

## CODE OF CONDUCT

### Application of the code of conduct

This code of conduct expresses those rules and principles that every employee<sup>1</sup> of sanotact GmbH (hereinafter: sanotact) comply with and observe. It applies globally to every person who has a direct employment relationship with sanotact, including leadership, employees and trainees (hereinafter: employees). The leadership team has a particular and responsible task because they are a role model and must prevent any improper behaviour.

It is impossible for the code of conduct to reflect all legal rules and ethical standards that sanotact and its employees are exposed to. Rather, the principles of conduct help to point out possible areas of risk and conflict, as well as their relevance to the company. The code of conduct serves as a guideline on which everyone can base his decisions.

sanotact ensures that the prerequisites and working conditions are always in place for all employees to carry out their activities based on this code of conduct and to recognise and prevent potential misconduct in a timely manner. In particular, sanotact shall ensure that this code of conduct is handed out to each employee in a language he understands.

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<sup>1</sup> Male, female and nonbinary persons are always referred to equally; for better readability reasons, however, only the male form is used below.

## **1 Compliance with laws**

We are obliged to comply with the applicable law and to ensure we are informed as to which laws apply to us. We note that the applicable laws and regulations may also be governed by foreign law. Compliance with the law always takes precedence over other alternative courses of action. This applies even if rule-compliant behaviour has an unfavourable economic impact in individual cases.

## **2 Respect for human rights, social norms and ethical standards**

We respect human rights, social norms and ethical standards. sanotact offers the same opportunities for everyone and does not tolerate any form of discrimination – whether based on age, gender, origin, religion, ideology, disability or political opinion.

We treat each other as well as cultural differences with respect and courtesy. We do not accept actions and conduct that are humiliating, intimidating or hostile in nature. This applies not only within the company, but also to the conduct of and towards business partners. The law always takes precedence: Social customs that contradict applicable law are incompatible with this code. We will not comply with social expectations that violate mandatory legal requirements.

## **3 Securing quality and product safety**

We abide by the applicable product and production-related regulations and quality requirements along the entire value chain within sanotact and ensure we comply with them when purchasing raw materials and ingredients. This can involve legal regulations, internal processes and sanotact quality standards, as well as recognised standards or requirements of external stakeholders. We ensure that guaranteed product features are always fulfilled.

## **4 Protection of the environment and conservation of resources**

We comply with environmental laws and official regulations; we practice ecologically sustainable business and also align entrepreneurial decisions with the needs of future generations.

## **5 Ban on corruption – dealing with gifts and benefits**

We refrain from and do not tolerate any form of corruption, neither by accepting nor by granting an advantage to influence a business decision with regard to either business

partners or public officials. When dealing with gifts, benefits and invitations, we adhere to internally prescribed guidelines. Specifically, this means:

- Any benefit to officials for the purpose of facilitating or expediting an official act is strictly prohibited.
- Actions that may unfairly discriminate against market participants or initiate business by undue means must be refrained from.
- Payments may not be granted or demanded without appropriate consideration. In particular, no payment may be made without a legitimate reason for payment.
- Gifts, invitations and other benefits may only be made or accepted within reasonable limits.

## **6 Compliance with international trade restrictions, prevention of money laundering and financing of terrorism**

We are committed to complying with the applicable trade restrictions and other provisions of foreign trade law. We only maintain business relationships with business partners whose identity is known to us. Cash transactions may not be accepted in general. We take the necessary care when dealing with business partners in accordance with internal guidelines and contact Compliance if there are any suspicious payments.

## **7 Fairness in competition**

We adhere to the applicable competition laws in our daily business activities. In general, the following principles must be observed:

- No explicit or implicit agreements regarding factors relevant to competition may be entered into between sanotact and third parties. Even the appearance of anti-competitive agreements or practices must be prevented. Competitive factors include prices, price components, general conditions of sale or purchase or the segmentation of customers and markets.
- It is not illegal to hold a dominant market position. It is, however, anti-competitive to exploit this dominant position. Actions aimed at improperly hindering third parties in competition are therefore prohibited.

## **8 Prevention of conflicts of interest**

We make our decisions solely based on objective criteria and do not let ourselves be influenced by personal or political interests and relationships. The following principles must be observed here:

- No employee may exploit his position in the company to give himself or others an undue economic advantage.
- No employee may use means or resources of sanotact to support political parties or party candidates in Germany or abroad. This also applies to supporting other associations that pursue political goals or serve party-related interests.

Conflicts of interest cannot always be completely avoided; should such a situation arise, we will disclose these to one of our Managing Directors and work together to find a solution.

## **9 Safety and health protection in the workplace**

We abide by the precautions taken and standards set by sanotact for compliance with occupational safety and for the protection of health and endanger neither our own health and safety nor that of others.

## **10 Protection of personal data**

Through the responsible handling of personal data each one of us contributes to safeguarding the rights and interests of employees and business partners whilst averting risks for the company.

## **11 Protection of company property, information and intellectual property**

We handle company property in a correct, careful and cost-conscious manner and protect it in particular against loss, harm, misappropriation, theft and embezzlement.

We handle any information obtained in the context of business confidentially and do not disclose any information obtained in connection with activities with sanotact to third parties and do not use it for any purpose other than official business. We protect the intellectual property of sanotact and recognise that of third parties.

## Contact person Compliance

Situations covered by this code of conduct are as varied as the activities of sanotact. The principles of the code of conduct are therefore inevitably expressed in an abstract way and you may find yourself in a situation that is not directly reflected in the code of conduct. The primary contact for questions and uncertainties about the principles of conduct set out in this code is Compliance.

## Compliance violations

Our company is committed for an open internal communication and compliance of higher standards. Only when rules and standards are complied with can risks be minimized and damage to sanotact, its employees and business partners be averted. Our goal must first and foremost be to recognize and stop misconduct and the associated risks at an early stage. Conduct that constitutes a serious infringement of law, this code of conduct or existing guidelines within sanotact can have disciplinary and other consequences.

Violations of this code of conduct, other inappropriate behaviour as well as suspected misconduct should be reported directly to Compliance also for any suspicious fact. If you wish to remain anonymous, please inform Compliance Manager accordingly because he is instructed by the Managing Directors to keep your name confidential if you wish to do so. Please note, however, the more information is available, the easier it is to investigate suspicious cases and coming back to you will typically be very helpful. There is an alternative to report violations or suspicious facts via our anonymous, electronic whistleblower link <https://sanotact.hinweisgeber.legal>. For this reason, our company implemented this whistleblower system, incoming information will be handled by reliable lawyers and your anonymity is guaranteed.

We do not tolerate any pressure on or discrimination against whistle-blowers. You retain the right and option to directly contact the works council.

## Suggestions for improvement

Do the code of conduct and guidelines still correspond with the applicable law? Are specific requirements expressed in an unclear or ambiguous manner? Are there areas where you miss guidelines or regulations? It is important that we continue to question our compliance system and improve it where necessary. You can direct your suggestions for improvement to Compliance.