

BUSINESS CONDUCT CHARTER

CHARTER OF KEY PROPER BUSINESS CONDUCT COMMITMENTS



passion for sports grounds

RELEASE: JULY 2024



FUNDAMENTAL VALUES

RESPONSIBLE AND
SUSTAINABLE ACTION.

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► KEY PROPER BUSINESS COMMITMENTS

This charter contains the key proper business conduct commitments of the SMG Sportplatzmaschinenbau GmbH.

This charter contains the key proper business conduct commitments that SMG Sportplatzmaschinenbau GmbH expects from all members of top-management of the SMG Sportplatzmaschinenbau GmbH and constitutes the basis for further actions within the SMG Sportplatzmaschinenbau GmbH with respect to the implementation of a best-fit compliance and business ethics culture throughout the entire company. The six commitments below refers to the company, all members of top-level management and the employees (or equivalents).



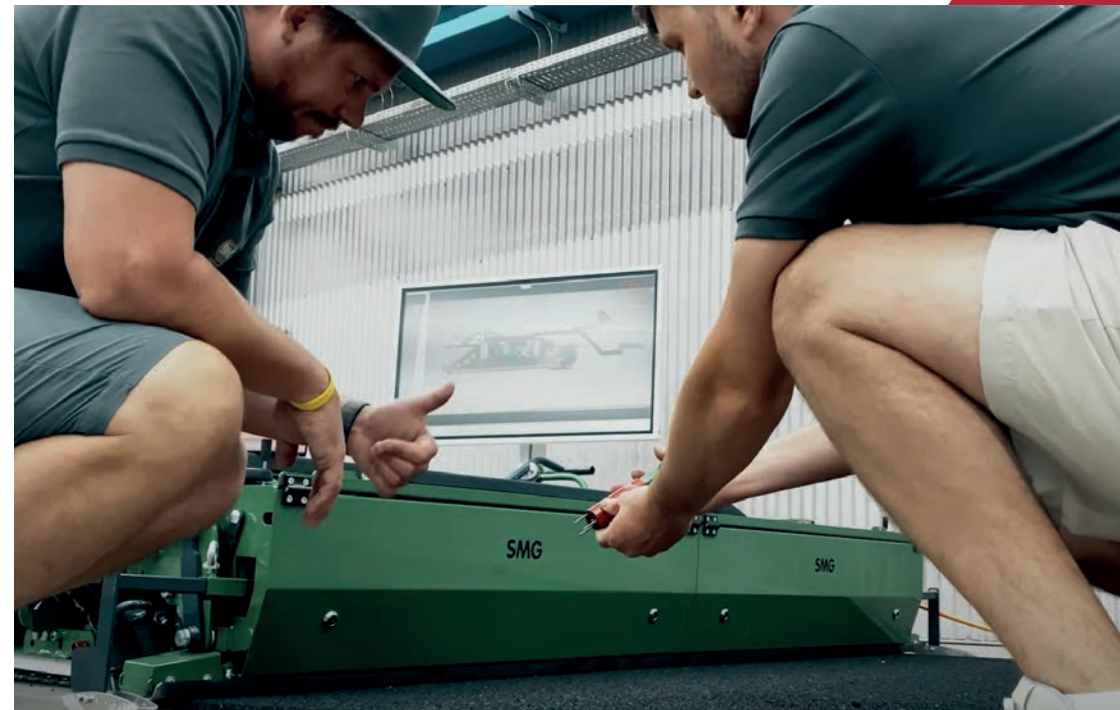
01 COMMITMENT TO COMPLIANCE

The SMG Sportplatzmaschinenbau GmbH will act in accordance with applicable laws and regulations at any time. In the selection of its business partners, the SMG Sportplatzmaschinenbau GmbH will expect the same standards in terms of compliance with laws and regulations from their partners. Furthermore, the SMG Sportplatzmaschinenbau GmbH will install and/or safeguard a proper compliance culture consisting of the following building blocks:

Philosophy: draft a code of conduct that reflects the company's vision on integrity & compliance culture

People: create a compliance function or allocate compliance responsibilities to an existing member of top-level management

Policies and procedures: adopt and implement the necessary policies and procedures where mandatory or recommended from a risk management point of view



02 COMMITMENT TO FAIR COMPETITION

The SMG Sportplatzmaschinenbau GmbH will always respect competition law in all dealings with competitors, suppliers and customers. Violations can result in severe sanctions such as large fines and criminal sanctions for the SMG Sportplatzmaschinenbau GmbH and employees involved. Additionally, disciplinary sanctions should be imposed by the SMG Sportplatzmaschinenbau GmbH to the involved employees in case of a violation. In this respect, the SMG Sportplatzmaschinenbau GmbH engages to provide necessary training for the employees to ensure proper knowledge of applicable competition law.

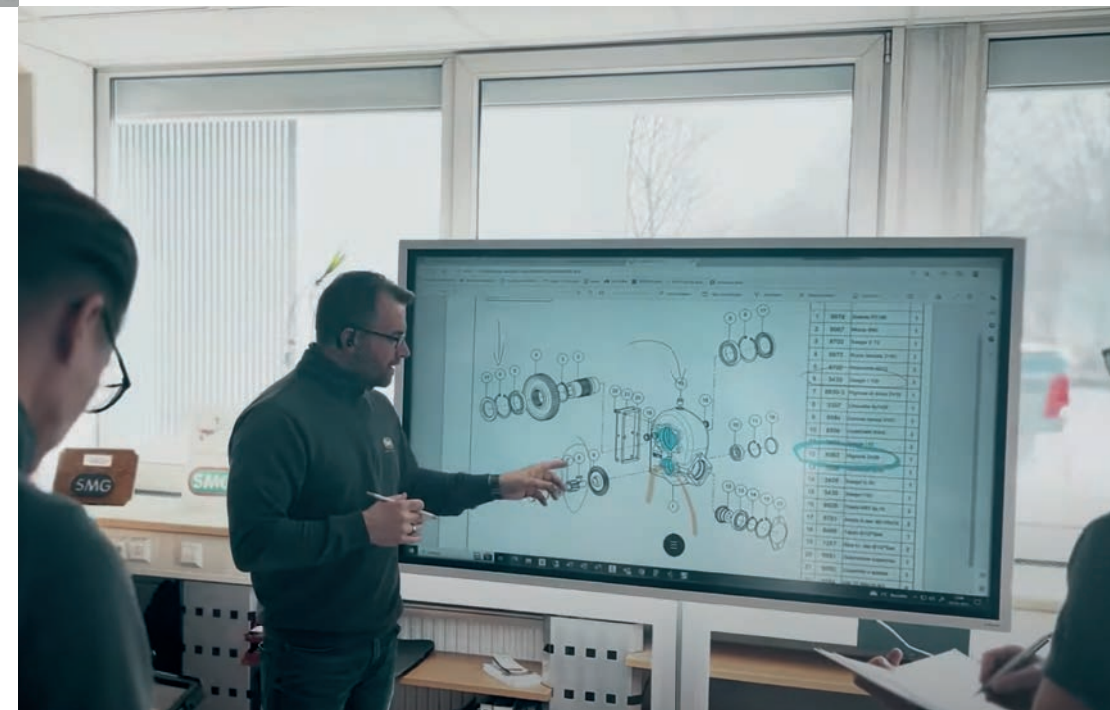
03 COMMITMENT TO THE FIGHT AGAINST CORRUPTION

SMG Sportplatzmaschinenbau GmbH expects full commitment and cooperation on the area of the fight against corruption and will put the necessary internal control mechanisms in place to prevent that the SMG Sportplatzmaschinenbau GmbH and its employees collect any dishonest gain. Intolerable behavior in this respect may not only cause severe regulatory and/or criminal sanctions for both the SMG Sportplatzmaschinenbau GmbH and the involved employees but will also have a substantial negative impact on the image of the SMG Sportplatzmaschinenbau GmbH. Hence, the SMG Sportplatzmaschinenbau GmbH (including its employees) will never explicitly or implicitly offer, authorize or give any pecuniary or other benefit to a third party to incentivize them in granting the SMG Sportplatzmaschinenbau GmbH any business advantage. The fact that such benefit was given directly or through an intermediary makes no difference. Vice versa, the SMG Sportplatzmaschinenbau GmbH and its employees will also never accept any benefit which might offer third parties a preferential treatment.



04 COMMITMENT TO AVOID CONFLICTS OF INTERESTS

The SMG Sportplatzmaschinenbau GmbH commits to create the necessary awareness on the importance of avoiding conflicts of interests and will implement policies and procedures that allow to disclose potential conflicts of interests and safeguard a proper decision-making process in case of any (potential) conflict of interest.



05 COMMITMENT TO INTEGRITY

The SMG Sportplatzmaschinenbau GmbH will always act honestly, diligently in line with the highest ethical standards and with integrity and will pay close attention on how it achieves its goals. Any behavior which violates the law or this charter is by definition classified as unethical behavior and should be avoided at any time.



06 COMMITMENT TO SUSTAINABILITY

The SMG Sportplatzmaschinenbau GmbH must be fully aware of the sustainable societal context in which it operates. As such, the SMG Sportplatzmaschinenbau GmbH will permanently take into account its impact on society and sustainability while conducting its business, defining future strategies and developing new products or services, including the commitment to limit potential negative impact (if any) as much as possible within the given context.



