

Code of Conduct

of the Uhlmann enterprise group

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Duties & obligations



1 Compliance policy statement

OUR DUTIES, OUR VALUES

As employees of the Uhlmann enterprise group*, it is our duty every day to provide our customers across the globe with excellent products, services, and solutions to support them in achieving their goals. In doing so, our conduct as a business is defined by our core values: strength, transparency, reliability. By living out these values in our everyday work and actively promoting them, we create a solid basis of trust with our business partners for a long and successful partnership.

OUR OBLIGATIONS

In order to carry out our duties sustainably and successfully, we must be reliable. However, we can only be reliable if our conduct in our everyday work is always in conformity with the law, which is why the Uhlmann Group exclusively does business in compliance with legal framework conditions. This includes the relevant laws, regulations, and guidelines, as well as the specifications and standards applicable at Uhlmann ("compliance rules"). All employees of the Uhlmann Group must observe the compliance rules. The managers set an example for legally compliant conduct, meaning all employees make a significant contribution to effective compliance through their behavior.

Transparent communication between employees, team members and managers and with our business partners is necessary to ensure that compliance is effective and sustainable. This enables us to find practical solutions for how to conform with compliance rules and still work efficiently. Uhlmann therefore expressly encourages all employees to communicate their questions and information regarding compliance. Employees are to inform their manager or the responsible organizational unit without delay regarding violations or suspected violations of compliance rules. It is only through transparent communication and consistent conduct that we can effectively limit compliance risks, avoiding damage to the company. All employees check within their relevant areas of responsibility whether business activities conform with compliance rules. We only conduct business dealings that also conform with aspects of compliance, and therefore consistently and appropriately sanction any violations of compliance rules, which may also lead to termination of employment.

Uhlmann requires lawful, responsible, and accountable conduct from all employees and business partners and encourages this conduct through the company-wide compliance management system (CMS). Thanks to the fact that this is constantly undergoing review the CMS always creates a reliable framework for conduct in conformity with the rules.

* The Uhlmann enterprise group comprises Uhlmann Group Holding GmbH & Co. KG and its direct and indirect subsidiaries.

Basic principles & values



2 Basic principles of the Uhlmann enterprise group

Any company can only enjoy success in the long term if it has clear basic principles and a strong, reliable value system. The Uhlmann enterprise group has therefore brought together its experiences from past and present to form common company principles. Uhlmann aims to inspire with its company principles and the values embodied within them.

STRONG, TRANSPARENT, RELIABLE – these three characteristics form the core values of the Uhlmann enterprise group and shape our everyday work. Our operational and strategic objectives are designed to be in line with these values, which is what our business partners and employees particularly appreciate about Uhlmann.

Strong

WE ARE STRONG WHEN:

- We inspire our customers.
- We recognize the needs of the market with strategic foresight and act accordingly.
- We have excellent market presence and penetration.
- Our product range is the benchmark in the sector.
- Financial resources allow us to be independent, provide security, and enable investment required for the future.

Transparent

WE ARE TRANSPARENT WHEN:

- We look out for ideas and trends, thereby creating momentum for the sector.
- Constructive criticism helps us to improve constantly for the benefit of our customers and employees.
- We are respectful in our dealings with other people.

Reliable

WE ARE RELIABLE WHEN:

- Our customers can count on us.
- We keep to our commitments.
- Our dealings with customers, suppliers and employees are collaborative and authentic.

3 Binding Code of Conduct

We can only live out our basic principles and values if they are built upon a strong, transparent, and reliable culture of compliance. We therefore require that we ourselves always behave with honesty and integrity in our everyday dealings with business partners, employees, and authorities. The Uhlmann Code of Conduct explains the most important aspects of our understanding of honesty and integrity, providing numerous

examples and demonstrating the limits of permitted conduct. The Uhlmann Code of Conduct is recognized as binding by all companies belonging to the Uhlmann enterprise group. Compliance with the binding Code of Conduct is ensured with the help of suitable measures in all parts of the organization, and its effective implementation is regularly reviewed with accordingly appropriate measures.

Fairness & respect

4 Dealings with business partners and third parties

4.1 We stand for free and fair competition

Antitrust laws protect free and effective competition. Any violation of antitrust stipulations may have far-reaching consequences for the employees concerned and the Uhlmann enterprise group. Possible consequences include fines, damage suits, custodial sentences, or reputational damage. The Uhlmann enterprise group observes the antitrust laws applicable to it and undertakes to comply strictly with rules and regulations for the promotion and protection of fair competition.

Therefore, in order to maintain or increase our business opportunities, we do not collude with competitors to fix prices or terms of sale, we do not divide up customers

or sales territories with competitors, we do not share information prohibited under antitrust law with competitors, and we do not coordinate any prohibited conduct either expressly or de facto, and neither do we take part in anti-competitive boycotts or other unlawful competitive methods of any kind.

We select our business partners in accordance with legally permitted, objective, and transparent criteria on the basis of their services. Checks are carried out meticulously and fairly, and these must be reviewed by the compliance officer responsible for existing restraints on competition before we enter into business partnerships.

Question

During the meeting of the professional association, a manager from our competitor starts talking about profit margins, pricing, and future projects. Do I have to intervene here?

Answer

To outsiders, e.g., to a regulatory authority, it may give the impression that the participants have entered into a tactical agreement regarding pricing. This conversation is inappropriate, which you should indicate. It is best to leave the event immediately and speak to the legal department of the Uhlmann enterprise group.

4.1 We stand for free and fair competition

Question

I meet a former colleague at the airport, who now works for a competitor. I would like her to tell me how business is going in the regions and about the business purpose of her journey. Can I talk to her about that?

Answer

No. Limit the conversation to topics not related to business. This kind of conversation, covering business topics, generally goes far beyond polite small talk and is therefore quickly assessed by the antitrust authorities to be a prohibited exchange of information. Accordingly, if you are asked business-related questions, avoid giving concrete answers.

Question

My friend of many years and former colleague works for a competitor. I have been invited to his birthday party. Do I have to decline the invitation or obtain prior consent from my superior?

Answer

No. However, you must avoid talking about confidential information or information relevant to competition law.

4.1 We stand for free and fair competition

Question

During a customer call, the end customer keeps showing me offers from different competitors. Am I allowed to use the content of the offers in my work?

Answer

Yes and no. There is no explicit prohibition against using this information if the customer has told you. However, the risk of allegations that you may have obtained this information illegally is very high. Even if it is difficult, advise the customer that you would not like to know this information, then carefully document the circumstances in which the information was obtained.

4.2 We stand for quality and safety in our products and services

The Uhlmann enterprise group defines quality as continuous improvement of all processes in order to maintain and increase the quality standards achieved. For Uhlmann, quality assurance means observing all relevant security regulations and additionally implementing further provisions to ensure continuous improvement. Our products and services are to help

people improve their lifestyle and must not endanger the life or health of people at any point. Our production processes must ensure that we comply with the applicable Product Safety Act at all times. We do everything within our power to ensure this. We will not tolerate anyone accepting the risk of a violation vis-à-vis applicable product safety regulations.

4.3 We condemn corruption, bribery, and money laundering

The conduct of the Uhlmann enterprise group is therefore always based on the applicable anti-corruption and anti-money laundering provisions to be used. Uhlmann makes clear that abuse of a position of trust in any role within the Uhlmann enterprise group with the intention of obtaining a material or immaterial advantage for oneself or a third party is strictly prohibited.

Employees of the Uhlmann enterprise group are not open to bribery and they also do not bribe. Donations of any type or amount, including but not limited to invitations, are only permitted if and to the extent that these arise from usual business operations, and they do not represent or cannot constitute any inappropriate influence.

In the context of procurement, neither receiving nor sending donations of any type or amount are permitted. We do not send donations to public officials as a matter of principle. Even the appearance of inappropriate influence must always be eschewed. The responsible compliance officer must be contacted without delay in the event of doubt.

The Uhlmann enterprise group takes effective pre-emptive measures to prevent money laundering. In doing so, we place great value on choosing our business partners carefully and accepting financial transactions (including but not limited to cash payments) only within legal provisions.

Question

As part of a regular exchange, I visit the procurement employee of a customer in my capacity as sales representative. After a good discussion during which the procurement employee showed great interest in our new products, I would like to invite her and her partner out for a meal out of politeness and reserve a table at a local restaurant. Am I allowed to give this invitation?

Answer

Not really. You are not allowed to extend the invitation to her partner. The partner has nothing to do with the business relationship. Apart from that, you can give the invitation if you can be sure that the scope of the invitation is within appropriate limits. To check the appropriateness, ask yourself: Would I also give this invitation with this content if I had to pay for it myself privately? However, the invitation is not permitted if it occurs close in time to a contract award process.

4.3 We condemn corruption, bribery, and money laundering

Question

As part of a FAT, the participating employees from the customer's purchasing department ask Uhlmann to cover the costs for their business class flights, accommodation for seven nights in a five-star hotel, two sightseeing tours, and a shopping trip. Am I allowed to give approval for these costs to be covered? What is the correct way for me to react?

Answer

No, you are not allowed to give approval for these costs to be covered. Clarify how to proceed with the responsible compliance officer.

Question

During a supplier visit to a country with a different culture, the sales representative gives me a watch worth several hundred euros. Gifts of this value are normal in this country and are simply understood as a show of politeness. Is it therefore OK for me to accept the watch?

Answer

No, you are not allowed to accept the watch. Familiarize the gift giver with the content of the Uhlmann Code of Conduct. If it is not possible to refuse the gift, make the gift giver aware that strict customs regulations do not permit you to take the watch to your home country, in all likelihood. Then inform your superior and the responsible compliance officer immediately about what has happened. If the supplier then sends the gift by post, provide information in the same way.

4.4 We comply with import and export regulations and export restrictions

The import and export of technologies, commodities, goods, services, and information to or from certain countries is subject to legal limitations. We comply with all regulations and procedures for control and limitation of imports and exports that are applicable to Uhlmann. In order to prevent the risk of sanctions, we carry out appropriate checks in good time.

We react attentively and consistently to suspicious requests from individuals, companies, or third parties who would like to access our goods, software, or technology – including but not limited to having to refuse on the basis of sanctions and embargoes, or the persons or companies being associated with illegal goods.

Question

Our customers abroad are expecting a component urgently. We have been delayed due to non-arrival of the appropriate export license. As I have an appointment with the customer on location next week, I could take the part with me and complete the relevant forms in retrospect. Is that okay?

Answer

No. We comply with import and export laws. If we were to bypass these laws, this could have serious consequences – from being seen as untrustworthy by our customer to legal consequences for our company.

Question

I would like to collaborate with a supplier against whom the European Union has imposed certain trade sanctions. Can I enter into a contract for a supply agreement?

Answer

It depends whether the trade sanctions also cover the products concerned, the supplier's company, persons associated with the business relationship, or the business relationship itself. Before making initial contact, contact the responsible compliance officer and clarify the facts of the matter conclusively.

4.5 We avoid conflicts of interest

Personal and private interests must not unduly influence our judgment in our everyday work to ensure no conflicts of interest arise. This is why we always maintain separation between business and private interests. A conflict of interest arises if our personal and private interests are contrary to the interests of Uhlmann, which causes divided loyalties that may regularly have a negative effect on Uhlmann. As employees of Uhlmann, we must avoid situations where our personal and private interests may come into conflict with those of Uhlmann, or create the impression that this is the case.

Activities of our relatives, loved ones, and friends may lead to conflicts of interest. We do not take part in decisions which may cause a conflict between our own interests and those of Uhlmann. We are not permitted

to misuse our employment at Uhlmann in order to obtain unjustified personal advantages or advantages for relatives, loved ones, or friends. We must check carefully for conflicts of interest before we pursue a secondary occupation.

Many actual or potential conflicts of interest can be solved in a reasonable way, for both Uhlmann and the employees concerned. The employees concerned must contact the responsible office at Uhlmann (e.g., the compliance officer, HR department) so that an appropriate solution can be found. Employees must not only avoid actual conflicts of interest, but also avoid situations in which outsiders may gain the impression of a conflict of interest, even if this is not the intention of the employees concerned.

Question

I am organizing an appropriate venue for a company event. My cousin owns a suitable conference hotel. Am I allowed to include him when obtaining suitable offers?

Answer

No. There may be exceptional cases where including an offer is permitted for mainly objective reasons. The potential conflict of interest must be transparently declared to your superior before contacting the hotel, and the existence of an exceptional case must be justified objectively. The decision regarding inclusion is then made by the superior after consultation with the responsible compliance officer.

4.5 We avoid conflicts of interest

Question

My spouse works as a manager in sales at one of Uhlmann's suppliers, which is competing for a contract with Uhlmann. I have at least a partial influence over the decision regarding the choice of supplier. How must I behave?

Answer

You must inform your superior or the responsible compliance officer of the facts of the matter and the potential conflict of interest immediately and transparently, and you are not allowed to take part in this selection procedure. You are sworn to secrecy regarding confidential information concerning the selection procedure.

4.6 We maintain appropriate discourse with political institutions and authorities

The Uhlmann enterprise group cooperates constructively with political institutions and authorities, while safeguarding its own interests and rights. Public

announcements are always compiled and prepared comprehensively, truthfully, and in a timely manner.

Question

As an Uhlmann employee, am I allowed to hold a political office?

Answer

Yes, but you must not use the name of your employer when carrying out your political activities. In addition, you should refrain from transferring your political views to the company or spreading them. Activities related to a political office are prohibited during working hours.

4.7 We respect the property of others

We always treat other people's property that we obtain from third parties for business purpose use with care and exclusively for the intended purpose. This also includes intellectual property. Protection of this property is particularly important to us, including but not limited to in relation to our customers, suppliers,

and other business partners. We do not collect, acquire, read, or use intellectual property which is protected by copyright through third parties or only disclosed in a limited manner. In cases of doubt, we clarify the state of affairs and legal situation with the responsible office at Uhlmann in good time before use.

Question

A customer sends pharmaceutical test products. I determine that not all test products are needed. Am I allowed to use the excess test products myself or pass them on to my colleagues?

Answer

No. Handling pharmaceutical test products is subject to very stringent legal requirements. You are not allowed to use such products for anything other than the intended purpose under any circumstances. This also applies if a test product is not required for test purposes. Inform your superior without delay.

People & the environment

5 Dealings with people and the environment

5.1 We treat each other with dignity and respect

In everything we do, we always respect and expect compliance with human rights and employee rights and do everything we can to embody these in the value chain. We behave fairly and respectfully in all our interactions with staff and business partners.

The UN Guiding Principles on Business and Human Rights is an important point of reference for the Uhlmann enterprise group.

We do not tolerate discrimination or bullying, nor child labor or forced labor in any form. Rather, we stand for equal treatment of all employees, irrespective of ethnic or social background, nationality, gender, age, culture, sexual identity or orientation, physical features, religion, worldview or political conviction, and we actively promote equality and equality of opportunity for everyone.

5.2 We are mindful of environmental protection and use natural resources sparingly and sustainably

We have a comprehensive approach to sustainability for purposes of compliance with economic, environmental, and social standards.

The Uhlmann enterprise group believes in environmental and climate protection, including preservation and efficient use of resources as another important goal. All process steps have been designed to have as little impact on the environment and climate as

possible so that we can make a positive contribution to environmental and climate protection with our products and services. This strategy results in a proportionate carbon footprint.

We constantly strive to prevent or reduce negative effects on the climate and environment linked to our business activities, even if Uhlmann has neither caused nor contributed to these effects.

5.3 We stand for fair working conditions

The Uhlmann enterprise group undertakes to create safe, fair, healthy, and socially acceptable working conditions, and undertakes to develop these constantly. No exploitation of employees or business partners takes place at Uhlmann. Remuneration and other benefits at the very least meet with local or national legal requirements and are in accordance with the basic principle of

“same remuneration for the same work”. As such, the relative level of the economic region of employment is also taken into account.

The Uhlmann enterprise group ensures compliance with the relevant national regulations and agreements regarding working time and regular paid vacation leave.

5.4 We pay attention to occupational safety, health protection, and fire prevention

OCCUPATIONAL SAFETY

We are very strict in paying attention to the safety of our employees in their places of work. Uhlmann supports this with regular training. We wear the appropriate prescribed safety clothing.

Keeping our employees in good health is of the utmost importance for us. Thanks to our broad occupational health management, Uhlmann promotes and supports health-conscious conduct and behavior in the workplace.

HEALTH PROTECTION

Globalization, continuous developments in technology, and a longer working lifetime are all causes for the increasing health challenges in our world of work.

FIRE PREVENTION

The Uhlmann enterprise group puts into practice the legal requirements for fire prevention and supports compliance with regular training and drills.

5.5 We stand for constructive relationships with employee representative organizations

All employees are permitted to be involved in unions or other democratic employee representative organizations. In exercising this human right, national regulations, and existing agreements must be observed, and we respect the right to freedom of association even in states where freedom of association is not protected. We constructively cultivate collaboration

with employees, employee representative organizations, and unions, which aims for a fair balance between the economic interests of the country and the interests of employees. We aim to maintain workable, constructive, and long-term cooperation, even during contentious disputes.

5.5 We stand for constructive relationships with employee representative organizations

Question

I get the feeling that my department is not observing or is violating national environmental laws. How do I deal with this?

Answer

Our company undertakes to comply with the law. Please speak to the manager of your department or the responsible person.

Question

I have a suspicion that our supplier is paying their employees less than the legal minimum wage. Should I report this?

Answer

Speak to your manager and the manager responsible for the supplier company about the issue. It is important to us that our suppliers do not exploit their employees and do not act in any way that is unlawful.

Question

Various team members are always talking about a colleague's appearance and background and make comments about this. When I talk to them about it, they say that it is only a joke and there is no ill will. Should I accept that?

Answer

No! Please first talk to your manager, your responsible compliance officer or the HR department. You can also be confident in contacting the Works Council. If the issue is not appropriately handled internally or you feel that you are not being taken seriously, you can also contact the external, independent trusted lawyer via the whistle-blower system.



Safety & trust

6 Handling business information and IT data

A large proportion of the Uhlmann enterprise group's information is highly confidential. This is therefore subject to a confidentiality obligation and must be handled with great care. We pay very close attention

to information security and data protection. The procedure occurs in accordance with the applicable regulations and laws.

6.1 We keep our accounts and records in accordance with regulations

The Uhlmann enterprise group uses the basic principles of bookkeeping and accounting in accordance with regulations and complies with these. This includes but is not limited to the following basic principles:

- ▶ True and fair representation
- ▶ Clarity and clearness
- ▶ Single valuation

- ▶ Completeness
- ▶ Correctness
- ▶ Security
- ▶ Documentation

All relevant data and records are correctly and completely created in good time.

6.2 We consciously work to ensure that business is documented

We comply with all laws and statutory provisions applicable to us, as well as appropriate technical and professional standards for storage of documents and files. A stringent monitoring system for finances, business processes and compliance, and an effective risk management system are part of our everyday work.

Deliberately inaccurate representations in business documentation, reports, products, or services affect

our integrity. Any form of deception is an offense and is not tolerated in our company.

When dealing with the tax authorities, we work in a way that is transparent and open to scrutiny, make our tax strategies and business activity freely accessible to the authorities, and comply in all business matters with the tax regulations applicable at Uhlmann.

6.2 We consciously work to ensure that business is documented

Question

So as not to overspend our budget, my manager asks me to transfer certain costs to a different cost center, whose expenditures are significantly under their budget. Am I allowed to do that?

Answer

No. In doing so, you would be manipulating the budget plan, and with it the associated business results. Costs may only be transferred if there is proper reason to do so, e.g., provision of a service in the department concerned.

6.3 We protect personal information and secure company information

Data protection is of paramount importance for the Uhlmann enterprise group. Data protection has an influence on our success as a business. This is why we use all technical and organizational measures available to us to protect our own data and external business data as well as possible against unauthorized access, unauthorized use, and improper use and loss. This is done in adherence to the relevant legal framework and national laws, as well as internal rules and guidelines.

The Uhlmann enterprise group is keenly aware of the highly sensitive nature of the personal data with which it is entrusted, and protects this data by handling it carefully and responsibly. We have adopted a range of technical and organizational measures which aim to ensure the availability, integrity, and confidentiality of personal data. As part of their duties, all employees are

responsible for ensuring a high level of protection for this personal data and complying consistently with the applicable privacy policies, including but not limited to the EU General Data Protection Regulation. All employees are responsible for protecting personal data and collecting, processing, and saving it only for business purposes and exclusively to the extent necessary.

In addition to technical and organizational measures for data protection, all employees of the Uhlmann enterprise group undertake to protect the interests of the company. For this reason, company information is exclusively communicated to authorized persons, which applies to internal and external dissemination. Similarly, all employees are mindful of confidentiality of information and protect business documents from being seen by unauthorized persons.

6.3 We protect personal information and secure company information

We classify and process business information in accordance with the company regulations. Confidential documents or information must not be used outside of the company. Sensitive company information is only allowed to be sent and stored when encrypted. When handling company information, we place great value on compliance with the basic principles of confidential communication. This applies in both official and private spheres, including but not limited to use of social media.

Our technologies, intellectual property, and sensitive business information are crucial resources for our

company, which is why it must be protected against unauthorized use and disclosure using cybersecurity and IT security. We perform IT security measures without delay and do not bypass them. All data-related documents and information are stored in such a way that only authorized persons can access it.

Without authorization, we do not hand over confidential material or material protected by copyright, business secrets or software to third parties. At the same time, we are not allowed to receive documents, materials, or software if we do not have express authorization from the appropriate office.

Question

A former team member has become self-employed. This person has asked me to send them the names and addresses (including company e-mail addresses) of my team members for marketing purposes. Is that permitted?

Answer

No. This is personal data, which is subject to data protection and must not be given out to third parties. Any violation may have legal consequences for you and/or the company.

Question

In my department, measures to protect company data and information keep being neglected. What should I do?

Answer

Security measures must never be bypassed or neglected at any point. Contact your manager. If your manager cannot help or cannot solve the problem, contact the next highest level of management or the Information Security Officer (ISO).

6.3 We protect personal information and secure company information

Question

I would like to take company data away with me on a USB stick to be able to work on it outside the company premises. Is this possible?

Answer

Company data may only be stored in the folders and services intended for this purpose (e.g., SAP, Sharepoint, etc.). Avoid saving data locally as far as possible. Removable media such as USB sticks are possible as a transport medium, but only on the condition that the company's own media are used and these are also manually encrypted. Processing and saving private data and information on company storage media is prohibited.

Question

Do I have to be aware of anything when using my company notebook outside of the office?

Answer

The hardware and software provided by your employer must only be used for work purposes. When outside of the office, ensure that no one has access to your laptop or company cell phone and keep these objects securely stored. Contact your manager for the precise usage guidelines.

7 Responsibility and sanctions

The content of this Code of Conduct is essential for the corporate activities of the Uhlmann enterprise group. Uhlmann therefore expressly makes employees and business partners aware of the binding nature of compliance with this Code of Conduct. The employees

are responsible for compliance with the Code of Conduct. Violations of the content of this Code of Conduct are sanctioned proportionately and may lead to termination of employment.

8 Points of contact for the Code of Conduct

QUESTIONS

Employees have the opportunity to ask questions regarding observance and correct implementation of the Code of Conduct. Superiors and offices responsible for compliance are available for this purpose. The contact details of the compliance officers can be found via the established communication channels in the company.

INFORMATION

All employees are urged to report violations or suspicions of violations immediately. The Uhlmann enterprise group ensures that there are no disadvantages for persons who report violations or suspicions of violations to the responsible offices.

The following institutions or groups are named as points of contact for the aforementioned topics:

- The Group Management Board
- Managers
- Employees with compliance roles (all compliance officers) and those in the legal department

Laupheim, January 20, 2022

UHLMANN GROUP HOLDING GMBH & CO. KG

T. Uhlmann

Tobias Uhlmann
Chair of the Supervisory Board

If Uhlmann employees do not want to contact the aforementioned points of contact, they also have the option of contacting the trusted lawyer, Dr. Carsten Thiel von Herff in writing (e-mail, letter, fax), by telephone or in person, at any time:

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