

# SCHOTT

## Code of Conduct

Version 3.2 | June 2025



Dear employees,

Our founders, Otto Schott and Ernst Abbe, made responsibility part of our corporate culture.

Our long-term strategy is based on responsible corporate governance with a view to our employees and their families, our society and science, and the environment.

More than 130 years later, we still want to create trust through responsibility – because the trust our business partners place in our company is our most valuable asset. We can only protect this trust by always acting with integrity and sincerity.

**Pioneering.  
Responsibly.  
Together.**

Particularly due to the challenges of today, such as new technologies, increasing competition, and global social and climate challenges, it is important for us as an internationally operating technology company to define

uniform principles of conduct. Thus, our SCHOTT Code of Conduct has been in effect since 2010 and serves as a guideline for responsible and appropriate behavior. It helps us to anchor these values in all our actions and to make the right decisions in critical situations in our daily work.

We all shape the daily interaction at SCHOTT through our actions. By complying with our Code of Conduct and all applicable laws and regulations, we ensure the success and reputation of our company. Therefore, let us all take responsibility together and always act according to the values contained herein at SCHOTT.

We thank you very much for your support.

Your SCHOTT Board of Management



**Dr. Andrea Frenzel**

Member of the  
Board of Management  
since 2023

**Marcus Knöbel**

Member of the  
Board of Management  
since 2024

**Dr. Torsten Derr**

Chairman of the  
Board of Management  
since 2025

**Dr. Heinz Kaiser**

Member of the  
Board of Management  
since 2016

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## Preamble



**It is our common purpose to live responsibly, strengthen trust and create the future.**

Dr. Torsten Derr,  
Chairman of the Board of Management  
of SCHOTT AG.

An important goal of the Carl Zeiss Foundation is the assumption of special social responsibility by the companies of the Foundation and their respective subsidiaries. Since the establishment of the company in 1884 and later as an enterprise of the Carl Zeiss Foundation, SCHOTT AG has been committed to let its social responsibility for mankind and the environment guide its actions and the effects of those actions.

In this respect, our SCHOTT Code of Conduct defines important principles for our everyday work. In addition to SCHOTT's values and applicable laws and regulations, the SCHOTT Code of Conduct is based on the principles of the UN Global Compact.

We are thus committed to upholding human rights, maintaining sustainable and fair business practices, respecting employee rights, taking a clear stance in the fight against discrimination, bribery and corruption, and advocating fair competition.

In doing so, we are aware of our responsibility for the economic, social and ecological impact of our actions.

# Our Responsibility in Dealing with Each Other



**Doing the right thing  
in line with our corporate  
values and principles**

**We promote a culture of  
respectful togetherness**

## Proper Conduct

It is a basic principle of SCHOTT to follow all applicable laws and regulations. All employees must observe these, the SCHOTT Code of Conduct as well as the applicable corporate rules. Violations must be avoided without exceptions and will be systematically investigated, clarified and sanctioned by SCHOTT.

## Respect, Honesty & Integrity

Our conduct at SCHOTT is based on universally applicable values and principles, in particular respect, honesty, and integrity.

SCHOTT follows reputable and recognized business practices. In doing so, we make our decisions toward employees and business partners exclusively based on factual and objective considerations.

## Recognition & Compliance

All employees have the responsibility to comply with the principles of our Code of Conduct.

Managers always act as trustworthy contact persons for their employees. In addition, they ensure that their employees comply with the applicable laws and regulations, the SCHOTT Code of Conduct and the SCHOTT rules under all circumstances and at all times as part of their management responsibility.

# Our Responsibility towards Humanity



SCHOTT respects the human rights in accordance with the International Human Rights Charter of the United Nations. In this context, we are committed to upholding internationally recognized labor and social standards. Our goal is to value all employees equally and to support them in achieving their individual potential.

## Employee Rights

The right of our employees to freedom of association, freedom of assembly, and collective bargaining is recognized and respected – to the extent that this is legally permissible and possible in the respective country. Members of employee organizations or trade unions are neither favored nor disadvantaged.

## Freedom of Expression

The freedom of opinion of all employees and the right to freedom of expression are protected and upheld.

## Remuneration & Working Hours

SCHOTT observes the applicable laws and regulations on remuneration and ensures that employees are paid appropriately. We comply with the applicable safety regulations and regulations on working hours worldwide.



We promote individuality and employee rights as part of our corporate strategy

## Employee Development & Non-Discrimination

At SCHOTT, we value and welcome differences between people, cultures, opinions and perspectives. Therefore, we demand and encourage the creation of interdisciplinary and intercultural success teams with a gender mix. We are committed to building a global culture of diversity in which our employees feel integrated.

Therefore, SCHOTT will not tolerate any form of discrimination, harassment or insult under any circumstances.

All employees have the right to fair, courteous and respectful treatment by managers and colleagues. Thus, we expect all our employees to respect the personal sphere as well as the personal rights of other persons. Sexual harassment and bullying, discrimination or insults will not be tolerated and will result in consequences under labor law.



Equal opportunities  
for everyone –  
we create a culture  
of tolerance

## Prohibition of Child Labor & Forced Labor

No one may be forced to work or employed against their will.

SCHOTT observes the prohibition of child labor in accordance with the standards of the International Labor Organization (ILO) and rejects any form of child labor, forced labor, slavery and practices similar to slavery, trafficking in human beings, as well as the use, procurement or offer of illicit activities.





**The health and safety of employees at their workplace is a top priority for SCHOTT**

### **Health & Safety**

In all our business activities and in close cooperation with our suppliers, we maintain high health and safety standards and thus retain the trust of our employees, business partners and other stakeholders. In this context, we undertake a wide range of efforts to continuously improve the health, performance and occupational safety of our employees.

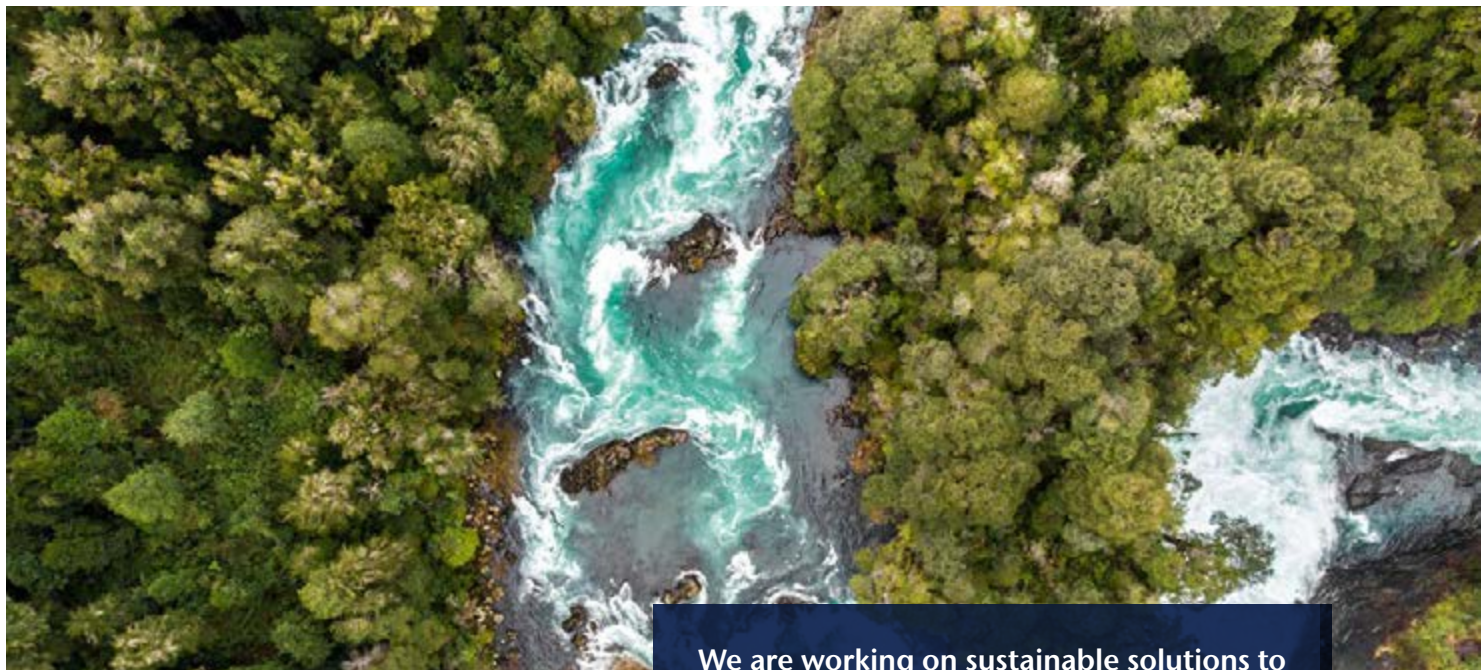
At SCHOTT, we work continuously to prevent accidents and injuries. Furthermore, protective measures are taken to avoid exposure to chemical, physical or biological substances.

We not only ensure compliance with applicable laws and regulations, but also create a culture in which every individual feels responsible for minimizing risks and promoting safe working practices. This also includes regular employee training to ensure occupational safety, improve risk sensitivity and raise safety awareness.

### **Promoting Responsible Supply Chains**

In accordance with the guiding principles of the Organization for Economic Co-operation and Development (OECD), SCHOTT ensures that we do not source minerals from conflict and high-risk areas whose extraction contributes to the financing of armed conflicts or violates the human rights of the mining employees.

# Our Responsibility for the Environment



We are working on sustainable solutions to reduce our CO<sub>2</sub> emissions.



Protecting the environment and conserving natural resources are high-priority corporate goals for SCHOTT.

It is a matter of social responsibility. At a time when resources are dwindling rapidly and the environment is in danger, we aim to find ways to make our energy-intensive material fit for the future.

We have therefore set ourselves ambitious targets concerning climate change: We want to reduce the CO<sub>2</sub> footprint of our production (Scope 1+2). We are implementing this initiative with an action plan comprising four fields of action: technological change, enhancing energy efficiency, transitioning to green energy sources, and offsetting emissions. We are additionally working closely with our suppliers to reduce greenhouse gas emissions in the supply chains (Scope 3). By reducing emissions, we also help customers improve their carbon footprint.

In addition to reducing our CO<sub>2</sub> emissions, SCHOTT is committed to preserving natural resources such as land, forests, and water. We achieve this by reducing our waste volumes, water consumption, and noise as well as other emissions to air, water, and soil.



# Our Responsibility as a Business Partner



**We want to be ahead  
the competition –  
but always by fair  
means**

**No chance for  
corruption**

In accordance with our SCHOTT values, which determine and guide SCHOTT's entrepreneurial activities and actions, we always act as a business partner with integrity, drive innovation and thus create value for our customers.

## Fair Competition

All employees are obliged to observe the rules of fair competition. No anti-competitive agreements may be made with competitors, in particular to set obligatory prices, coordinate offers, limit or set production restrictions or quotas, or to divide up customers or markets.

As a matter of principle, the exchange of market-sensitive, non-publicly known information with competitors is also prohibited.

## Corruption Prevention

SCHOTT rejects any form of corruption. This applies to individuals, companies, authorities and other institutions.

Invitations, gifts and other favors that exceed a symbolic value and are beyond a reasonable limit must be declined politely but firmly.

Orders or consulting contracts may not be used means to grant undue favors to public officials, employees or business partners or their relatives and/or business associates. The compensation paid to those performing services for and on behalf of SCHOTT must be fair, proportionate to the service provided and is to be paid exclusively for legitimate services.





**We weigh the interests of SCHOTT and personal interests carefully**

### **Conflicts of Interest**

No employee may pursue his or her own business activities or personal interests that conflict with SCHOTT's legitimate interests.

Conflicts of interest may arise, in particular, if employees maintain private (business) relationships with business partners of SCHOTT or their employees, or if they themselves hold an interest in a company maintaining a business relationship with SCHOTT.

SCHOTT employees may not work for or manage a company that competes with SCHOTT or engage in activities that compete with SCHOTT.

### **Combating Money Laundering & Terrorist Financing**

**We observe sanctions and support the fight against money laundering and terrorist financing**

SCHOTT conducts business activities only with reputable and previously vetted business partners who comply with anti-money laundering and anti-terrorist financing laws and regulations and obtain their resources from legitimate sources.



## Export Control & Customs

SCHOTT complies with all export control and customs regulations that apply in all countries where we do our business. All employees involved in the import and export of goods, services, software or technology must comply with them.



We stand for high-quality products through innovation, courage and expertise

## Product Compliance

SCHOTT manufactures innovative and high-quality products. Therefore, it is a matter of course for us that these comply with the applicable laws and regulations as well as the quality requirements of our customers.

Environmentally friendly design, technical safety and health protection are fixed targets as early as the product development stage.

Through their expertise, courage and openness, all employees contribute to SCHOTT always fulfilling this responsibility towards all market participants.

# Our Responsibility for Information



In a digital society, the responsible handling of information of all kinds is an essential part of our business.

## Privacy

Personal data may only be collected, processed or used by SCHOTT to the extent necessary for specified, explicit and legitimate purposes. In addition, personal data is stored in accordance with the state of the art and only transmitted in a legally compliant manner using secure means of communication.

The use of data is transparent for the data subjects and their rights to information and, if applicable, to objection, blocking and deletion are safeguarded.

## Information Protection

Protecting internal SCHOTT information and trade secrets – including those of our business partners – is of extremely important to SCHOTT's success and continued existence.

Organizational, technical and legal protective measures have been implemented for the security-conscious handling of information. All employees must comply with these measures in their areas of responsibility in order to ensure an appropriate level of information protection at SCHOTT.

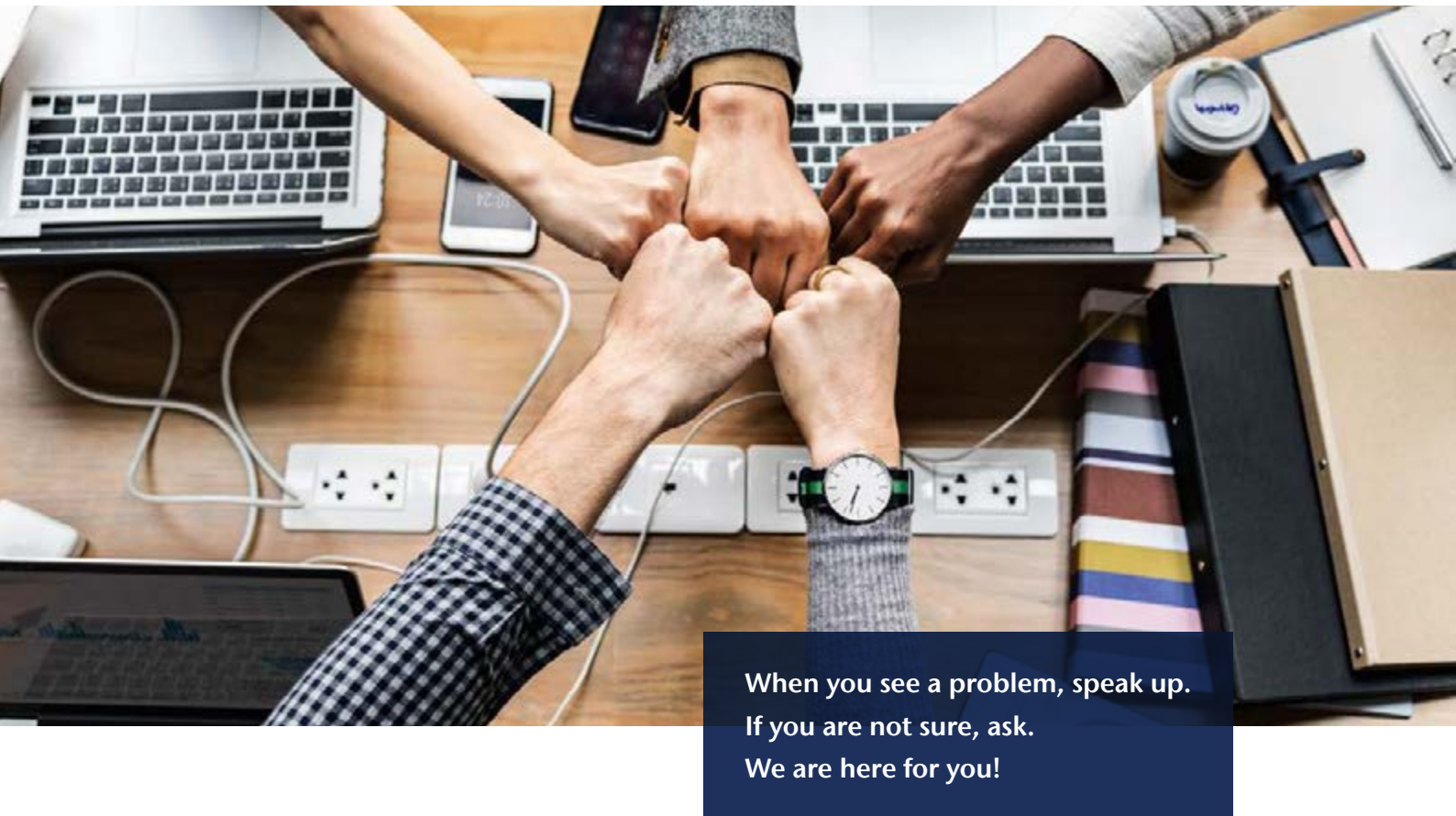
## Cyber Security

In an environment of constantly changing IT threats, it is of great importance to maintain the confidentiality, availability and integrity of computer systems and networks as well as the information stored in them. The measures implemented at SCHOTT are based on the requirements of ISO 27001. In order for these to be effective, all employees must actively contribute to IT security through their own security-conscious behavior.

**We protect the  
knowledge that  
drives our success**



# Our Responsibility for Compliance



If you have any doubts as to whether your actions or the actions of third parties comply with applicable laws and regulations, the SCHOTT Code of Conduct or other corporate rules, your manager, the responsible compliance representatives of your units or the Compliance Office of SCHOTT are available as contacts.

You can also report possible compliance violations via the SCHOTT Integrity Helpline while maintaining confidentiality. The information will be forwarded to the Compliance Office via external persons of trust (so-called ombudspersons) or electronically. Your identity will only be disclosed to the Compliance Office if you expressly agree to this.

# Responsibility of our Business Partners



SCHOTT has set ambitious goals for itself with this Code of Conduct – and we expect the same from our business partners. In particular, we commit our suppliers to also work towards these goals and work together with them to improve their sustainability performance.

## Scope & Implementation



This Code of Conduct applies to all SCHOTT employees worldwide. Rules and regulations within the Group may specify this Code of Conduct, provided that they do not contradict the basic principles set forth herein.

As a responsible company, SCHOTT actively works to ensure that the above principles are observed and complied with.

The Code of Conduct is regularly reviewed by the Compliance Office for any need for revision. Changes must be approved by the Board of Management of SCHOTT AG.

SCHOTT regularly monitors compliance with this Code of Conduct.







## Contact and further Information



Talk about concerns with your supervisor or the Compliance Office



Send an email to:  
[compliance.office@schott.com](mailto:compliance.office@schott.com)



Report violations through our Integrity Helpline



For more information, see here:



**[schott.com](https://www.schott.com)**

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