

## The Code of Conduct of PohlCon GmbH

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## Foreword

PohlCon GmbH, including PohlCon Solar GmbH & Co. KG and other associated subsidiaries - (hereinafter referred to as "PohlCon") - would like to set a common basic understanding of social, responsible and ethical corporate governance with this Code of Conduct.

This Code of Conduct not only reflects our values, but also lays down the principles of our actions, the observance of which we demand from all employees, executives and the management at all locations worldwide. We see our long-term success as being linked to the fact that responsible and economic corporate success are not mutually exclusive, but rather mutually supportive.

Only through our constant commitment to the following principles we can ensure the trust, acceptance and goodwill of our business partners, customers and contractual partners for the future.

## A. Values

### I. Our Understanding

Our conduct and cooperation are based on treating each other with respect, honesty and tolerance. We see ourselves as a team that draws on the strengths and experience of a total of over 200 years of activity in the construction industry, thus providing mutual trust as the basis for our work.

Our success is the result of joint efforts and constant commitment of all our employees. We are proud of the strong identification and longstanding loyalty of our employees, who contribute an important part to the success story of our group of companies through their high level of competence.

### II. Our Actions

Ensuring the satisfaction of our customers and continuously increasing their loyalty are among our highest principles. For our clients always means with our clients. Together we find solutions for almost all challenges.

We convince through communication, reliability, quality, and competent service. Creativity and inventiveness characterise our progress in the development of products and services.

### III. Our Responsibility

As a growing family business, we are aware of our responsibility as an employer, a reliable business partner and a resource-conserving and sustainable company.

We fully stand behind the applicable laws, official requirements and internal company guidelines, compliance with which we see as an essential component for a credible appearance of our company.

## B. Principles

### I. Adherence to Laws and Compliance Guidelines

We believe it is our responsibility to ensure compliance with all applicable laws and regulations in our business dealings. The principles contained herein reflect only a portion of our code of conduct.

The most important compliance guidelines are:

#### 1. Fair Competition

We act in accordance with national and international competition and antitrust law. PohlCon supports fair competition and the free development of all market participants. Agreements of any kind with competitors on prices, business conditions, market division and non-competition are to be refrained from. Our employees must observe the principles of fair and open competition.

#### 2. Prevention of Corruption

We reject corruption, bribery, and any form of extortion. PohlCon's business relations are based on objective criteria to maintain our integrity as a reliable and competitive business partner. PohlCon does not influence or distort competition through corruption-induced payments, nor do we make any such attempts.

#### 3. Prevention of Money Laundering

We also do not tolerate any activities related to money laundering. Our employees are responsible for being vigilant and preventing transactions that could potentially expose PohlCon to suspicion of money laundering. We are committed to identifying and reporting any such suspicious transactions or activities.

#### 4. Data protection, Confidentiality, and Protection of Third-Party Rights

Personal information about employees, customers, business partners and other third parties are treated confidentially and processed in compliance with national and international data protection laws.

All employees acknowledge that they are obliged to maintain confidentiality of business and proprietary information within the scope of their employment at PohlCon. This includes company and business secrets as well as business documents, business books, etc.

All employees must respect the effective property rights of third parties (such as patents, copyrights, and trademarks). Any unauthorised use must be avoided.

## II. Human Rights, Labour and Health Rights

### 1. Human Rights

For PohlCon, respect for internationally recognised human rights is the basis of any business relationship. We respect the dignity, privacy, and personal rights of every individual.

We do not tolerate any verbal or physical counteraction that disrespects or humiliates a person. PohlCon treats employees fairly and without prejudice. We do not tolerate insults, mobbing or any kind of harassment.

We reject any form of forced compulsory or child labour.

### 2. Anti-Discrimination, Equal Opportunities, Diversity

We reject any form of discrimination and explicitly promote equal opportunities. We treat all people equally, regardless of gender, age, skin colour, ethnic origin, sexual identity and orientation, disability, religious affiliation, ideology, or other personal characteristics.

### 3. Safety and Health Protection

PohlCon is committed to a healthy and safe working environment. For us, occupational health and safety has the highest priority in the company. Our goal is to reduce occupational accidents to zero. We create the necessary conditions to maintain the safety of our employees and third parties.

## III. Environmental and Climate Protection, Sustainability

PohlCon is continuously improving the sustainability of its products and services, so that it lives up to its claim of environmentally oriented management.

Furthermore, we have taken appropriate measures and act in accordance with the applicable environmental protection laws and orientate ourselves towards international standards to minimise negative effects on the environment.

We reject the use of "conflict materials", such as rare earths and ores from conflict areas.

## C. Implementation and Integration into the Organisation and Processes

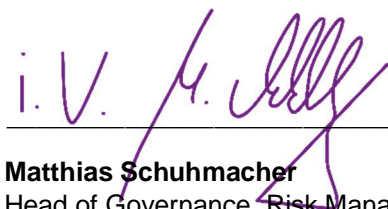
PohlCon expects compliance with the Code of Conduct in its value and principle requirements in everyday business. To fulfil these requirements, there will be regular training and e-learning tools for all employees.

Violations of the Code of Conduct will not be tolerated. They will be punished appropriately and may even lead to consequences for the employment relationship and claims for damages.

All employees are required to familiarise themselves with the Integrated Management System, to conduct themselves in accordance with the rules set out in this Code of Conduct, to report violations and to cooperate fully with investigations into violations.



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