



Ethics Policy

26. Juni 2025

Preamble

SmarAct is fully committed to providing a respectful working environment for all employees, contractors, partners, and visitors. This policy is designed to align with the principles of the Responsible Business Alliance (RBA) Code of Conduct while ensuring full compliance with local laws and relevant international regulations.

SmarAct upholds the highest standards of integrity, transparency, and fairness in all business dealings. Our ethics policy guides our decision-making, fostering a pleasant working environment within the company and responsible business relationships with our partners.

Business Integrity

SmarAct maintains a strict zero-tolerance policy toward corruption, bribery, and fraudulent activities.

Employees and business partners must not offer, give, solicit, or accept bribes in any form, including gifts or favors intended to influence decisions.

Business dealings must be transparent, fair, and lawful, in compliance with local regulations and international anti-corruption laws.

No Improper Advantage

We do not engage in unethical practices to gain a competitive edge.

Employees must avoid conflicts of interest and disclose any personal or financial relationships that may influence business decisions.

Payments or incentives to government officials, customers, or suppliers to secure business advantages are strictly prohibited. Small tokens of appreciation or low-value gifts are permitted, provided they do not influence business decisions and comply with applicable laws.

Disclosure of Information

SmarAct is committed to honest and accurate reporting of business operations.

Financial statements, contracts, and employment records must be complete, accurate, and in compliance with applicable laws.

Misrepresentation, falsification, or withholding of critical business information is not tolerated.

Internal Communication

SmarAct values direct communication and feedback by fostering eye-level communication across all teams.

All employees are encouraged to participate in company development with suggestions for optimizations.

All workers are regularly updated about company development, successes and areas for improvement through various channels, including, but not limited to, team meetings, personal meetings, town hall meetings, newsletters.

Intellectual Property

We safeguard our and our partners' intellectual property rights.

Employees and business partners must respect patents, copyrights, trademarks, and confidential information.

Unauthorized sharing or misuse of proprietary information including technology, research, or designs is strictly prohibited.

Fair Advertising and Competition

SmarAct engages in fair competition and does not engage in deceptive business practices.

We comply with antitrust laws and fair-trade regulations to maintain market integrity.

Our marketing and product claims are honest, transparent, and evidence-based.

Ethical Trade

SmarAct does not engage in business conduct with terrorist organizations.

We value human life, safety and well-being, therefore any ethically concerning transactions are discussed by our ethics committee on a case-by-case basis.

If any of our products are classified as dual-use goods, we declare them transparently and obtain appropriate export licenses.

Non-Retaliation and Whistleblower Protection

Employees and business partners should feel safe when reporting ethical or any other concerns.

Anonymous Whistleblower portal is available for raising concerns about any misconduct.

Whistleblower protections ensure that individuals who report ethical violations do not face retaliation.

Responsible Sourcing of Materials

We commit to ethical sourcing and expect our suppliers to follow responsible labor and ethics standards.

We avoid the use of minerals from conflict-affected and high-risk areas and continuously develop our sourcing processes to ensure robust monitoring for compliance with this commitment.

We encourage our supply chain partners to conduct due diligence on their sourcing practices adhering to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Privacy

We respect and protect employees' and business partners' data privacy.

Personal data is handled in compliance with EU General Data Protection Regulation and other applicable laws.

Employees, contractors and visitors receive written information on data security and confidentiality obligations.

Ethical Use of AI

Our use of AI technologies respects privacy laws and strictly follows EU General Data Protection Regulation principles when handling personal and business data.

Human oversight guarantees that AI enhances our work processes without replacing human decision-making.

Validity and Scope

This Policy is valid from the date of publication and remains in force until superseded or revoked. The Policy applies to the following companies within the SmarAct Group:

- SmarAct GmbH, Schuette-Lanz-Strasse 9, 26135 Oldenburg, Germany
- SmarAct Metrology GmbH & Co. KG, August-Wilhelm-Kühnholz-Straße 1, 26135 Oldenburg, Germany
- SmarAct Automation GmbH & Co. KG, August-Wilhelm-Kühnholz-Straße 1, 26135 Oldenburg, Germany

Change History

Rev.	Date	Author	Chapter	Changes	Approvals
00	26. Juni 2025	DB (Sustainability Manager)	all	Document published	MWJ (CEO SmarAct GmbH, CEO SmarAct Automation); SR (CEO SmarAct Metrology);