SCHOLZ
Produkt und Media Fulfillment

CORPORATE ETHICS

Corporate Ethics

Preface

Scholz Promotion Service GmbH is committed to fair and integral conduct towards employees, customers, suppliers, and business partners in all its business operations. We are aware of our role as a responsible market participant and the associated responsibility. We aim to meet this responsibility by adhering to the principles of corporate ethics derived from this awareness.

This corporate ethics guideline sets a minimum standard that must be followed without exceptions, even those derived from cultural reasons. If legal requirements, regulatory provisions, or equivalent rules impose a higher standard, then that higher standard must be followed.

The goal of the management of Scholz Promotion Service GmbH is to comply with recognized ethical standards and jointly create business practices that promote integrity, respect, and fair behavior. A stringent, legally compliant, and principled business policy ultimately serves the company's long-term interests.

This guideline is thus binding for all areas of Scholz Promotion Service GmbH and for all employees.

Management and monitoring are also carried out within the framework of our certification according to ISO 9001:2015 Quality Management, which we have implemented for our company starting in 2012.

We ask all employees in their daily work to inform their supervisors trustfully and openly if there is an evident need for action to ensure ethical behavior. To enable this, we raise awareness among our employees through training and information about the consequences of violations of these principles.

Stuttgart, 09.01.2026

Alexander Helm
Management

Corporate Ethics Guidelines

Corruption

The term corruption derives from the Latin „corruptio" and means „depravity or bribery." Corruption involves obtaining or granting advantages in an abusive manner to which there is no legitimate entitlement. As this contradicts our principles, we combat corruption, regardless of the form it takes:

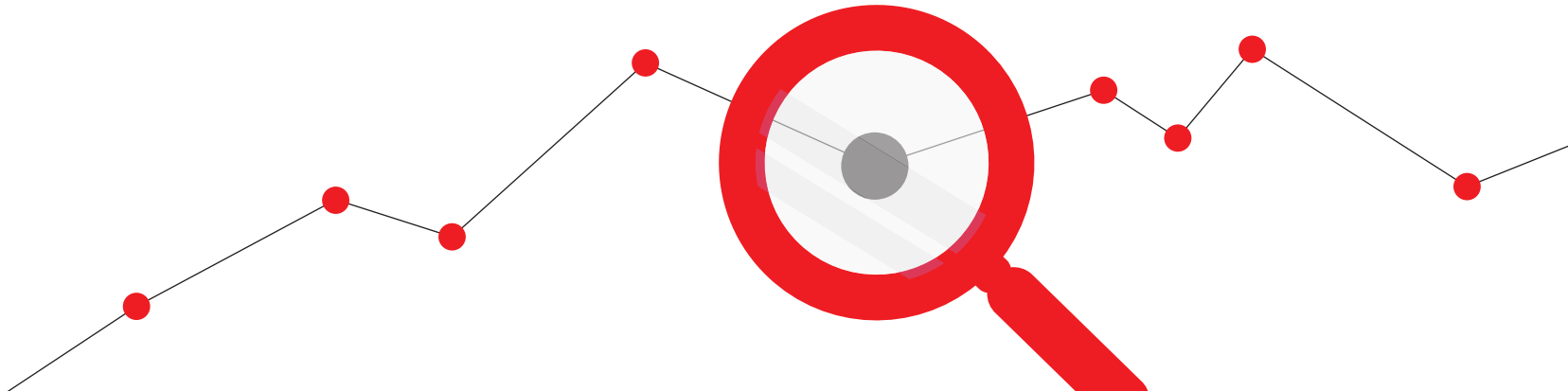
- Passive (acceptance of advantages, bribery).
- Active (offering, promising, or demanding an advantage, granting advantages, bribery, kickback payments).

Scholz Promotion Service GmbH is strictly against corruption and other practices where business is conducted by unfair means. These practices are not tolerated.

Bribery

Employees of Scholz Promotion Service GmbH may not receive or accept any benefits from business partners that could impair an objective and fair business decision or even give the appearance of such. Therefore, we expect all employees to reject gifts, payments, services, or invitations that go beyond customary business hospitality. Any attempt at bribery by a business partner must be reported.

Violations will result in appropriate consequences. In addition, criminal measures may be initiated.



Bribery and Extortion

We aim to surpass our competitors through better products or services. We categorically reject the use of unfair or dishonest practices:

- We do not distort or conceal facts and the truth.
- Insider information (important information that is not public) is used solely for the purpose for which it was originally provided to us.
- Gifts, payments, services, or invitations may only be granted within the framework of customary business hospitality, provided that no undue influence can be seen in them.
- In case of doubt, we forgo a business deal and achieving internal objectives before violating laws.

All managers and other employees must be aware of the extraordinary risks that a case of bribery or extortion poses for the company and for them personally.

Money Laundering

Through our preventive activities to combat money laundering, we aim to prevent the introduction, concealment, and integration of illegally acquired assets into the legal economic and financial system:

- We comply with money laundering regulations.
- Before using new technologies or virtual currencies, we establish appropriate measures for money laundering prevention.
- Regular reliability checks of relevant personnel are conducted.
- We ensure careful identification of our contracting partners.
- Authorities are provided with prompt and comprehensive information in case of suspicion.
- Compliance with retention obligations is a matter of course for us.

Competition and Antitrust Law

We respect the rules of fair competition and fair business practices. We categorically reject any form of anti-competitive behavior and antitrust violations.

Disclosure of Information

We disclose financial and non-financial information, business documents, and records at all times, in accordance with applicable regulations.

Financial Responsibility

Scholz Promotion Service GmbH documents all business transactions continuously, promptly, and audit-proof. We take all relevant technical and organizational measures to do so.

Internal and external reports such as financial accounts, quality reports, time recordings, expense reports, submissions to customers and authorities are fully prepared.

Books and records are maintained, monitored, and audited in accordance with applicable law and generally accepted accounting principles.

Data Protection and Data Security

We respect the privacy of all employees and our business partners. We comply with relevant laws and regulations for the protection of personal data and trade secrets and observe any further contractual obligations in this regard.

Scholz Promotion Service GmbH keeps confidential data secret and protects it from loss and unauthorized access by third parties. We classify all non-public information about the company and all business partners as confidential if its disclosure could be detrimental to these companies or if someone could gain an unjustified business or personal advantage.

The contact details of the appointed external data protection officer of Scholz Promotion Service GmbH are:

Rechtsanwalt Ulf Neumann
Master of Laws (LL.M.)
Certified Data Protection Officer
Lederstr. 134
72764 Reutlingen
Germany

Conflicts of Interest

Conflicts of interest can arise from personal advantages, benefits for one's own company, or from contact with multiple clients who compete with each other. In such cases, we strive to disclose the interests and the point at which these interests conflict.

In principle, our employees should try to avoid such conflicts of interest. If this was not possible or conflicts of interest were recognized too late, they must report the conflict to their supervisor or senior management. Measures are taken together with them to mitigate or eliminate the conflict.

Export Controls and Economic Sanctions

As part of our export activities, we examine, in addition to legally relevant concerns, restrictions on exports and limitations in trade with third countries and/or the respective recipients of services.

Plagiarism and Intellectual Property

For ethical and legal reasons, Scholz Promotion Service GmbH respects the intellectual property of third parties. This includes the protection of trademark rights, patents, and copyrights. We fundamentally exclude the procurement or distribution of plagiarized works or forgeries and take targeted measures to prevent them.

Whistleblowing and Protection Against Retaliation

When reporting misconduct or risks, we provide full protection to the reporting person against retaliation. The reporting office in this case is the senior management of the company. For this purpose, we have implemented a whistleblower reporting system.

Supplementary Information to the Guideline:

All employees are required to follow the rules of corporate ethics and proactively contribute to improvement.

This corporate ethics guideline is managed as documented information in our management system, i.e., regularly reviewed and adapted to relevant requirements of interested parties as needed.

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