

Code of Conduct

of Neovendi GmbH

Neovendi GmbH

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- ✓ **Comply with all applicable laws and regulations that govern our business worldwide.**
- ✓ **Be honest, fair and trustworthy in all of your business activities and relationships at all times.**
- ✓ **Avoid conflicts of interest between your working life and private life.**
- ✓ **Create a working atmosphere in which fair working conditions prevail for all members of the Neovendi community.**
- ✓ **Care for a secure working place and protect the environment always.**
- ✓ **As a leader, create a working climate in which our employees acknowledge, value and practice ethical behavior.**
- ✓ **Protect entrusted data.**

Preamble

All employees, representatives and members of the management as well as the shareholders of Neovendi GmbH are bound to the regulations of this code of conduct and the company policy. This company policy sets out the values, principles and procedures that determine the corporate activities of Neovendi GmbH. The aim of the company management is to adhere to ethical standards and to create a working environment that supports integrity, respect and fair behavior. A business policy that is strictly adhered to the law and principles serves the long-term interests of the company.

Neovendi GmbH stands up to the diversity of society, languages, cultures and lifestyles. We respect and support this diversity because it is a guarantee for the proximity to society, to the customer and for good and new ideas. We do not tolerate any discrimination of persons, in particular on the basis of their descent, religion, sexual orientation, nationality, origin, political or trade union activity or on the basis of their age, gender or disability. [We want to be continuously measured against our values and guidelines in order to continuously improve ourselves.](#)

Conflicts of interest

Neovendi GmbH expects loyalty to the company from its employees.

All employees must avoid situations in which their personal or financial interests' conflict with those of the Neovendi GmbH. Therefore, it is in particular prohibited to acquire interests in competitors, suppliers or customers or to enter into business relationships with them in a private environment if this could lead to a conflict of interest. The interests of Neovendi GmbH may not be impaired by conflict situations.

Such conflicts of interest can arise in many situations: For example, no employee may accept advantages - in any form whatsoever - which, from a reasonable point of view, can be expected to influence business decisions or transactions of Neovendi GmbH. Invitations must remain within the limits of customary business hospitality. Due to their position at Neovendi GmbH, employees should not gain personal advantages directly and/or indirectly through access to confidential information. All employees have the duty to promote the legitimate interests of Neovendi GmbH as far as possible. Any competitive situation with the company is to be avoided.

We avoid situations in which personal or own financial interests collide with the interests of Neovendi GmbH or our business partners. In conflict situations the interests of Neovendi GmbH must not be affected. The compatibility of family and career remains unaffected.

Any actual or potential conflict of interest must be reported to the management or the ombudsman and discussed with the respective superiors.

Conduct towards competitors, public officials and business partners

The Neovendi GmbH sees itself in the duty to act economically, socially and environmentally conscious. Neovendi GmbH therefore strives to conduct its business competently and ethically and to protect fair competition in all markets in which it operates by complying with applicable laws on cartel prohibitions, competition and restraints of competition. Unfair advantages over customers, suppliers or competitors must be avoided.

Neovendi GmbH addresses the needs of customers, suppliers and business partners and treats them honestly, responsibly and fairly. Neovendi GmbH does not tolerate corruption or other unfair business practices among employees, or third parties commissioned by us. Incentives, privileges or benefits that could impair the ability to make objective and fair business decisions are neither offered nor accepted by us or third parties engaged by us.

Tangible and intangible contributions of any kind to employees or agents of governmental institutions or their relatives are strictly prohibited. Contributions of any kind to political parties, their representatives as well as to holders of political office and candidates for political office are also strictly prohibited.

We expect our business partners to base their business activities on the principles formulated in this Code of Conduct. The cooperation with our business partners is characterized by a fair, trusting and stable partnership.

Remuneration of consultants, agents and intermediaries must be in reasonable proportion to the services rendered and may not be used to grant undue advantages to business partners.

We comply with the relevant competition law requirements and do not enter into any agreements and arrangements that influence prices and conditions or otherwise restrict fair competition in an inadmissible manner.

The allocation of a donation must always be transparent and documented. Donations may only be made on a voluntary basis and without expecting anything in return. Sponsoring measures may not serve any covert promotion of interests. Donations to political parties and religious communities are generally not permitted.

Prohibition of corruption

Neovendi GmbH is against corruption and bribery. We will not tolerate conduct in which business is conducted with unfair means. Employees of Neovendi GmbH may not offer business partners any benefits or receive or accept from them any benefits that could lead or even appear to lead to an impairment of an objective and fair business decision.

Neovendi GmbH takes all necessary measures to prevent money laundering within its sphere of influence.

Compliance with laws and other regulations national as well as abroad

In all business decisions and actions Neovendi GmbH endeavors to comply with the applicable laws and other relevant regulations in Germany and abroad. Integrity and honesty support fair competition, also in the relationship with our customers and suppliers.

Fair working conditions

All employees of Neovendi GmbH have to ensure a safe and healthy environment. Therefore, safety regulations and practices must be strictly observed.

As a socially responsible employer Neovendi GmbH considers its employees to be of great value. It demands great commitment from its employees and in return shares its business success with them. The personnel policy of Neovendi GmbH contributes to offering each employee the opportunity for professional and personal development. Open exchange of opinions, criticism and ideas are encouraged.

We are committed to the principles of sustainable management and to environmental protection as a corporate value. We promote appropriate measures for dealing with relevant environmental impacts.

The safety of our employees and customers is our top priority and is one of the central values of Neovendi GmbH. Together we ensure a safe working environment and the safety of our products.

Neovendi GmbH condemns illegal discrimination or harassment of any kind.

Dealing with internal knowledge

All employees of Neovendi GmbH are obliged to ensure a fast and smooth exchange of information within the company. Information is to be passed on correctly and completely to the departments concerned, unless in exceptional cases there are overriding interests, in particular due to confidentiality obligations. Relevant knowledge may not be unlawfully withheld, falsified or selectively passed on.

Dishonest reporting within the company or to organizations or persons outside the company is strictly prohibited. All annual financial statements and annual reports, business papers and books of Neovendi GmbH must accurately present business transactions and transactions and comply with legal requirements as well as the accounting principles and internal accounting procedures of Neovendi GmbH.

Handling of assets

All employees of Neovendi GmbH are responsible for the proper and careful handling of company property. Every employee is obliged to protect the property of Neovendi GmbH against loss, damage, misuse, theft, misappropriation or destruction. Every employee is obliged to inform his or her superior immediately of any use of assets contrary to the above.

Confidentiality and data protection

A large part of the business information of Neovendi GmbH is confidential or legally protected, so that a duty of confidentiality exists. This does not apply if publication of the information has been approved by Neovendi GmbH or is mandatory due to laws or regulations.

The obligation to maintain secrecy applies in particular to intellectual property. This includes trade secrets, patents, trademarks and copyrights, but also business and marketing plans, drafts, business papers, salary data and all other non-published financial data and reports.

All personal information about employees, customers, business partners and suppliers as well as other third parties will be used carefully and treated confidentially within Neovendi GmbH in full compliance with the data protection laws. Any documents, data and information entrusted to us by customers, business partners and suppliers are to be treated with special care and, if necessary, strictly confidential. The protection of this information must be fulfilled with the utmost care.

Implementation and monitoring

The rules contained in this Code of Conduct form a core element of the corporate culture of Neovendi GmbH. Uniform compliance with these principles is indispensable. Every employee is responsible for this.

If an employee has any concerns or complaints regarding the points listed in this Code of Conduct or has knowledge of a possible breach of the Code of Conduct contained herein, he/she should immediately report this to his/her superior for clarification. This may also be done anonymously or in a confidential manner. If an employee is not satisfied with the resolution, he or she may raise the concern or complaint not only with his or her supervisor, but also with the Legal Department, Human Resources, or management. Neovendi GmbH does not permit reprisals based on complaints made in good faith under this Code of Conduct.

Environmental protection, health and safety

Neovendi's goal is to create a safe and healthy working environment and to avoid environmental damage or negative effects on the environment and the local environment in which Neovendi operates. This is the responsibility of the management as well as all employees and Neovendi representatives, regardless of their function.

Suppliers where unsafe working conditions, violations of environmental protection standards exist/are known or who employ minors or forced laborers are excluded as suppliers.

Take appropriate measures to prevent accidents and illnesses in the workplace and to ensure safe and healthy working conditions.

Reduce, as far as reasonably practicable, the use and release of toxic and harmful substances, prevent pollution and maintain or recycle materials.

Consider continuously developing the working practices of your work environment, the relevant regulations and, in general, the social awareness of the issues mentioned above.

If you become aware that current practices are unsafe or constitute violations of health, safety or environmental laws, regulations and policies, report the issue to your supervisor and management immediately (no later than 24 hours) on a non-discriminatory basis.

Responsibility

All employees, representatives as well as the members of the management and all shareholders of Neovendi GmbH are bound by the rules of this Code of Conduct. Violations of this Code of Conduct will lead to consequences. In serious cases this may lead to termination of employment.

[This code of conduct and guidelines are also company goals by which we all measure ourselves and work to continually improve.](#)

Your corporate management:

Georg Holtmann
Managing Director, COO
Neovendi GmbH

L. Heinrich Möllmann
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Neovendi GmbH