



DO
THE
RIGHT...
NOW!

CODE OF CONDUCT
01/01/2023



INTRODUCTION

GPN GmbH is committed to conducting business only in full compliance with all laws and regulations and in accordance with the highest ethical standards. Only conducting business in full compliance with all laws and regulations and the highest ethical standards will guarantee the long-term success of our Company and best serve society.

The Code of Conduct provides the legal and ethical framework for the behaviour of all the Company's managing directors and employees (hereinafter "employees") and defines the fundamental principles of conduct within the Company as well as in relation to the Company's business partners and the general public. The Code also reflects the underlying core values pursued by the Company, including in particular those relating to employment, occupational and product safety and environmental protection.

The underlying principles and values can be summarised as follows:

- All laws and regulations in each jurisdiction must be strictly observed. There are no exceptions.
- Never compromise your integrity. Do not use your position in the Company to gain any benefit for yourself, your family or your friends.
- Do not offer (or accept) gifts or invitations that might appear to influence the recipient's professional judgement.
- Do not deliberately mislead anyone. Never attempt to falsify any documents.



- Treat your colleagues with fairness and respect. Any form of discrimination based on race, skin colour, religion, gender or sexual orientation, age or disability is unacceptable.
- Respect our business relationships. Always treat our customers and suppliers with fairness and respect.
- Health and safety regulations and processes are there to protect you, your colleagues and others. Follow them at all times.
- Respect and protect the environment.
- If you have any doubts, always ask. If you are uncertain about a particular situation, talk to your supervisor, the compliance officer or the human resources department.

The Company has established a Compliance Management System (CMS) to ensure that the Company's business and the conduct of its employees are in full compliance with its fundamental principles and values. The Code of Conduct is a fundamental element of this CMS.

The Code of Conduct was issued by the management of GPN GmbH on 01/04/2022 and came into force with immediate effect.

Nußbach, 01/01/2023
GPN GmbH

A handwritten signature in black ink, which appears to read "Harald Sadleder". The signature is written in a cursive, flowing style.

Harald Sadleder

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1. FUNDAMENTAL PRINCIPLES OF CONDUCT

Compliance with laws and regulations: Each managing director and employee ("employee")¹ of GPN GmbH ("the Company") is responsible for being familiar with and strictly complying with the laws and regulations of the jurisdiction in which he or she is acting. Notwithstanding the sanctions that may be imposed by law, disciplinary measures may also be imposed on any employee for a violation of laws and regulations, because a violation of laws and regulations is at the same time a violation of the obligations under the employment contract.

Highest ethical standards: Furthermore, all employees are required to follow the highest ethical standards in their work, both internally and with other stakeholders. This means not only that all external and internal partners are treated with respect, fairness and honesty, but also that all human rights, good labour practices and environmental protection are actively promoted. Supervisors are expected to prevent any unacceptable behaviour.

Image of the Company: To a significant degree, the image of the Company is determined by the actions of its employees and their conduct and behaviour. The unlawful or inappropriate conduct of a single employee can cause significant damage to the Company. Therefore, every employee is expected to behave in a manner that preserves and promotes the good image of the Company.

¹ For better readability of the text, masculine pronouns are used to represent all genders.





2. ANTITRUST LAWS

General: In conducting its business, the Company is committed to the principles of fair competition. This includes strict compliance with antitrust laws and regulations which seek to protect competition from anti-competitive conduct.

Horizontal agreements: No employee may enter into agreements with competitors or potential competitors or engage in concerted practices with competitors or potential competitors (collectively “horizontal agreements”) that have as their purpose or effect the prevention or restraint of competition. Therefore, it is strictly prohibited

- to enter into an agreement with a competitor to refrain from competing, to restrict business with suppliers, to divide customers, markets, territories or output, or
- to discuss prices, output quantities, output capacity, sales, tenders, profits, profit margins, costs and other parameters with competitors which determine or influence the competitive conduct of the company with the purpose of inducing a parallel behaviour on the part of the competitor.

Vertical agreements: In many jurisdictions, such as the European Union or the US, many types of vertical agreements and arrangements, i.e. agreements or arrangements between suppliers and customers or patent holders and licensees, are prohibited, albeit with minor differences. These include

- restrictions on the customer’s freedom to set resale prices,

- restrictions on the customer's freedom to set supply conditions with regard to its business partners (e.g., geographic restrictions or customer restrictions),
- certain most-favoured-customer clauses,
- certain exclusivity agreements (e.g., total requirement purchase clauses) as well as
- non-competition agreements.

In many cases, whether or not such restrictions are allowed depends on the duration and intensity of the restrictions as well as on the market position of the companies involved. Therefore, employees should seek legal advice before entering into such vertical restrictions.

Abuse of a dominant market position: To the extent that the company has a dominant position in a particular market, employees need to be aware that the abuse of a dominant market position is prohibited in many jurisdictions, such as the European Union and the US (albeit with minor differences). For example, the following behaviour may constitute such abuse:

- treating customers differently without good reason (prohibition of discrimination),
- refusal to supply,
- selective supply,
- imposing unreasonable purchase or sales prices and conditions,
- bundling additional supply or service without any objective reason for doing so (so-called "linkage deals").

The identification of a dominant market position as well as the limits within which a certain conduct is still permissible depends on the circumstances of the individual case. Employees should therefore seek legal advice if the company's position can be considered dominant and the relevant conduct takes place in that market.

Mergers and acquisitions: Mergers or acquisitions of the Company may be subject to the prior approval of the relevant antitrust authorities. As the company is part of the larger industry holding company Nimbus, the need for prior approval is very likely. Therefore, the company may not acquire any business or shares of another company or enter into any merger with another company without the prior approval of the legal department of the industry holding company Nimbus.

Consequences of non-compliance: In the event of a violation of the antitrust laws, not only are the relevant agreements void, but a violation may also result in significant penalties and claims for damages that could jeopardise the existence of the company. Therefore, the Company follows the principle of "zero tolerance" and is determined to take disciplinary action (including termination for cause) against any employee who violates antitrust laws.

Employees should also be aware that they may face personal liability actions and penalties (including imprisonment in some jurisdictions).

3. ANTI-CORRUPTION REGULATIONS

General: The Company is committed to upholding the principles of fair competition. This includes, inter alia, the obligation of the Company to compete for business on the quality and price of its products and services, but not on the provision of undue benefits to others.

Granting of benefits to public officials: Under the anti-corruption laws in most jurisdictions, no employee may directly or indirectly offer, promise, grant or authorise the granting of any benefit, pecuniary or otherwise, to any public official (or to any person related to a public official) for the purpose of influencing any official action or obtaining any benefit. In addition, in order to avoid any suspicion, it is prohibited to offer, promise, grant or authorise a benefit to the public official if this could give rise to the impression that this was done with the intention of influencing an official act or obtaining a benefit.

The term "*public official*" is broadly defined and includes:

- any official, employee or representative of a public authority and any person acting in an official capacity for a public authority (where the term "public authority" includes all state and local public institutions and associations, as well as all enterprises and companies owned or controlled by the public sector and all supra-national public organisations),
- any employee of a political party and any persons holding a position in a political party, as well as any candidate for political office,
- any person who otherwise performs a public function or duty for any country or public administration.

In practice, this includes in particular (but is not limited to) all civil servants and public employees, members of a political party, employees of a state university, judges, customs officials, and immigration officials.

The term "benefit" includes anything of any value, including (but not limited to) cash or monetary benefits (such as cheques, loans, moratoriums, cancellation of debts), personal discounts and price reductions not generally given, gifts, invitations to cultural or sporting events, gratuities, use of facilities, materials or equipment, beverages, meals, transportation, lodging, promises of future employment.

Granting of benefits to other persons who are not public officials: No employee shall directly or indirectly offer, promise or give, or authorise the giving of, any benefit to any person (such as customers, suppliers or other business partners, or the respective employees or representatives or other persons associated with the customers, suppliers or other business partners) for the purpose of inducing that person to improperly perform his function or reward him for this. The same applies if the benefit could be interpreted as inducing or rewarding improper performance of the function of the person concerned.

The term "function" includes any function

or activity connected with the business, any activity connected with the employment relationship of the person concerned and any activity performed by the person concerned for a company or enterprise.



The function is performed

“improperly” if the individual does not perform it in accordance with the expectations that a

reasonable third party would have with reference to the requirements of good faith, impartiality or a position of trust that the individual may hold.

Cash and monetary benefits; sexual or immoral favours: Regardless of the nominal amount, offering, promising, granting as well as authorising the granting of cash or monetary benefits (such as cheques, loans, moratoriums, cancellation of debts) and favours that are sexual or immoral in nature is always prohibited.

Granting of benefits with the involvement of third persons: Employees are prohibited from indirectly offering or granting prohibited benefits to public officials or other business partners through the use of third parties such as agents, consultants or other business partners. Furthermore, it is prohibited to give money or other valuables to third parties if circumstances indicate that the third party may possibly pass the money or valuables (in whole or in part) to a public official in order to influence an official act or obtain a benefit, or to another business partner in return for obtaining unfair competition in a business transaction.

Representation of the Company: It is important for the Company and its reputation that third parties representing the Company (such as sales representatives, distributors, consultants and the like) strictly observe the relevant anti-corruption rules. Employees who are responsible for engaging such representatives must therefore ensure that the representatives comply with the Company's anti-corruption rules or have implemented and comply with comparable rules.

Requesting and accepting benefits: No employee may use his position to request, accept or be promised personal benefits. Only benefits that are consistent with customary business practices and do not compromise the Company's reputation or the employee's absolute integrity may be accepted. This exception mainly concerns the acceptance of occasional gifts of symbolic value and business meals that are reasonable in terms of their value and frequency.

Cash and monetary benefits must never be accepted.

Benefits that do not comply with the above rules must be rejected or, if this is not possible, the respective supervisor and the Company's compliance officer must be informed.

If and to the extent that local anti-corruption regulations are stricter than the foregoing general principles, the employee must comply with the stricter regulations.



4. POLITICAL CONTRIBUTIONS, DONATIONS & SPONSORSHIPS

Political contributions: Political contributions refer to all contributions of value to further a political objective. Examples include local, regional or national events to raise funds for the pursuit of political objectives, the provision of goods or services to a political party or candidates for political office, the payment of employees to work during working hours for a political purpose, or the payment of expenses for a political campaign.

Political contributions by corporations are prohibited in many countries and are open to possible abuse. Therefore, any political contribution by or at the expense of the Company requires explicit prior consent of the management. It is prohibited to exert pressure of any kind, directly or indirectly, on an employee to make a personal political contribution or to support a political party or the political candidacy of a person.

Donations: Donations are voluntary contributions in cash or in kind without consideration (i.e. the company receives no money or other material value) to third parties for educational, scientific, environmental, cultural or social purposes.



Every donation must be clearly and identifiably documented. It must not be made in order to gain an unfair competitive advantage for the Company or for other misuse. It must not be made to individuals or profit-making organisations. Each donation must be signed off by at least one member of the management board.

Sponsorships: Sponsorships are any contributions in cash or in kind by the Company to an event organised by a third party, in return for which the Company is given the opportunity to display the Company's logo at the event, promote the

Company's brands, be mentioned at the opening or closing speeches, participate as a speaker on a panel and/or receive tickets to the event.

Any such sponsoring must be made on the basis of a sponsorship agreement which mentions the recipient of the contribution, the amount of the contribution, the event for which the contribution is made and the consideration which the Company will receive. Each sponsorship must be signed off by at least one member of the management board.



5. TRADE CONTROL REGULATIONS

Many jurisdictions in which the Company operates have enacted trade control laws and regulations that restrict or prohibit the cross-border transfer of goods, services and technology as well as certain cross-border capital transactions and payments. These restrictions may apply not only to the export (including re-export) of goods, services or technologies to certain countries or to certain persons or companies on a "black list" ("denied persons" or "blacklisted persons") but also to the import of goods, services or technologies from such countries or from such persons or companies on a "black list".

Violations of trade control laws and regulations can result in severe penalties for the Company (including the risk that the Company will in turn be "black-listed", which will discourage public organisations and many companies from doing business with the Company). It may also lead to personal liability and imprisonment.

All employees involved in the export or import of goods, services or technologies, as well as in cross-border capital transactions and payments, must be familiar with and strictly comply with applicable trade control laws and regulations.



6. CONFLICTS OF INTEREST

Company's best interest: It is the duty of every employee to show undivided professional loyalty to the Company and to make business decisions in the best interest of the Company, not on the basis of possible personal gain.

Avoiding conflicts of interest: Each employee must avoid any conflict of interest and even any possible appearance of a conflict of interest. In the event of a (possible) conflict of interest, the employee concerned must immediately inform the supervisor and the human resources department and must not make any decision on behalf of the Company, participate in any decision-making process or influence others in the decision-making process.

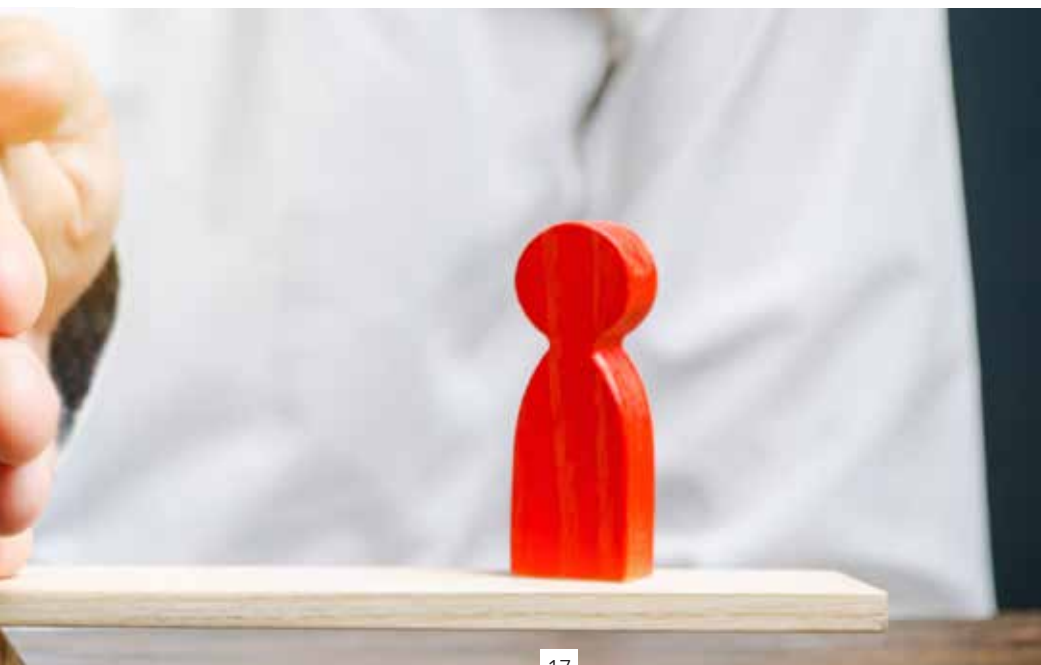
Competition with the Company: No employee may, during the course of his employment, engage in any activity that competes with the Company or assist any company (whether through employment, consulting or otherwise) that competes directly or indirectly with the Company. After termination of employment, unless the employee is bound by a post-contractual restraint on competition, the employee may compete with the Company or assist another company that competes with the Company only to the extent that the employee does not exploit confidential information of the Company.

Employee shareholding in third parties: Any employee who directly or indirectly holds or acquires shares in a customer, supplier of goods, service



provider or other business partner of the Company must report this to the relevant human resources department and his supervisor if he is directly or indirectly involved in any transactions with the respective customer, supplier of goods, service provider or other business partner or if he can influence decisions of the customer, supplier of goods, service provider or other business partner due to his shareholding. Furthermore, any employee who directly or indirectly holds an interest in a competitor must disclose this to the relevant human resources department and to his supervisor if, as a result of the shareholding, he can exercise any influence over the management of the competitor. As a general rule, it can be assumed that holding more than 5% of the total capital of the competitor gives the employee the opportunity to exert influence on the management.

Shareholding of related persons in third parties: The above rules on the holding or acquisition of an interest by an employee in a customer, supplier, service provider, other business partner or competitor similarly apply if a person closely related to the employee (in particular, for example, the employee's spouse, brothers or sisters, children, parents) holds or acquires such a shareholding.







7. DUAL CONTROL PRINCIPLE

Internal dual control principle: As a general rule, all contracts (whether in writing, electronically or in any other form) and all declarations or statements which create or may create obligations or liabilities of the Company or by which the Company waves rights require the approval of at least two employees who have the necessary authorisation (“dual control principle”).

Right to represent the Company in external relations:

The dual control principle also applies if the declaration or statement of only one employee vis-a-vis a third party would legally bind the Company. This means that even if a contract requires the signature of only one employee to be binding on the Company (because the employee has the right of sole representation in external relations), the Company's internal rule requires the signature or consent of a second employee who has the necessary authorisation. In order to avoid, as far as possible, differences between the right to represent the Company in external relations and the internal dual control principle, employees should in principle only be given the right to represent the Company jointly, unless there are valid and well-documented reasons for granting sole powers of representation.

Documentation: Consent of at least two employees must be well documented. This can be done either on the relevant document itself (e.g. by a personal signature on a written document) or – especially in the case of e-mails – by other appropriate means (e.g. by printing out the relevant e-mail and signing and archiving the printout, or by establishing an appropriate electronic process that ensures audit-proof approval of the transaction by two sufficiently authorised employees).

Exceptions: As an exception to the dual control principle, the signature of only one employee is sufficient in the following transactions:

- internal ordering of material or semi-finished goods,
- internal ordering of services,
- authorisation to lend tools or other equipment.

The management may define further exceptions to the dual control principle for routine transactions in the normal course of business.



8. HANDLING OF ASSETS

Responsible and careful handling of assets: All employees are obliged to handle Company assets responsibly and carefully and to protect them against loss, theft, misuse and access by third parties. Assets include real estate and other tangible assets (such as machines, tools, computers, copying machines, telephones), but also intangible assets (such as inventions, know-how, trade secrets, copyrights, patents and other industrial property rights).

Removal from Company premises: Company assets may not be removed from the Company's premises unless permitted on a case-by-case basis by the responsible supervisor, in which case permission must be properly documented.

Use only for pursuit of Company business: Subject to the explicit and properly documented consent of the responsible supervisor in each individual case, Company assets may only be used for the pursuit of Company business, but not for private purposes or third-party business.



Mobile phones and computers may only be used for private purposes in accordance with the specific rules defined by the Company. Under no circumstances, however, may mobile phones and computers (as well as the other assets) be used for harassing, discriminatory or offensive comments or criticisms of third parties.

Computer programmes: Many computer programmes have been licensed to the Company for business use by their employees. Employees may not make any copies for their personal use or – due to the usually limited number of licences – for the Company’s use, unless specifically authorised by the IT department. Computer programmes may contain viruses or other dangerous elements that can attack or even destroy the Company’s IT system. Therefore, no employee is permitted to install computer programmes or other software on the Company’s IT systems unless the IT department has given its express prior consent.



9. CONFIDENTIALITY

Company know-how: The Company's business and technical know-how is particularly important for the long-term success of the Company. All know-how of the Company that is not publicly known must therefore always be kept secret and protected against unauthorised access by third parties. If, in the pursuit of the Company's business interests, it becomes necessary to disclose confidential know-how of the Company to a third party (e.g. a customer or cooperation partner), it must be ensured that the third party is



bound by appropriate confidentiality obligations.

Third-party know-how: Frequently, confidential information of third parties (e.g. customers, suppliers, agents, consultants) is disclosed or otherwise made available to the Company and its employees. All employees are required to handle this information as confidentially as the confidential information of the Company itself.

10. DATA SECURITY & PROTECTION OF PERSONAL DATA

General: The Company relies on the use of electronic data processing systems and the worldwide exchange of electronic data to conduct its business. These systems and these data exchanges carry the risks that (i) third parties may gain unauthorised access to the Company's data and harm the Company by using, altering or destroying that data and (ii) personal data may be misused and individual privacy violated.

Data security: All employees must take appropriate measures to ensure that third parties do not gain access to Company data (in particular, but not limited to, electronic data). These measures include, among others,

- that the Company premises are protected against unauthorised access by third parties,
- that documents containing sensitive data are not left unprotected at the workplace when the room is left,
- that documents containing sensitive data are not taken out of the office if and to the extent that this is not necessary (e.g. for visiting customers or for working at home),
- that the Company's computers are protected against theft and unauthorised access (especially while travelling),
- that appropriate passwords are used, changed at regular intervals and not disclosed to third parties,
- that firewalls and regularly updated anti-virus-programmes are installed on the computers,
- that IT hardware (especially external hard disks and memory sticks) are not connected to the Company's computers, unless the hardware and its use have been approved by the IT department,
- that no software is installed on the Company's computers unless the IT department has given its prior express consent,
- that no Company data is stored on a private computer or private computer accessories (in particular hard disks and memory sticks).

Furthermore, employees responsible for data security must ensure (i) that each employee has access only to data that he actually needs to perform his duties, (ii) that access is restricted by appropriate technical measures, and (iii) that the restrictions on access are monitored and audited at regular intervals.

Data privacy laws: Many jurisdictions (such as the European





Union and its member states) protect personal data and the privacy of individuals through strict laws. The term “personal data” includes any data relating to an individual (such as name, address, telephone number, birthday, salary, race, religion, etc.), whether the individual is an employee, a customer or any other person. All employees are expected to familiarise themselves and comply with applicable data protection laws.



11. COMMUNICATION

Appropriate external and internal communication is essential for the success of the Company. In the communication process, each employee is considered a representative and ambassador of the Company. Therefore, it is important to always communicate in a professional and prudent manner. Care must therefore be taken to communicate in a professional and prudent manner at all times.

In external communications (e.g. with customers and suppliers), no business forecasts and no business or financial information of the Company may be disclosed unless the Company has officially published the respective forecasts and information.

All employees are expected to take the same care when sending e-mails as they do when sending formal letters. As messages are easily sent to the wrong address, the identity of the recipient must always be verified before sending. It must be noted that e-mails can easily be forwarded to additional



addresses without the sender's knowledge – and what may sound humorous to a close friend may sound offensive to another person. It must also be noted that in the event of a subpoena or discovery order, electronic information may have to be disclosed and that deleted electronic information can also usually be re-produced.

All communications with the media (press, radio, television) should be done exclusively through, or must be approved by, the Company's communications department/manager.

All communication with banks and other investors should be done exclusively through the Company's finance department. All employees should therefore forward questions from banks or other investors to the finance department for a response.



12. RECORDS & FINANCIAL INFORMATION

Books and records: All employees who maintain or are responsible for books and records of the Company must ensure that

- the books and records are complete and accurate and adequately disclose each transaction, expense, asset and liability of the Company,
- the books and records do not contain false, misleading or other inaccurate entries,
- all entries are made in a timely manner,
- the entries are made in accordance with all applicable accounting prin-



- ciples and standards,
• all books and records are maintained in accordance with all applicable laws, regulations and accounting standards.

Unregistered or undisclosed funds: No employee may create or hold funds or assets of the Company that are unregistered or undisclosed.

Disclosure of financial data: Company financial data (such as revenue, EBITDA, EBIT, profit or loss) may not be discussed with or disclosed to third parties unless the respective data has been officially disclosed by the finance department.





13. BASIC RULES FOR PAYMENTS

Type of payments: To ensure transparency, payments by or on behalf of the Company shall be made by bank transfer or cheque as far as possible; cash payments should be avoided as far as possible.

Payments only to the respective party: All payments must be made directly to the respective party. No employee may make any payments under a specific name or to a numbered account of a third party (even if this is requested by the business partner).

Cash payments: If a cash payment cannot be avoided, the employee must document the payment and indicate the name of the payer and the person who authorised the payment, the name and address of the payee, the amount, the date and the purpose of the payment. The documentation must be immediately forwarded to the Company's finance department.

Payments to oneself: No employee may make, authorise or influence any payments by the Company to himself or to a relative.





14. MONEY LAUNDERING

The Company is committed to doing business only with reputable clients and other business partners who conduct their business in a lawful manner and whose funds are derived from lawful sources. Therefore, all employees must comply with the relevant money laundering laws and internal Company processes designed to detect and prevent suspicious payments. All employees must report suspicious conduct by customers or other (potential) business partners to the Compliance Officer and follow all accounting, record-keeping and financial reporting requirements that apply to cash payments and other payments related to transactions.



15. HUMAN RIGHTS, EMPLOYMENT & OCCUPATIONAL HEALTH AND SAFETY

Human rights: The Company respects and supports the protection of internationally proclaimed human rights in accordance with the United Nations Universal Declaration of Human Rights.²

International Labour Organisation (ILO): The Company supports the principles laid down in the Declaration of Fundamental Rights at Work³ of the International Labour Organisation (ILO)⁴. It supports the work of the ILO in the formulation and enforcement of international labour and social standards and in the creation of humane working conditions as an essential prerequisite for combating poverty.

Freedom of association: The Company recognises and promotes the freedom of association and the right of workers to collective bargaining within the limits of applicable laws. The Company ensures that trade union representatives are not discriminated against.

Forced labour: The Company does not tolerate any form of forced labour.

Child labour: The Company supports the elimination of exploitative child labour. It only employs workers who are at least 15 years old or, if the country has a higher age limit, workers who have reached that higher age limit. The Company only exceptionally accepts a minimum age of 14 years if a legal minimum age of 14 years applies in the country concerned. The Company undertakes to comply with the Convention concerning the Minimum Age for Admission to Employment (ILO Convention No. 138) and the Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (ILO Convention No. 182). If a national regulation sets stricter standards for child labour, then these stricter standards take precedence.

Equal employment opportunities: The Company will comply with all national regulations governing equal employment opportunities and will not tolerate unlawful discrimination against any employees, except where national law requires selection on the basis of specific criteria.

Remuneration: The Company observes the principle of "equal pay for work of equal value".



Discrimination: The Company undertakes to reject all forms of discrimination within the framework of applicable law. This includes that no employee may discriminate against another employee or business partner based on their ethnic background, culture, religion, age, disability, race, gender, sexual orientation or ideology.

Abusive behaviour and harassment: Respect for others is the foundation of our Company's culture. Therefore, every employee must strive to ensure that the working environment is respectful and free from any abusive behaviour and harassment. Any harassment of a staff member or business partner and any offensive behaviour, sexual or otherwise, is strictly prohibited.

Complaints: Any employee who believes that he has been or is being unlawfully discriminated against or abused or harassed should immediately bring the incident to the attention of his supervisor, Human Resources or the Compliance Officer. All complaints are investigated immediately. If the investigation reveals discrimination, abuse or harassment, remedial action will be taken immediately. An employee who complains in good faith shall not be reprimanded or discriminated against for making a complaint.

Occupational health and safety: The Company is committed to providing a safe and healthy work environment. All employees must continuously pay attention to workplace safety and perform work in a manner that protects the Company and employee safety in the workplace. It is the responsibility of management to implement the best possible accident prevention measures to ensure that the work environment meets the requirements for a health-oriented design and to ensure that all employees are adequately instructed in safety-related matters.

²⁾ *Universal Declaration of Human Rights of the United Nations*

³⁾ *Declaration on Fundamental Principles and Rights at Work*

⁴⁾ *International Labour Organisation (ILO)*



16. PRODUCT SAFETY

It is of utmost importance to the Company and its long-term success that the Company's products are safe. Employees responsible for the development, marketing and/or sale of products must therefore ensure that

- before marketing and selling new products, the possible effects on the safety and health of people and on the environment are carefully evaluated and the results documented,
- new products may only be marketed if it is ensured that, when used as



intended or in a foreseeable manner, they do not endanger the safety and health of people and do not have any avoidable negative effects on the environment,

- all products of the Company are continuously monitored for new findings on their effects on safety, health and the environment.





17. ENVIRONMENTAL PROTECTION

The protection of the environment and the conservation of natural resources are a high priority for the Company. The Company strives to conduct its business in a manner that is safe for the environment and continuously improves the ecological life cycle assessment. All employees must familiarise themselves with environmental laws and regulations, strictly observe them, and, through their own conduct, contribute to the goals of environmental protection and conservation of natural resources beyond the requirements of current legislation.





18. PROMOTING BEST BUSINESS PRACTICES AMONG BUSINESS PARTNERS

The Company will communicate the fundamental principles of the Code of Conduct to its suppliers and service providers. In particular, the Company will, to the best of its ability, promote among and require of its suppliers and service providers the following:

- that they comply with all applicable laws and regulations (in particular, the basic provisions of the antitrust law and the anti-corruption laws and regulations),
- that they observe the principles set out in the United Nations Universal Declaration of Human Rights,
- that they observe the principles set out in the International Labour Organisation (ILO) Declaration on Fundamental Rights at Work (including, in particular, the promotion of equal employment opportunities and equal treatment of workers irrespective of colour, race, nationality, disability, gender or sexual orientation, political or religious beliefs or age, and the rejection of all forms of prohibited child labour or forced labour),
- the responsibility for health and safety of employees,
- the principles of environmental protection.

Furthermore, the Company will recommend to its suppliers and service providers to follow and promote such principles.

In selecting its suppliers and service providers, the Company will take into account the extent to which each supplier and service provider has committed themselves to strictly observe such principles.





19. QUESTIONS, REPORTING VIOLATIONS & SANCTIONS

Questions: If an employee has questions about the Code of Conduct or the relevant laws and regulations, or if he is not sure what to do in a specific situation, he should be encouraged to contact his supervisor or the Compliance Officer. If an employee is unsure whether his actions are lawful or in accordance with the Code of Conduct, then he should follow this principle: Ask first, act later.

Reporting of violations: Employees who know or have good reason to believe that laws or regulations, this Code of Conduct or other internal rules have been violated should bring the relevant matter to the attention of their supervisor or the Compliance Officer. The report should be made regardless of the position of the person responsible for the violation. All reports will be investigated without delay. If necessary, corrective action will be taken.

If you would like to make such a report, please use the e-mail address ombudsmann@rosinus-partner.com or the telephone number +49 69 87406306-0.

Dr. Christian Rosinus (<https://rosinus-partner.com>) acts as ombudsman and lawyer of confidence for various international companies and associations. Your report will be treated in the strictest confidence.

Protection of employees who have made a report: An employee who reports a violation that he knows or has good reason to believe has occurred may not be reprimanded or discriminated against for making the report. Upon request, the identity of the employee who made the report will be kept confidential unless otherwise required by law.

Sanctions: Violations of the Code of Conduct and other Company regulations will be subject to official sanctions.

