

NOMOS Glashütte Code of Conduct for Employees

June 2026

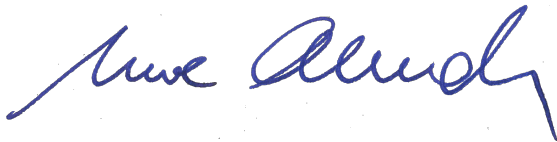
The world is changing – and we want to help shape it. NOMOS Glashütte/SA Roland Schwertner KG has played a key role in reviving traditional German watchmaking in Glashütte. We carry this spirit forward: We want to be pioneers in sustainable and inclusive development – not because it is required of us, but because it is who we are.

This Code of Conduct describes how we intend to act and what guides us in doing so. It applies to all employees of NOMOS Glashütte and its subsidiaries – regardless of role or location. It serves as the foundation for honest, cooperative, and ethical collaboration.

Our normative framework goes beyond mere compliance with legal regulations. It is based on the ten principles of the UN Global Compact (UNGC), the conventions of the International Labor Organization (ILO), the Universal Declaration of Human Rights, the UN Conventions on the Rights of the Child, the German Youth Employment Protection Act (JArbSchG), the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), the OECD Guidelines for Multinational Enterprises, the European Corporate Due Diligence Directives (CSDD), and the United Nations Sustainable Development Goals (SDGs).

We take all appropriate measures to comply with these commitments, in a spirit of diligence that we share with one another and with all stakeholders. This Code is part of our shared framework, together with the Code of Conduct for Business Partners and the Supplier Code.

Glashütte, June 2026



Uwe Ahrendt
NOMOS Glashütte/SA
Roland Schwertner KG

Business Ethics

Compliance with Laws, Regulations, and Internal Policies

We comply with all applicable laws, regulations, industry standards, and internal guidelines as a matter of course. We place particular emphasis on international standards in the areas of environmental, social, and governance (ESG) responsibility. For us, this is not merely a formality, but part of the standards we hold ourselves to.

Since NOMOS Glashütte operates internationally, this explicitly applies to laws related to international trade and financial transactions, particularly international sanctions.

Anti-Corruption

Corruption is one of the greatest obstacles to a sustainable society and we firmly reject any form of it. We make business decisions objectively and with integrity, free from personal interests and improper considerations.

Employees may not grant personal benefits to third parties in order to secure advantages for themselves or others, or to unlawfully influence official decisions. This includes, among other things, cash payments, gifts, travel, sponsorship, donations, perks, discounts, hospitality, expenses, or other items of value, including intangible benefits. Monetary benefits or personal advantages may not be offered, promised, or granted in return for anything, nor may they be requested or accepted by individuals, their representatives, family members, or close associates.

If you are unsure whether a gift – whether tangible or intangible – may be accepted or given, please seek the advice and approval of your supervisor. If a gift cannot be accepted, we ask that you politely decline it.

Money Laundering

We comply with all applicable laws regarding the fight against money laundering and the prevention of the financing of illegal activities and terrorism. There are no exceptions to this. As employees, we ask you to be alert to unusual transactions and to report any suspicions immediately to the appropriate authority (see Compliance with the Code of Conduct, pp. 4-5)

International Sanctions

The sanctions programs of the United Nations Security Council and the European Union are binding for us – whether they are directed against a state, an individual, or an organization. Anyone acting on behalf of NOMOS Glashütte must refrain from any activity that could violate embargoes, sectoral sanctions, or asset freezes.

Fair Competition

A healthy, innovative competitive environment benefits everyone: our customers, our industry, and us. We comply with all applicable laws protecting fair competition, particularly antitrust law. We do not engage in practices that distort, hinder, suppress, or abusively restrict free competition – including price-fixing, market-sharing, and bid-rigging.

Tax Integrity

Responsible tax practices and compliance with all tax laws in the countries where we operate are a matter of course for us. We advocate for transparent and compliant solutions and consciously refrain from any form of profit shifting or concealment.

The principle of tax transparency is important. We cooperate with tax authorities and provide all necessary information for the effective and fair application of tax laws. These commitments are an integral part of our risk management systems and corporate policies.

Conflicts of Interest

As soon as a personal interest – whether family-related, financial, club-related, or political – arises that could significantly impair the impartial performance of one's duties, the employees concerned must recuse themselves from the relevant decision. This is not a matter of mistrust, but of treating one another fairly.

If an actual or potential conflict of interest arises, we ask that you report it immediately to your supervisor. Transparency protects everyone involved.

Data Protection and Confidentiality

Personal data is entrusted to us by employees, customers, and partners. We handle it with care. Across all business areas, we implement appropriate technical and organizational measures to process this data in accordance with applicable regulations.

All employees are obligated to maintain confidentiality regarding the personal data and business information to which they have access in the course of their work. This applies equally – and especially – to social media.

Ethical Marketing and Communication

Communication and advertising shape values and perceptions, which is why we take this seriously. We present our products accurately and truthfully. We promote diversity by showcasing a wide range of people. We do not speak disparagingly about competitors. And we avoid any deliberate exaggeration – especially with regard to environmental or social aspects.

Our external communications are managed by a qualified team. Employees who are not authorized to do so should not issue public statements or make comments to the media on behalf of

NOMOS Glashütte. Please forward media inquiries to our press department.

Responsible Employer

Health & Safety

Anyone who works at NOMOS Glashütte should be able to do so safely. We ensure workplace safety and health protection in accordance with national regulations. We train our employees in occupational safety – particularly in handling hazardous substances – and take preventive measures to avoid accidents and occupational illnesses. This includes identifying and eliminating potential hazards.

In return, we expect all employees to adhere to safety standards and act responsibly to protect their own health, that of their colleagues, and the environment.

Freedom of Association and Expression

The right to freedom of expression, freedom of association, and collective representation of interests is important to us; we promote and protect it. We are committed to ensuring an open social dialogue. Anyone acting on behalf of NOMOS Glashütte must not exert any pressure to influence or restrict employees' freedom of expression.

Combating Discrimination and Harassment

Through an inclusive corporate culture, we ensure that everyone has equal opportunities in hiring, personal and professional development, and promotion – regardless of religion, ethnicity, nationality, gender, age, political beliefs, social background, or sexual identity. We respect the personal dignity, privacy, and individual rights of each and every person.

We do not tolerate physical punishment, threats, psychological abuse to maintain discipline, or sexual or personal harassment under any circumstances.

Compensation and Benefits

We guarantee fair compensation that meets at least the statutory minimum wage and ensure equal pay for equal work. Length of service and professional experience are recognized and may result in different compensation levels for comparable positions. We, of course, provide all benefits required by national law.

Respect for Human Rights

We adhere to the UN Guiding Principles on Business and Human Rights. We strictly reject any form of forced labor, slavery, or human trafficking. Anyone acting on behalf of NOMOS Glashütte must refrain from any involvement – direct or indirect – in situations of forced labor. We define forced labor as any work performed against a person's will and/or under threat or coercion, such as through violence, intimidation, withholding of wages, or the threat of legal action.

In accordance with ILO regulations, we only hire employees who have reached the legal minimum age, have completed compulsory education, and are at least 15 years old. Exceptions include internships, training programs, and part-time jobs that are permitted under the German Youth Employment Protection Act (JArbSchG).

Environment

We care deeply about environmental and nature conservation; we always have. In our pursuit of excellence, we work every day to improve our environmental performance. We develop and implement measures to reduce negative environmental impact – this includes measuring and reducing pollutant emissions as well as conserving natural resources in our own production and throughout the entire supply chain.

We expect our employees to support and implement these measures – and, beyond that, to actively contribute to reducing pollutant emissions and waste by focusing on resource conservation and reuse.

We treat the infrastructure, equipment, and tools at our disposal with care. We use business resources exclusively for legitimate business purposes – that goes without saying.

Compliance with the Code of Conduct

The provisions of this Code of Conduct apply to all employees of NOMOS Glashütte and its subsidiaries. We ensure that every employee is informed of these obligations and made aware of their importance. On an individual level, we expect the principles of this Code to be observed and respected.

This Code is not exhaustive. It supplements legal provisions and does not replace them under any circumstances. It is provided to every employee upon joining the company, is accessible through appropriate channels, and is an integral part of our shared understanding of responsible conduct.

If you are involved in or become aware of an incident that violates or could violate this Code: Speak with your supervisor, contact the Human Resources department, or use our complaint procedure (compliance@glashuette.com). We do not want silence that hides problems; we want openness that solves them.

Those who live by the principles of this Code of Conduct contribute to achieving our sustainability goals and, in turn, to our shared success – and for that, we thank you.