

# Code of Conduct of the Eckert & Ziegler Group

## Preamble

The companies<sup>1</sup> of the Eckert & Ziegler Group (“Eckert & Ziegler”) conduct their business responsibly and in accordance with the legal and regulatory requirements of the countries in which the companies operate. The Management Board of the Group is fully committed to the legal and company-specific regulations on responsible and lawful conduct, and to renouncing any business violating the principles below.

### Principles of responsible and lawful conduct

Eckert & Ziegler respects applicable laws and expects the same from its employees<sup>2</sup> and business partners. The following principles indicate priorities of particular practical relevance.

#### 1. Fair and respectful working conditions

Eckert & Ziegler is committed to ensuring that no employee is treated in an unprofessional, disrespectful or discriminatory manner. It is the goal of the company to create an appreciative and collegial working environment for each employee. In particular, Eckert & Ziegler does not tolerate any undue disadvantage based on race, ethnic origin, gender or sexual identity, religion or belief, disability or age. The company attaches great importance to making its personnel decisions purely on the basis of personal qualifications and performance.

Each employee is expected to have a friendly, objective, fair and respectful relationship with colleagues and third parties. Discrimination and harassment of any kind will not be tolerated.

Eckert & Ziegler undertakes to collect, process and use personal data only responsibly and in accordance with applicable data protection and information laws and to protect it with due care.

#### 2. Principle of sustainability

Eckert & Ziegler is aware of its responsibility of protecting the environment as well as for the health and safety of people. As a contribution to sustainable development, resources are used efficiently. In order to reduce the consumption of energy and raw materials in production and at the same time to limit emissions, all reasonable possibilities of process optimization must be exhausted.

As an international company, we live diversity and place great value on appreciative communication as an important component of our corporate culture. It also means that we, of course, comply with all labor and co-determination laws and regulations of the respective countries and maintain regular, constructive and trusting dialogue with the relevant committees.

Caring for the environment is an important objective of Eckert & Ziegler. With our actions, our processes and our products, we accept our responsibility to people, the environment and the future. From production to disposal of our products, we focus on resource conservation and recycling.

Comprehensive quality management and other regulations ensure that we provide patients with safe, effective and high-quality products.

<sup>1</sup> [https://www.ezag.com/home/about\\_us/locations/](https://www.ezag.com/home/about_us/locations/)

<sup>2</sup> The terms "employee" and "supervisor" are used gender-neutral in the following context. The same applies to terms such as "business partners". A gender-specific disadvantage is by no means intended, the wording is only for better readability. Insofar as the term "employee" is used, it includes the management and executives.

We consciously fulfill our social responsibility and are involved in early childhood science education as well as local, non-profit projects at individual company locations.

### **3. Integrity in business dealings**

It is one of the central themes of Eckert & Ziegler's corporate culture to conduct its business activities in an ethically correct, trustworthy manner and with integrity. This includes, in particular, being honest with ourselves, with our business partners and with our customers. Corruption, bribery and other illegal payments damage the integrity and reputation of our company. The Company expects each of its employees and each of its executives not to accept, promise or grant any benefits (of any kind), to exercise or have exercised unlawful influence on the conduct of the company, a business partner, a public official or a customer.

Any fraudulent, corruptive, collusive or coercive practice is prohibited and will not be tolerated by Eckert & Ziegler. All employees and business partners must follow this principle. Violations regularly result in termination of contractual relationship and prosecution.

Employees can find further information in the Corporate Guideline for compliant behaviour of the E&Z Group and the anti-corruption guideline.

### **4. Fairness in competition**

Offering products and services in a fair and transparent manner is the cornerstone of a functioning market economy. Eckert & Ziegler attaches great importance to providing its customers with only truthful information about its own products and services at all times and to orienting its market behavior in such a way that no unjustified restriction of free competition takes place. The company is convinced that the quality of its products and services must be the only legitimate selling point, so that any unfair competitive behavior is superfluous. Eckert & Ziegler is fully committed to competition by fair means and in particular to strict compliance with antitrust law. It is a fundamental principle of the group of companies that all employees act in accordance with the applicable competition law. Suppliers, agents or other intermediaries are only selected after a careful and objective performance assessment. Unfair practices such as price fixing with competitors, market sharing, boycotts and bogus offers with competitors are strictly prohibited and will not be tolerated in any form. Furthermore, the company disapproves of any form of unfair trade to gain illicit benefits.

### **5. Compliance with laws**

Eckert & Ziegler undertakes to comply with all relevant local, national and international laws. All employees must respect and comply with laws and regulatory requirements. The same applies to internal instructions and guidelines by Eckert & Ziegler. For foreign activities and foreign business, in addition to complying with the laws and regulations that apply there, the main social standards applicable in the country in question must be observed.

### **6. Maintaining equal opportunities in securities trading**

Each employee is required to keep company information that may be relevant to the stock market prices confidential. Such insider knowledge is relevant to stock market prices if informed investors classify it as material in a decision to buy, sell or hold shares. Eckert & Ziegler does not permit its employees any securities transactions in the knowledge of material, nonpublic information. Similarly, no third party may be helped to insider knowledge in securities transactions. The members of the Supervisory Board, the Board of Directors and the Executive Management are obligated to comply with the statutory provisions for the prevention of insider trading. Disclosure obligations must always be observed. Violations of applicable law and insider regulations can have serious labor and criminal consequences for the responsible employee or body.

### **7. Proper file management and reporting**

Transparent and legally sound accounting is of the utmost importance. This covers all aspects of Eckert & Ziegler's financial activities, including all expenses, transactions, and the

reporting and documentation of our business relationships. Operational, accounting-related and quality-related business processes must be adequately documented within the framework of an internal control system. It must be ensured that all necessary documentation is transparent, correct, complete and appropriate.

Reporting on the Company's economic, financial and other situations must be complete and timely in accordance with all applicable laws at all times. Eckert & Ziegler attaches particular importance to keeping its shareholders, business partners, customers and employees well informed at all times. The company sees this task as part of its responsibility in the marketplace.

#### **8. Protecting our knowledge advantage and respecting the intellectual property rights of third parties**

The success of our company is essentially based on special know-how worth protecting. The specific knowledge of our employees as well as the plans and strategies of the company are among the most important assets of Eckert & Ziegler. The company protects particularly valuable knowledge and inventions through patents, trademarks and other protection instruments. Company secrets may not be disclosed to third parties unprotected or even be made public.

Likewise, the property rights of third parties must be respected. The company deliberately refrains from gaining economic benefits through the infringement of third-party intellectual property.

#### **9. Separation of corporate and private interests**

Business and private interests are strictly separated at Eckert & Ziegler. Thus, personal interests must never influence business actions. Any action in the service of Eckert & Ziegler must be purely factual and based on objective criteria so that genuine and unbiased decision-making processes are guaranteed. It is strictly forbidden to misuse corporate resources for personal gain or to influence corporate decisions by private motives. Personal activities that are likely to damage the company or its reputation are to be reported to the supervisor. Likewise, potential conflicts of interest must be disclosed and approval or instructions from the supervisor must be obtained.

#### **10. Cooperation with authorities**

Eckert & Ziegler strives to maintain a cooperative relationship with all relevant authorities. Information should be provided in a complete, open, accurate, timely and comprehensible manner. Representatives of supervisory authorities are always to be treated politely, honestly and respectfully.

If you have any questions, or would like to report a suspicion of misconduct, you can contact the responsible Chief Compliance Officer at any time in either German or English at [compliance@ezag.de](mailto:compliance@ezag.de). Eckert & Ziegler will ensure the anonymity of the employee as much as possible. Alternatively, you can contact directly an external law firm appointed by Eckert & Ziegler:

**Attorney Dr. Hubertus Hoffmann**

**Cyanenstr. 17**

**10407 Berlin**

**Germany**

**Tel. +49 30 96067555**

**Fax +49 30 96067557**

[hh@hubertus-hoffmann.de](mailto:hh@hubertus-hoffmann.de)

[www.hubertus-hoffmann.de](http://www.hubertus-hoffmann.de)

Last revised March 2020