



Herba Gruppe

## Code of Conduct of Herba Group

This document applies to the affiliated companies of  
Herba Chemosan Apotheker-AG in Austria, Switzerland and the Czech Republic.

Published: April 2022

**#itstartswithme**

# Message from the Executive Board

**Dear employees,**

Our company's mission is to provide optimal business development for our partners, and exceptional health care for their customers. As we expand our market presence, we must not forget that integrity knows no boundaries. Correct conduct in business has always been a cornerstone of our corporate culture. For our long-term success, it is fundamental that we adhere at all times to the highest ethical standards in everything we do.

This Code of Conduct provides important guidelines on how to interact with customers, business partners and each other. The Code is based on our common values, which guide us in all our decisions and actions. Please take the time to familiarize yourself with and assimilate the Code. Always remember: the integrity of our company starts with you. If you have any questions at any point, or are ever unsure how to behave, see the "[Recommendations for Action](#)" section of the Code for who to contact.

Thank you for all you do to help us fulfil our mission of optimal healthcare for everyone.

Sincerely,

The Executive Board of Herba Chemosan Apotheker-AG

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# OUR SHARED VALUES



# OUR SHARED VALUES

Everything we do is based on our shared values. These values are the crucial elements that unite us across all business areas and locations. These values form the basis of our corporate culture. They enable us to set a positive example through our behaviour towards our interest groups, including customers of the Herba Group, business partners, shareholders and each other.

## INTEGRITY

When making decision both big and small, we are guided by our clear ethical principles.

### For us, integrity means:

- We work with our customers, colleagues and suppliers in an open, fair and honest manner.
- We stand by our commitments.
- We treat confidential information and sensitive topics with due discretion.
- We address actions that are or appear to be unethical.

## CUSTOMERS FIRST

For us, the focus is on the customers. Our success is reflected in their success.

### For us, customers first means:

- We build and maintain close relationships with our customers.
- We are always available for our customers.
- We anticipate the needs, priorities and expectations of our customers.
- We develop ideas and respond to feedback to continuously improve the satisfaction of our customers.

## RELIABILITY

We take responsibility – towards our customers, suppliers and colleagues – and commit to the promises we make.

### For us, reliability means:

- We foster trust among our customers by keeping our promises.
- We take individual responsibility for the decisions we make to benefit our customers.
- We act when concerns, problems or obstacles arise.
- We encourage others to perform at the highest level.

## RESPECT

We treat each other, as well as our customers and suppliers, with dignity, prudence and openness.

### For us, respect means:

- We ensure an environment in which fairness and personal dignity are valued.
- We build resilient relationships based on trust, and honest communication.
- We value diversity of languages, cultures, ideas, opinions and skills.
- We respect people's time and ideas, irrespective of their position.

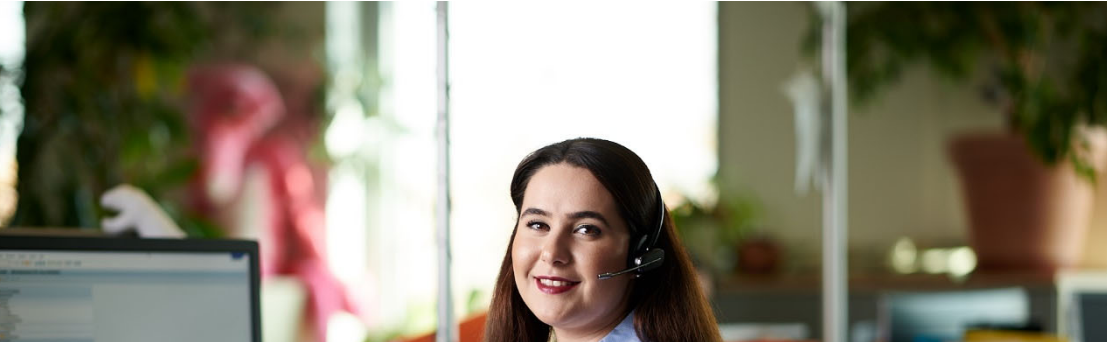
## EXCELLENCE

We exceed our customers' and our mutual expectations.

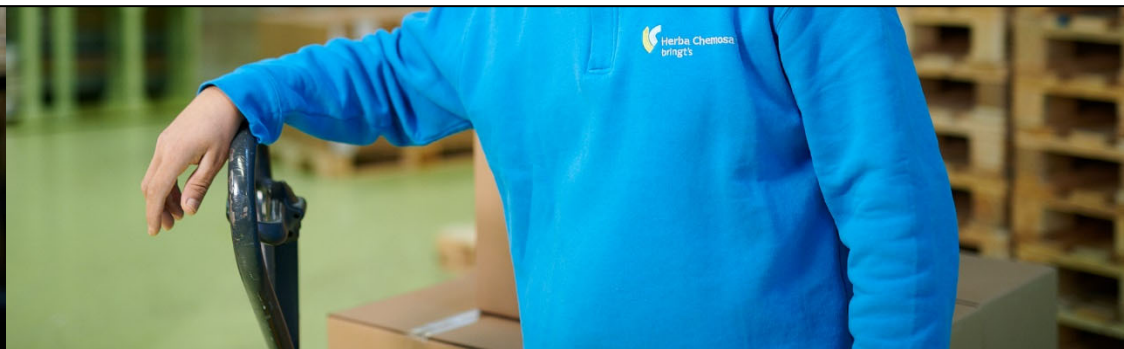
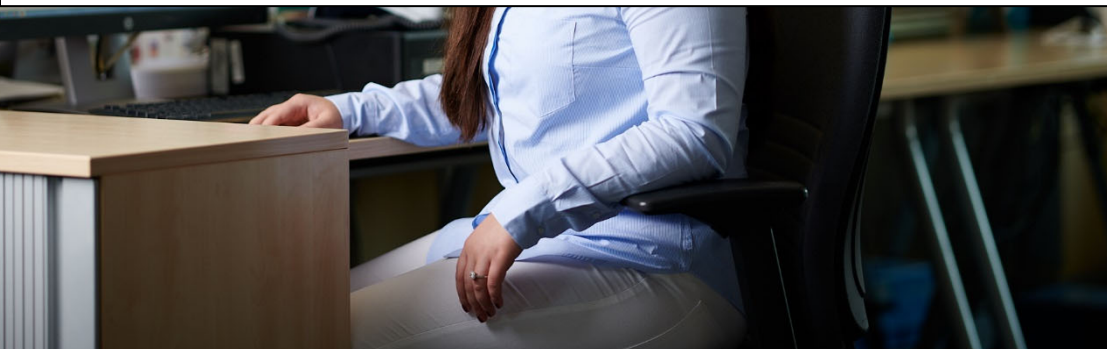
### For us, excellence means:

- We accept only the best.
- We are not satisfied with the phrase "this is the way it's always been done".
- We act with a focus on success and results.
- We anticipate problems, and proactively get involved to find solutions.
- We strive to expand our knowledge and acquire new skills.





## OBJECTIVES AND SCOPE OF OUR CODE OF CONDUCT



# OBJECTIVES AND SCOPE OF OUR CODE OF CONDUCT

## Objectives and scope

We conduct our business honestly and ethically. This attitude strengthens our company and ensures us the support of those who rely on our work. This Code of Conduct (the "Code") describes the basic principles, internal policies and procedures by which we conduct our work. Like our corporate values, the Code is an element that binds us all together.

It is a valuable instrument that enables us to make ethically sound decisions every day, as well as in difficult situations.

We comply with all applicable laws – no matter in which country we operate. Consequently, this Code is also subject to national legislation. National laws or guidelines may sometimes be stricter or less restrictive than our Code. In such cases, the stricter rule always applies. In the event of a conflict, contact your Compliance Officer or the Legal Department. As employees, we are obliged to read and understand our Code and the guidelines relevant to our current activities. However, the Code cannot regulate every conceivable situation.

In case of uncertainty, it is therefore essential that we consult our guidelines or ask for clarification.

It is also important that we **report every** identified (or suspected) unlawful or unethical behaviour, as well as violations against our Code or other local policies and applicable laws.

## To whom does the Code apply?

This Code applies to all employees and managers of the Group – regardless of the type and duration of their employment. Our business partners are also expected to share our values and commit to conducting business with integrity.



Always remember:

It is our responsibility to comply with the Code, company policies and applicable laws. Violations can have serious consequences, depending on the legal situation, including disciplinary measures and even the termination of employment. If you have any questions or concerns about a rule, regulation, internal policy, or law that may be related to your work, ask before you act.



# OUR RESPONSIBILITY





# OUR RESPONSIBILITY

## Fair and honest business conduct

In addition to our guidelines, procedures, standards and contact points within the company, our Code helps us to identify the right path in difficult situations.

### ASK YOURSELF:

Is what I am doing compliant with internal policies and laws?

Do my actions reflect our corporate values – integrity, reliability, and respect?

Am I acting honestly towards all those involved?

Would I be uncomfortable if the press learned what I did?

To what extent could others be affected by my decisions?

## Our responsibility to raise concerns

It is important to raise concerns. This applies to violations of the Code, corporate policies and procedures, as well as the law. If you are asked to commit or are aware of any unlawful or unethical act, you should report it immediately. Our company has an open ear for you and takes your information seriously – you can be assured that we will investigate your concerns promptly and in detail.

Concerns must be expressed in good faith, which means that you may express any suspicion that you consider to be true, even if the corresponding decision later proves to be lawful. We do not tolerate any negative measures for expressing concerns and questions or for participating in investigations as long as this is done with good intentions.

## WHAT IF...

... I contact the Compliance Helpline/Ombudsman's Office (see page 10 of this Code) with a request or a question?

The Compliance Helpline/Ombudsman's Office forwards your information to the responsible department in the company, which checks it and - if necessary - follows up.

# OUR RESPONSIBILITY

## Recommendations for employees of the Herba Group

If you have any questions or concerns, please contact:

- the Executive Board or the Management Board
- your manager
- the Compliance Officer (Mag. Thomas Schellander, by phone on Ext. 1521 or by email to [compliance@herba-chemosan.at](mailto:compliance@herba-chemosan.at))
- the Legal Department
- the Human Resources Department (Mag. Claudia Bliem, by phone on Ext. 1534 or by email to [claudia.bliem@herba-chemosan.at](mailto:claudia.bliem@herba-chemosan.at))
- the Compliance Helpline/Ombudsman's Office

## The Compliance Helpline/Ombudsman's Office

- The Ombudsman's Office is an independent third party where concerns can be reported anonymously if desired.
- The Ombudsman's Office can be contacted 24/7, with support available in various languages.
- The Ombudsman's Office can be reached free of charge on 00800 – OMBUDSMANN or 00800 – 66283762, as well as by fax on +49 (0)521 557333 – 44, or by email at: [ombudsmann@thielvonherff.com](mailto:ombudsmann@thielvonherff.com)
- An electronic reporting platform of the Ombudsman's Office can be found at: <https://report-tvh.com/>
- Detailed contact details can also be found on the intranet.

# OUR RESPONSIBILITY

## Support in investigations

We undertake to immediately follow up on any information we receive. In the case of in-house investigations, it is important that all necessary information is provided. Please always make precise statements. Refrain from providing untrue or misleading information and from causing others to do so.

Government agencies may also request information from or about our company. If you are contacted by an external investigator, please notify the Legal Department or your Compliance Officer immediately.

If you are informed by your Legal Department, Compliance Officer, or executive that documents in your possession are to be retained or investigated, follow these instructions and back up the documents. Under no circumstances may you destroy, withhold or in any way modify the relevant documents.

## The Duties of a Leader – Leading by Example

Managers are particularly obliged to lead by example and to embody and promote correct behaviour. This is an integral part of their leadership role. They should regularly talk to their direct reports about the importance of integrity in the workplace. Furthermore, it is also important:

- To understand the Code and the internal guidelines, and to disseminate their content.
- To be a role model through one's own correct behaviour.
- To show your employees that they can come to you with questions and concerns, listen to them attentively, and respond appropriately.
- To refrain from taking negative measures against employees who express concerns in good faith.



Always remember:

If you have the impression that you or someone else in our company is experiencing a negative measure, you should immediately report this to one of the bodies listed in the [Recommendations for Action](#) (see page 10 of this Code).



**WE ACT FAIRLY AND HONESTLY IN THE MARKET**



# WE ACT FAIRLY AND HONESTLY IN THE MARKET

## Honesty in marketing and sales

Our marketing and sales behaviour reflects our values and is a prerequisite for our success. The following principles must be observed in all marketing or sales activities towards our customers:

- Always behave with integrity. As a representative of our company, you are expected to maintain our reputation as a trustworthy business partner.
- Make only true, accurate statements about our company's products and services.
- Talk about the benefits of our own services and products instead of belittling those of our competition.
- Avoid misleading or unfair comparative advertising.

## Service and product quality

Our company enjoys a reputation for providing excellent services as well as high-quality and safe products. To maintain this reputation, we adhere to quality and safety standards. These include applicable laws and regulations as well as internal procedures that ensure the safe handling, distribution, and production of high-quality goods.

We also hold our suppliers accountable to ensure the quality of the products and services they provide to us. If you notice anything that could jeopardize our reputation for quality, raise it immediately.

# WE ACT FAIRLY AND HONESTLY IN THE MARKET

## Marketing and sales to people working in the health sector

We respect the relationship between patients and care companies/organizations, as well as their medical decisions. We also believe that everyone should receive reasonable reward in return for providing health-related goods and services. To ensure this, a variety of laws have been passed to prevent fraud, waste and abuse in healthcare. We comply with these laws by refraining from offering benefits such as gifts or hospitality which could unfairly influence the decisions of healthcare professionals.

When people working in the healthcare sector provide services to our company, we pay them the standard market rate for their work, taking into account all legal framework conditions. We ensure that the decision on the use of services by persons working in the health sector and on the amount of the corresponding remuneration is not intended to influence their purchase decision in an unfair manner.

For further information, please contact your Compliance Officer.



Always remember:

What is permissible in the commercial business environment may be inadmissible in dealing with public sector clients or people working in the health sector. This also depends on the respective legislation and legal jurisprudence. These activities are subject to complex laws and regulations, and often involve various supervisory authorities. For more information, contact your Compliance Officer.



# WE ENTER THE MARKET FAIRLY AND HONESTLY

## WHAT IF...

... I would like to invite potential customers to lunch?

There may be legal restrictions regarding hospitality extended to people working in the health sector, or to other business partners. We want to avoid any appearance of obligation or undue influence on potential customers. For more information, contact your Compliance Officer, or check to see if other local policies apply.

## Marketing and sales to government agencies

We value fair competition when we supply public clients with goods and services – whether at federal, state or local level. There are a variety of laws designed to protect the integrity of public procurement, from acquiring new customers and bidding, to negotiating contracts and building relationships with public servants, to correct accounting and reporting, and hiring former government employees.

When doing business with public contractors, we are fully committed to following our company's internal policies and applicable laws to prevent dishonest influence and abuse. For example, there are restrictions on giving gifts, hospitality, and extending inviting to public servants. For further information, please contact the Legal Department or your Compliance Officer, or read the applicable anti-corruption policy.



Always remember:

We have a special responsibility to ensure that integrity is maintained when providing health services to public clients. Be sure to fully comply with all applicable laws, regulations and existing internal guidelines when dealing with government agencies and their employees.

# WE ACT FAIRLY AND HONESTLY IN THE MARKET

## Corruption

We do not tolerate any form of corruption or bribery within the scope of our business, either by our employees or by third parties acting on our behalf. We refrain from promising "something of value" to public officials, employees or representatives of our business partners in commercial enterprises which might influence them in an unfair way. Furthermore, we do not accept anything of value, that might give the appearance of unfair influence. We also expect our business partners and other third parties acting on our behalf to ensure that they comply with all laws and standards to combat corruption and bribery. This particularly includes third parties who interact on our behalf with customers or officials.

You must not instruct any third person or entity to do anything prohibited by this Code. Nor may you hire consultants or intermediaries who you believe could attempt corruption or bribery. If you plan for a third party to have contact with customers or officials on our behalf, discuss this with your Compliance Officer in advance.



### Keywords

"Public official" in the broader sense is not only defined as ~~persons~~ a person holding public office. The term can also include employees of federal or state governments, municipalities, chambers, international organizations or even public institutions, such as doctors in public hospitals or professors at state universities. Judges, employees of health or supervisory authorities and military personnel can also be included – in short, any employee in the public sector. Functionaries of political parties or candidates for public office are also considered public officials.



### Always remember:

The term "something of value" is broad, and can include things such as cash, gifts, hospitality, entertainment, vouchers, travel expenses, donations, loans, and job offers.

# WE ENTER THE MARKET FAIRLY AND HONESTLY

## WHAT IF...

... you are at a trade fair and a sales representative from a competing company operating in your territory invites you to lunch to discuss a distribution opportunity that would "benefit both sides." How should you react?

Before accepting the invitation, consult with the Legal Department or your Compliance Officer.

### Fair competition

We value a market in which we compete with high-quality services and products at a fair price. Our business is governed by laws designed to ensure fair and open competition. These laws prohibit discussing, coordinating or entering into agreements with the competition to jointly set prices, allocate sales and market opportunities, coordinate or manipulate tenders, exclude (or boycott) suppliers or customers from business, or limit distribution channels in any other unfair manner.

Contact the Legal Department if there is any possibility that your behaviour might give the impression that our company is unfairly exploiting a dominant market position to influence competition. In addition, you should consult with the Legal Department before joining an interest organization or standard-setting organization, or negotiating (with competitors, customers, or suppliers) a joint venture agreement or cooperation.

### Analysis of fair competition

We value fair, open competition, and collect information exclusively by legal and correct

means. For example, we refrain from obtaining information about our competitors through deception, manipulation or false pretenses. When new employees move to us from a competing company, we are happy about the growth, but do not try to elicit confidential information about their previous company.

If you are uncertain, or have any concerns related to information about competitors, ask your Legal Department or Compliance Officer for advice.



# WE ACT FAIRLY AND HONESTLY IN THE MARKET

## Political commitment

We attach great importance to working in an environment in which every individual is free to express their political opinion. Under certain circumstances, the personal political commitment of employees and their relatives may be attributed to the company. Such exposure may be subject to certain limitations and reporting obligations. For these and other reasons, it is important that you do not use corporate time or resources for your personal political activities. You may not claim or imply that the company promotes, directs or supports your personal political activities.

Our company completely refrains from political donations. However, the company shall ensure that our views on matters relating to our business or our clients are brought to the attention of the government and policy-makers in an appropriate, transparent and effective manner.

There may be laws at the federal, state, and local levels that prevent dishonest interference with public servants or limit the company's involvement in political processes.

## International trade

We are proud to source and distribute quality products and services in numerous countries around the world. To protect and promote fair and safe international trade, many countries have laws that regulate where, when and how we can import or export our products. These complex laws are often also subject to corresponding licensing and documentation, as well as embargoes and international boycotts.

For more information, contact your Compliance Officer or check to see if other local policies apply.

## WE MAINTAIN RESPECTFUL RELATIONSHIPS



# WE MAINTAIN RESPECTFUL RELATIONSHIPS

## Prevention of harassment in the workplace

It is important to us to offer our employees a workplace free of harassment. Harassment can take different forms depending on the situation, and create or promote an aggressive, intimidating or tense working atmosphere. This will not be tolerated. Harassment can include verbal, physical, visual, or written actions, as well as bullying. Harassment includes, for example:

- Inappropriate, degrading or offensive jokes, comments or other messages
- Unwanted physical contact
- Threats
- Suggestive images, statements or actions

Anyone who is exposed to or observes any form of harassment should raise the matter immediately. Harassment can be reported to the bodies listed in the [Recommendations for Action](#) section (see page 10 of this Code). Our company does not tolerate any negative measures against people who express concerns with good intentions.

For further information, please contact your HR department or your Compliance Officer.

## WHAT IF...

... it bothers me that a colleague regularly touches my shoulder when greeting me in passing? How should I react?

If it does not cause **you** too much discomfort, talk to the person about it and ask them to refrain from the unwanted behaviour. If this has no effect, or if you prefer not to address the topic directly, please contact one of the entities listed in the [Recommendations for Action](#) section (see page 10 of this Code).



# WE MAINTAIN RESPECTFUL RELATIONSHIPS

## Diversity and prohibition of discrimination

We ensure a balanced and diverse work environment by offering all employees the same opportunities, and maintaining a dignified and considerate relationship with each other, even if we have different ideas and experiences. We support each other to create a respectful, welcoming and productive work environment.

We all benefit from our company's ability to attract the best in the industry. Accordingly, decisions concerning employment relationship (such as new hires, dismissals, promotions and transfers) are based on individual merit. We do not discriminate against anyone.

## Social commitment

Our social commitment is fundamental to creating added value to our society and to our company. It is important for us to be able to give something back to the community. We strive to work with partners who share our corporate values.

We are committed to preserving and protecting the environment, and to complying with environmental protection laws. You should immediately report actual or potential risks to the environment, health or safety, or violations of related policies, to your manager or to one of the entities listed in the [Recommendations for Action](#) section (see page 10 of this Code).

# WE MAINTAIN RESPECTFUL RELATIONSHIPS

## Safety at work

We know how important it is that our workplaces are free of health and safety risks, and the danger of injury. Safety concerns us all – each of us has a duty to point out unsafe situations or behaviours and ensure that they are properly reported.

## Prevention of violence in the workplace

A safe working environment is free from any form of violence, be it verbal or physical threats, intimidating or abusive acts, or even physical attacks. Violence – in whatever form – is not tolerated in our company. If you witness violence between colleagues or third parties in our work environment, you should report it immediately. If the situation escalates and your safety or the safety of people in your area is at risk, first alert the local authorities.

## Substance abuse in the workplace

We contribute to the safety of our workplace by striving to do our best at all times. But we can only do our best if we are not under the influence of drugs or alcohol. Such addictive substances limit our perception and motor skills, which in turn endangers our colleagues, customers and other people. We may consume alcohol in moderation at official company events or on special occasions provided we continue to behave appropriately and professionally.

The illegal possession, consumption or sale of drugs or alcohol in the course of business activities or on the company premises is prohibited.



**CONFIDENTIALITY**



# CONFIDENTIALITY

## Patient and consumer data

We are committed to protecting personal data and health-related information. Complex laws restrict the access, use and disclosure of personal patient data and other special categories of data by health insurance companies, pharmacies, hospitals and other institutions. You may only view, use, store or disclose such information if necessary, and you are authorized to do so only within the scope of your official work obligations, and in compliance with all applicable laws and company policies.

## Employee data

Individuals who have access to employee personal data must take great care to make it available only to company members who have a legitimate interest in accessing these data.

We need to adequately protect these data, both during the term employment and afterwards. If you become aware of a case in which personal employee data have been disclosed in a verifiable or suspected irregular manner, please immediately report your concerns to your Compliance Officer.

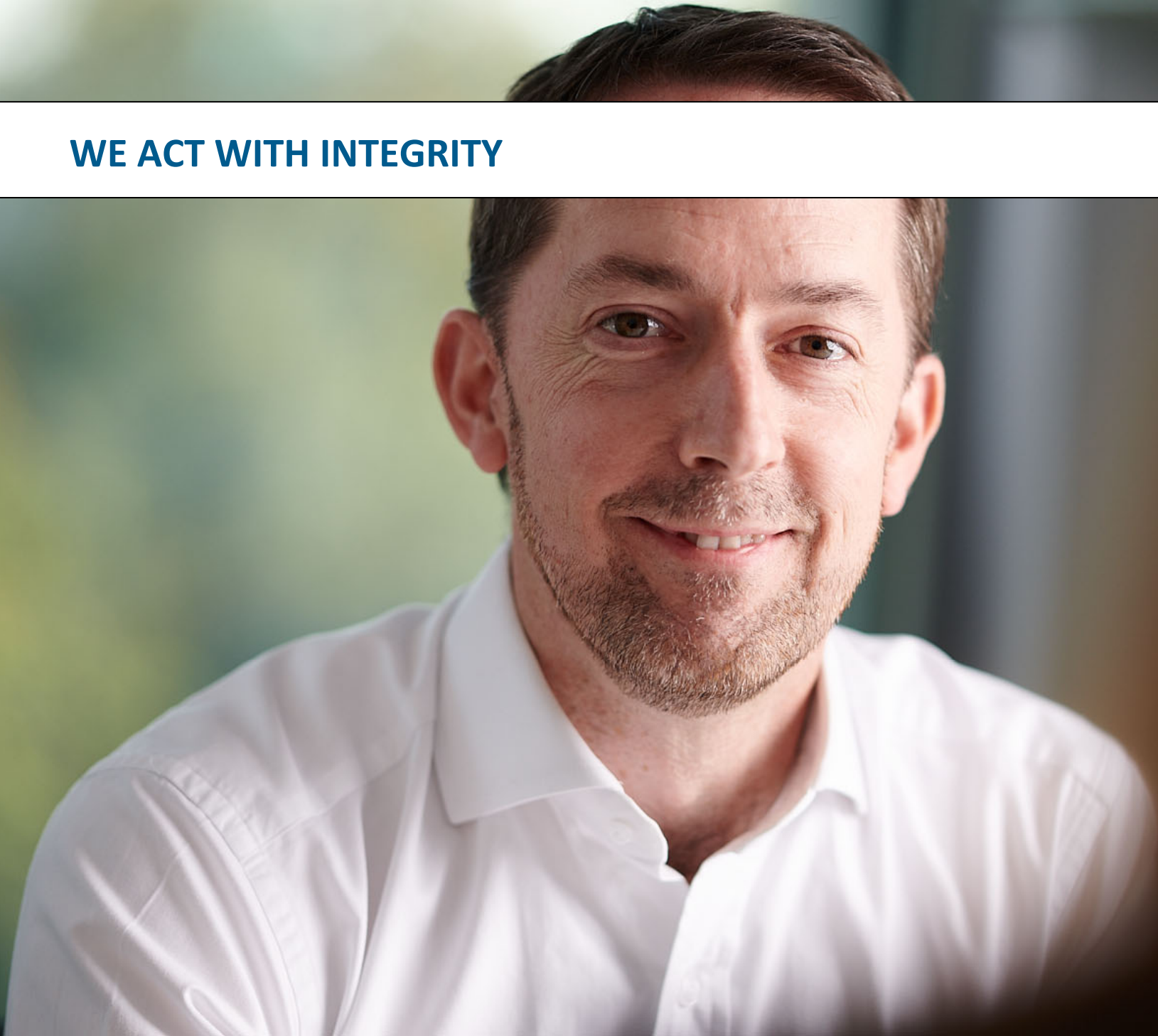


Always remember:

Mutual respect requires us to treat confidentially personal employee data of which we acquire knowledge in the course of our work. All personal employee data may only be used for their lawful and intended purpose.



**WE ACT WITH INTEGRITY**



# WE ACT WITH INTEGRITY

## Conflicts

Acting with integrity means that we avoid actions, relationships, or situations that may lead to, or create an impression of, an actual or potential conflict of interest. A conflict of interest arises when a personal interest, relationship or action runs counter to our professional judgment or loyalty to our employer. In our work, we should always put the interests of the company before any personal interest.

Conflicts can arise in many situations. If, for example, in addition to your work with us, you are also in a managerial function or employed by another company, pursue an independent secondary activity or act as a consultant, this may lead to a conflict of interest depending on the type of company or organisation concerned.

While we can't cite every conceivable situation, but here are some general examples of actual or potential conflicts that may arise:

- Working for, belonging to, or having a significant financial interest in a company or organization that is active in the healthcare industry, a supplier company, a customer, or other business partner.
- Supervision of or responsibility for hiring a family member.
- Giving or receiving gifts, hospitality or entertainment in situations where someone else might feel that these attentions are jeopardizing our judgment or loyalty to the company.

- Any external business relationship between you or one of your dependents and the company (for example, joint ventures, partnerships, personal loans, etc.).
- Circumvent these ethical principles through the intermediary of a relative or other third party (such as the spouse's company, parties involved on behalf of another, etc.).

Avoid conflicts of interest at an early stage by pointing out situations that cause a conflict of interest or could be perceived as such.

For further information, please contact your Compliance Officer.

# WE ACT WITH INTEGRITY

## Business relationships with family and friends

Your spouse or partner, one of your children or parents, or another relative may work for our competitors, or one of our suppliers or customers (or hold significant shares in such a company). Although this is permissible, it requires a special degree of attention in terms of security, confidentiality and possible conflicts of interest.

In particular, you may not be involved in or influence tendering procedures, contract negotiations and the conclusion of contracts between our company and you, a family member, a close friend or employer of such a person. The mere appearance of a conflict of interest can lead to problems, even if you behave correctly. To eliminate any doubt or suspicion, you should inform your manager of any such circumstances in advance.

## Family relationships

In our work, we should not exert any influence on another employee with whom we have a family relationship. This type of influence includes, inter alia, the management or co-responsibility for the recruitment, performance or remuneration of the person concerned. If such a situation arises or threatens to arise, contact your manager or Compliance Officer.

# WE ACT WITH INTEGRITY

## Gifts, hospitality and entertainment

In certain situations, the exchange of gifts or hospitality may be common to build a good business relationship. Be careful, however, as accepting or granting gifts and hospitality in the context of business relationships could give the appearance of impropriety or a conflict of interest, even where there is none.

We are not permitted to accept gifts, hospitality and entertainment from representatives of a company with which we are close to concluding business, awarding a contract or extending a contract.

We may not ask suppliers or business partners for gifts, hospitality, entertainment or other things of value to us or our family members or friends. Asking others for such favours is inappropriate.



### Permitted gifts, hospitality, and entertainment

A courtesy is permissible if it meets the following criteria:

- It cannot be perceived as an attempt to influence a business decision.
- It does not give the appearance of bias.
- It is of reasonable value.
- It is not cash or a cash equivalent.
- It was not requested by you or a team member.
- It is carried out within a framework that is appropriate for a business meeting.
- Its disclosure would not harm the reputation of our company.

For more information — or if you are unsure about the appropriateness of a gift, hospitality, or entertainment — contact your Compliance Officer.



### Always remember:

Under no circumstances may we accept gifts or other favours that could influence business decisions or give the appearance of such influence. The acceptance or granting of favours is permissible only if it does not create a sense of obligation or the appearance of impropriety. This is the case if it is a favour for a rare occasion and of little value.



# WE ACT WITH INTEGRITY

## WHAT IF...

... my contact person in the sales department of a large IT provider invites me to lunch? May I accept the offer?

Make sure that the restaurant is not unreasonably expensive, that there is a business background to this, and that the food meets all the criteria listed in the "Gifts and Hospitality" section of this Code. You must not give the impression that our company can "be bought". If in doubt, ask your Compliance Officer for specific instructions.

### Confidential information

In our daily work, we may gain knowledge of confidential information about our company, business partners or customers.

Confidential information generally covers all non-public information, which includes both business secrets and intellectual property of our company, our customers and business partners. Confidential information includes, for example:

- Prices
- Financial data
- Specifications
- Plant layout and design
- Product costs
- Technical processes
- Sales and marketing strategies
- Product features and functions

- Information about Product Roadmaps
- Directory of customers

These details and other confidential information may be passed on only to colleagues who need it for their work, are informed about their confidential nature, and are authorized to access these details. If confidential information is to be passed on to current or potential business partners, a non-disclosure agreement must first be signed. If you require such a non-disclosure agreement, please contact the Legal Department.



Always remember:

Confidential information may be disclosed to outsiders only in accordance with the requirements specified. Outsiders include consultants, traders, temporary workers, suppliers, customers and other partners.

# WE ACT WITH INTEGRITY

## Books, documents and financial reporting

Our company makes important business decisions that rely on the integrity of financial and other business documents that we prepare on a daily basis. Therefore, we must ensure that all our documents (however insignificant they may appear) are complete, correct and up-to-date. When it comes to



Keyword

A "document" is recorded information that is self-created or provided by others in any format (e.g. paper or electronic format). Such documents must be retained and managed for business, operational, legal, regulatory and/or historical reasons as a record to document or substantiate decisions, actions or transactions made by our company.

accounting, we adhere to generally accepted principles. In accordance with the laws and regulations to which our activity is subject, we are obliged to keep correct and proper accounts. The accuracy of our books and documents contributes to the quality of the financial reports we file and publish with government agencies. Our company is committed to the comprehensive, appropriate, orderly, timely and comprehensible disclosure of these reports.

## Contracts

We are committed to diligently following the company's processes for contracting. This includes, for example, the following:

- Do not enter into a contract, promise of payment or any other obligation unless you are authorized to do so.
- Ensure that the contracts are complete, in writing, and duly approved, if necessary after review by the Legal Department. Do

not enter into business agreements that do not meet our standards.

- Do not make any ancillary agreements or agreements "under the hand" and do not use any other mechanisms that do not comply with our internal guidelines.
- Follow the processes for signing contracts and procedures, including release and signature rules.

## Retention of documents

Our company's management and retention of documents preserves the integrity of our information. We comply with existing company policies and applicable laws to ensure that our documents are genuine, accurate, accessible, complete, secure, legally compliant and effective.

We must keep documents and records in accordance with the statutory retention obligations.

# WE ACT WITH INTEGRITY

## Protection of company property

The assets of our company are valuable and must be protected. In principle, the company's property such as equipment, facilities and documents may be used only for approved activities. We all have a duty to protect assets from loss, damage, theft and misuse. We must also ensure their efficient use and avoid waste. Lost, damaged or stolen company property must be reported to the appropriate entity listed in the [Recommendations for Action](#) section (see page 10 of this Code).

## Protection of intellectual property

Intellectual property is another important asset of the company. Intellectual property is defined as intangible assets developed through the creative work of our employees and partners. Intellectual property is legally protected by patents, trademarks, copyrights and trade secrets. Our technologies, software and technical data contain large amounts of intellectual property and one of our principle aims is to protect the company's intellectual property rights as comprehensively as possible. However, we not only protect our own intellectual property, but also respect the corresponding rights of third parties. This

includes, in a broader sense, that we do not infringe any patents, trademarks, copyrights and trade secrets of third parties. In addition, we respect the rights of third parties to software, even if it is open source software. When working with third parties, we must ensure through contracts that our company acquires the appropriate intellectual property rights created within the framework of the cooperation in question. If you have any uncertainties or concerns about our company's intellectual property, please contact the Legal Department.



# WE ACT WITH INTEGRITY

## Proper use of enterprise technology

We are all responsible for ensuring that our company's network, computers and communication systems are used ethically, legally and carefully. Occasional private use of these systems is permitted, but the use must be appropriate, must not violate internal policies and must not interfere with our daily work. Our company reserves the right to control access to and the use of all corporate systems within the framework of applicable laws.

When securing sensitive data, we must act prudently to protect it from theft and loss. Confidential data may be stored on company devices or held or processed by third parties on our behalf in accordance with applicable laws. To protect sensitive data, appropriate controls must be put in place, such as restriction of access as necessary, password protection, encryption and physical security. Only share information (such as by email, social media posts, or by granting system access) if it is actually necessary for business. Information in electronic form may be changed and disseminated without our consent. A publication is difficult to undo.

## Social media and activity on electronic media

We respect the rights of our employees and temporary employees with regard to the use of social media. In general, we are allowed to do what we want in our free time. However, activities during or outside of work that affect our work performance, the performance of other employees or temporary employees, or damage the reputation of the company and its economic interests, are of concern to the company, and can be regulated by company policies.

Official social media activities of the company are the responsibility of the communications department. Unless you are officially authorized to speak publicly about the company, its products and solutions, you must refrain from speaking on behalf of or representing the company. Please note that only authorized company spokespeople are allowed to communicate with the media or other market experts.



Always remember:

We are all responsible for ensuring that our company's network, computers and communication systems are used ethically and legally, and in accordance with our corporate values.

# WE ACT WITH INTEGRITY

## Responding to media and other inquiries

You should speak to the media or organisations as a representative of the company only if you have been authorized to do so by the company.

Any inquiries from the media or the public should be immediately forwarded to the Board and Communications Department. Requests for information from authorities or government agencies must be immediately forwarded to the Legal Department.

Requests for financial and other information about the company by the financial world or by shareholders must be immediately passed on to the Legal Department.

## Derogation

Occasionally, situations may arise that require individuals to obtain an official exemption from any provision of this Code.

Exemptions are granted only to the extent necessary and are restricted accordingly to protect the company as much as possible. For exemptions by the Compliance Officer or the Executive Board, contact your Compliance Officer or the Legal Department.



## AS A REMINDER:

**The following contact points are available to employees of the Herba Group for compliance issues and for questions in connection with this Code of Conduct:**

- the Board of Directors or the Management Board
- your manager
- the Compliance Officer (Mag. Thomas Schellander, by phone on Ext. 1521 or by email at [compliance@herba-chemosan.at](mailto:compliance@herba-chemosan.at))
- the Legal Department
- the Human Resources Department (Mag. Claudia Bliem, by phone on Ext. 1534 or by email at [claudia.bliem@herba-chemosan.at](mailto:claudia.bliem@herba-chemosan.at))
- the Compliance Helpline/Ombudsman's Office

**The Compliance Helpline/Ombudsman's Office:**

- The Ombudsman's Office is an independent third party where concerns can be reported anonymously if desired.
- The Ombudsman's Office can be contacted 24/7, with support available in various languages.
- The Ombudsman's Office can be reached free of charge on 00800 – OMBUDSMANN or 00800 – 66283762, as well as by fax at +49 (0)521 557333 – 44, or by email at: [ombudsmann@thielvonherff.com](mailto:ombudsmann@thielvonherff.com)
- An electronic reporting platform of the Ombudsman's Office can be found at: <https://report-tvh.com/>
- Detailed contact details can also be found on the intranet.



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