



Code of Conduct
of EUROGATE GmbH & Co. KGaA, KG
and the EUROGATE Group Companies
(„EUROGATE“)

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Responsible: Dr. Cornelius Polter

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I. Preamble

With the introduction of this Code of Conduct, EUROGATE is taking a further consistent step to emphasise its responsibility for economic success and socially responsible action. Our behaviour in business life is particularly characterised by our values and norms. We want to be a reliable and fair partner for our customers, business partners and shareholders by complying with laws and rules as well as our ethical principles.

This Code of Conduct is intended to serve as an aid to protect against wrong behaviour in case of doubt. The Code of Conduct is intended as a guideline for the prescribed behaviour of employees at EUROGATE, which is supplemented by individual, more detailed guidelines in the respective departments.

EUROGATE is convinced that sustainable management is only possible through ethical, compliant and upright behaviour. Social responsibility is an important factor in the success of our company. Respect for law and order, especially human rights, is therefore an integral part of EUROGATE's corporate culture. As part of our business activities, we are fully committed to our social responsibility and, as an international company, we take compliant behaviour within the company and along our supply chain very seriously. This Code of Conduct serves this purpose.

In order to comply with our values and norms, but also to preserve our reputation in the market, especially in critical situations for our own protection and that of the Group companies, it is particularly important that every decision is made in accordance with the law, statutes, rules of procedure, guidelines and our Code of Conduct.

In cases of doubt, superiors, the ombudsperson or the Compliance Officer should always be contacted.

Working together in a spirit of trust is important to EUROGATE. This is why employee representatives also play a particularly important role at EUROGATE. Our collaboration is aimed at creating and developing a motivating and positive working environment in order to be and remain economically successful in the long term.

With our commitment to comply with our Code of Conduct and our behaviour in accordance with the law, we are well equipped for a successful future together.

Our daily actions should be characterised by integrity and ethical behaviour, which contributes to a positive working environment through the active support of every employee.

If an employee has any doubts or questions regarding compliance with this Code of Conduct, other guidelines or legal regulations, or if there are concrete indications of a violation, the Compliance Officer, the ombudsperson or a representative named below must be informed about this situation.

II. Scope of Application

This Code of Conduct is binding for our daily actions and applies to all Group managing directors, managing directors, authorised signatories, managers, employees, temporary workers, external customers and external contractors. Furthermore, this Code applies to all domestic companies in which EUROGATE holds more than 50% of the shares or is involved in the management.

This Code of Conduct focuses on the following standards of behaviour:

- Corruption is not tolerated in any way,
- Discrimination of any kind is refrained from,
- Occupational safety and health protection are given high priority,
- We use our resources responsibly,
- We respect fair competition and
- We treat the personal data of our employees and customers as strictly confidential.

Accordingly, all decisions that serve economic success are only to be made if they do not violate applicable law or turn out to be unethical. The violation of applicable law leads to considerable damage for the company and employees, in particular through high fines or

claims for damages. Last but not least, EUROGATE's reputation would be severely damaged, even if only the appearance of unlawful behaviour were to arise.

III. Working Environment

With this Code of Conduct, Eurogate ensures that every employee is guaranteed equal opportunities at all times and that all employment rights are granted on the basis of the relevant local and country-specific laws.

1. Internationality and Equal Opportunities

The personal dignity of each individual must be fully respected. The working atmosphere at EUROGATE is also characterised by mutual appreciation, understanding for one another and open, respectful and fair treatment of one another. Every employee has the right to be treated with respect by colleagues, superiors and employees.

We therefore consciously promote a working environment full of respect and equal opportunities. We do not tolerate discrimination, harassment or a hostile working environment.

No one may be discriminated against or favoured because of their skin colour, gender, disability, ideology, culture, sexual orientation, age, religion, ethnic or social origin, nationality, appearance, marital status or political or trade union activity.

Managers lead by example and are responsible for creating a positive working environment for their employees, free from discrimination and harassment. Any form of child labour or forced labour is prohibited.

Compliance with this behaviour and respectful interaction enable us to work together as partners.

2. Sustainability and Environmental Protection

We comply with the environmental protection laws of the countries in which we operate and always strive to act in a sustainable and environmentally friendly manner. When designing

our products and services, we are responsible for continuously improving their environmental compatibility and reducing the use of natural resources while taking economic considerations into account.

To this end, employees are obliged to avoid unnecessary waste and waste in the workplace and to dispose waste in accordance with regulations.

3. Health and Safety in the Workplace

Health and ensuring occupational safety are particularly important to us. We guarantee a safe working environment for every employee. Preventive occupational safety and health-promoting measures should contribute to the health, satisfaction and long-term performance of our employees. The national and local regulations represent minimum requirements for us.

Every employee should help to ensure that health hazards are avoided. If deficiencies are identified, they must be reported immediately to the relevant manager or alternatively to the Safety Officer.

IV. Behaviour towards business partners and competitors

EUROGATE ensures that all transactions with business partners and all behaviour in the market are in accordance with applicable law and, in particular, that the national and international provisions of fair competition, cartel and corruption law are complied with.

1. Anti-Corruption

Various requirements must be observed when accepting and granting benefits from/to third parties. Third parties include, for example, public officials, business partners, representatives and consultants. For the purposes of this regulation, gifts and gratuities include, for example, dinner invitations, hotel invitations, bouquets of flowers or similar.

Bribery or corrupt behaviour would not only harm us, but also the market and environment in which we operate. We consistently reject corruption and behaviour that is detrimental to the company or unfair business practices by employees or third parties.

In normal business dealings, it is part of maintaining relationships that business invitations or gifts are extended. However, this also means that gifts, invitations and gratuities should be in line with business practices and must be given transparently. Gifts and gratuities should be courtesies that have a low value. The acceptance of financial benefits is prohibited.

When accepting gratuities, care must always be taken to ensure that they are of low financial value, are legally unobjectionable and are customary in the industry in terms of custom and courtesy. They must not be given with unusual regularity or constitute a consideration, but must always be voluntary in nature.

Business meals that are of a work-related nature should also remain within an appropriate and customary framework. Overall, all benefits, invitations and gifts should have a business connection and be presented in a transparent manner. They should be appropriate, in line with social and customary business practices and should not be given on a regular basis. Benefits that have a temporal connection to important contract negotiations should be viewed particularly critically. In cases of doubt, every employee is obliged to seek advice from their superior or the Compliance Officer.

EUROGATE's anti-corruption guidelines, which must be followed by every employee, are available for more detailed information such as how to deal with public officials or donations and sponsorships.

2. Fair Competition

We at EUROGATE are committed to fair, undistorted and free competition, whereby compliance with the applicable cartel and competition laws is a matter of course for us. The cartel and competition laws protect performance-orientated companies such as EUROGATE and the common good, thus enabling free market development. Every employee is

obliged to comply with cartel law and fair competition. All illegal and anti-competitive activities are strictly prohibited. This includes any agreement or exchange of information with competitors on prices, offers, terms and conditions, market shares, capacities or a waiver of competition.

The submission of sham offers in tenders and the allocation of customers or territories are also strictly prohibited. As the interpretation of individual laws can be difficult in cases of doubt, questions should always be addressed to the superior, who in turn will consult the Group Legal Department if necessary.

V. Avoidance of Conflicts of Interests

EUROGATE ensures that the interests of the company are safeguarded in day-to-day business. Personal interests that conflict with the interests of EUROGATE are not to be prioritised.

Conflicts of interest arise, for example, if family members or other related parties work for business partners or competitors or could have a personal or financial interest.

When initiating business relationships, making purchasing or recruitment decisions, the selection must also be transparent and based on factual and objective criteria and must be documented. Potential and existing conflicts of interest must be reported to one of the contacts listed below.

Secondary Activities and Shareholdings in Companies

Every employee is obliged to make their contractually owed labour available and to fulfil the tasks assigned to them to the best of their knowledge and ability. Secondary employment that impairs the fulfilment of these obligations is not permitted. Any external secondary employment must be reported in advance to the respective superior and the relevant HR department and confirmed by the HR department. The additional contractual and other regulations applicable to the respective employment relationship in this context must be observed.

Shareholdings of employees, managers or Group managing directors in third-party companies are only permitted if they do not represent a conflict of interest with EUROGATE. If there is a risk of a conflict of interest, such shareholdings must be discontinued immediately. The additional contractual and other regulations applicable to the respective employment relationship in this context must be observed.

VI. Protection of Company Values and Third-Party Values

EUROGATE ensures that company values and the values of third parties are safeguarded in day-to-day business. Particular attention must be paid to the protection of property, external communication, data protection and data security.

1. Protection of Company Property

EUROGATE's property is particularly worthy of protection, as it is the basis of our development and our continued existence. Both material property and intellectual property must be protected.

Intellectual property & business secrets:

All employees and managers are obliged to keep business and trade secrets that have been entrusted to them or otherwise made known to them in the course of their work confidential. This applies equally to business documents that are marked as confidential.

If data and information is passed on internally or externally, it must be checked in advance whether the recipient is authorised to receive it. There is also a duty of confidentiality when dealing with confidential data and information of our customers, business partners or third parties. Unauthorised disclosure of information can lead to civil or criminal prosecution. The duty of confidentiality also applies after termination of the employment relationship. Additional applicable employment contract and other legal regulations must be observed.

Material property:

The property of EUROGATE is to be treated by every employee in a resource-friendly and appropriate manner. This includes all work equipment and other EUROGATE items that serve operational purposes. Every employee may only use EUROGATE property for business purposes. If private use is not contractually regulated, the private use and removal of company property is prohibited. It is our joint responsibility to protect EUROGATE property against loss, damage, misuse, theft, misappropriation or destruction.

2. External Communication

In the event of official requests for statements from the media, analysts or the general public, both the relevant manager and the central Group communications department must be informed at the same time. This is the only way we can ensure that our external presentation and dealings with the media are in line with our corporate values.

Every employee contributes to our public image and is therefore required to protect the company's reputation.

3. Data Protection and Data Security

At EUROGATE, we take the protection of the personal data of our employees (including those who have left the company), our customers, business partners and applicants very seriously. All employees are obliged to comply with the statutory data protection regulations. In order to both facilitate and illustrate this, we offer our employees data protection training. Personal data is only collected, processed and used if it is required for a defined task fulfilment and a legitimate purpose. Personal data is only disclosed to authorised persons. Every employee is obliged to handle personal data confidentially and to store it securely so that sensitive data cannot be misused. In addition to personal data, all other business data and all data belonging to the workplace must be handled in accordance with the statutory data protection requirements and protected against unauthorised access. If there are any questions or doubts regarding data protection, the respective superior or the (external) Data Protection Officer of EUROGATE must be consulted.

In order to prevent unauthorised internal or external access, a high standard of technical data security must be guaranteed.

VII. Implementation of the Code of Conduct

EUROGATE ensures that the Code of Conduct is implemented appropriately and effectively. Employees are informed about the Code of Conduct and its content and sensitised to the issues. Employees are also made aware of the whistleblower system.

1. Consequences of Violations

If misbehaviour by employees is revealed, this can have serious consequences for EUROGATE and also for the individual employees. These include, for example, civil and criminal prosecution, high fines, as well as loss of revenue and reputation. EUROGATE will consistently pursue and appropriately penalise violations of the Code of Conduct.

2. Whistleblower System

If employees become aware of violations of the Code of Conduct, other guidelines or other laws, these violations must be reported immediately to the relevant office. The same applies to specific suspicions of violations.

For a more detailed description of the process and responsibilities, the rules of procedure for the EUROGATE whistleblower system can be found at <https://www1.eurogate.de/ueber-uns/#compliance>.

VIII. Contact Options in the Compliance Department

This Code of Conduct and the company's internal guidelines and principles are intended to provide support and assistance in successfully navigating day-to-day business life. However, if questions remain unanswered or support is required in uncertain decision-making situations, the superior should be contacted in the first instance. In addition, the Compliance

Officer is directly available to each employee to answer individual questions. Every employee receives the necessary support here.

Compliance Officer

In order to avoid any violations, every employee has the opportunity to contact the relevant manager or the Compliance Officer. The Compliance Officer is a neutral point of contact for any employee who has questions about the Code of Conduct or requires further information. The Compliance Officer is also a neutral point of contact in the event of reports of legal violations. The Compliance Officer investigates all reported information in detail and will take appropriate action where necessary. All data and information is treated with strict confidentiality and respect at all times.

In addition to the option of contacting the Compliance Officer, there is also the option of contacting EUROGATE's (external) ombudsperson in the event of reportable violations.

The (external) lawyer appointed as ombudsperson receives the reports in strict confidence, checks them in advance and forwards them to the Compliance Officer with the consent of the whistleblower, anonymously if desired.

How to contact us:

<u>Compliance Officer:</u>	<u>Dr. Cornelius Polter</u>
E-Mail:	compliance@eurogate.eu
Tel.:	040/7405 2039
Mobile:	0171-9376828

<u>Ombudsperson:</u>	<u>Lawyer Markus Klindwort</u>
E-Mail:	Eurogate-ombudsmann@rmk-partner.de
Tel.:	0421/333 922 66



Ombudsperson representative: Lawyer Christian Menges

E-Mail: Eurogate-ombudsmann@rmk-partner.de

Tel.: 0421/333 922 66