# BLANC & BLANC

# Familienholding

# CODE OF CONDUCT



#### Dear employees,

Our success is based on people giving us their trust. Customers, business partners, shareholders, employees, and the public work with us in different ways. They all rightly expect us to be reliable partners.

Trust comes from a clear attitude and consistent daily actions. It takes years to build up, but can be destroyed in seconds.

#### We think long term and act sustainably.

In the spirit of our founders, we are committed to this guiding principle, and we want to and must measure up to it. Nobody should ever have the slightest doubt: integrity is not negotiable. This is our belief and the basis of our corporate culture. In addition, decisions that would harm the trust placed in us or violate laws and agreements pose an enormous risk to our company. We are obliged to do everything in our power to protect our company from harm. We never jeopardize the trust placed in us.

This Code of Conduct is designed to help you make the right decisions in your day-to-day work. Don't be afraid to ask questions, raise concerns, or to provide concrete information. I personally am committed to ensuring that we live and breathe a culture characterized by trust, but that we have the courage to look closely and act decisively.

Yours, Bernd Eckl CEO of the BLANC & FISCHER Family Holding

## OUR VALUES, OUR ACTIONS

#### Taking on responsibility

Each and every one of us bears responsibility for our own actions and is encouraged to play an active role. Our managers take employees' questions and concerns seriously. In doing so, they are guided by our Leadership Principles, which help to preserve and strengthen the sense of responsibility and integrity in our actions.



#### **Ensuring long-term success**

We plan and act with foresight to ensure the long-term success and stability of our company. Our actions are geared towards finding lasting solutions to current and future challenges.



#### Making decisions

We make decisions based on facts and data, and carefully consider opportunities and risks. We take the time to make informed decisions. We consider things carefully and ask the right questions to ensure that our decisions are in the best interest of our company.



#### We are the company's calling card

We are aware that we all represent our company, which is why we always act respectfully and professionally.

#### We comply with the law

We ensure that our actions are always in accordance with the applicable laws and internal regulations.

#### **Ethical standards**

Our company values social responsibility, both internally and externally. We strive to bring about positive change in society by, for example, promoting fair working conditions, environmental protection, and social justice. We gain and maintain the trust of our customers through consistent, fair conduct. This means that we strongly oppose illegal and unethical business practices.

# EARNING THE TRUST OF OUR CUSTOMERS



#### We do not bribe and cannot be bought

Corruption is highly detrimental to society and therefore not only illegal, but also unethical and incompatible with our values. We firmly oppose any form of corruption and avoid even the mere appearance of it.

We never make payments or grant benefits that go beyond what is legally permissible and customary. We never accept such payments or benefits for ourselves.

We do not grant any personal advantages to public officials (for example invitations or gifts), even if the advantages granted are only of a low value.

Further information on corruption prevention can be found in separate regulations here.

#### We present ourselves professionally

We are aware that we can also be perceived as representatives of our company outside of work and take this into account in an appropriate manner. We only speak on behalf of our company if we are authorized to do so. We forward inquiries from the media to the appropriate office in our company.

We always act in a transparent and fact-based manner when interacting with political stakeholders. Where there are registration requirements for lobbying activities, we comply with these.



# EARNING THE TRUST OF OUR CUSTOMERS

#### We always behave fairly, even in competition

We do not tolerate conduct that infringes on antitrust law by our employees or our business partners. We do not participate in agreements or concerted practices between companies if they have the objective or effect of unduly restricting competition. We do not share confidential information with competitors.

If we have a dominant position in individual markets, we do not abuse this position to the detriment of other companies.

We always behave fairly towards companies that are not in competition with us as well. For example, we never restrict our buyers' freedom to set their resale prices.

#### Further information on antitrust regulations can be found in separate regulations here.

#### We only sell safe products to our customers

We comply with all legal and contractual requirements regarding product safety. This ensures that the product standard meets both objective criteria (such as legal requirements) and subjective requirements (such as agreed customer specifications).

We strictly adhere to the requirement that the products we place on the market must comply with the applicable product safety regulations. Products must conform with the relevant standards of the applicable legal system, with applicable or customer requirements, and ultimately with the general safety requirements that can reasonably be expected when using the specific product. This also includes aspects of technical IT security requirements.

Even doubts as to whether product safety is guaranteed in a specific area are reason enough for us to actively work towards clarification without delay.

# **SOCIAL RESPONSIBILITY**



#### We respect and protect our environment.

We comply with the applicable environmental regulations and work hard to conserve resources. To this end, we strive to achieve a circular economy by observing the circular economy principles (e.g. recycle, reuse, refurbish) right from the design stage through to production and product use, all the way to the end of a product's life cycle.

We actively support climate change mitigation and use opportunities to prevent pollution of the environment. This also includes careful handling of water and the oceans of our planet. We work to conserve our planet's biodiversity and ecosystems. Further information on our responsibility in the supply chain can be found in separate regulations **here**.

#### Our values in the supply chain

Our suppliers must respect the prohibition of forced labor and child labor. They must ensure fair remuneration and fair working hours. They are obliged to comply with the freedom of association and to fight discrimination. They also bear responsibility for the health of their employees and must ensure safe workplaces. They must establish a complaints system to remedy any violations quickly. When handling conflict minerals, special measures must be implemented to minimize risks.

Our suppliers are committed to preserving natural resources. As far as possible and reasonable, emissions into the atmosphere, discharges into bodies of water, and contamination of soils are avoided and raw materials and natural resources are used carefully.

Energy consumption is reduced as far as possible and energy is used as efficiently as possible. The release of energy (in the form of heat, radiation, light, noise) and the generation of waste are avoided as far as possible. To preserve biodiversity, land consumption should be limited.

# **TRUST AMONG OURSELVES**

#### We embrace diversity and see differences as enrichment

We provide equal opportunities for all employees. Taking into account the applicable regulations, we refrain from any discrimination based on sex, religion, (ethnic) origin, age, skin color, disability, marital status, gender or sexual identity, union membership, or other differences. Any type of disciplinary action that uses or threatens physical or psychological violence, verbal abuse, and other forms of intimidation is explicitly forbidden. Any form of sexual harassment is prohibited and will not be tolerated under any circumstances.



#### Health and safety are of the utmost importance to us

We prohibit all forms of forced labor and exploitative child labor and take into account the corresponding international agreements (e.g. ILO conventions) in our actions. Children's safety and health must never be compromised and their dignity must be respected. We comply with all applicable provisions without exception.

It goes without saying that we evaluate and monitor the risks that may arise from our own business activities and prevent potential hazards. We report all incidents that could lead to a health or safety hazard immediately to the relevant manager or responsible department.

#### We act transparently

We make business decisions in the best interest of our company and not on the basis of personal or our own financial interests. To avoid the appearance of a conflict of interest, we disclose all circumstances where there is reason to believe there is a conflict of interest before making a business decision.

# **RESPONSIBLE HANDLING OF INFORMATION**

#### We protect our information and comply with data protection rules

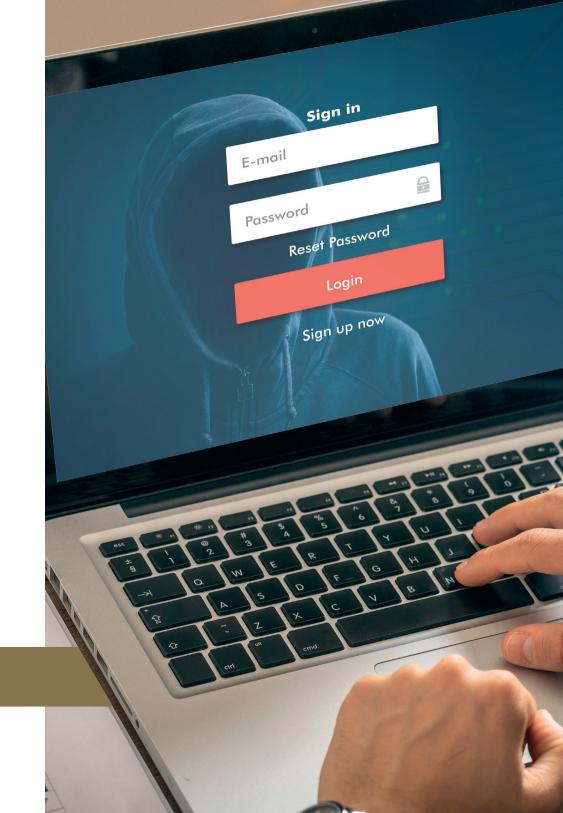
We see increasing digitalization as an opportunity for our company, but it also entails risks. The information we process is a valuable resource. It must therefore always be adequately protected by everyone.

We ensure that there is an appropriate level of protection with regard to confidentiality (information is only made accessible to authorized persons), integrity (changes to data must be traceable), and availability (in particular prevention of IT system failures).

We also comply with the applicable national data protection regulations, which seek to protect people from having their privacy compromised.

We will only use personal data for as long as there is a justification for doing so. Such justification may exist in particular if there is documented consent from the person concerned, or there is a legal obligation or legitimate interest to use the data. If a legitimate interest exists, a documented weighing of interests is also necessary.

Further information on the topic of information security and data protection can be found in separate regulations here.



# **RESPONSIBLE HANDLING OF OUR FINANCES**

We meet our obligations regarding the prevention of money laundering and terrorist financing.

We ensure that we do not receive any conspicuous payments that are suspected of originating from criminal activities. We do not enter into business relationships with persons or companies with criminal or terrorist backgrounds.

We comply with the applicable export control regulations, in particular with regard to embargoes and sanctions.

We ensure proper bookkeeping, accounting, and financial reporting in accordance with the applicable legal requirements and observe the applicable tax laws.



# **OUR RESPONSIBILITY**

This Code of Conduct provides an overview of the regulations to be complied with, which are relevant for all employees. There are separate regulations for individual compliance topics, to which this Code of Conduct refers at the appropriate points and in which further detailed information can be found, with examples.



If you become aware of possible violations of this Code of Conduct, laws, or other internal regulations, please inform your manager, the management board, or Compliance (compliance@blanc-fischer.com).

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If you are uncomfortable discussing a problem with the aforementioned bodies, you can also submit your report anonymously using our whistle-blower system. You can find this on the website www.blanc-fischer.com under the Family Holding/Compliance heading. Each report will be treated confidentially within the scope of statutory regulations. We ensure that whistle-blowers will not experience any adverse consequences as a result of their informing us.