

Message from the CEO

As the managing partner, it is my personal concern that we always uphold our values as a family company. For me, this includes above all responsible corporate action, integrity and trust as the basis for our business activities at VON ARDENNE. It is my fundamental aim to ensure sustainable economic success in compliance with all national and international laws and regulations.

This Code of Conduct is an integral part of our compliance system. It refers to all units of the VON ARDENNE group - hereinafter referred to as VON ARDENNE. It contains principles and rules that are binding for all employees at VON ARDENNE. It provides a clear orientation to act ethically in our day-to-day work and to practice fairness, sustainability and integrity both internally and externally.

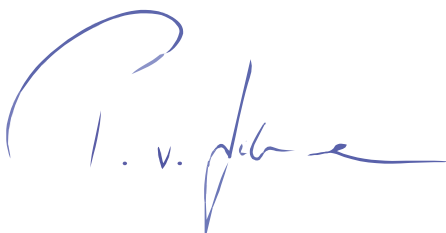
Compliance has the highest priority for me as the managing director. The senior management at VON ARDENNE has a special responsibility in this regard. Within their area, they are responsible for ensuring that the principles of this code of conduct are observed and implemented in such a way that no compliance violations occur. The senior managers convince with their personal role model function and are available as the first point of contact for questions. For us, an open feedback culture and mutual respect are part of our day-to-day work. Of course, this also applies to the relationship with our business partners.

The individual responsibility of each employee to comply with the VON ARDENNE Code of Conduct is essential for its successful implementation. We do not tolerate any violations of the law and are committed to fighting any form of discrimination, harassment and corruption.

The agreement to comply with the VON ARDENNE Code of Conduct is a fundamental criterion for us when selecting new suppliers and sales partners: we assume that our business partners conduct their business based on the values of this code and we support them as best we can. At the same time, we ask our suppliers to ensure the same in their supply chains.

This Code is based on the Code of Conduct and the sustainability standards set out therein by the Responsible Business Alliance (RBA), whose principles and guiding values we fully share.

Thank you very much for your contribution to the compliance culture at VON ARDENNE through your personal conduct.



Pia von Ardenne

Executive Director of the VON ARDENNE Group

1) Law and regulation

VON ARDENNE and all employees comply with all applicable national and international laws as well as with the recognised international standards of the countries in which VON ARDENNE operates. Violations of the law will not be tolerated and must be avoided. Likewise, the company's internal guidelines (e. g. conducts or occupational health and safety) must be adhered to by all employees.

2) Fair competitive environment

a) Corruption

VON ARDENNE strictly rejects any kind of corruption and bribery. We do not grant any unlawful advantages and do not accept such either.

Our employees may not offer, promise or grant any bribes or improper advantages, directly or indirectly, to any public official or private business or contractual partner. Likewise, no bribes or improper advantages may be accepted, tolerated or used.

Business transactions and payments must be documented in such a way that they can be traced at any time.

Donations and grants are only made based on our clear internal guidelines for processes, approvals and transparency in compliance with legal regulations.

b) Money laundering

VON ARDENNE only maintains business relationships with business partners who conduct their business in accordance with the law and whose funds come from legal sources. All business transactions and payments must be documented in such a way that they can be traced at any time and that the statutory storage requirements are complied with.

c) Antitrust law

VON ARDENNE complies with applicable competition and antitrust laws, which prohibit agreements or practices that unduly restrain trade.

d) Customs & Export

VON ARDENNE complies with all applicable export and customs regulations as well as applicable trade restrictions, sanctions and embargoes. This also includes economic sanctions and anti-terrorism regulations.

3) Fair Dealing with employees and business partners – social and ethical responsibility

a) Discrimination and harassment

VON ARDENNE does not tolerate any discrimination or harassment in the work environment, be it because of age, gender, language, political views, ethnic, national or social origin, skin colour, religion, sexual orientation or physical limitations.

The employment of VON ARDENNE employees is based solely on personal and professional competence and performance.

b) Forced labour and child labour

VON ARDENNE strictly rejects any form of forced or child labour. VON ARDENNE is also committed to the prohibition of any form of human trafficking.

VON ARDENNE assumes that its suppliers and sales partners also oppose any form of forced labour, child labour and human trafficking in their company. We also assume that they clearly communicate these requirements to their respective suppliers and sales partners.

c) Freedom of assembly

VON ARDENNE respects the right of employees to freedom of organisation and assembly as well as freedom to negotiate collective agreements in accordance with the applicable legal regulations. We assure that employees who engage in such activities in accordance with the law will not face any negative consequences.

d) Fair working conditions

VON ARDENNE ensures fair working conditions for all employees. This includes, among other things, compliance with all applicable legal regulations on working hours and occupational health and safety as well as appropriate remuneration, which is at least based on the applicable statutory minimum wage as well as remuneration benchmarks and industry-related collective wage agreements.

We also assume that our suppliers and distribution partners treat their employees fairly, pay them appropriately and comply with all applicable legal regulations.

e) Conflicts of interest

Our employees are guided exclusively by the interests of the company in carrying out their professional duties. Decisions must be based on objective considerations.

Professional activities that are contrary to the interests of our company are to be avoided.

Employees must not misuse their professional position, company information or company property for personal gain or for the benefit of others.

In the event of conflicts between personal interests and official duties, all employees are encouraged to contact their supervisor or to take the matter up with the Compliance Board.

4) Intellectual property

VON ARDENNE respects and protects the intellectual property of business partners and competitors. VON ARDENNE refrains from any activities that violate the property rights of third parties, as well as from any kind of counterfeiting or piracy.

We assume, our suppliers and sales partners behave in the same way.

5) Company property

The company's property and assets are values that our employees have created through their work. These values must be preserved through careful handling.

All employees are obliged to observe this in their daily work by: Protecting the company's property from loss, damage and misuse. Employees shall not make decisions or take actions that are contrary to the property and asset interests of the company.

6) Trade and business secrets

VON ARDENNE protects the company's trade and business secrets as well as confidential information of all business partners and always obliges third parties to maintain confidentiality if confidential information or trade and business secrets are shared with them.

We ensure that this information is stored in such a way that it is not accessible to unauthorised persons.

7) Data protection & handling of confidential information

VON ARDENNE attaches great importance to data protection and the confidentiality of the information entrusted to us.

We process data in accordance with the requirements of the applicable data protection laws and commit ourselves to appropriate data and IT security measures.

The data protection officer informs and advises the responsible persons at VON ARDENNE and regularly monitors compliance with the applicable law with regard to personal data requiring special protection.

VON ARDENNE respects the privacy of employees and protects their personal data to the best of its ability in accordance with applicable laws and regulations. Personal data of employees is only collected and stored if this is necessary for the smooth running of the business or to comply with legal requirements.

Likewise, VON ARDENNE ensures that all information security requirements for processing information from customers, suppliers and service providers are strictly adhered to.

8) Occupational health and safety

Constantly ensuring the occupational safety of all employees and business partners is a top priority at VON ARDENNE and is part of our company's self-perception. A safe and healthy working environment promotes the motivation of our employees and provides an important contribution to the success of the company. In addition to the overall responsibility of the management board to organise occupational safety, health and fire protection, all senior managers as well as the employees are obliged to comply with the regulations on this subject at all times.

The identification of hazards, the determination of suitable measures to avoid these hazards and the instruction of employees by the responsible senior managers are the fundamental prerequisites for creating safe working conditions. As part of their duty to cooperate, employees are responsible for ensuring compliance with occupational safety regulations and report violations or potentials for improvement to their senior managers. We assume that our suppliers and sales partners comply with all applicable health and safety regulations. These are part of all contractual agreements.

9) Product safety & quality

Excellent product quality and customer satisfaction are key priorities at VON ARDENNE. The products comply with all legal requirements as well as the extensive internal company safety and quality requirements. A comprehensive safety assessment is preceded by a well-founded risk assessment of the development department.

With proactive instruments such as advance quality planning and a stringent error management process, a holistic interdisciplinary control loop for quality assurance is maintained. Customers can always rely on the safety and reliability of VON ARDENNE products, as well as on their high quality.

The senior managers of the business units ensure that the quality assurance requirements are enforced in the areas they manage and that complaints are dealt with comprehensively and in good time.

Comprehensive quality management and the continuous improvement of our products and processes in terms of quality and reliability are the cornerstones of our success.

10) Environment

VON ARDENNE is committed to the responsible and careful use of natural resources. Throughout the company, we ensure compliance with applicable national environmental laws, rules and standards. Furthermore, we support the use of modern, efficient and environmentally friendly technologies to reduce our consumption at the respective locations. We place a special focus on the expansion of renewable energies, the reduction of our emissions, and sustainable waste management. We also assume that our suppliers and distribution partners comply with all applicable environmental laws, regulations and standards.

11) Whistleblower system

All employees, but also our business partners, customers, suppliers and other third parties have the opportunity to report any suspected violation of applicable laws, this code or other guidelines of VON ARDENNE to the whistleblower office (whistleblowing@vonardenne.biz).

The whistleblower system receives specific indications of potential misconduct. The whistleblower system guarantees the greatest possible protection for whistleblowers and those affected. We check every report and follow it up consistently. An essential pillar of the whistleblower system is the principle of a fair trial. In addition, we guarantee the greatest possible protection for whistleblowers, those affected and the employees involved in the clarification of the whistleblowing.

Pressure on whistleblowers and all persons who contribute to promoting correct behaviour at VON ARDENNE will not be tolerated. The presumption of innocence applies to those affected until the violation is proven. Investigations will be conducted with due confidentiality. The information will be processed within the framework of a fair, fast and protected process. Should any questions arise in this regard or should a legal review of compliance issues be necessary, the VON ARDENNE legal department can be contacted.

Depending on the severity of the possible violation, a superior/supervisor, the works council and/or the human resources department and/or the legal department may be involved.

Non-compliance with this code of conduct may result in disciplinary, civil and, if applicable, criminal sanctions.

12) Trainings

This code of conduct is accessible on the company's internal network as well as on the company's external website. It is available in both languages German and English.

To strengthen the understanding of the code of conduct and to ensure its compliance, our employees are regularly trained on relevant topics related to this code of conduct. This can be ensured through classroom training or also via e-learning methods.