

Code of Conduct for employees and managers

Our principles

Fundamental requirements

Legally unimpeachable conduct and adherence to the laws are a matter of course for us and serve as the basis for all decisions within our entire group of companies.

To whom does this Code of Conduct apply?

All employees throughout the entire corporate must abide by and embody the principles herein. It applies to all employees, managers and the executive board, regardless of position, responsibilities or location, including all domestic and international subsidiaries.

Open communication

Meyer & Meyer is obligated to create a culture of open communication shaped by trust-based dialogue with employees across all levels. All employees are encouraged to openly express and stand up for their opinions, and to report unacceptable conduct when it is in contradiction to this Code of Conduct.

Protecting company assets

We handle all company assets responsibly, such as work resources, IT equipment or intellectual property. Company assets will be used for their intended purpose, and not for personal purposes that are inappropriate or impermissible.

Avoiding conflicts of interest

We disclose potential or actual conflicts of interest and remedy them as quickly as possible. Employees who are affected by a possible or actual conflict of interest are obligated to notify their superior or company management so that the situation can be resolved quickly.

Our responsibility to our employees

Human rights

We abide by the principles of the General Declaration on Human Rights and the Global Compact of the United Nations. We respect human rights, rights to freedom of association and collective bargaining in agreement with the law. Meyer & Meyer prohibits forced labour, child labour, all forms of modern slavery and human trafficking, as well as any form of exploitation.

Equal treatment and equal opportunities

We promote equal opportunities and a working environment shaped by fairness, respect and trust. We thus do not tolerate any form of discrimination for reasons of ethnic background, nationality, sex, marital status, age, disability, religion or worldview, sexual orientation or other aspects that the ban on discrimination applies to.

Environmental and climate protection

We strive to consume natural resources sustainably and responsibly. Our employees are required to take preventive and alleviating measures while performing their tasks in order to prevent any environmental impact. They do this by using natural resources sustainably and with care.

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Health & safety

Every day, we strive to keep our employees healthy and safe. As we perform our tasks, we are all required to ensure a healthy and danger-free working environment. This is why we adhere to the laws and regulations concerning occupational health and safety. Our managers in particular are responsible for establishing suitable procedures and protective measures to ensure health and safety at the workplace.

Responsibility to business partners and third parties

Prevention of corruption

Meyer & Meyer's relationships with customers, business partners and stakeholders are based on trust and fairness. We thus reject any form of corruption and corrupt behaviour.

Our employees are not allowed to offer, promise, or provide perks or benefits to individuals in the public or private sector in order to achieve a positive decision or induce behaviour that is beneficial to Meyer & Meyer. At the same time, our employees are prohibited from accepting such advantages that may give the impression that decisions are being thereby influenced. They never request personal benefits for themselves or third parties.

Donations & sponsoring

On the basis of internal regulations and the company's economic capacities, Meyer & Meyer promotes projects and activities in the areas of education, science, culture, environment, sports and society that align with the company's strategy and values. In particular, Meyer & Meyer does not

support any organisations with extremist worldviews or backgrounds, nor those that stand in opposition to freedom and human dignity.

Any sponsoring must be compliant with the current legislation and existing, internal regulations. Sponsoring also requires appropriate, verifiable communication and marketing by the sponsoring partner. The sponsoring process must be transparent for all parties.

No donations are made to political parties. Employees are prohibited from engaging in political activities within the company as well as from having any political influence on the Meyer & Meyer Group.

Fair and free competition

Meyer & Meyer is obligated to adhere to fair competition as well as antitrust and competition law in all its business activities. The Group holds no anti-competition discussions with customers, suppliers, business partners or competitors about prices, markets or market segmentation, nor do we disseminate false information about competitors and their products or acquire information or competitive advantages unjustly.

Money laundering

We reject any form of money laundering and only maintain business relationships with partners whose funds come from lawful sources. We also investigate the legitimacy of our business partners to the best of our ability.

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Security and sensitivity in the handling of data

Protection of intellectual property

From customer-specific warehouse, transportation or IT solutions to new technology and business ideas, we are obligated to protect intellectual property and to not disclose any confidential information to competitors or otherwise disseminate such information.

Data protection and information security

We are obligated to protect personal privacy and adhere to all applicable laws and regulations concerning the protection of personal data, in particular the General Data Protection Regulation (GDPR).

Meyer & Meyer is aware of the sensitivity of the data that customers, employees, business partners and other third parties entrust to the company. We abide by the applicable laws and regulations, as well as strict confidentiality, when obtaining, storing, processing and forwarding personal data. All employees are obligated to take the necessary measures to protect IT systems against internal and external misuse.

Confidentiality & public relations

Each employee is obligated to communicate in such a way that protects the company. Information is only disclosed to internal and external persons who are authorised to receive it. We expect every employee to be particularly careful when working with any public media. We acknowledge the confidentiality of information and protect business documents from being access by unauthorised persons.

Financial integrity

We conduct our business, store documents, and generate financial reports in a proper and transparent fashion.

Business transactions and documents belonging to our company must be correct and proper. We document all business transactions, asset values and liabilities in accordance with the financial reporting regulations of Meyer & Meyer Holding SE & Co. KG as well as in compliance with the legal requirements.

Assistance with decision making

Are you unsure whether a decision you are making is compliant with the Meyer & Meyer Code of Conduct? If so, ask yourself the following questions:

- Is my decision ethically correct?
- Have I understood the potential risks of the decision?
- Is my decision legal and am I authorised to make it?
- Does my decision benefit the company's interests?
- Could my decision harm Meyer & Meyer's reputation?
- Can I make this decision in good conscience?
- Would this decision withstand scrutiny by a third party?

You can also approach persons in your working environment to ask about this Code of Conduct or to report violations of our Code of Conduct or compliance regulations. These persons could include:

- your supervisor(s),
- your HR, Legal or Compliance department,

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- your employee representative(s).

Expressing concerns and reporting violations

You can use the channels listed below to submit a report. Your report will be kept confidential and processed in accordance with all applicable data protection requirements. Every report of potential compliance violations will be investigated.

Compliance reporting system

Use our compliance reporting system: [online reporting system](#)

(available at: <https://meyermeyer.hinweisgeben.eu/whisper>)

E-mail address: hinweis-meyermeyer@park-wstr.de

Telephone number: +49 231 9580 6850

Address: Rheinlanddamm 199, 44139 Dortmund

- violations of antitrust or foreign trade legislation;
- violations of human rights, sexual harassment or violations of anti-discrimination laws;
- violations that could result in a regulatory agency or law enforcement agency (such as a supervisory authority) becoming involved.

Consult with the Compliance department if you are uncertain whether a compliance violation must be reported.

Obligation to report significant compliance violations

Managers and employees who, due to their position, have a special obligation to ensure compliance are obligated to immediately report any concrete indications or initial suspicions of a significant compliance violation to the Compliance department. All other employees are asked to do the same. Examples of such violations include but are not limited to:

- financial crimes such as corruption, fraud, embezzlement, theft;