

Code of Conduct Melchers HOME GmbH

03.03.2022

The company management has produced this set of regulations with the help of the Compliance Committee and the Works Council. The aim of these regulations is to ensure that we comply with today's exacting requirements as regards company management in accordance with the relevant standards, rules, and ethical principles within our social environment.

Our business acumen, our absolute focus on our customers and clients and our good reputation are recognized by our customers and partners, in society and both nationally and internationally. We strive to maintain and further improve this excellent position within the market. Even seemingly minor infringements of standards can undermine trust and damage the company.

Every employee is expected to act in accordance with our principles of conduct in order to protect the good reputation of our company, our products and our services both now and in the future.

Organizational measures are in place to ensure that the applicable law, our internal rules and guidelines and the standards recognized by the company are known and complied with. Not only do we want to avoid the risk of liability, criminal proceedings, fines or other financial losses for the company, we would also like to ensure that the company and its employees are perceived in a positive light in public.

Conduct towards each other

All employees have the right to be treated fairly, courteously and respectfully by superiors and colleagues. At our company, employees' working relationships are based on trust, openness and fairness. No one is disadvantaged, favored or discriminated against owing to their race, their skin color, their nationality, their origins, their faith, their gender, their age, their appearance or for other reasons.

Avoiding conflicts of interests

Conflicts of interests can occur if employees, family members or friends are also business partners and thus objectivity could be affected. This can result in decisions not being made objectively in the interests of the company.

Any conflicts of interests and doubts should be reported.



Handling company property

Every employee must handle company property responsibly and protect it against loss, destruction or theft. Equipment, furnishings or other objects belonging to the company should not be used for private purposes or removed from the company premises without explicit permission.

Company secrets

Company secrets and other information not known to the public regarding the company, its customers, suppliers, advisers, or other business partners must be handled in strict confidence and not disclosed to third parties (these include unauthorized company employees). This shall also apply even after an employee's employment has ended.

Gifts

Each employee must keep their private interests absolutely separate from those of the company. In particular, employees must not demand or accept from third parties' gifts or other benefits in connection with business activities – neither for themselves nor for other people – or grant to third parties unjustified advantages.

Gifts, favors, entertainment and other perks may only be accepted or granted if

- they remain within the bounds of typical business practice
- their value is not unreasonably high and
- it can be ruled out that a business or official decision could be influenced as a result – even when subjected to scrutiny.

Under no circumstances should an advantage be accepted in connection with a previous or future business action.

The requirements are particularly strict as regards all persons who work in public administration. In cases of doubt, civil servants, politicians or other representatives of public institutions should avoid accepting entertainment or other perks altogether.

Likewise, the indirect granting of benefits via advisers, intermediaries and agents is forbidden in both the public and private sector if the aim of these benefits is to influence actions or gain advantages.

If employees have doubts regarding the appropriateness of a perk, they should consult their superior or the company management for advice.

Second jobs

Employees must not harm the justified interests of the company by taking on a second job or acquiring shares in another company. This shall apply in particular if our company competes against the other company or has business relations with it. In cases of doubt, these activities should be reported and discussed in advance.

Safety, health and environmental protection

All employees must explicitly observe the laws, regulations and internal instructions regarding plant and work safety as well as environmental protection. In particular,

- each employee shall avoid putting their own health and the health of others at risk through failing to observe the above
- each employee shall do everything possible to prevent accidents and work-related illnesses
- each employee shall bear in mind product and work safety as well as environmental protection when manufacturing, storing, transporting and selling the company's own products and products from other companies and
- each employee shall minimize the company's environmental impact, e.g. by using resources sparingly or disposing of waste in the proper manner.

Data protection

Data protection is the comprehensive protection of all personal data against any form of misuse. Each employee shall respect the constitutionally protected right of all employees and business partners to informational self-determination. Personal data may only be collected if this is necessary for business processes or in order to comply with legal regulations. Each employee shall play an active role in ensuring that personal data are protected reliably against unauthorized access.

Competition-related responsibility

We welcome free and fair competition and are explicitly against agreements or other coordinated actions with competitors as well as suppliers and customers which could restrict, distort or hinder competition. This applies in particular to

- agreements regarding prices, offerings, customer allocation, production and sales quotas or the geographical division of markets and the issuing of sham offers,
- restricting customers in their liberty to set sales prices or maintain supply relationships with other business partners and comprehensive exclusivity obligations and
- treating customers differently without good reason and imposing unreasonable conditions.

Even informal talks, coordinated behavior or casual agreements, which could influence competition should be avoided. Employees should also refrain from any activity or behavior that could give the impression of such conduct.

Donations and sponsoring

Donations for scientific, charitable or other benevolent purposes may be made only in accordance with the laws in force and the applicable internal regulations. Donations, whether in cash, in kind, or in the form of services, to political parties or organizations or persons closely associated or affiliated with them must not be made. All donations must be transparent.

Separate approval regulations apply to sponsoring. If the organizer of a campaign is a charitable or benevolent organization, the approval regulations for donations shall apply. No sponsoring shall be provided for events organized by political parties.

Sanctions in accordance with applicable law

For us, compliance means, first and foremost, putting in place a climate of compliance. Superiors are responsible for ensuring that laws, regulations and agreements are complied with. We will not tolerate infringements of the applicable law.

C. Melchers GmbH & Co. KG actively encourages communication of the group guidelines and agreements on which the Code of Conduct is based. The individual companies ensure that these are implemented. Superiors support and encourage their employees' activities when it comes to implementing guidelines and agreements.

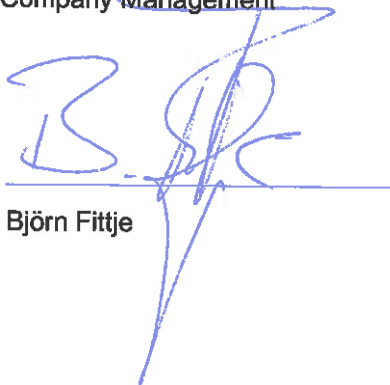
Our managers have a special duty to act as role models. The Code of Conduct is therefore of particularly relevance to them. They are the first people to contact if employees have any questions regarding the regulations and help to ensure that all employees know and understand the Code of Conduct. As part of their management duties, they help to prevent unacceptable conduct and take suitable measures in order to prevent breaches of regulations within their area of responsibility. The trusting and positive working relationship between employees and management can be seen in the honest and open way that information is shared and in the way that they support each other.

Advice and assistance

The Compliance Officer, all superiors and the company management are available to deal with all questions regarding conduct in accordance with these regulations. Any questions that they receive shall be dealt with in confidence.

Bremen, 3rd of March 2022

Company Management



Björn Fittje