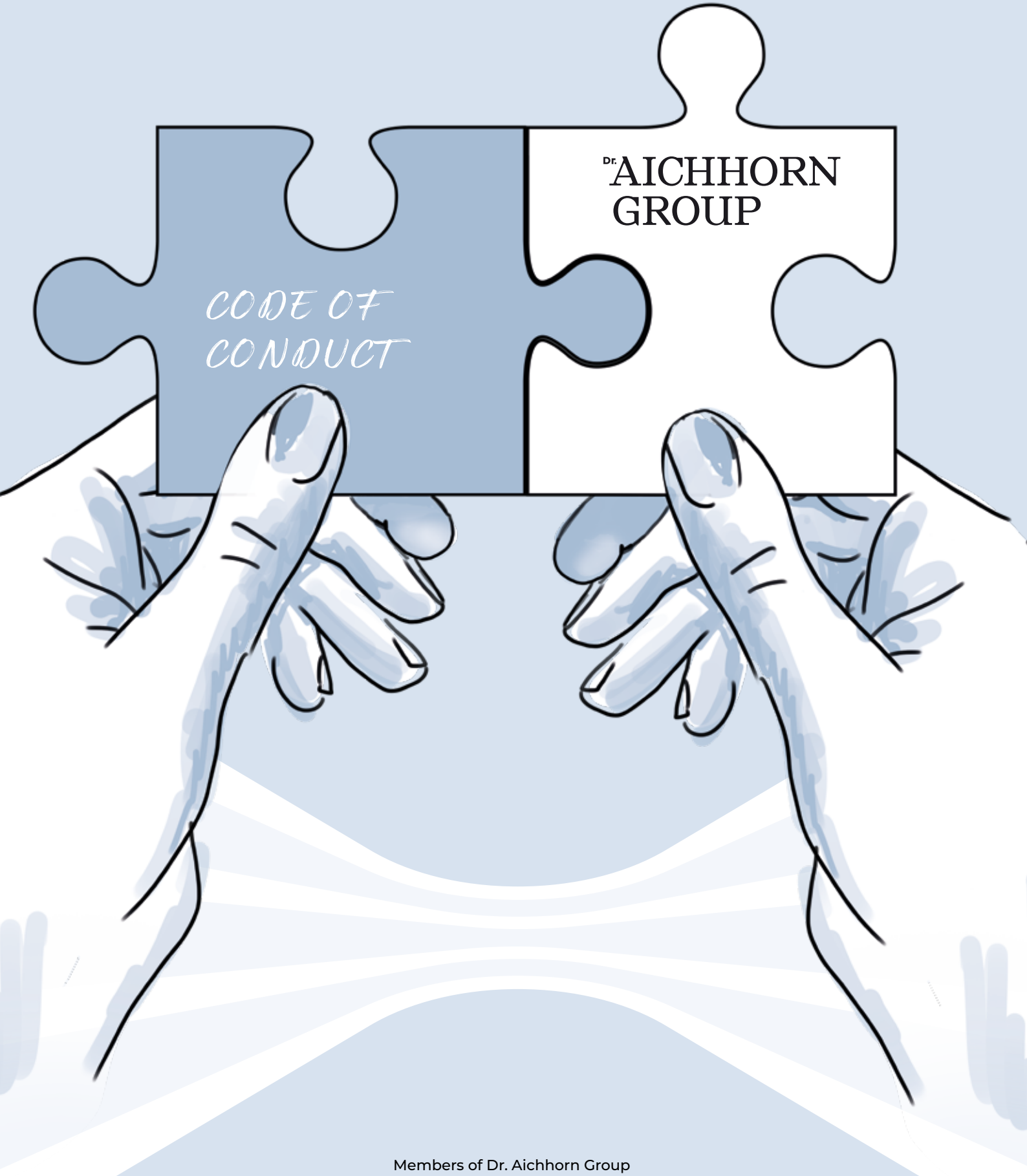


Members of Dr. Aichhorn Group

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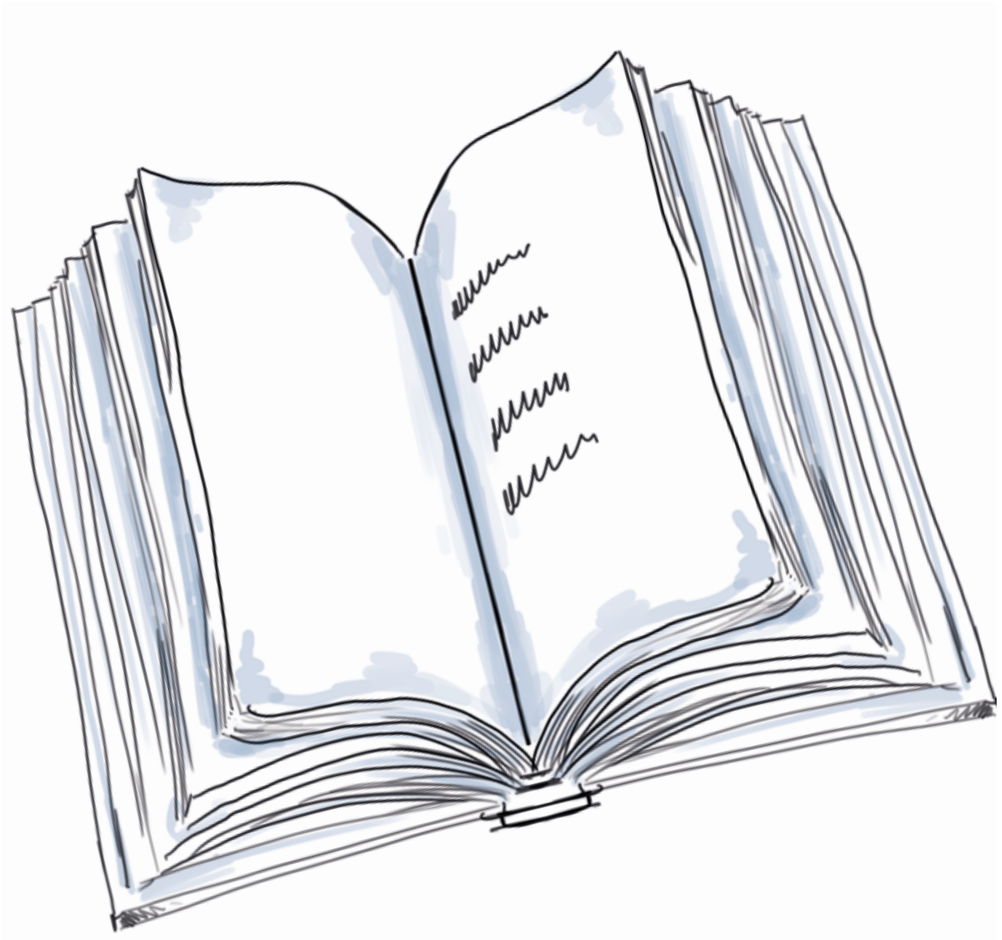


# PREAMBLE

Economically successful and sustainable action and corporate social responsibility are two inseparable goals of the Group. Responsible and ethical behaviour towards employees, business partners, society and the environment is an inherent part of the core values upheld by the Dr. Aichhorn Group. It goes without saying that we conduct our business in compliance with all applicable laws and regulations. Any violation of the law is not only incompatible with our values but also detrimental to our companies' reputation. Such conduct detracts from our economic success and our companies' ability to invest and grow, and can ultimately put jobs at risk.

The Dr. Aichhorn Group actively supports the implementation of the Sustainable Development Goals (SDGs) of the United Nations, on which this Code of Conduct is based. As a common framework to guide our decisions and actions, the Code of Conduct of the Dr. Aichhorn Group lays down binding minimum standards for responsible conduct towards business partners and the general public as well as for our behaviour within the Group. We all are required to abide by the principles set out herein. Personal integrity and sound judgment are irreplaceable. To live up to our corporate social responsibility, it is essential that we all know and are aware of the laws and regulations relevant to our work and that we make it our personal mission to comply with them in our own area of responsibility. The continuity and constant advancement of the Dr. Aichhorn Group is vitally dependent on our commitment to corporate social responsibility and our reputation as a reliable business partner.

# SUSTAINABLE MANAGEMENT

## OCCUPATIONAL SAFETY AND PRODUCT SAFETY

We fully adhere to all occupational safety laws and work with our employees to create a healthy and safe work environment. We expect our business partners to comply with the applicable legislation, implement appropriate safety measures to prevent accidents at work and provide relevant training to ensure the health and safety of employees. We act in strict compliance with rules and regulations on accident prevention and regularly assess their effectiveness. Our aim is to provide our business partners with safe and impeccable products and excellent services. It is imperative that our products and services are free from defects and hazardous characteristics that may be harmful to health or property.

## CULTURE AND HUMAN RIGHTS

The companies of the Dr. Aichhorn Group do business in countries and cultures all around the world. Our employees are therefore required to respect religious and cultural diversity as prescribed by the applicable local laws and regulations. They are held to behave in a tolerant, respectful and trustworthy manner and to be open-minded and sensitive in their conduct towards one another and third parties, especially with regard to different backgrounds in terms of culture, ethnicity and nationality.

We always act in full compliance with the Universal Declaration of Human Rights of the United Nations and the UN Global Compact initiative. The dignity, freedom and rights of our employees and business partners are upheld as a matter of course. We tolerate no form of discrimination or exploitation and oppose any kind of child labour or forced labour.

## ENVIRONMENT

We are aware of our responsibility towards the environment. Protecting and preserving the natural environment in all its diversity is a global challenge. We conduct our business with this in mind. It is therefore only logical for us to use natural resources carefully and efficiently. We strive to continuously reduce the environmental impact of our business activities and actively contribute to environmental and climate protection and the conservation of natural resources. In doing so, we aspire to do more than just comply with legal requirements.

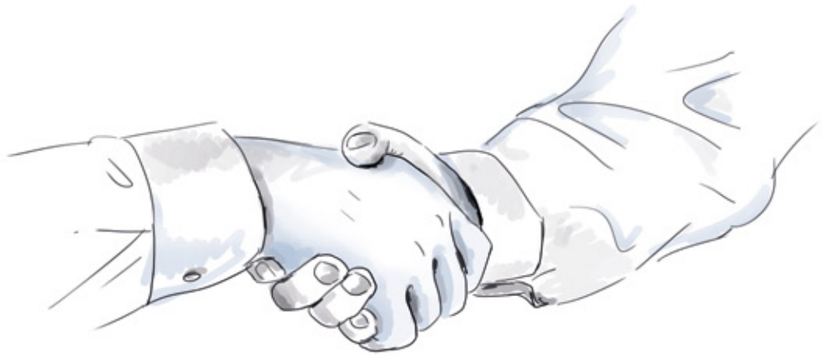
## EQUAL TREATMENT

We are respectful and trusting of one another and cultivate a work environment that is free of discrimination. Every individual is entitled to fair, dignified and respectful treatment. We are committed to equal opportunities and foster a work environment built on respect and tolerance in which the value and dignity of every individual are acknowledged and all people treat each other with courtesy, honesty and dignity. We do not tolerate harassment, bullying or intimidation. Neither do we tolerate any form of discrimination, including, without limitation, based on gender, ethnicity, religion, age, disability, sexual orientation, national origin, ideology or other attributes that are protected by law. Adherence to these commitments is not just limited to the companies of the Dr. Aichhorn Group itself but is also expected of the business partners we select to work with us.

# COMPLIANCE AND SUSTAINABLE GOVERNANCE

## COMPLIANCE AT ALL LEVELS

We comply with all legal requirements and abide by all local, national and international laws. We expect our business partners to do the same. Our employees are required to know and be aware of the fundamental laws, regulations and corporate policies that are relevant to their area of responsibility. Some countries may have stricter regulations in place than those stated in this Code of Conduct. In such cases, these stricter regulations are to be applied. Should any doubt arise as to the legal soundness of a particular decision, our employees are held to seek advice from their head of department in consultation with the compliance team and/or legal department.



## FAIR COMPETITION

We stand for fair competition in all areas of business. It goes without saying that we comply with all competition and antitrust laws, and we expect our business partners to do the same. Acting fairly and transparently in our dealings safeguards the interests of the Group and its employees in a sustainable manner. We therefore do not tolerate practices that restrict fair competition. Examples of such unacceptable behaviour include, without limitation, price fixing, unlawful exchange of information and market sharing with competitors or suppliers.

## CORRUPTION AND BRIBERY

We are firmly committed to fighting corruption. Bribery will not be tolerated under any circumstances. Gratuities, for example in the form of invitations to promote business relationships, are permitted if they are moderate and proportionate to the relevant occasion. Giving and accepting gifts or other benefits is expressly prohibited if they are likely to influence upcoming business decisions or constitute a violation of a particular law, rule or policy.

## TRADE SANCTIONS AND EXPORT CONTROLS

Since our companies engage in international business, we have a responsibility to ensure compliance with national and international foreign trade and customs regulations. We take all the measures necessary to achieve this. To prevent our products from falling into the wrong hands, we always check in advance whether a particular transaction can be lawfully executed under the applicable regulations. Furthermore, we screen potential business partners against sanctions lists even before initiating a business relationship. We expect our business partners to know and strictly abide by the applicable trade and export control regulations. Our business partners also take appropriate steps to prevent money laundering and terrorist financing.

## MONEY LAUNDERING AND TERRORIST FINANCING

Money laundering most notably means introducing money or other assets obtained through criminal activity into the financial and economic system so that they appear legitimate. Terrorist financing means providing financial assets to commit a massive crime against life, limb or freedom. As a general rule, we expect our customers to make payments from bank accounts held in their own name. Payments that we owe to suppliers or third parties must also be made to bank accounts held in their name. Any exceptions to this rule are subject to prior approval in writing. To prevent money laundering and terrorist financing, we therefore set great store by the Know Your Customer principle, as it is the only way to eliminate the advantage of anonymity conducive to money laundering and terrorist financing.

# PROTECTION OF ASSETS AND INFORMATION

## BUSINESS AND TRADE SECRETS

The individuals employed by the Dr. Aichhorn Group are required by law and/or contract to maintain confidentiality. Intellectual property is of great economic importance to our company, which is why we protect our know-how and our products against unauthorised use. Our employees are required to exercise particular care in dealing with the business know-how of the Dr. Aichhorn Group. It must be ensured that confidential information does not fall into the hands of unauthorised third parties. This confidentiality obligation applies to confidential company information, including, without limitation, business secrets, know-how, patents, trade marks and copyrights, business and marketing plans, designs, business documents, salary data and any other unpublished financial and technical data and reports. This also applies to information which we receive from our business partners. Appropriate steps must be taken (e.g. locking offices, using passwords on electronic devices) to protect information against unauthorised access under any circumstances. Compliance with the applicable internal policies is mandatory.

## PRIVACY

When collecting, storing, processing or transferring personal data (e.g. name, address, telephone number, date of birth) of employees, customers or other third parties, we exercise the utmost care and maintain strict confidentiality in compliance with the applicable laws and regulations (e.g. GDPR and the Austrian Data Protection Act [Datenschutzgesetz, DSG]). In particular, employees who have access to highly confidential information (such as in the areas of finance, human resources, legal affairs, sales or inside information about other companies) are required to observe strict confidentiality at all times, including in interactions with co-workers. These employees should seek legal advice before any confidential information is disclosed to third parties. Every individual must do their part to ensure privacy. We expect our employees to exercise a fundamental duty of due care in this area.

## IT SECURITY

Electronic data processing requires a special awareness of security issues, as system breaches or cyber incidents may cause significant harm to the Group, our customers or other business partners. The IT departments of the Dr. Aichhorn Group have therefore established appropriate protective rules which must be followed and upheld. To avoid and reduce IT risks, email attachments, applications (apps), internet downloads and files from other sources must not be opened and/or installed without appropriate verification.

# CORPORATE COMMUNICATION

## REPORTING VIOLATIONS AND CONCERNS

Being able to express concerns openly significantly helps to prevent misconduct or to detect and correct it early on. This is why we foster an open atmosphere where employees can approach their head of department or the management about critical and non-critical issues without hesitation and in confidence. Employees are encouraged to engage in an open dialogue and can count on their superiors to support them and deal with any concerns raised in a fair and impartial manner. Attempts at intimidation and retaliation against employees who, in good faith, report actual or alleged wrongdoing will not be tolerated. “In good faith” means that the employee is convinced that their account is true, regardless of whether this is or is not confirmed in a subsequent investigation.

If employees nonetheless have reservations about speaking with someone in their immediate circle or if such a discussion has no effect, they can contact a member of our compliance team at any time. We encourage our employees to address issues openly and without fear of retaliation.

## REPORTING SYSTEM

In implementation of Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law, a reporting system for internal and external informants who wish to report breaches of law has been in place at the Dr. Aichhorn Group since August 2023. The confidentiality and anonymity of the information and the informants are guaranteed.

Dr. AICHHORN GROUP

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