

# Code of Conduct for Business Partners of the Branicks Group

## Version management

Version	Date	Revision	Source	Approved by
1.0	15/12/2021	-	DIC	Management Board
2.0	15/12/2022	Substantive addition	DIC	Management Board
3.0	01/12/2023	Substantive addition	Branicks	Management Board
3.1	01/04/2025	Change of Compliance Officer	Branicks	Management Board



## Introduction

We can only live up to our maxim of “We shape our business with and for the people” if our business partners abide by the same high legal and ethical standards, and if these are embedded in our entire supply chain.

The following rules shall serve as foundation for any collaboration that the Branicks Group of companies enters into with third parties. Business partners of the Branicks Group are obliged to comply with these regulations and, in turn, to impose them on their own business partners, including their suppliers, sub-contractors or similar.

## 01 Law and Responsibility

Applicable laws and regulations must be adhered to. The same is true for generally accepted international standards of social and environmental responsibility as well as for international human rights conventions, including existing laws to prevent child labour, forced labour and discrimination.

## 02 Fairness and Workers' Rights

The applicable health laws and occupational health and safety laws, other labour law provisions as well as the provisions of social security law shall all be adhered to.

This includes, in particular, the obligation to pay the minimum wage in accordance with the German Minimum Wage Act (Mindestlohngesetz - MiLoG) and to comply with the maximum working hours in accordance with the German Hours of Work Act (Arbeitszeitgesetz - ArbZG). Our business partners shall uphold the freedom of association and the right to form interest groups. This means they shall grant their employees, within the boundaries of national laws and regulations, the right to defend their interests.

Our business partners shall guarantee their employees fair working conditions that let them live dignified independent lives and acceptable living conditions. Unethical or illegal working conditions (e.g. harassment, physical or psychic violence, forced labour,



undeclared work, child labour, human trafficking) in any form must be avoided. Employees must be treated in a dignified and respectful manner, while their privacy should be protected and their personality rights be honoured.

Business partners shall make every effort to prevent discrimination, unfairness or undesirable behaviour, especially when motivated by reasons of race, ethnic origin, gender, religion/belief, disability, age or sexual identity.

Business partners shall also uphold current human rights standards.

## 03 Avoiding Insider Trading

Business partners who obtain insider information in the course of their collaboration with the Branicks Group must be aware of their responsibility, pledging to maintain particular confidentiality and to exercise particular restraint. They shall adhere to any applicable regulation of insider law. In particular, they shall comply with the statutory prohibition of insider trading.

## 04 Data Protection and Confidentiality

Business partners who obtain confidential information in the course of their collaboration with the Branicks Group are prohibited from disclosing such information to any third party. The foregoing shall not apply if the business partner is obliged to disclose such information due to statutory regulations or on the grounds of an enforceable official or judicial order, or if the Branicks Group expressly permits the disclosure.

Company and business secrets should be treated as such, and all applicable protection laws be adhered to. Personal data in particular shall be processed exclusively for a specific purpose, plausibly, with due care, and in accordance with the applicable data protection laws.

Disclosure of the cooperation with the Branicks Group to third parties as a reference or for other advertising purposes is only accepted with the prior, express consent of the Branicks Group, which can be revoked at any time for good cause.



## 05 Avoiding Collisions of Interest, Corruption Risks and Money Laundering; Competitive Behaviour

Business partners shall be committed to fair, free and undistorted competition, and shall strictly reject corrupt practices as well as any violation of antitrust law requirements. Specifically prohibited are collusive agreements with competitors and concerted practices for the purpose of preventing, obstructing or distorting competition.

Business and personal connections of business partners to employees of the Branicks Group shall be made transparent whenever they could potentially cause conflicts of interest.

Neither corruptive behaviour of any kind nor the abuse of entrusted decision-making powers will be tolerated. No private interests, nor the interests of any third party, may influence business actions.

The business partners refrain from promising or granting any kind of advantages to employees of the Branicks Group and to persons or organisations close to them, as doing so could already be interpreted as intended to improperly influence business decisions. This is particularly relevant whenever business decisions are imminent.

Money laundering is not facilitated or tolerated in any way, and all statutory regulations to prevent money laundering shall be adhered to.

## 06 Environmental Protection

All applicable environmental protection laws, regulations and standards shall be complied with. Business partners shall ensure that materials intended for delivery to the Branicks Group are not obtained or manufactured in an illegal or unethical manner.



## 07 Reporting Violations and Consequences

To ensure a prospering business relationship, breaches of this Business Partner Code of Conduct should be reported as soon as they are detected.

In the event of concrete evidence for breaches of this Business Partner Code of Conduct, employees of the Branicks Group are instructed to report to their superiors or to the company's compliance officer.

Conversely, if concrete evidence of misconduct by employees of the Branicks Group comes to light, we ask our business partners to report it to the Branicks Compliance Officer.

Alternatively, you may contact the Compliance Officer anonymously via EQS Group's online whistleblowing system SAFE CHANNEL (accessible via <http://www.branicks.com/unternehmen/values-compliance/>).

In the event of a report in which the Compliance Officer or his/her deputy is affected as a party to the case, the SAFE CHANNEL whistleblower system offers the option of reporting this information without notifying them.

Contact details of the Branicks Compliance Officer:

Lea von Wahlert  
Branicks Group AG  
Neue Mainzer Strasse 32-36  
D-60311 Frankfurt am Main  
Phone: +49 69 9454858-1465  
E-mail: [compliance@branicks.com](mailto:compliance@branicks.com)

Contact details Deputy Compliance Officer of Branicks:

Eva Stegmayer  
Branicks Institutional GmbH  
Neue Mainzer Straße 32-36  
60311 Frankfurt am Main  
Phone: +49 69 9454858-1237



The Branicks Group expressly points out that a violation of this Business Partner Code of Conduct may prompt an immediate termination of the business relationship and the assertion of claims for damages.

## 08 Monitoring

The Branicks Group reserves the right to monitor compliance with this Business Partner Code of Conduct.

The Management Board of Branicks Group AG