

## **Code of Conduct and Ethics of the CVH-Group**

### **Foreword**

The Code of Conduct and Ethics of the CVH-Group is based on the common conviction of management and employees that entrepreneurial action based on ethical values not only generates internal and external trust, but also guarantees sustainable economic success.

With this Code of Conduct and Ethics, we are fulfilling our social responsibility and facing the complex challenges of global markets.

Sustainability is an integral part of our corporate philosophy and we try at all levels, together with our customers, suppliers and service providers, to develop ourselves further in all relevant areas.

This code is binding for us and forms the basis of our actions.

### **1. General principles**

#### ***Integrity, credibility, transparency***

We base our business actions and decisions on generally accepted ethical values, in particular integrity, credibility and respect for human dignity. We promote transparency in an appropriate manner through responsible management and control within the company.

#### ***Supply chain***

We expect our suppliers to follow our guiding values, support them as best as we can and ask them to do the same in their supply chains. *Corresponding legislation forms here the basis (LkSG, LkG).*

#### ***Compliance with laws, embargo and export control regulations***

We observe the laws and other legal provisions in the countries in which we operate. This applies in particular to national and international embargo and export control regulations.

### **2. Conduct towards competitors, business partners and third parties**

#### ***Competition and antitrust law***

We respect the rules of fair and open competition and do not enter into any agreements that unduly impair competition.

#### ***Corruption***

We expressly oppose all forms of corruption at home and abroad and avoid even the appearance of trying to influence business decisions through unfair business practices.

No employee may use his or her position in our company to demand or accept unreasonable advantages for himself or herself or for third parties.

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Any tangible or intangible benefit to employees or agents of a commercial enterprise in return for preferential treatment in commercial transactions is prohibited.

### ***Invitations and gifts***

Invitations, such as to business lunches or events that are in accordance with accepted customs and are appropriate, may be issued or accepted if they do not serve to give undue preference. The same applies to the acceptance or granting of gifts.

### ***Officers***

Granting of advantages of any kind to civil servants and other public officials as well as to representatives of state institutions, even indirectly via third parties, is generally prohibited.

### ***Parties and elected officials***

Donations to political parties and political organisations as well as to elected officials and candidates for political office are generally prohibited.

### ***Donations and sponsoring***

Donations are only made on a voluntary basis and without expecting anything in return. Donations and sponsoring services must not be designed to covertly promote decisions in the interest of the company.

## **3. Avoidance of conflicts of interest**

### ***Loyalty***

We expect loyalty from our employees. We take care to ensure that our employees do not get into situations where personal or financial interests conflict with those of our company or our business partners.

### ***Secondary activities and participations***

Sideline activities and shareholdings in competitors or business partners may not impair the interests of our company. This also applies to shareholdings of a close relative or life partner.

## **4. Handling of information**

### ***Trade and business secrets***

We oblige our employees to maintain silence about company and business secrets and other internal matters. This applies equally to information about contractual partners and customers that is not publicly accessible.

### ***Data protection***

The CVH-Group respects the right to privacy of every individual. We therefore comply with all applicable laws and regulations regarding the collection, processing or use of personal data. *Any unlawful processing or use of personal data of our employees, suppliers, customers and third parties is strictly prohibited.*

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All personal data must always be handled with due care and protected against unauthorised access by third parties (see DSGVO employee information). The internal implementation of the legal requirements is ensured by the appointment of an external data protection officer, Mr Martin Lorenz (TRIADES Data Protection).

### **5. Principles of social responsibility**

Social responsibility is an indispensable component of our value-oriented corporate management and a key factor in sustainable corporate success.

We respect and support internationally recognized human rights.

The prohibitions of child labour and forced labour are observed in every form.

Discrimination against employees and third parties will not be tolerated and violations will be sanctioned immediately. We act in accordance with the "General Equality Act (AGG)".

We promote equal opportunities for all employees.

We observe the applicable employee rights and labour standards with regard to appropriate remuneration and working hours. We ensure fair working conditions overall.

We are committed to the training and further development of all employees.

Occupational health and safety at work is ensured within the framework of national regulations.

We are committed to the applicable environmental standards at all CVH-Group locations and ensure compliance with the law.

We are involved in social projects and support them continuously.

### **6. Sustainability**

In addition to active participation in the sector-related Responsible Care Programme of the VCH and the ESAD II Assessment, the CVH-Group is participating in the German Sustainability Code initiated by the German Federal Government in 2010. The publicly accessible DNK database creates visibility and transparency with regard to our sustainable corporate development. All our colleagues are committed to sustainable action and are expressly called upon to promote the sustainable development of the CVH-Group through new ideas and intensive dialogue internally and externally.

Detailed information is available at [www.deutscher-nachhaltigkeitskodex.de](http://www.deutscher-nachhaltigkeitskodex.de).

In the strategic orientation, sustainability projects with customers and suppliers under the motto "together sustainable" are a key driver for future business development.

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The consistent reduction of energy consumption, the conservation of resources and climate protection are particularly in focus. Through the introduction of an energy management system all employees are involved in a continuous improvement process with clear targets. *The execution of an energy audit is supposed to identify further energy efficiency potentials.*

### **7. Compliance with the Code of Conduct**

#### **Communication**

We familiarise our employees with the contents of the Code of Conduct and explain the obligations arising from it. We actively communicate the principles of the Code of Conduct to our business partners.

#### **Notification of infringements, contact person**

All employees are required to report suspected violations of this Code of Conduct to their direct superior or to the group-wide Compliance Manager Wladimir Bangert ([compliance@CVH.de](mailto:compliance@CVH.de)).

*Furthermore, the requirements under the Whistleblowing Guideline (WB-RL) and the Whistleblower Protection Act (HinSchG) will be fulfilled by an external compliance ombudsperson with effect from 01.12.2023: [reinke@compliance.ruhr](mailto:reinke@compliance.ruhr); Reporting channels: Hotline 0152/23147909, Wire: @compliance.ruhr*

The persons providing the information must not suffer any disadvantage as a result. Each report will be handled in strict confidence and with the necessary care.

#### **Consequences of infringements**

Violations of the Code of Conduct or legal provisions may result in consequences under labor and liability law, depending on their severity.

If the reported non-compliance is confirmed, appropriate remedial and disciplinary action will be taken.