



## Code of Conduct

December 2023

## TIEFENBACHER GROUP Code of Conduct

### Who we are

We, at TIEFENBACHER GROUP, are driven by a deep sense of purpose: we are pioneering healthcare to improve patients' lives around the world. We believe that the access to affordable high quality-healthcare is a human right. We always challenge the status quo by being one step ahead – in terms of business models as well as concrete products and services. This entrepreneurial spirit is the driving force of making high-quality pharmaceuticals more affordable, more available, and better than before.

100% family owned since 1963, we are a healthcare company providing best-in-class solutions along the entire pharmaceutical value chain, from initial idea to market access. We distribute raw materials and develop, manufacture, and register finished dosage forms like tablets, capsules, powders, drops, and patches as well as medical devices. This broad competence enables us to pioneer healthcare holistically as we can connect ideas and expertise to create novel healthcare solutions.

### Our Mission

By working together as TIEFENBACHER GROUP, in flexible and agile cross-functional structures, we tap into our full potential, drive our success, and make us stay at the forefront of our field – to make advanced, value-driven pharmaceutical solutions available to everyone around the globe. We believe that by creating innovative high-quality medicines with broad access to patients around the world and providing a safe and rewarding workplace we can use our business to build a better tomorrow.

We demonstrate our commitment to doing business responsibly in a very meaningful and tangible way by building a healthier and more sustainable future. We understand sustainability as behaving responsibly towards society and our planet – in our day-to-day work.

We promote ethical and trustful behavior by all employees of TIEFENBACHER GROUP. Furthermore, we strive to make efficient use of natural resources, to minimize the environmental impact of our operations, and to invest in environmental solutions that drive a circular economy. We also care about our society – especially in the countries where our company operates. Our caring culture is fundamental to achieving our purpose to make life significantly better for people around the world.

### Our Code of Conduct

We guarantee the highest quality standards for our products and processes and ensure that TIEFENBACHER GROUP acts in compliance with applicable regulations, laws, policies, and guidelines.

This Code of Business Conduct describes the fundamental principles for our conduct and is designed to promote lawful, ethical and trustful behavior by all employees and members of Advisory Board of TIEFENBACHER GROUP as well as all employees of subsidiaries and controlled entities. To

maintain our reputation within the business community and the general public, each of our employees is personally responsible for avoiding unlawful and unethical behavior and complying with the Code of Conduct at all times. Under no circumstances will TIEFENBACHER GROUP pursue any business opportunity which would require it to violate the law or this Code of Conduct.

TIEFENBACHER GROUP maintains the sole discretion to interpret and enforce this Code. The Code may be updated, amended, modified, or withdrawn at any time at the discretion of TIEFENBACHER GROUP. Any changes, along with this Code of Conduct, will be publicly disclosed in accordance with applicable laws.

## Compliance with the Law

As a worldwide active pharmaceutical company, TIEFENBACHER GROUP is subject to a wide variety of laws and regulations in every country where we do business.

TIEFENBACHER GROUP mandates that all employees, officers, and members of the Advisory Board adhere to the laws, rules, and regulations pertinent to TIEFENBACHER GROUP's business operations globally. It is expected that individuals exercise good judgment and common sense in ensuring compliance with all relevant laws and regulations, seeking guidance when faced with uncertainties. TIEFENBACHER GROUP's operations are invariably subject to the laws of the local countries and the jurisdictions in which they function.

All individuals conducting business on behalf of TIEFENBACHER GROUP worldwide are required to adhere to this Code of Conduct and take reasonable steps to prevent violations, in conjunction with all applicable laws and company policies. This obligation extends to all staff, management levels, consultants, external workers, secondees, and temporary workers. Violators may face disciplinary action, including termination.

## Ethical Standards and Human Rights

TIEFENBACHER GROUP is dedicated to maintaining ethical labor practices globally across all its locations. This commitment involves fostering awareness and understanding of human rights, employment, and labor practices. It is not only the responsible course of action but also aligns with our values as an industry, organization, employer, and as individuals. By integrating these principles into our strategies, policies, and procedures, and embodying our values, TIEFENBACHER GROUP aims to fulfill its fundamental responsibilities to its people, the environment, and to establish a foundation for long-term success.

We endorse and respect the protection of internationally proclaimed human rights, striving to avoid complicity in any human rights abuses. Our commitment extends to upholding the freedom of association, recognizing the right to collective bargaining, eradicating forced and compulsory labor, and effectively eliminating child labor. Child labor is acknowledged as a form of exploitation violating human rights, and it is the stated policy of the international community and nearly all governments to eradicate it.

At TIEFENBACHER GROUP, our responsibility goes beyond our employees and internal facilities to encompass our global partnerships. This involves identifying and addressing potential issues related to

compromised human rights within our business, particularly in industry sectors with geographically distant supply chains. No human rights violations by TIEFENBACHER GROUP or any director, officer, employee or person doing business on our behalf will be tolerated.

## Unfair Competition and Antitrust Law

We firmly believe that fair, free, and open markets benefit both customers and society at large. Therefore, our approach is to compete based on the merits of our products and services, conducting business with integrity. TIEFENBACHER GROUP is committed to free and fair competition without unlawful restraints and collusion.

We acknowledge that any violation of Competition or Antitrust Laws can have serious consequences for TIEFENBACHER GROUP's reputation and the severe penalties associated with violating competition laws, which can lead to civil fines and criminal penalties for TIEFENBACHER GROUP, members of the Advisory Board, and employees.

Therefore, each TIEFENBACHER GROUP employee must always comply with all Competition and Antitrust Laws of the countries where we do business, in particular the Treaty on the Functioning of the European Union (TFEU), and compete with our competitors solely based on TIEFENBACHER GROUP's price, product, quality and service strategy. Hence, we unequivocally disapprove of our employees engaging in any verbal or written agreements with suppliers, customers, competitors, or any third party that could impede the free market or exploit a dominant position in the marketplace. We do not gather information about our competitors through deception, theft, misrepresentation, or any other illegal or unethical means. Specifically, no agreement or understanding should be forged with competitors to directly or indirectly manipulate or control prices (including pricing elements like discounts, rebates, or costs), allocate products, markets or territories, boycott certain customers or suppliers, or inhibit or restrict the manufacture, sale, or production of any product. Such agreements and understandings are deemed unethical, contravene antitrust and fair competition laws, and are in violation of our policies.

## Anti-Bribery and Anti-Corruption

TIEFENBACHER GROUP is committed to complying with anti-bribery and anti-corruption laws in all countries in which TIEFENBACHER GROUP operates, in particular with the Treaty on the Functioning of the European Union (TFEU). We require the same from all TIEFENBACHER GROUP employees, directors, agents, contractors, consultants, intermediaries, distributors, contract sales representatives, joint-venture partners and any other individual or entity acting for or on behalf TIEFENBACHER GROUP anywhere in the world.

TIEFENBACHER GROUP will not take part in bribery or corruption to secure any kind of business advantage. TIEFENBACHER GROUP requires all its employees to refrain from any behavior that could potentially be construed as improper or contrary to the law.

TIEFENBACHER GROUP employees are strictly prohibited from directly or indirectly promising, granting or offering money or other improper incentives to public or government officials, any official,

employee or representative of any government or state-owned company or international organization, business partners or any other person.

TIEFENBACHER GROUP employees must not exert unlawful influence on any of the above listed persons, e.g. by making gifts, doing favors or granting other advantages. Employees may not use their position at TIEFENBACHER GROUP to directly or indirectly request, obtain or accept money, improper gifts, favors or other advantages from business partners or other parties involved.

### Prevention of money laundering

TIEFENBACHER GROUP's policy is to avoid conducting business with persons or entities who are involved in criminal or illegal activities. All employees must adhere to local and applicable foreign anti-money laundering laws and regulations.

In our business dealings, we exclusively engage with customers who are willing to furnish us with accurate information, enabling us to assess the appropriateness of payments. Additionally, we refrain from making payments to an entity or accepting payments from an entity not involved in the transaction or lacking legal entitlement to receive payment.

All cases of suspicious payment behavior or other unusual financial transactions, which raise doubts as to the legality of the source of the funds must be immediately reported to the respective Managing Director.

### Entertainment and gifts

TIEFENBACHER GROUP employees must refrain from offering or accepting gifts which may influence their professional behavior or in circumstances where the outcome of a transaction may be influenced by the gift. TIEFENBACHER GROUP employees may offer or accept certain gifts or invitations that are of modest value and that are customary in the normal business practice and compliant with applicable national and/or international laws. Gifts in the form of cash may never be offered or accepted.

### Confidentiality

We expect our employees to uphold the confidentiality of non-public TIEFENBACHER GROUP information, proprietary data, and intellectual property. This encompasses a range of sensitive details, including but not limited to strategic business plans, financial results, pricing decisions, marketing strategies, upcoming acquisitions, divestitures or licenses, and the outcomes of clinical trials or similar activities. Such information constitutes a valuable business asset that must be safeguarded, as unauthorized disclosure could diminish or destroy its value, potentially causing financial, reputational, or other harm to TIEFENBACHER GROUP and providing others with an unfair advantage.

Employees are strictly prohibited from disclosing confidential information or any data that might compromise TIEFENBACHER GROUP's competitive position or violate the private rights of individuals, enterprises, or institutions without proper authorization. It is essential to take appropriate steps to protect such information. Additionally, employees must respect the proprietary rights of others, including



third parties who share their information with TIEFENBACHER GROUP.

In the event a decision is made to disclose confidential information to any external party, it should only be done after executing appropriate confidentiality agreements and limiting the information disclosed to the minimum necessary to address the relevant business need.

## Intellectual Property

TIEFENBACHER GROUP's property and assets, particularly our Intellectual Property (IP), play a pivotal role in our success. It is imperative that all employees actively contribute to the protection of our patents, trademarks, copyrights, trade secrets, and other proprietary information and know-how.

All information, technology, and other intellectual property created by employees of TIEFENBACHER GROUP during their association are the exclusive property of TIEFENBACHER GROUP. It is mandatory for all such intellectual property to remain with TIEFENBACHER GROUP even after the termination of the employee's relationship with TIEFENBACHER GROUP. Employees are required to take all reasonable steps to confirm TIEFENBACHER GROUP's ownership of the intellectual property.

TIEFENBACHER GROUP assets, whether tangible or intangible, should be used solely for legitimate purposes. Employees are strictly prohibited from reproducing, distributing, or altering copyrighted materials without the explicit permission of the copyright owner or its authorized agents. Any instances of loss, misuse, fraud, or theft must be promptly reported to a manager.

## Fraud

TIEFENBACHER GROUP emphasizes its commitment to preventing fraud. Fraud includes various activities such as misappropriation of funds, securities, supplies, or other assets. Accordingly, improper handling or reporting of monetary or financial transactions, profiting from insider knowledge, and unauthorized disclosure of confidential or proprietary information are considered fraudulent activities.

TIEFENBACHER GROUP employees are explicitly prohibited from engaging in any activities related to fraud, including disclosing actual or contemplated corporate, operational, or securities activities of the company to unauthorized third parties. Inappropriate use, destruction, or removal of the TIEFENBACHER GROUP's business records, or equipment is also highlighted as fraudulent behavior that is strictly prohibited.

## Privacy and Personal Data protection

During our routine business activities, we may gather personal information concerning various individuals, such as employees, patients, customers, and other entities with whom we conduct business. TIEFENBACHER GROUP is dedicated to collecting and retaining only the necessary personal information required to carry out our business operations, and we are committed to implementing measures designed to safeguard this information.

While the collection and use of personal information are integral to our business, any unlawful use or disclosure could adversely impact the individuals concerned, our company, and other stakeholders.

Consequently, TIEFENBACHER GROUP undertakes to treat personal data confidentially and to process it exclusively in accordance with applicable data protection regulations.

Personal information is collected, used, and retained only to the extent necessary for legitimate business, human resource, or scientific purposes, or as required or permitted by applicable law. We adhere to all relevant privacy laws, including informing or obtaining consent from individuals regarding the collection, processing, access, and disclosure of their personal information. Personal information is not shared or entrusted to third parties within or outside of TIEFENBACHER GROUP unless they have a legitimate need to know, and these third parties adhere to confidentiality standards at least as stringent as those maintained by TIEFENBACHER GROUP.

### Integrity of Third Party Proprietary Information

At TIEFENBACHER GROUP, respecting proprietary information and trade secrets of third parties is a core principle in our work environment. Whether we receive sensitive or confidential information from suppliers, customers, or other business partners, we treat it with the utmost care and confidentiality, with the same level of care as TIEFENBACHER GROUP's own information. The confidentiality of this information is paramount to our relationships and collaborations.

Accordingly, we recognize the proprietary nature of information from our business partners and ensure that all required licenses are obtained before incorporating such information into our operations.

TIEFENBACHER GROUP employees are also reminded of their responsibility regarding confidential information if they leave the company, emphasizing that they may not take or reveal any confidential information from their time at TIEFENBACHER GROUP to a new employer. Similarly, they are not allowed to disclose a previous employer's confidential information to TIEFENBACHER GROUP.

### Integrity of Business Records and Reporting

Ensuring the accuracy, honesty, and completeness of all recorded data and information is a fundamental commitment at TIEFENBACHER GROUP. T

In financial reporting, strict adherence to Generally Accepted Accounting Principles (GAAP) and internal controls is mandatory. All assets, liabilities, revenues, and expenses must be accurately entered into TIEFENBACHER GROUP's books, records, and other documents, aligning with finance policies.

Accordingly, TIEFENBACHER GROUP 's books, records, and documents must accurately reflect and appropriately describe the transactions they record. The establishment of any undisclosed or unrecorded fund, asset, or account for any purpose or the creation of false or artificial entries in the books or records for any reason are strictly prohibited. It shall be ensured that no payment on behalf of TIEFENBACHER GROUP is approved or made with the intention or understanding that any part is to be used for a purpose other than that described in the supporting documents.

## Information Technology and Security

TIEFENBACHER GROUP provides access to and use of electronic media for business purposes, and such electronic media may not be used for purposes that are contrary to any law, regulation, directive, guideline or other provision of TIEFENBACHER GROUP.

The use of electronic communication and media is strictly prohibited for any purpose that is discriminatory, harassing, obscene, illegal, or against company policy. Prohibited activities include but are not limited to copyright or trademark infringement, misappropriation of trade secrets, disruption of network communications, non-sanctioned network monitoring, circumvention of user authentication/security, introduction of malicious software programs, sharing passwords, and sending "spam email."

The security of TIEFENBACHER GROUP's electronic information and systems, including cybersecurity, is a collective responsibility. Any suspected cybersecurity threats or incidents must be reported immediately to the IT Help Desk. It is essential to ensure the adequate protection of information when using home or public wireless networks. Additionally, any confidential TIEFENBACHER GROUP information stored on portable devices must be protected, and access to devices with the ability to access our systems must be restricted.

We also require our employees to consistently adhere to all relevant records management policies, standards, and guidelines. The lifecycle of records is crucial, and their retention should align with the business value derived from legal, regulatory, compliance, operational, fiscal, or informational considerations.

## Social Media

TIEFENBACHER GROUP recognizes and allows employees to engage in personal use of social media. However, it is important to exercise common sense and discretion, as content shared online can reach a global audience instantly, whether intended or not.

Responsible use of social media includes both professional and personal contexts. The behavior exhibited on social media platforms should align with the standards outlined in this Code of Conduct. Harassment, inappropriate language, bullying, or any form of discrimination is not acceptable at TIEFENBACHER GROUP, whether in the workplace or on social media.

Only authorized employees may use social media to disseminate company and product information. Employees and external consultants contracted by TIEFENBACHER GROUP, unless specifically, are not permitted to speak on behalf of TIEFENBACHER GROUP on social media channels. Violations of these constitute a breach of this Code of Conduct.

## Media Communications

We are dedicated to delivering information to media representatives, analysts, and the general public that is timely, accurate, and credible. To ensure clarity and precision, specific functions have been defined, and individuals have been designated with the responsibility of communicating with media



representatives, financial analysts, and the public.

## Conflict of Interest

We require our employees to refrain from engaging in interests, relationships, or activities that either do, may, or could be perceived to lead to a conflict of interest. A conflict of interest arises when your personal interests, relationships, or activities could potentially interfere with your duty of undivided loyalty to TIEFENBACHER GROUP or impede your ability to carry out your work for TIEFENBACHER GROUP objectively and effectively. Examples of such conflicts include personal business, financial, or other ties with individuals or entities that are current suppliers, customers, or potential competitors of TIEFENBACHER GROUP.

Members of TIEFENBACHER GROUP's Advisory Board and employees are obligated to avoid situations that could create conflicts of interest or the appearance thereof. This commitment extends to both professional and personal contexts to ensure that nothing conflicts with their responsibilities to TIEFENBACHER GROUP.

Avoiding conflicts of interest, both actual and perceived, enables individuals to make business decisions in TIEFENBACHER GROUP's best interests rather than being influenced by personal factors. This commitment to sound business judgment is crucial for maintaining trust and upholding ethical standards.

## Quality and Safety

At TIEFENBACHER GROUP, our primary objective is to achieve positive healthcare outcomes for patients by focusing on customers, efficiency, innovation, and our people. We are dedicated to earning the trust and confidence of our customers every day.

Throughout the lifecycle of our products, our employees, suppliers, and partners are dedicated to fulfilling our ethical and scientific responsibility. This involves collecting, processing, and evaluating safety information and promptly informing authorities, healthcare partners, and patients. This commitment underscores our dedication to patient safety and well-being.

We maintain an unwavering commitment to never compromise on quality or safety in any aspect of our operations, thus we require our employees, suppliers, and partners to commit to meeting all applicable regulatory requirements, including GLP, GCP, GMP, GVP, and GDP to ensure the highest standards.

## Environmental Protection

Safeguarding the environment is an integral aspect of our commitment to social responsibility at TIEFENBACHER GROUP. While our primary contribution to a better world is driven by our company's mission, we recognize the importance of minimizing our environmental impact in all our global operations.

We strictly adhere to all environmental rules and regulations, consistently aiming to adopt "best practices" in environmental procedures and standards. Accordingly, Employees shall strive to protect

natural resources and ensure that TIEFENBACHER GROUP business activities minimize the impact on the environment through material savings and energy- efficient planning.

## Animal Welfare

TIEFENBACHER GROUP is committed to strict adherence to relevant animal welfare laws, industry codes, and standards pertaining to the ethical treatment of animals in research. Emphasizing the principles of the 3Rs—Reduce, Refine, Replace—the company is dedicated to reducing and replacing animal use in research wherever possible and refining research methods to minimize any potential impact on animals.

Furthermore, TIEFENBACHER GROUP actively supports and invests in the development of new medicines using scientifically validated alternative testing methods that eliminate the need for animals. This commitment aligns with the ethical principles of minimizing animal use in research while advancing scientific progress.

In instances where the use of animals is deemed necessary for research purposes, TIEFENBACHER GROUP asserts its responsibility to ensure that animals are treated with the utmost respect and a high level of ethical concern. This reflects TIEFENBACHER GROUP 's dedication to upholding ethical standards in the conduct of research involving animals.

The TIEFENBACHER GROUP emphasizes the importance of treating animals with respect, ensuring that their use is approached with a high level of consideration for their well-being. All activities involving animals are meticulously planned and executed to minimize or entirely avoid causing pain, distress, or discomfort to the animals.

Prior to undertaking any proposed use of animals, a thorough evaluation is conducted, placing the health and well-being of the animals as a top priority. This careful consideration is fundamental to TIEFENBACHER GROUP 's commitment to ethical and responsible animal research practices.

Furthermore, TIEFENBACHER GROUP extends this expectation to any third-party organizations engaged to conduct animal-based research on its behalf. These organizations are required to adhere to TIEFENBACHER GROUP Animal Welfare Policy in the Supplier Code of Conduct and comply with all relevant laws and regulations governing the ethical treatment of animals in research. This commitment reflects TIEFENBACHER GROUP 's dedication to upholding ethical standards and ensuring the welfare of animals involved in its research endeavors.

## Diversity, Equity and Inclusion

At TIEFENBACHER GROUP, we uphold a fundamental commitment to fostering an environment of respect and consideration among our employees. This entails treating each individual fairly, with dignity, and without discrimination. We recognize and appreciate the diverse contributions that each employee brings to our organization, believing that diverse teams, encompassing varied backgrounds, beliefs, talents, and cultures, enhance our creativity and contribute to TIEFENBACHER GROUP's dynamism and success.

Our dedication to equality goes beyond legal obligations; it reflects our ethical stance and sound

business practice. Our employment policy expressly prohibits discriminatory practices or harassment based on factors such as race, color, religious beliefs, sexual orientation, national origin, age, marital or family status, gender or gender identification or expression, genetic information, citizenship, or veteran status.

In our pursuit of diversity and inclusion, we strive to recruit, hire, and promote individuals who represent a diverse cultural mix. These principles extend across all facets of the employment relationship, covering the application process, initial employment, promotion and transfer, selection for service, retirement, seniority, and employee benefit plans.

## Safety in the Workplace

TIEFENBACHER GROUP prioritizes the safety and well-being of its employees, conducting its operations with the utmost consideration for their safety and that of the general public.

Any acts or threats of physical violence, intimidation, coercion, or stalking—whether during on or off-duty periods—will not be tolerated. This policy extends to employees, customers, vendors, solicitors, or any members of the public. Immediate reporting of all threats or instances of violence, whether direct or indirect, is crucial and should be made to management or Human Resources.

The use or possession of illegal drugs, narcotics, alcohol, and firearms on at TIEFENBACHER GROUP property is strictly prohibited, as they pose threats to the well-being of our employees and undermine the work environment and ethic.

Additionally, the overarching objective is to prevent any workplace accidents by adhering rigorously to global safety standards. Each member of our workforce bears responsibility for, and benefits from, contributing to a secure and healthy work environment. Before commencing work with equipment, comprehensive training is a prerequisite. Employees are required to wear the necessary protective equipment whenever the nature of their work demands it. Any actions or activities that compromise employee safety are strictly avoided.

Prompt reporting of accidents, incidents of non-compliance, or any situations posing a threat to the safety or health of employees or the public is essential.

## Freedom from Workplace Harassment

TIEFENBACHER GROUP is committed to maintaining a workplace that is free from any form of harassment, recognizing that such behavior is detrimental to the collaborative and inclusive environment we strive to create.

We expect our employees to treat others with respect, value the opinions and differences of each team member and ensure that our business partners share a commitment to diversity and inclusion. All types of harassment, whether expressed through words, actions, or behavior, leading to an intimidating, hostile, or offensive environment, as well as sexually suggestive language and the dissemination of emails containing sexual content are strictly prohibited at TIEFENBACHER GROUP.

By adhering to these principles, we aim to foster a workplace that is respectful, inclusive, and free

from harassment of any kind. We encourage the prompt reporting of offensive, threatening, or violent behavior, regardless of whether it is verbal or physical.

## Freedom of Speech

At TIEFENBACHER GROUP, we strongly believe in fostering an environment where employees can freely express their opinions, feel secure in the workplace, and not face any fear of harm, including for their viewpoints or their affiliation with any legally recognized trade union.

We acknowledge that employees are entitled to fundamental rights, including freedom of opinion, association, expression, and speech. These rights are respected, provided they do not impede their ability to fulfill job responsibilities or contradict the principles outlined in this Code of Conduct and other company policies.

As we exercise our freedom of speech, we understand that we are part of a workplace community. We respect the rights of our fellow employees, ensuring that our expressions and opinions contribute positively to the overall work environment and do not disrupt the collaborative spirit of the workplace.

## Cooperation with authorities

Engaging with government entities, their officials, and employees is one of the aspects of our operations at TIEFENBACHER GROUP. Navigating the complex regulatory landscape in the healthcare industry is a common responsibility. Accordingly, the regulatory obligations vis-à-vis the competent authorities must be observed and TIEFENBACHER GROUP needs a good and cooperative relationship with all competent authorities. Information must therefore always be complete, correct and timely, as these factors can significantly impact how we conduct our business and contribute to ensuring patients have access to safe and cost-effective healthcare.

Accordingly, we stay informed about the regulatory requirements that influence our business operations, actively monitoring and adapting to regulatory developments. Regulatory requirements are integrated into key operating processes, and proactive management of regulatory risks is a priority.

We secure business with government entities through legitimate and transparent means, adhering to high ethical standards. Additionally, individuals or entities providing goods or services for TIEFENBACHER GROUP on government projects or contracts, such as consultants, sales representatives, distributors, or suppliers, are expected to uphold TIEFENBACHER GROUP's standards for interactions with government officials and employees.

## Cooperation with Suppliers

TIEFENBACHER GROUP places significant value on its relationships with suppliers, emphasizing lawful, professional, and fair practices. Compliance with all applicable laws and regulations is a key expectation from suppliers.

Supplier selection often involves competitive bidding, providing each supplier with an equal chance to compete for business. Decisions regarding hiring, contracting, or purchasing goods and services must

be made independently by employees. These decisions should be based solely on factors such as quality, performance, and price to reflect TIEFENBACHER GROUP's commitment to fair and ethical dealings with suppliers, ensuring transparency and integrity in the procurement process.

## Compliance with the Code of Conduct and Whistleblowing

TIEFENBACHER GROUP emphasizes the importance of an open business climate, high business ethics, and the well-being of employees. The management of TIEFENBACHER GROUP is responsible for implementing and monitoring compliance with the Code of Conduct. Employees are encouraged to ask questions about the Code for guidance on appropriate behavior. The managers and the Human Resources Department are identified as resources for such inquiries.

TIEFENBACHER GROUP has a whistleblower policy to encourage reporting of potentially illegal and unethical activities, also known as misconduct. Serious misconducts that can be reported include economic crimes (bribery, theft, fraud, forgery, accounting fraud), conflicts of interest, and other activities affecting vital interests or the well-being of individuals (serious environmental crimes, workplace safety deficiencies, discrimination, and harassment).

The reporting function is available to all employees globally, regardless of employment type. It is also open to suppliers, former employees, and others.

Confidentiality is emphasized when reporting violations or suspected violations of the Code of Conduct or applicable laws. The whistleblower platform ensures anonymity and the information provided will be shared only on a "need-to-know" basis with those responsible for resolving the concern. In addition, TIEFENBACHER GROUP emphasizes the value and respect for data privacy and the protection of personal data within the whistleblower process. The rights of individuals involved in whistleblower cases are protected in accordance with current data protection laws.

Reports can be submitted anonymously through whistleblower platform at <https://tiefenbachergroup.com/about-us/#whistleblower-platform> Reports will be addressed in a timely and confidential manner.

TIEFENBACHER GROUP emphasizes its commitment to supporting individuals who raise concerns about potential violations. The Code of Conduct explicitly prohibits retaliation against individuals who raise concerns about potential compliance violations in good faith. Acts or threats of retaliation are considered serious violations of this Code and TIEFENBACHER GROUP company values.

Members of the Advisory Board and employees are accountable for their actions and may face sanctions if they violate this Code of Conduct. Various forms of misconduct, including violations of the Code of Conduct, requesting others to violate the Code, failure to cooperate in investigations, and retaliation, may result in disciplinary actions. TIEFENBACHER GROUP emphasizes the seriousness of misconduct, and potential disciplinary actions include termination of employment or removal from the Advisory Board.

These provisions underscore TIEFENBACHER GROUP's dedication to maintaining a culture of integrity, transparency, and accountability, encouraging employees to report concerns without fear of reprisal.