance with internal rules and applicable laws. The Code of Conduct is approved by the Board of Directors of SFC Solutions and applies to all legal entities within

SFC Solutions. It is applicable to SFC Solutions worldwide workforce, including Directors, Officers, Auditors, Employees (full-time or part-time), Contract Workers, and other temporary employees, in their business relations with internal and external stakeholders.

Responsibility to the company

As employees of SFC Solutions, we are all entrusted with the responsibility to act in the best interests of the company. This means safeguarding company assets, avoiding conflicts of interest, maintaining confidentiality, and ensuring that our actions align with the company's values and policies. By upholding these responsibilities, we contribute to the company's success and integrity.

DATA PRIVACY

We respect the privacy of our employees and business partners. We therefore protect the personal data of employees and third parties. Therefore, we collect, store, use and transfer personal data and information only in accordance with applicable laws and guidelines. In doing so, we observe that the

collection, storage, processing, and other use of personal data may only take place with the consent of the person concerned or based on a contractual or legal basis. We treat such information confidentially both during and after the termination of our employment relationship.

PROTECTION OF COMPANY ASSETS

Every day, our assets are essential tools that enable us to perform our jobs efficiently and effectively. Given their crucial role in our operations, it is our responsibility to protect and maintain these assets diligently. By safeguarding our assets, we ensure that we can consistently deliver superior products and maintain our competitive edge in the

marketplace. This commitment to asset preservation not only supports our current success but also secures our future growth and innovation.

The private use of company property is only permitted if this is provided for by individual law, collective law or company regulations.

INFORMATION SECURITY

Respecting information security rules within a company is essential to protect sensitive data and ensure the continuity of business activities. Every employee must be aware of the importance of these rules and apply them rigorously on a daily basis. This includes using complex and unique passwords, regularly updating software and systems, and being vigilant against phishing attempts and other

cyberattacks. Confidential information should only be shared with authorized individuals and through secure channels. It is also crucial to lock workstations when away and not to leave sensitive documents lying around. Regular data backups help minimize losses in the event of an incident. Training and raising employee awareness of best security practices are key elements in strengthening the security culture

within the company. In case of doubt or suspicion of a security breach, it is important to immediately report the incident to your IT team of reference. Compliance with these rules contributes not only to data protection but also

to the reputation and credibility of the company. Finally, information security is a collective responsibility that requires the commitment of everyone, from management to employees, to create a safe and secure work environment.

ACCOUNTING AND FINANCIAL REPORTING REGULATIONS

We are committed to accurate accounting, record keeping and to maintaining a system of internal controls. In addition, we conduct our financial reporting and our businesses with

integrity and transparency. We prepare and publish our periodic financial statements in accordance with applicable national and international accounting standards.

CONFLICT OF INTEREST

We communicate honestly and transparently. We disclose potential or actual conflicts of interest in the workplace in a timely manner for review and definition of necessary measures. A conflict of interest exists when a private interest of an employee could collide with the interests of the company. This may also include the fact that a partner or close relative has conflicting interests, for example working in a responsible position for a competitor.

and not under the potential influence of personal interests or relationships.

Business decisions may only be made based on objectively comprehensible business criteria

We all have a duty to avoid conflicts of interest and never use our positions for personal gain. Any situation that creates or appears to create a conflict must be promptly disclosed to your Supervisor, the Human Resources Department, the Legal and Compliance Department, or through other channels provided by the Company.

Responsibility to the customer and supplier

At SFC Solutions, we are committed to fostering honest and respectful relationships with our customers and suppliers. This means delivering high-quality products and services, honoring our commitments, and conducting business ethically and transparently. By upholding these standards, we build trust and maintain strong, lasting partnerships.

CONFIDENTIAL INFORMATION

We win business through the quality of our products and people, not by using unfair practices. It's fine to gather information about our competitors, partners, and vendors, as long as we do it legally and ethically.

We protect confidential information from unauthorized disclosure and use. We use

sensitive or confidential data, information, and documents only in connection with our professional duties. Employees will not disclose confidential information to third parties unless they have explicit permission for such disclosure from the owner of the information in question or a clear legal obligation.

EXPORT CONTROL AND SANCTIONED PARTIES

Our products are used worldwide, making us subject to numerous laws regulating where and with whom we can do business. As a global company, we strictly adhere to all import and export regulations, ensuring full compliance with international trade laws.

In the context of international business transactions, we comply with all export control regulations, and, in the case of cross-border transactions, we carefully check whether any export control restrictions apply to goods, services or information.

In addition, countries, or potential business partners (companies and individuals) could be on embargo or sanctions lists as per EU, US/OFAC or UN updates. Before entering a business transaction, we ensure that sanctions are not violated in the execution of the transaction.

Transactions with sanctioned individuals and countries or goods and services regulated under export control law can have serious consequences for the SFC Solutions and responsible employees.

ANTI-BRIBERY AND CORRUPTION

We condemn any form of corruption and bribery, whether active or passive, direct or indirect. We do not offer or grant personal benefits to representatives or employees of other companies or public administrations in connection with official activities. We grant gifts

or invitations only in an appropriate form and amount.

No one - director, officer, or other employee or representative - shall, directly or indirectly, give, offer, request, promise, authorize, solicit or

accept bribes or any other perquisite in an inappropriate form or amount in connection with their work for SFC Solutions at any time for

any reason. Even the appearance of corruption and bribery must be avoided at all costs.

COMPETITION AND ANTITRUST LAWS

All employees are committed to fair competition in all business relationships. No agreements that restrict competition or are relevant under antitrust law (e.g. on prices or markets) are made in the course of our business activities. We comply with applicable competition and antitrust laws and avoid unlawful restrictions on competition in our

dealings with competitors, customers or suppliers. Employees who are particularly confronted with these issues as a result of their work (e.g. in sales or purchasing) must familiarize themselves in detail with the applicable competition and antitrust laws.

TAX LAWS AND CUSTOMS DUTIES

We are aware of our legal obligation to comply with tax and custom duties. Every responsible employee must therefore ensure that all taxes

and duties are determined, recorded, declared if necessary and paid to the relevant tax authorities completely, correctly and on time.

PREVENTION OF MONEY LAUNDERING AND TERRORIST FINANCING

We comply with the applicable regulations on the prevention of money laundering and terrorist financing. Money laundering occurs when funds, assets or substitute items for such assets derived from criminal acts are brought into the legal economic cycle.

Terrorist financing occurs when funds or other assets are provided to support terrorist goals or associations.

POLITICAL COMMITMENT

All employees can become politically and socially involved in their free time within the scope of the given opportunities. We attach great importance to political neutrality and therefore we do not make any financial contributions such as donations or sponsoring

measures with political objectives. This means that we do not make donations or comparable contributions to political parties, party-like organizations, individual elected officials, or candidates for political office in any country where we are present.

Responsibilities to Employees

At SFC Solutions, we are dedicated to creating a safe, inclusive, and respectful work environment for all employees. This includes promoting diversity, ensuring fair treatment, and providing opportunities for professional growth and development. By valuing and supporting our employees, we foster a workplace where everyone can thrive and contribute to our collective success.

EMPLOYMENT LAWS

Respect for and compliance with human rights as well as the protection of health and the environment are essential components of our corporate responsibility. We strictly reject any form of forced or child labor. We recognize the right of all employees to form trade unions and employee representatives on a democratic basis within the framework of national regulations. The right to adequate remuneration and legally regulated working hours is recognized for all employees. Remuneration and other benefits correspond at least to the respective national and local legal standards or the level of the national economic sectors and regions.

We offer equal opportunities for all and prevent discrimination in the hiring of employees as well as in the promotion or granting of training and development measures. We treat everyone fairly and with dignity. We treat each other with respect and trust. We create a work environment that is free from discrimination and harassment. We treat all employees equally, regardless of gender, age, skin color, culture, ethnic origin including minorities and indigenous peoples, sexual identity, disability, religious affiliation, or world view. Everyone is required to always comply with these standards of conduct.

DIVERSITY, EQUITY AND INCLUSION

We provide equal opportunities to our employees without any kind of discrimination and harassment. We do not discriminate against anyone based on a person's or group's race, color, religion, age, sex (including pregnancy, childbirth, breastfeeding, or related

medical conditions), sexual orientation, gender, gender identity or expression, marital or partnership status, family status, citizenship, genetic information, national origin, geographic background, or disability.

DIVERSITY & EMPOWERMENT OF WOMEN

We believe that diversity and the empowerment of women in the work context are key in fostering a more inclusive and equitable workplace. We believe that embracing diversity

means recognizing and valuing the unique perspectives, experiences, and talents that individuals from different backgrounds bring to the table. All these factors contribute to

enhancing creativity and innovation and promote a more collaborative and harmonious work environment.

ETHICAL RECRUITMENT

We follow ethical recruiting practices, ensuring that all job candidates are treated with fairness and respect, regardless of their background. We conduct structured interviews, offering

structured skills-based assessments, providing tangible feedback to every candidate, and ensuring compliance with employment laws.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We recognize and respect the right to associate and to bargain collectively, as permitted by law and in accordance with all applicable laws and regulations. No workers shall be subjected to harassment, intimidation, or retaliation for

exercising their right to freedom of association and collective bargaining. Workers' representatives should have access to carry out their representative functions in the workplace.

INTERACTING WITH COLLEAGUES AND BUSINESS PARTNERS

We always behave fairly and act with integrity and respect toward each other and third parties.

We do not tolerate any form of bullying, coercion, or other harassment. Neither on a sexual nor on a physical, psychological, or other level. SFC Solutions is committed to providing equal employment opportunity to all qualified employees and applicants. As an employee, you must comply with all laws and regulations prohibiting discrimination with respect to age, physical appearance, gender, ethnic origin, nationality, religion, medical condition, disability, marital status, sexual orientation, political or philosophical beliefs, union membership or any other characteristic protected by law or regulation.

If you observe or experience any form of abuse or harassment, you are requested to report it to the Human Resources Department, which is responsible for compliance in the company.

Reporting case employees will be protected if such reports are made in good faith.

Respect for others means respect for their dignity and personal integrity, their self-respect, their property, and their contribution to the overall success of SFC Solutions. We protect our company's reputation in our public statements. We conduct our business responsibly and do not engage in practices that harm SFC Solutions's reputation or are contrary to our values.

We meet the highest standards of ethics and integrity in the performance of our work. Even when performing actions that are lawful or not regulated by law, we always ensure that our actions are honest and ethical. SFC Solutions assets must be used only for their intended business purposes and not for improper personal, illegal, or other unauthorized purposes.

OCCUPATIONAL HEALTH AND SAFETY, ENVIRONMENTAL LAWS AND OTHER REGULATIONS

HEALTH AND SAFETY

We have made it our mission to create a healthy and safe working environment. Each one of us must comply with the applicable safety standards. We ascribe a high priority to safety in the workplace and strive for an accident rate of zero.

ENVIRONMENTAL IMPACT

We are dedicated to minimizing the environmental impact of both our direct and indirect operations, as well as that of our products. SFC Solutions is steadfast in its commitment to continuously enhance the environmental performance of our operations, ensuring that we not only comply with all relevant legal and regulatory requirements but also strive to exceed them. Our goal is to implement sustainable practices across all facets of our business, driving innovation and efficiency while protecting the planet for future generations. By integrating environmental stewardship into our core values, we aim to

DECARBONIZATION, EMISSIONS AND RENEWABLE ENERGIES

The energy used in the necessary company processes is an essential and important resource that should be used as sparingly and economically as possible from an economic and ecological point of view. The continuous improvement process aims, among other things, to increase energy efficiency and the use of renewable energies. We are committed to actively contributing to decarbonization and conducting our business activities in a way that

WATER QUALITY, CONSUMPTION AND MANAGEMENT

Our aim is to organize our water balance in such a way that

- the ecological balance is preserved and restored,

We and our suppliers must be aware of the source and origin of the raw materials used in our products. For this reason, we also oblige our contractual partners to comply with the "Code of Conduct".

make a positive and lasting contribution to the communities we serve and the global environment.

Pollution must be prevented or reduced as much as possible. We strive to improve environmental protection in our business activities, to minimize our use of resources (in terms of energy, water, etc.) and to conserve natural resources.

has the least possible impact on climate change. We will constantly look for ways to reduce our energy consumption, promote renewable energy sources and minimize our CO₂ emissions. This includes promoting environmentally friendly transportation and reducing waste in our operations. We are determined to fulfil our responsibility to future generations by adopting a sustainable, low-carbon approach in our business environment.

- the direct and indirect consumption of energy and resources is minimized and
- measures introduced or taken are as flexible and modifiable as possible

and the possible consequences are reversible.

Our commitment aims to reduce energy consumption and greenhouse gases as well as

RESPONSIBLE HANDLING OF CHEMICALS

Responsible chemicals management is an essential focus for all companies that work with hazardous substances or use them in production. Compliance with laws and standards is the minimum requirement. Our aim is to substitute hazardous substances with less dangerous ones and adapt processes accordingly.

WASTE PREVENTION, REUSE AND RECYCLING

When designing our processes and procedures, as well as in purchasing, we must ensure that we conserve resources and avoid waste at an early stage, both from an economic and an ecological point of view. The Closed Substance Cycle Waste Management Act (KrWG) and its waste hierarchy (Section 6) serve as a guideline:

ANIMAL WELFARE

We are committed to the responsible treatment of living creatures and expect all employees to

BIODIVERSITY, LAND USE AND DEFORESTATION

The issues of biodiversity, land use and deforestation are closely interlinked and SFC Solutions will work towards ensuring the sustainable use of resources and the preservation of biodiversity as far as possible. The protection of ecosystems, sustainable forestry and agriculture as well as the creation and safeguarding of protected areas are essential prerequisites for an intact environment. SFC Solutions promotes these

impairments to water and air quality to the absolute minimum and to promote good water and air quality.

Key points for safety when handling hazardous substances are the handling, development, production, transportation, storage, use, recycling and disposal of waste, waste gases, wastewater, chemicals and hazardous substances in accordance with the laws, regulations, provisions and ordinances.

- Waste avoidance
- Reuse
- Recycling
- Other utilization of waste
- Waste disposal.

comply with national and international legal standards on animal welfare.

goals through the responsible and careful use of resources and the minimization of emissions and waste. SFC Solutions also respects the rights of local communities to decent living conditions, education, employment, social activities, and the right to Free, Prior, and informed Consent (FPIC) to developments that affect them and the lands on which they live, with particular consideration for the presence of vulnerable groups.

SOIL QUALITY

SFC Solutions ensure that the materials and procedures used in its business activities do not adversely affect soil quality.

NOISE EMISSIONS

The reduction of noise emissions must start at the source. As with all workplace safety measures, the following sequence must be followed:

T - technical measures (e.g. enclosure of the noise source)

O - organizational measures (e.g. separation of the simultaneous encounter of noise source and person)

P - personal measures (personal protective equipment)

Decision-making

If you are unsure whether a decision is consistent with the requirements of our Code of Conduct, the following questions may help:

- Is my action legal and have I checked relevant internal policies?
- Can I make an impartial decision that is in the best interest of SFC Solutions and free from any competing personal interests?
- Can I make the decision in good conscience? Can I stand by my decision if it becomes known?
- Would my decision stand up to scrutiny by a third party?

If you can answer “yes” to each of these questions, **it is likely that your decision is appropriate**. If you are still in doubt, you can always contact your supervisor or Human Resources reference or Legal and Compliance Department.

Reporting possible violations

Any employee or third party who become aware of violations of the provisions of this Code of Conduct or otherwise becomes aware of violations of the law, harmful conduct or risks that endanger the company is required to report them.

At SFC Solutions, we practice open communication. Normally, therefore, the **supervisor** is the right contact person for questions, possible errors, or indications of irregularities.

If you believe the issue you wish to raise involves your Supervisor, then you may also speak to your **Supervisor's Manager**.

If you prefer in an individual case - for whatever reason - not to contact the supervisor directly, you can also contact **Human Resources** reference or **Legal and Compliance Department**.

At certain times, you may feel more at ease if you report the violations using the **SFC Whistle Blowing Portal**:
<https://sfcsolutions.integrityline.com/frontpage> and in this case it can be done also anonymously.

In addition to information from employees, we also expressly welcome information from our business partners, suppliers and other third parties. These should first contact their contact

person or Legal and Compliance Department. If they do not wish to do so, third parties are also invited to report indications of violations of legal provisions or this Code of Conduct via

SFC Whistle Blowing Portal

<https://sfcsolutions.integrityline.com/frontpage>

We are committed to thoroughly investigating all concerns raised by our workforce and third parties. Management will review all allegations and assign them to the appropriate level of investigation. If wrongdoing is found, we will take corrective action, no matter the level or position of those involved.

We do not tolerate retaliation against anyone who raises a concern in good faith about a possible Code violation. Those who retaliate will face disciplinary action, up to and including termination.