

NOMOS Glashütte Code of Conduct

June 2026

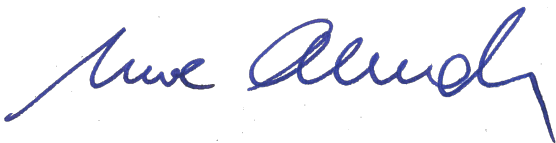
The world is changing – and we want to help shape it. NOMOS Glashütte/SA Roland Schwertner KG has played a key role in reviving traditional German watchmaking in Glashütte. We carry this spirit forward: We want to be pioneers in sustainable and inclusive development – not because it is required of us,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

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 obligations, in a spirit of diligence that we share with all stakeholders. This Code is publicly available and an integral part of all business relationships with NOMOS Glashütte – along with our Code of Conduct for Employees and the Supplier Code. It serves as the foundation for honest, cooperative, and ethical collaboration.

Glashütte, June 2026



Uwe Ahrendt

NOMOS Glashütte/SA
Roland Schwertner KG

Business Ethics

Compliance with Laws and Regulations

We comply with all applicable laws and regulations; that goes without saying. 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.

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.

Anyone acting on behalf of NOMOS Glashütte 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 neither be offered, promised, or granted in return for anything, nor may they be demanded or accepted from individuals, their representatives, family members, or close associates.

Money Laundering

We comply with all applicable laws designed to combat money laundering and to prevent the financing of illegal activities and terrorism. There are no exceptions to this.

International Sanctions

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

Fair Competition

A healthy, innovative competitive environment benefits everyone, including 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 familial, financial, associational, or political – arises that could significantly impair the impartial performance of duties, the employees concerned recuse themselves from the relevant decision. This is not a matter of mistrust, but of treating one another fairly.

Data Protection

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 to which they have access in the course of their work.

Ethical Marketing

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 regarding environmental or social aspects.

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 – especially 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 impacts – this includes measuring and reducing pollutant emissions as well as conserving natural resources in our own production and throughout the entire supply chain.

We are committed to transparency in this area and expect everyone who works with us to share our commitment to nature conservation and to conduct their business activities responsibly.

Compliance with the Code of Conduct

The provisions of this Code of Conduct apply to NOMOS Glashütte and all employees. We ensure that every employee is informed of these obligations and made aware of their importance. At the 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 publicly accessible through appropriate channels, and is an integral part of the contracts governing our business relationships.

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. 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.