STIEBEL ELTRON

Code of Conduct

The Code of Conduct of the STIEBEL ELTRON Group

Dear colleagues,

In the interests of the sustainable development of our company, the Code of Conduct of the STIEBEL ELTRON Group provides a unified guide across the company that supports employees in choosing ethical actions in the course of their daily work activities.

The basis for these guidelines for our behaviour is the wider framework of legislation and the demands that this places on all our actions. Within the company we strictly monitor conformity to the Code of Conduct and where possible, this is extended to our suppliers, whom we call upon to make appropriate commitments in the same spirit.

Dr. Kai Schiefelbein

Compliance with applicable laws

We abide by human rights as defined in the UN Universal Declaration of Human Rights. In particular, we oppose unethical and illegal business practices, forced labour and child labour under all circumstances. We act honestly and sincerely at all times and abide by applicable laws.

We do not work with third parties that oppose the observance of our company's guidelines for behaviour in the form of this Code of Conduct or who do not observe it in significant respects.

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Dealing with our business partners

Our companies and employees are forbidden from engaging in practices that are unlawful and/or criminal in nature:

- Bribes or backhander payments or corruption
- Offering or accepting illicit advantages

We and our competitors operate in fair and open competition.

We are committed to transparency in respect of givers and recipients of gifts. Any such invitations or gifts are in conformity with company guidelines.

Cooperation within the company

We are reliable, maintain a climate of open communication based on trust and resolve conflicts on a consensual basis. We expect and give one another regular, honest and constructive feedback.

By giving appropriate instructions we ensure that our employees are able to express any concerns with regard to workplace conditions directly to their superiors or to management without fear of repressive measures or of losing their jobs.

We cooperate according to the following values:

- Mutual respect
- Protecting the dignity, private life and personal rights of every individual
- Zero tolerance of discrimination
- Promoting groupwork and teamwork
- Mutual support on the job
- Supporting the continuing development of individual employees

This Code of Conduct must be freely accessible and understandable to all employees. Its content will be explained to all employees.

Data protection

We treat information in a professional manner and safeguard the integrity of the company.

When processing personal information we maintain the strictest integrity and abide by the rules and regulations applicable in law.

Commercial secrets are treated in confidence. The passing of confidential information to third parties can cause a breach of trust and may result in legal consequences.

The following information is confidential:

- Access data to our systems
- Lists of customers and suppliers
- Procurement figures staggered by product and supplier
- Sales figures staggered by product and customer
- Financial data and other reports
- Sales and profits forecasts
- Plans for growth and improvements
- Business or product plans
- Investment plans

Company property, remuneration and employees' rights

We place great importance on treating company property responsibly. Work equipment provided (furnishings, licences, computers, information) should be treated with care and used exclusively for the fulfilment of company objectives. Any misuse, particularly for illegal purposes, is forbidden.

The rights of employees to freedom of association, to free assembly and to collective bargaining are respected to the extent that these are lawful and possible in their respective countries. Working hours are based on applicable law and/or industry standards. Remuneration and rates of pay are in accordance with applicable laws and regulations. Employees receive all services that are mandatory under national law.

Product safety

Our competitive advantage is the quality of our products. On this basis we undertake our work activities diligently and to the highest quality standards at all times.

- We produce and develop products that are safe and of unblemished quality.
- The safety of our products has highest priority. They may not have any fault or properties that could be harmful to our customers' health in any way.

Our long-term relationship with our customers, based on our demand for the highest quality standards, is the cornerstone of our success.

Health and environmental protection

We treat the resources available to us with care and responsibility in the course of our work and adhere to the applicable environmental protection regulations. We maintain high technological standards in order to be able to act sustainably in an environmentally responsible manner.

As we develop new products we consider their environmental compatibility (emissions, energy use in manufacture, disposal/recycling) in detail as a core aspect.

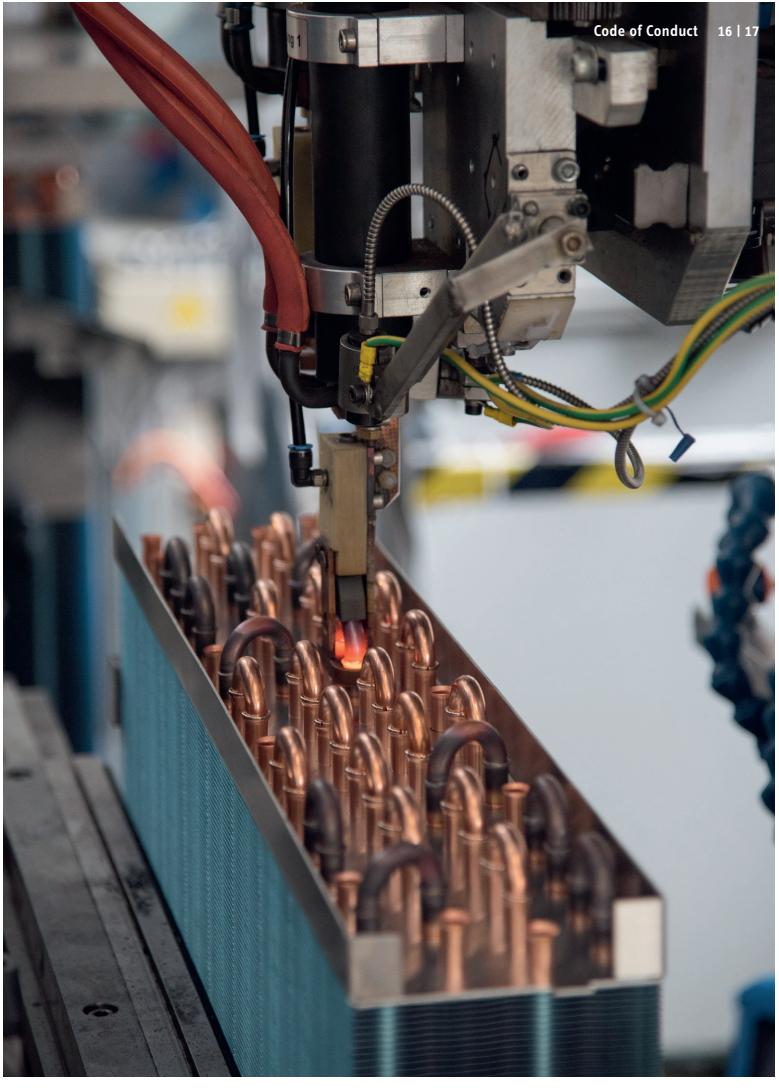
- Focus on the principle of sustainability
- Responsible use of natural resources
- Clean production
- Prevention of environmental pollution
- Sustainable development and use of materials, technologies and products

Health and safety

We plan the development of the company on a sustainable, long-term basis and can thus secure jobs. Our workstations and work processes are designed according to the state of the art in order to ensure a work environment that is conducive to the health of our employees. A prerequisite for this is that all safety regulations and practices are observed.

We abide by the laws and regulations relating to safety inspections of our equipment. Employees must report any potential hazard they may detect to their superiors. We actively support our employees' responsibility for their health through continuous improvements to the work organisation and through preventive measures.

We take the necessary precautions to prevent accidents and injury to the health of our employees. In this regard, actions are taken by their superiors to prevent potential injury to health and safety, to detect it and where possible to remedy it. Employees are regularly informed and trained in current health and safety standards.



Monitoring and observance procedures

We make all appropriate and reasonable efforts to continually implement and apply the principles and values described in this Code of Conduct.

We also undertake to promote observance of the substance of the Code of Conduct in dealing with our suppliers and the wider value chain within the limits of our opportunity and scope of action.

We are committed to taking appropriate action if we become aware of any violation of the provisions stated in this Code of Conduct. Complaints about and also information concerning violations of the Code may be passed, anonymously if desired, to the following contact points at any time.

All employees should report any suspected or actual misconduct or concerns about operational procedures to their superior, the management and the Compliance Officer without fear and in good trust. The company will ensure that no employee is disadvantaged in any way because of having reported any such matter.

By adhering to the Code of Conduct we can come to agreement with other employees or superiors, particularly in cases of doubt.

The non-observance of the Code can, on the other hand, cause serious damage not only to our own company but also to our business partners. For this reason it is mandatory for all STIEBEL ELTRON employees to comply with the Code of Conduct. Any employee who violates the Code must face the consequences. Depending on the severity of the violation, these could be of far-reaching effect.

The point of contact for corporate compliance is Andreas Campe at:

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