

## **1. Area of application and objective**

This company policy concerns all employees and entities of the V-LINE GROUP. Main objective of this company policy is to ensure that the following standards are followed throughout the V-LINE GROUP and to create a working environment characterized by integrity, respect and fair and responsible conduct.

## **2. Responsibilities**

The Compliance Manager is responsible for the completeness, accuracy and regular updating of this company policy.

## **3. Terms and abbreviations**

V-LINE GROUP = All companies affiliated with V-LINE EUROPE GmbH

## **4. Realization**

As a globally operating group of companies, the V-LINE GROUP has to comply with a multitude of different social, political and legal requirements worldwide. In addition, the V-LINE GROUP bears the responsibility for sustainable business activities with its self-imposed values (ownership, innovation, passion and integrity). In order to ensure the conformity of all employees of the V-LINE GROUP with these values, this company policy describes behavioral patterns which the employees of the V-LINE GROUP are expected to observe. The employees are aware that even supposedly minor violations of the behavioral patterns described herein by employees or entities can considerably damage the reputation of the V-LINE GROUP and can also cause great financial damage.

### **4.1. Compliance with the applicable law / regulations**

Compliance with applicable law and other legal provisions is the underlying basis for all activities of the V-LINE GROUP. All employees and entities of the V-LINE GROUP are obliged to familiarize themselves with the legal provisions and internal guidelines applicable to their area of responsibility in the company and, in case of doubt, to seek advice from the relevant entities. In addition, this corporate policy contains some basic principles, which are intended to ensure responsible behavior by all employees and entities of the V-LINE GROUP.

### **4.2. Human Rights**

In acknowledgement of fundamental human rights, the V-LINE GROUP is committed to the principles of diversity and equality, promoted by treating people without discrimination with regard to their ethnic origin, gender, religion, belief, disability, age and sexual identity. Harassment and any intimidating or offensive behavior towards another person, including derogatory remarks

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based on ethnic characteristics and sexual harassment, will be strictly prohibited. V-LINE GROUP employees are expected to treat other people with respect.

The V-LINE GROUP recognizes and protects the privacy, identity and personal data of an individual. In order to protect the personal rights of its own employees as well as the employees of business partners, the V-LINE GROUP ensures compliance with the applicable data protection regulations and also demands this from its employees.

#### **4.3. Fair working conditions**

Human trafficking, slave labor and other forms of forced and compulsory labor as well as child labor are strictly prohibited within the V-LINE GROUP and its business partners. All employment relationships are established lawfully and the V-LINE GROUP respects the employees' freedom of association. The V-LINE GROUP provides safe and healthy working conditions and equipment for all its employees, complies with all applicable health, safety and hygiene rules and regulations and conducts appropriate safety trainings. Legal requirements are also met with respect to the employees' working hours and their wages and benefits, including, but not limited to regulations on maximum working hours, overtime, minimum wages and legal compensation elements. The V-LINE GROUP considers treating its employees with respect and social justice as its duty as a fair employer.

#### **4.4. Fair competition**

The business policy of the V-LINE GROUP is to promote and ensure fair competition. In this respect, the V-LINE GROUP relies on customer orientation and the quality of its products and services. The V-LINE GROUP observes all applicable national, international and foreign antitrust laws and regulations against unfair competition and expects the same from its competitors. As a result, the V-LINE GROUP does not enter into any agreements with competitors with regard to price fixing or arranging business conditions or other agreements with competitors that distort competition, in particular agreements with competitors for the purpose of market or customer allocation. These principles naturally also apply with regard to coordinated conduct and participation in trade associations and organizations.

The V-LINE GROUP rejects unfair competitive practices. Where one of its companies enjoys a dominant position in a market, this position is not abused in relation to customers and competitors.

Managers of the V-LINE GROUP are under the obligation to carefully select their employees for the performance of competition-relevant tasks, to inform them continuously about the restrictions of competition restraints, to monitor compliance with the regulations by means of suitable measures and to draw attention to the serious legal consequences of violations of competition law, both for the company and for the acting individuals. It must be clear to every employee and all entities that under no circumstances is any violation of competition law in the interest of the V-LINE GROUP and therefore must be avoided without exception.

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#### **4.5. Corruption**

The V-LINE GROUP strictly rejects corruption in commercial transactions both within the country and abroad. This applies equally to holders of public offices as well as to entities and employees of other companies. Neither entities or employees of other companies nor holders of public offices may be promised or granted personal advantages in return for preferential treatment in connection with the activities of the V-LINE GROUP within the country or abroad.

The employees and entities of the V-LINE GROUP cannot be corrupted and do not gain any advantage from their activities other than the remuneration paid by the employer. Accordingly, they do not accept any gifts (with the exception of customary promotional gifts), invitations which exceed customary practices (e.g. vacation trips) or any other direct or indirect benefits and they refrain from granting such benefits to competitors, professional consultants, customers, suppliers, service providers and other business partners of the V-LINE GROUP.

The V-LINE GROUP ensures an appropriate relationship between performance and compensation - this applies in particular to cooperation with agencies, professional consultants, suppliers and other service providers of the V-LINE GROUP.

#### **4.6. Conflicts of interest**

It is the official duty of all entities and employees of the V-LINE GROUP to avoid conflicts of interest between their private lives (either directly or indirectly or through persons or companies related to them) and the interests of the V-LINE GROUP. The avoidance of conflicts of interest also requires that the entities and employees of the V-LINE GROUP avoid even the appearance of preferential treatment in business dealings with competitors, professional consultants, customers, suppliers, service providers and other business partners of the V-LINE GROUP due to the personal proximity to individual persons of the above-mentioned types.

Examples of conflicts of interest include the private use of business opportunities of the V-LINE GROUP, its operating resources and the manpower of its employees.

Conflicts of interest may also exist

- in the event of activities as an employee, executive entity, specialist consultant or investor with competitors, customers, suppliers, service providers or other business partners of the V-LINE GROUP (for example as a buyer or seller of a shareholder or as its professional consultant).
- in the case of private business relationships with competitors, professional consultants, customers, suppliers, service providers or other business partners of V-LINE GROUP.

In case of doubt, the possible conflict of interest must be disclosed, the superior of the employee concerned must be consulted and the opinion of the management must be sought.

#### **4.7. Integrity**

For the V-LINE GROUP, open and transparent reporting both internally and to the public is essential. Accordingly, all entities and employees of V-LINE GROUP are obliged to conscientious,

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complete, loyal and timely reporting within the V-LINE GROUP. Entities and employees of the V-LINE GROUP who report to third parties (for example to auditors, shareholders, authorities or to the press) are also committed to comply with these same principles. This is indispensable for maintaining the credibility of the V-LINE GROUP.

The V-LINE GROUP documents all business activities correctly, properly and responsibly.

#### **4.8. Intellectual property & Counterfeits**

The V-LINE GROUP acknowledges the intellectual property rights of its business partners and third parties and is committed to the responsible handling of their confidential information. The misuse of intellectual property as well as the handling of counterfeits is strictly prohibited.

#### **4.9. Sustainability**

The sustainability of business processes is essential for the performance of the V-LINE GROUP and the environmental impact of business activities receives continuous consideration. The V-LINE GROUP promotes awareness of environmental protection issues among its employees and business partners and thus continuously develops its sustainability efforts.

#### **4.10. International trade (Export control)**

The V-LINE GROUP is bound by the legal requirements regarding its commercial products and services in international business transactions. Accordingly, all companies of the V-LINE GROUP comply with all applicable import and export prohibitions and observe all national and international official approval requirements.

#### **4.11. Confidentiality**

The knowledge and information acquired at the V-LINE GROUP contributes significantly to its business success. The V-LINE GROUP invests considerable human and financial resources in the development of innovative services and processes. The protection of the know-how acquired thereby secures the success of the V-LINE GROUP in the competitive market and thus represents a particularly valuable asset that must be protected. Employees of the V-LINE GROUP must maintain the confidentiality of the sensitive information of the V-LINE GROUP and its business partners and protect it against unauthorized disclosure.

#### **4.12. Ensuring the rules of conduct**

The V-LINE GROUP ensures the knowledge of and the compliance with these rules of conduct by its employees by training them and by checking their compliance with these rules of conduct. All employees of the V-LINE GROUP are aware that violations of this Code of Conduct will not be tolerated under any circumstances and may result in consequences in respect of labor law.

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In addition, the V-LINE GROUP offers its employees and business partners an anonymous as well as confidential whistleblower system, with which violations of this Code of Conduct can be reported. In this respect, the V-LINE GROUP follows the principle of non-retaliation against whistleblowers.

## **5. Remarks**

None.

## **6. Distribution list**

All employees and entities of the V-LINE GROUP, on the website [www.v-line.com](http://www.v-line.com)

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