



**GREENOVIS  
GROUP**

# **CODE OF CONDUCT**

**CODE OF CONDUCT FOR THE GREENOVIS GROUP**

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## Foreword

Dear colleagues,

Corporate responsibility and integrity are core elements of the GREENOVIS GROUP's business culture. In our working environment, we face a variety of challenges every day. Our aim is to raise awareness of these challenges and therefore avoid unconsciously crossing boundaries. We want to be successful in a sustainable way while complying with all internal and external principles.

The Code of Conduct for the GREENOVIS GROUP contains a series of principles and guidelines for our corporate behaviour, which are intended to help us make correct decisions and set the right tone in our daily exchanges and actions to protect against any possible misconduct. This code includes every employee and expressly encourages the disclosure of problematic issues and an open culture of dialogue when dealing with company practices, the working environment, individual behaviour and the behaviour of other employees.

Only by working together can we ensure comprehensive compliance with the law. We base the relationship between our employees and business partners on trust and mutual respect. Neither discrimination nor harassment or violations of the law are tolerated. We want to create a working environment that is characterised by a spirit of reciprocal understanding and respect.

If you have reason to believe that there is any wrongdoing, or if you have concerns about the decision-making process, you can contact your line manager or our compliance contact person.

We have appointed Benedikt Kupka, M&A Manager of the GREENOVIS GROUP, as our compliance contact partner, who will be available to answer all incoming enquiries and provide legal advice where necessary.

In addition, an anonymised reporting channel (WhistleB) is available via the <https://report.whistleb.com/de/Greenovis> for reporting possible grievances or misconduct.

We would like to sincerely thank you for making such an important contribution to the GREENOVIS GROUP's compliance culture through your personal behaviour.

**The GREENOVIS GROUP management**

## Basic principles

As a group, we focus on maintaining a high level of quality as a service provider and competent partner for our customers. We aim to guarantee consistent satisfaction and are guided by precise requirements.

### Compliance with laws and guidelines while taking into account any cultural values

As a matter of course, we comply with all applicable regulations and laws to ensure the success of our business. Failure to observe applicable laws or regulations can have significant consequences for both employees and the company itself, such as criminal prosecution, penalties under labour laws or damage to our reputation. We closely monitor violations and reports and take appropriate action to rectify them. We adhere to applicable laws at local and national level. Managers in particular undertake to familiarize themselves with basic legislation, regulations and internal company rules that are relevant to their area of responsibility. The interests of our customers, employees and the environment are always considered in our business activities.

## Principles – Fundamental requirements

### Mutual behaviour

This Code of Conduct is a voluntary commitment to ethically impeccable behaviour. It includes requirements that form the basis for our decisions and actions. Each individual is ultimately responsible for the success of the GREENOVIS GROUP. These guidelines are intended to support employees and managers alike in aligning their actions with our requirements. We want to create an environment that is characterized by respect and appreciation. The open discussion of any reservations that may arise contributes significantly to the early detection and limitation of misconduct.

We encourage free and critical thinking and have no tolerance for any form of discrimination on the grounds of ethnic origin, nationality, gender, sexual orientation and identity, pregnancy or parenthood, marital status, age, religion, belief or disability or any other grounds covered by the prohibition of discrimination, insults, intimidation or any other form of bullying. Our management encourages open discussion, stands by its employees and investigates any concerns raised fairly and impartially. People who express misgivings about developments in the company in good faith must not be disadvantaged as a result.

### Employees representing our company

As an employee of the GREENOVIS GROUP, you represent our group of companies to the outside world. Every employee is perceived as a member of the GREENOVIS GROUP through their actions and behaviour and contributes to a positive perception of the Group. This applies equally to cooperation with customers and suppliers as well as in the private sphere. Each of us has the task of complying with the Code of Conduct, to carry forward its principles into the company and to implement them through our conduct. Against the background of a representative function, including in the private sphere, we would like to ask you to always act in a reflective manner and not to jeopardize the reputation of the GREENOVIS GROUP through thoughtless actions or statements, including when using social media channels. Managers and the Executive Board have an additional

responsibility to function as role models and advisors, to convey the Group's guiding principles and values and to uphold ethical principles.

#### Health and safety in the workplace

The GREENOVIS GROUP is committed to providing safe and healthy working conditions, continuously developing them further and thereby creating a working environment based on appreciation and ensuring the well-being of each individual. Adherence to high standards in the area of occupational health and safety is therefore compulsory and must be observed at all times. Each individual employee can contribute to creating a safe working environment.

The following rules of conduct should be a matter of course:

- Responsible conduct that does not endanger anyone;
- Careful and considered action to avoid situations that could jeopardise safety. Forwarding the relevant information to management if dangerous situations are not avoided;
- Reporting all safety-threatening incidents to a manager.

#### Protection of company assets

All corporate assets of the GREENOVIS GROUP, whether work equipment, IT resources or intellectual property, must be handled responsibly at all times. Corporate resources and their efficient use at all levels can ensure the long-term success of the company. Any waste or misuse of resources damages the economic performance of the company. Each individual can contribute to safeguarding interests through their personal actions:

- Budget-conscious actions and careful examination of expenditure.
- Responsible handling of company property; protection against damage, destruction and theft.

#### Fair competition and antitrust laws

The GREENOVIS GROUP is committed to the rules of fair competition. These include the safeguarding and maintenance of free and fair competition. We do not support agreements with competitors, suppliers and sales or trading companies that impair the principles of fair competition. This principle is a central idea of the antitrust laws that exist worldwide and is therefore binding for our company. If in doubt, the line manager and, if necessary, the Compliance Officer should be consulted. We will stop any violations immediately.

#### Managing conflicts of interest, gifts and invitations

No decisions relating to professional activities for the GREENOVIS GROUP may be influenced by private interests or personal relationships. Any circumstances that lead to conflicts of interest should therefore be avoided. Employees who are affected by a potential or actual conflict of interest are obliged to inform their superiors or the management promptly in order to ensure a rapid solution. Complete transparency is also essential for the GREENOVIS GROUP's loss prevention with regard to gifts and invitations. The granting of high-value gifts, monetary contributions and financial benefits is strictly prohibited. This does not affect customary business gifts or corporate invitations as long as there is no expectation of anything in return. Gifts or invitations are never requested from our business partners.

## Protection of company assets

The GREENOVIS GROUP does not tolerate any form of corruption or bribery. Granting benefits to third parties, such as employees or business partners, is prohibited. Even the appearance of bribery or the granting of advantages is unacceptable. The prohibition on all forms of corruption applies without restriction, as violations of the applicable anti-corruption legislation entail serious penalties for the GREENOVIS GROUP and individual employees, including fines and imprisonment. This restriction also means that personal advantages in connection with business activities may neither be demanded nor accepted, offered or granted.

## Prevention of money laundering

Our obligation to prevent money laundering is fulfilled by complying with the applicable laws. Unwitting participation in money laundering activities can also have criminal consequences for anyone involved.

We meticulously assess the identity and integrity of potential business partners and attach great importance to transparent and traceable payment flows. We are committed to only entering into and maintaining business relationships with reputable partners whose activities comply with the applicable laws and whose resources are of legitimate origin.

## Data protection

We are committed to the utmost care and strict confidentiality in accordance with the fundamental right of the EU General Data Protection Regulation (GDPR) when collecting, storing, processing or transferring personal data (e.g. name, address, telephone number, bank details, health information) from employees, customers or other third parties. We respect the right of information regarding the purpose of transparent data collection and processing as well as all legal deletion and retention obligations.

## Financial integrity

The GREENOVIS GROUP is fully aware that the diligent handling of financial documents is of the utmost importance. All business transactions and the documentation of our group of companies are required to be correct and in order. For this reason, we adhere to our obligation to comply with national accounting standards, fulfil tax regulations and ensure the correct storage of documents. We also attach great importance to cooperative and transparent collaboration with internal and external auditors.

# Society and community

## Environmental responsibility

Environmental protection and the responsible use of natural resources is an important goal of our group of companies. Our economic success should be based on a sustainable foundation and

therefore goes hand in hand with the consideration of ecological and social benchmarks. Our employees are responsible for conserving energy, water and raw materials and using them efficiently. We also demand a similar environmentally conscious behaviour from our suppliers and other business partners.

### Diversity

The GREENOVIS GROUP is committed to the principles of the Universal Declaration of Human Rights. We believe that the diversity of our employees is the foundation for our company's success and the growth of our Group – and is what makes this possible in the first place. In this context, we support the diversity of our workforce and are committed to preventing any discrimination, exclusion or preferential treatment based in particular on ethnic, national or social origin, gender, age, religion and ideology, political views, disability and sexual orientation. We also expect our suppliers and business partners to have a comparable set of values and to undertake to comply with them.

## Contact partners, information and communication channels

### Validity of the Code of Conduct

This Code of Conduct combines applicable legal and company regulations and applies to all employees of the GREENOVIS GROUP. The requirement to comply with the principles contained in the Code of Conduct arises either directly from the law, company regulations, company guidelines or from the employment contract. Deliberate violations of the Code of Conduct may lead to civil or criminal consequences in addition to consequences under labour laws within the framework of the applicable provisions.

### Guidelines for decision-making

Should there be any uncertainty in individual cases as to whether a decision complies with the requirements of the Code of Conduct, you can use the following questions to carry out your own review of the facts. If the answer to each question is “yes”, your decision is probably justifiable. If you have any doubts about individual questions, please get in touch with one of the contact partners listed below.

- Can I justify the decision in good conscience?
- Can I make the decision in the best interests of the company and the Group, without any competing interests of my own?
- Can I justify my decision to third parties without a guilty conscience?
- Can I be confident that my decision is within the legal and internal guidelines?
- Have I considered all essential aspects and weighed them up appropriately?

If one or more questions are answered with “no”, concerns should be discussed with the respective manager (or, if applicable, management colleagues) or raised via the reporting channels listed below.

## Reporting channels

The guidelines of the Code of Conduct are intended to serve as a guide for our daily work at the GREENOVIS GROUP and in our external behaviour. Any concerns about conduct in the workplace can often be resolved through constructive dialogue between those affected on site. We would like to encourage you to address conflicts openly and to consult either your line manager, your management and/or the compliance contact person if you have any concerns.

In general, a compliance violation is material and must be reported as soon as it is suspected if it could cause significant economic damage to the GREENOVIS GROUP or jeopardize the company's reputation.

- Compliance enquiries to the GREENOVIS GROUP:  
**compliance@greenovis.de**
- The anonymous reporting channel is available on our website or directly at <https://report.whistleb.com/de/Greenovis> .