



## Code of Conduct

June 2024



## Dear Colleagues,

The Avemio Group has a diverse workforce. It attaches great importance to friendly interaction with and among each other. In addition, virtues such as decency, tolerance and understanding are practiced. With this Code of Conduct, we provide ourselves with a basic constitution that everyone can and should refer to.

In our working environment, everyone has the right to feel safe, respected and valued. This code serves as a guideline for daily behavior and interactions with each other in order to live and promote the integrity of trust, openness and cooperation.

Together, we all contribute to creating a pleasant corporate culture and working atmosphere and represent values that express the fact that we make these guidelines the benchmark for our daily actions. As the Group grows, the responsibility of individuals increases. We have now grown into a large team with our Group companies. Where many people come together, it is helpful to identify behavioral guidelines as a cornerstone of orientation.

The Code of Conduct cannot cover or anticipate every situation. It forms the basis for a dynamic

dynamic process that changes and is adapted over time. As a community, we are actively

actively involved in this process. In this respect, our Code of Conduct serves as a reliable guideline.

The entire Avemio Management Board and employees in all areas of responsibility welcome concerns, suggestions, proposals for improvement or questions and are open to criticism.

Let us work together towards a happy and healthy cooperation.

Ralf P. Pfeffer, CEO

Steffen Schenk, COO

Norbert Gunkler, CFO



## CONTENTS

Our Code of Conduct

Avoidance of Conflicts of Interest

Prevention of Bribery and Combating Corruption

Data Protection

Work Environment and Diversity

Business Relationships and Compliance with Suppliers

Sustainability and Environmental Protection

Reporting and Enforcement

Regular Training and Updating

Compliance Contact



## OUR CODE OF CONDUCT

### Ethics, integrity and compliance

These three fundamental principles form the framework on which responsible and sustainable action is based. They are based on values such as fairness, transparency, reliability and trust. These values not only serve as guidelines, but should also be firmly anchored in all decision-making processes. This Code of Conduct defines, describes and interprets these values and how they are to be understood and implemented.

Our Code of Conduct is a shared responsibility - not just for management, but for every single employee. Together, we want to ensure that the principles formulated here are firmly integrated into our day-to-day dealings with one another.

### How to use the Code of Conduct

The Code of Conduct ensures compliance with company guidelines. It serves as an orientation and guideline for decision-making and as an instrument for conflict resolution. It is a guideline for communication and transparency for the management towards all stakeholders interacting with the Group. At the same time, this formulation of the Code provides the basis for feedback and further development regarding existing corporate values.



## AVOIDANCE OF CONFLICTS OF INTEREST

### Guidelines on disclosure and avoidance

A conflict of interest exists when the personal interests of employees collide with the interests and duties of the company. Professional decisions and actions must be taken independently of personal interests. Employees and managers are obliged to disclose potential conflicts of interest that could impair the objective fulfillment of their professional duties and jeopardize trust in the integrity of the company to the management, the HR department or the compliance officer.

### Examples of conflicts of interest

- *Exercise of secondary activities that may be in conflict with the interests of the company*
- *(e.g. impairment of the employee's main activity or breach of the non-competition clause)*
- *Use of company property or resources for personal purposes without authorization*
- *Acceptance of gifts or benefits from business*
- *partners that could compromise independence and objectivity*
- *Disclosure of confidential company information to external parties for personal interest*
- *Favoring relatives in hiring or promotion decisions without objective criteria*



## PREVENTION OF BRIBERY AND COMBATING CORRUPTION

### Antitrust law, bribery and insider information

The Avemio Group is committed to upholding the highest standards of anti-corruption and anti-bribery. Corruption is defined as any form of unethical behavior aimed at obtaining unlawful advantages. Bribery refers in particular to the unlawful acceptance or granting of gifts, money or favors in order to exert influence or gain improper business advantages.

Employees are obliged to comply with the rules of fair competition within the legal framework. This applies in particular to competition and antitrust law; any appearance of unfair competition must be avoided. Agreements with competitors on prices, market shares or conditions are not permitted and can lead to legal consequences.

Gifts, courtesies and hospitality may not exceed a generally customary level. They must not influence business decisions in any way and must comply with the legal framework.

In cases of doubt, the Compliance department or the line manager should be informed. The acceptance of gifts or similar that exceed the defined value limits must be reported and approved by the management.

All employees are free to buy and trade Avemio AG shares. This assumes that the employees do not have insider information. Employees who have access to insider information must always protect it and may only pass it on to authorized persons in accordance with the existing regulations. Insider trading is prohibited and will be punished.



## Procedure and immediate reporting

Our Code of Conduct emphasizes a zero-tolerance policy towards all forms of corruption and bribery. Employees who violate these principles must expect serious action, including legal consequences. If there is any suspicion of corruption or bribery, this must be reported immediately. The whistleblowing portal enables employees to report incidents securely and anonymously. There are defined procedures for investigating reported incidents to ensure compliance with the principles.



## DATA PROTECTION

### Protection of confidential information of the company, customers and employees

We are committed to ensuring the confidentiality and security of all company, customer and employee information. This includes sensitive data such as intellectual property, personal identification data, financial data and all other confidential information. Everyone is required to use confidential information for business purposes only and to protect it from unauthorized access or disclosure.

It is our own responsibility to take appropriate security measures to ensure the protection of confidential information. This includes using secure passwords, encrypting data, restricting access to authorized individuals and regularly reviewing and updating existing security protocols. In the event of a suspected breach of confidentiality or security of information, each individual is obliged to take immediate action and report this to the compliance department or supervisor.

By following these guidelines, we ensure the security of our data and the trust of our customers, employees and business partners.

### Compliance with data protection laws and security standards

For personal data, the guidelines resulting from the GDPR (or corresponding laws) are unconditionally binding. Everyone is obliged to handle personal data responsibly and to strictly adhere to the data protection guidelines in order to maintain the trust placed in us.





## WORK ENVIRONMENT AND DIVERSITY

### Promoting an inclusive working environment

We are committed to respectful behavior towards all employees, without discrimination or harassment based on gender, origin, religion, sexual orientation or other characteristics. Everyone should feel safe and accepted in our working environment.

We see diversity as a strength that we use to promote a culture in which different perspectives are shared and valued, leading to creativity and innovation.

An inclusive work environment also means breaking down barriers and ensuring that everyone has an equal opportunity to succeed. We offer training and support to raise awareness of diversity and inclusion and to resolve conflicts constructively.

### Zero tolerance policy towards Discrimination, harassment and bullying

Our Group is firmly committed to creating a working environment characterized by respect, fairness and cooperation. A zero-tolerance policy towards discrimination, harassment or bullying is an integral part of the existing Code of Conduct. Discrimination based on ethnic origin, gender, sexual orientation, religion, disability or other characteristics as well as harassment and bullying of any kind, including verbal, physical or psychological forms, are strictly prohibited. This applies to all employees, managers, contractors and anyone acting on our behalf.

Employees are encouraged to report incidents, whether directly to their line manager, HR management or via the Avemio Group's anonymous whistleblowing portal. Reported incidents are investigated promptly, fairly and thoroughly.



## BUSINESS RELATIONSHIPS AND COMPLIANCE WITH SUPPLIERS

### Guidelines for fair business and ethical behavior

We are committed to maintaining the highest standards of integrity, honesty and transparency in all business relationships and activities. This means that any form of bribery, corruption or unfair competition is prohibited. Fair and transparent business practices as well as the rights and interests of customers, suppliers, employees and other stakeholders are respected and promoted.

### Requirements for suppliers and partners for compliance

These self-imposed requirements for suppliers and partners for compliance reflect our commitment to only work with companies that share the associated values and standards. Suppliers and partners are expected to comply with all applicable laws, regulations and industry standards, in particular with regard to human rights, fair working conditions, environmental protection, data protection and ethical business conduct. The requirements are checked in the long term through corporate due diligence obligations such as risk management and analysis, compliance management and suitable preventive and remedial measures.



## SUSTAINABILITY AND ENVIRONMENTAL PROTECTION

### Environmentally conscious action

The employees of the Avemio Group take their responsibility for our environment seriously and act accordingly. We strive to keep our ecological footprint as small as possible and use company property, resources and energy responsibly

### Cycle Economy

We think in cycles, avoid waste and recycle where technically possible and sensible.



## REPORTING AND ENFORCEMENT

### Reporting procedure (Whistleblowing portal)

In the event of breaches of the Code of Conduct, those affected or observers can contact their line manager or the HR and Compliance department. Our whistleblowing platform at [whistleblowing.avemio.com](https://whistleblowing.avemio.com) is available for anonymous reports.

### Violations and consequences

Employees of the Avemio Group are obliged to comply with the Code of Conduct. Violations can have disciplinary, civil or criminal consequences. If a situation arises that is not covered by the Code of Conduct, a superior, the HR or Compliance department should be consulted in case of doubt.



## REGULAR TRAINING AND UPDATING

The Avemio Group provides regular training (face-to-face or virtual) to inform employees about compliance, sustainability and data protection topics.

Regular measures are taken to ensure that employees are always up to date and understand and follow the existing policies and procedures. Training on our company policies, procedures and ethical standards as well as regular reviews are part of these measures. Continuous training and review strategies ensure compliance with and improvement of the relevant company standards and values.



## COMPLIANCE CONTACT

Compliance Officer: Matthias Peterhänsel

E-mail: [compliance@avemio.com](mailto:compliance@avemio.com)

Tel. +49 176 46798516

Whistleblowing portal:  
<https://whistleblowing.avemio.com>



Avemio AG  
Schaumainkai 91  
60596 Frankfurt  
[www.avemio.com](http://www.avemio.com)

**AVEMIO**