

Foreword

Esteemed employees of EHG,

This code of conduct sets out the fundamental principles governing our conduct and proper business actions within the EHG Group.

It is a reflection of our corporate values; at the same time, this code of conduct forms the basis of relations with our partners and the general public.

The principles of this code apply to all executives and workers at EHG – hereinafter referred to as "employees".

Our code of conduct does not absolve anyone of their personal responsibility. We expect our employees to take decisions in a responsibly-minded and considerate manner. Honesty, reliability and integrity are key cornerstones of our activities.

No employee may use their position to derive benefits for themselves. By the same token, no conduct that goes against the principles of this code of conduct may be promoted or tolerated.

We also expect our suppliers and other people working for EHG to apply the principles of this code of conduct in how they behave.

Stefan Girardi

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Markus Lutz



Art. 1 Compliance with laws and regulations

Each employee must comply with all valid laws, regulations and internal instructions applicable to their area of work and fulfil all obligations arising therefrom.

Art. 2 Employees

Our employees are the foundation of our success. In order for their strengths to unfold, we create a working environment that fosters this appreciation and promotes integrity.

Fairness, respect, team spirit and openness characterise the cooperation with line managers, colleagues and employees. We do not tolerate discrimination or harassment. Our employees are selected, assessed and promoted regardless of age, origin, sex, race, religion, physical constitution, sexual identity or political commitment.

We respect the private sphere of our employees.

These principles also apply to conduct vis-à-vis external partners.

Art. 3 Safety and sustainability for people and the environment

EHG complies with labour laws and works together with the employees to ensure a healthy and safe working environment. The provisions on occupational safety must be observed. Every employee is jointly responsible for the safety in their area and the safety of their colleagues. Another contributing factor is that EHG erects and operates production facilities exclusively within the framework of the licensing requirements.

Natural resources are protected. We make use of ways to reduce consumption of raw materials and energy or to cut emissions as far as these exist.

When selecting business partners, not only are commercial aspects considered but also environmental and social criteria. Anyone who violates environmental requirements, exploits employees, permits child labour or operates in legal grey areas, shall not be accepted by us as a business partner.

Art. 4 Protection of own and third-party property

EHG provides its employees with all the necessary resources to perform their work.

These material and intellectual resources – such as buildings, installations, equipment, vehicles, inventories, funds, software and know-how – are the property of EHG.

This property is to be treated with respect by every employee and protected against loss, theft and misuse. All employees are requested to protect data and business documents against the unauthorised access of third parties. IT security, data security and data protection have a high priority for us.

As a basic principle, the property of EHG may only be used for business purposes. Private use of EHG property without the consent of the superiors is prohibited.

Each employee undertakes to treat all business information of EHG or a business partner of EHG that has not been publicly disclosed with confidentiality, and to ensure that such information is not made accessible to third parties under any circumstances, even inadvertently.



We undertake to respect and protect the material and intellectual property of third parties to the same extent as the property of EHG.

Art. 5 Integrity and transparency

Employees of EHG shall avoid any conflict of personal interests with those of the company. Accordingly, situations in which private interests or personal relationships conflict with the interests of EHG must be prevented. Should an actual or potential conflict of interests arise, the employee must immediately report this to their line manager.

Above all, employees, whether themselves or via third parties, are not supposed to maintain their own supply or service relationships with competitors, suppliers or customers. Even the intention to start another employment relationship or an active entre-preneurial activity is only permissible after consultation with the line manager.

Art. 6 Independence – Giving and accepting gifts

We make our decisions freely and independently, without allowing any form of dependency to develop.

Invitations by business partners to events or business meals are only made or accepted if there is a business purpose. The invitation must be commensurate with the relationships with this business partner and may not exceed the boundaries of standard hospitality. Gifts from business partners must be within the limits set by law, as well as appropriate in nature and scope.

We do not give or accept gifts that are intended to have a specific influence on the awarding of a contract. This also applies if such gifts would only give the impression that influence was attempting to be exerted.

Art. 7 Open and fair competition

EHG is committed to free and fair competition.

We comply with antitrust and trade laws, competition law and laws on consumer protection. Illegal collusion with competitors and other violations of competition laws are unacceptable to EHG.

Art. 8 Attitude towards customers and suppliers

EHG is committed to adopting a fit and proper attitude towards its customers and suppliers. Customers and suppliers are selected solely on the basis of objective and transparent criteria.

Art. 9 Corruption/bribery

Active relationship management is part of our business success. However, we do not operate in legal grey areas, nor do we act in improper ways. We achieve our commercial targets solely on the basis of the quality and performance of our services.

Sales are not supported with gifts, donations, bribery or corruption. Bribery is illegal in business and vis-à-vis officials.

Only the management of EHG decides on donations and sponsorships which go beyond locally limited and temporary activities, as well as on minor donations.



Art. 10 Transparent financial management

Customers, business partners, banks, financial authorities, and our shareholders rely on the accuracy of our accounting and financial reporting.

As a matter of course, all of EHG's transactions and business activities are properly recorded and displayed in EHG's accounts in accordance with the applicable laws and accounting standards. Records and documents must be kept with an appropriate degree of detail and in accordance with EHG's internal control system.

Notes and files must be kept in such a way that auditors and financial authorities can understand their contents at any time.