


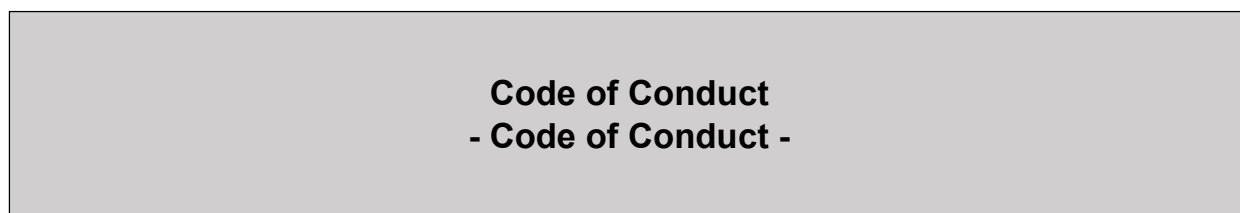


# Dr. Schumacher Code of Conduct

**As of 03/2025**




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## 1. Preamble

Driven by our desire to protect the health of everyone through easy-to-use and at the same time highly-effective solutions, we at Dr. Schumacher have been putting people and their health at the centre of our thoughts and actions for more than 40 years. Both the values of our company and the expectations we place on ourselves are based on this guiding principle of our company founder, Dr. Henning Schumacher. We are always guided by our vision: "Revolutionising hygiene - for a healthy life. Wherever, whenever." Together with our values of "agility", "courage", "connectedness" and "authenticity", this vision is what defines our Code of Conduct. This serves as a watchword for everyone who works for and with Dr. Schumacher or acts on our behalf.

As a family business, we are convinced that in everything we do, we are first and foremost responsible to the people we work with. We want to be a reliable partner for our employees. A pleasant working atmosphere, safe workplaces around the globe and a lived corporate culture are therefore particularly important to us. We also make sure that our employees receive the appreciation they deserve. Respectful treatment, the promotion of personal development opportunities and the delegation of responsibilities in a spirit of trust are essential for this. Such value-oriented cooperation is also very important to us in dealing with our suppliers, partners and customers. In order to ensure the greatest possible stability and reliability, we therefore offer long-term supply contracts and a continuous customer relationship.


We, the Dr. Schumacher Group, are an internationally established developer and manufacturer of medical products, pharmaceuticals, biocides and cosmetics.

Our focus here is on disinfectants, washing, care and cleaning agents, both for professional medical facilities, such as clinics, medical practices and elderly care facilities, and for customers from the non-medical segment and private consumers.

We are a high-performance, shareholder-managed family business with more than 1,650

employees. In addition to our founding headquarters in Malsfeld in northern Hesse, we have other production facilities in Poland, Turkey and India as well as sales offices in eight countries. This helps us ensure that our product solutions can reach customers in around 70 countries worldwide. These clients include medical care facilities, elderly and nursing homes, chemists' chains, discounters and retail chains as well as well-known international brand providers.

In addition to the guiding principle of our company founder, his idea of innovative, highly effective and user-friendly solutions continues to be what motivates Dr. Schumacher's product development. For us, quality is not a promise, but a commitment. We are aware of our responsibilities to our customers and users and do everything we can to meet them. As a versatile certified manufacturer of medical devices, biocides, cosmetics, washing and cleaning products and pharmaceuticals, we therefore ensure that our product systems meet the highest quality requirements and checks (Annex 1: Product classes and regulatory background). Numerous dermatological tests and product tests as well as additional external tests for efficacy and skin and material compatibility of our product systems allow us to ensure consistently high standards. We are committed to the applicable national and European legal frameworks and therefore strictly adhere to them, from the development phase through serial production to the distribution of our products. Upon customer request, we can also ensure that our product solutions are also marketable outside the European Economic Area.

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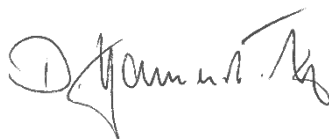
We not only apply the principle of the Dr. Schumacher Group, "We protect your health", to the direct application of our product solutions to our customers, but also to a safe working environment, continuous training and further education of our employees. In this context, we make a major contribution to training young people through a very high proportion of apprenticeships. We also attach great importance to ensuring sustainable and environmentally friendly production. We invest in our buildings, machines and equipment to keep them up to date with the latest technology. We meet all legal requirements of the Fourth and Twelfth Ordinance for the implementation of the Federal Immission Control Act (BImSchG) and are certified in accordance with DIN EN ISO 13485 (QM system for medical devices), DIN EN ISO 14001 (environmental management system), DIN EN ISO 9001 (quality management system), DIN EN ISO 45001 (occupational health and safety management system) and the SA 8000 standard (international standard for social responsibility). In addition, we have already been certified several times in a row according to the Eco Management and Audit Scheme (EMAS) developed by the EU. If we cannot avoid these all together, we offset greenhouse gas emissions from individual product groups by working with well-known partners through a climate protection project. In addition, we are increasingly using non-woven materials and other raw materials that are certified, for example, according to FSC (Forest Stewardship Council), RSPO (Roundtable on Sustainable Palm Oil) or PEFC (Programme for the Endorsement of Forest Certification Schemes).

We want to maintain and promote our values, which have always been the watchword and guarantee of success for our family business and to which this *Code of Conduct* is dedicated, for our future development. We feel committed to them and at the same time see them as the basis for cooperation with our employees and business partners. It is up to all of us to contribute every day to ensuring that Dr. Schumacher continues to remain a company that we can all be proud of.


This is our commitment as the management team of the Dr. Schumacher Group.



Dierk Schumacher  
Managing Director



Dirk Hamenstädt  
Managing Director

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## 2. Scope of application

This Code of Conduct sets out the fundamental ethical principles that apply to all employees of the Dr. Schumacher Group. Compliance with these principles is a matter of course for us, the Dr. Schumacher Group, both in the cooperation between the individual departments and in dealing with colleagues among themselves as well as in cross-location cooperation between companies and at each individual location of our corporate group.

In addition, the principles set out here form the basis on which we, the companies of the Dr. Schumacher Group, will establish cooperation with our customers, suppliers, advisors or other business partners. If it becomes apparent during an ongoing business relationship that our business partner is disregarding the principles of this Code of Conduct, we, the company of the Dr. Schumacher Group with which this business partner has a contractual relationship, will consider this to be a breach of contract and will only maintain the contractual relationship if the business partner concerned immediately takes measures to remedy the breach and prevent it reoccurring in the future, and gives the Dr. Schumacher Group the opportunity to satisfy itself of the measure taken and its effectiveness.

The principles set out in this Code of Conduct are intended as a minimum standard. We always strive to consistently increase the level of protection that results from our responsibility to people with whom we work in business, to our own employees, our customers, society and the environment as a whole, and to eliminate any known maladies. We also expect this from our business partners.

## 3. Company values and self-image


Our company values and our self-image have already been outlined in the preamble to this Code of Conduct. These guiding principles and strategic principles form the building blocks from which the foundations, the floors and the roof of our "Dr. Schumacher House" are built. Our employee watchwords are based on this model.

**WE – the employees –** are the success factor of the Dr. Schumacher Group.

Our corporate culture can only be successfully brought to life through cooperation with each other. This requires everyone to think and act responsibly. It is also particularly important to the management of the Dr. Schumacher Group that close relationships are maintained across locations and throughout hierarchies. Our employees treat each other with respect and fairness to ensure trust and long-term cooperation; they have an understanding of other business areas and departments; and when abroad they take the local environment into account and respect the local culture and laws. We, the employees of the Dr. Schumacher Group, attach great importance to our continuing development, taking responsibility and being actively involved in shaping the company. We practice a modern culture of feedback, in which errors are dealt with openly and constructively and conflicts are managed.

**Work processes** are continuously analysed and made more efficient within the Dr. Schumacher Group. We ensure this through our fact- and solution-oriented working method, which is characterised by both active knowledge management, consisting of documentation and know-how transfer, and transparency. For cross-departmental cooperation, the respective process participants therefore have access to all relevant information. This also makes the best possible use of synergy effects.



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Another building block of the "Dr. Schumacher House" is our self-image of maintaining respectful and fair partnerships with our **customers, product users, suppliers and other business partners**. To this end, processes and procedures are designed in a customer- and solution-oriented manner and strategic measures and objectives are regularly reviewed and adjusted with regard to their priority. At the same time, something which drives us at all times is offering customers innovative, marketed and high-quality product solutions and services in addition to developing pioneering technologies for this purpose.

We, the Dr. Schumacher Group, are committed to **sustainable profitable growth**. The long-term success of our company, secure jobs and high employee retention come before short-term profit maximisation. Our goal is also to preserve the structure and culture as a family business into the future. To this end, all shares in our company will remain in family hands to ensure its independence from capital investors. We will remain true to our core business activities and be represented with high-quality product systems – whether under our own Dr. Schumacher brands or under the private label of our customers – as well as among professional users and in private households as manufacturers of internationally known consumer brands.

#### 4. Fair competition

Fair competition is important to us, the Dr. Schumacher Group. We respect applicable competition and antitrust law. The Dr. Schumacher Group will not enter into agreements of any kind that restrict or prevent free competition for customers with other market participants. We do not participate in price-fixing agreements which restrict competition to the detriment of customers. If we, the Dr. Schumacher Group as a whole, or if one of our companies, should achieve a dominant position in a segment of our business, this will under no circumstances be abused.


As manufacturers of pharmaceuticals, medical devices, biocides, washing and cleaning products as well as cosmetics and services, we, the Dr. Schumacher Group, are aware that we must take the greatest possible care to protect users when promoting our products and services and that we must comply with all relevant national and international legal bases.

Throughout the history of our company, we have always been able to impress our customers with the quality and innovation of our product solutions as well as the high degree of customer orientation and service awareness that is part of our corporate philosophy. This will remain so in the future.

#### 5. Data protection, intellectual property and industrial property rights

Ownership of recipes as well as other developments and intellectual creations within the Dr. Schumacher Group is the heart of our company. We attach great importance to the protection of this information and will take all necessary precautions to prevent the loss of confidential information and to reduce and control its disclosure to the extent necessary.

Within the Dr. Schumacher Group, we ensure that our employees show the due sensitivity and care for the company's intellectual property both internally and externally at all times. This is reflected in particular in the observance of confidentiality obligations stipulated in the employment contract vis-à-vis third parties, including family members and friends, and – insofar as this is necessary in individual cases due to the situation or the value of the confidential information – also vis-à-vis our colleagues. In addition,

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our employees work to effectively protect all documents and records related to their professional activities for the Dr. Schumacher Group, as well as any digital work equipment (e.g. computer, tablet, mobile phone, USB sticks, etc.) at all times - whether in our company's facilities, at home or on the road - against access by unauthorised persons. If necessary, important documents or their copies must be destroyed in a secure manner. Computers and other digital work equipment must be protected – if technically possible – by assigning and regularly changing suitable passwords.

Our employees are also encouraged to obtain industrial property rights (e.g. patents, trademarks, designs, etc.) for the company's intellectual property wherever possible and reasonable and after careful strategic consideration.

However, we do not only ascribe this importance to our own intellectual property. Within the Dr. Schumacher Group, we apply the same standards of care to the intellectual property of third parties. All our employees are obliged to refrain from violating the industrial property rights of third parties in their work. In case of doubt, they must consult the legal department of our company or contact external experts. A deliberate violation of the industrial property rights of third parties will not be tolerated. In addition, all business partners of the Dr. Schumacher Group may rely on the fact that the confidential information they provide to us remains confidential and is used by us exclusively within the framework of the confidentiality agreements concluded in this regard.


## **6. Granting / receiving benefits**

At the Dr. Schumacher Group, we do not tolerate any form of corruption or behaviour that could be interpreted as corruption. Our employees will therefore neither offer a business partner a financial or other kind of benefit nor will they accept any kind of benefit offered to them by a business partner to initiate or maintain a business relationship. If our employees are offered an unlawful benefit by a business partner in connection with their work for the Dr. Schumacher Group, our employees must inform their managers of this.

In the same way, the granting or acceptance of benefits vis-à-vis employees of the Dr. Schumacher Group on the part of representatives of official bodies and other state or private authorities (e.g. auditors, notified bodies, etc.) is prohibited.

If employees of the Dr. Schumacher Group wish to give a so-called "courtesy gift" of low value to a third party with whom we are in close business contact, the consent of the respective manager of Dr. Schumacher GmbH must be obtained before it is given. Accepted "courtesy gifts" of low value, insofar as they are not perishable goods, are collected centrally for the purpose of our annual employee raffle. Invitations or acceptance of invitations to business dinners must also be proportionate.

We, the Dr. Schumacher Group, take all necessary measures and precautions to prevent money laundering activities. Our employees are encouraged to bring unusual financial transactions to the attention of their managers or to have them checked by the relevant accounting or legal department.

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## **7. Handling company property**

Responsible use and treatment of company property is important to us. The operating equipment, machines, tools, and work equipment provided must be treated with care by our employees. Other resources provided by the Dr. Schumacher Group (energy, water, electricity, information and communication systems, etc.) are always used by our employees economically and only in a lawful manner for corporate purposes. Private use of the property and resources of our company is only allowed if permission to do so is expressly granted. If our employees are allowed to access the financial resources of the Dr. Schumacher Group for business purposes (e.g. when procuring goods, business trips, etc.), the principles of economy and proportionality must also be observed.

If third parties (e.g. representatives of authorities, business partners, visitors) are present at the facilities of the Dr. Schumacher Group, they are also obliged to handle our property and resources in a careful and responsible manner.

We, the Dr. Schumacher Group, maintain suitable and appropriate measures and precautions to prevent property damage, misappropriation, theft, misappropriation or similar property-damaging offences by our employees or third parties.

## **8. Prohibition of insider trading**


At the Dr. Schumacher Group, we attach great importance to trust and cooperation with our business partners. Therefore, we ensure that our employees do not use internal information regarding direct business partners and other third parties which they may receive in the course of their work to acquire or sell shares or other participations in these partner businesses. At the same time, our employees are prohibited from passing on internal information about business partners to third parties (including family members and friends) without authorisation to enable these third parties to acquire or sell company shares in a business partner. Employees of the Dr. Schumacher Group are also not permitted to offer indirect information.

## **9. Separation of private and corporate sphere**

In their work, all employees of the Dr. Schumacher Group place the interests of our company at the centre of their actions and make decisions free from any external personal, social, financial or political interests. If employees encounter conflicts between private or otherwise external interests and the interests of the Dr. Schumacher Group during their work or if it becomes apparent that such conflicts of interest could arise, the employee will contact their own manager in good time, disclose the potential or already existing conflict of interest to them and seek a solution to the conflict of interest together with them.

If employees of the Dr. Schumacher Group wish to take up secondary employment, the consent of the manager or our management will be obtained before taking up this activity. This applies regardless of the extent to which the secondary employment is planned, whether it is to be self-employed, employed or voluntary or whether it is to take place within or outside the industry.



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## 10. Prohibition of discrimination

Both through the Dr. Schumacher Group's own international positioning and through our worldwide business relationships with suppliers, customers and other business partners, it is a matter of course for our employees to accept the people they work with as they are in all their diversity, and to treat each other with respect.

No harassment, discrimination, degradation or other form of discrimination on the basis of race, skin colour, nationality, descent, gender, sexual identity, belief, worldview, political attitude, age, physical constitution or appearance of a person takes place within our group of companies.

The management of the Dr. Schumacher Group pays special attention to equal opportunities in our company. We do not tolerate offences against anyone's personal dignity, such as insults, bullying or sexual harassment. In individual cases, the management will take appropriate, necessary and appropriate measures that, on the one hand, comply with the applicable legal requirements and, on the other hand, protect affected employees from discrimination in the future.

Each employee serves as a representative of the Dr. Schumacher Group and is responsible for ensuring that we are valued around the globe as an employer and business partner which acts in a social and respectful manner.

### *Recruiting*

When filling management positions, we ensure a balanced ratio of the genders with otherwise equal qualifications. Dr. Schumacher GmbH promotes diversity and equal opportunities Dr. Schumacher GmbH also promotes diversity and equal opportunities by subsequently inviting diverse people to apply. However, a position is generally only be filled on the basis of the applicant's suitability.

### *Selection of suppliers and service providers*

Dr. Schumacher GmbH also promotes diversity and equal opportunities by giving preference to women- and diversity-orientated companies with comparable conditions are given preference as suppliers, provided that we have information on this.


## 11. Human and employee rights / occupational safety

We, the Dr. Schumacher Group, ensure that internationally recognised human and employee rights are observed both in the companies that belong to us and among our suppliers.

Neither we, the Dr. Schumacher Group, nor our business partners tolerate any form of forced or compulsory labour. We reject physical and sexual violence and resolutely oppose forms of debt bondage. Employees must be guaranteed free mobility. As a result, retaining employees' travel and identification documents is not permissible for us. In all countries in which we, the Dr. Schumacher Group, are active, we oppose the denunciation of individual persons to state authorities. We reject even the threat of such denunciation.

All employment relationships between employees and employers are voluntary. The employment relationships are based on the mutual consent of all parties without the threat of penalties.

Fair wages are important to us. The wages paid to employees in the companies of the Dr. Schumacher Group and our suppliers must therefore at least correspond to the respective statutory minimum wage or – if this is higher – to the local wage level for a comparable activity. In doing so, we

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not only orientate ourselves on the legal regulations, but also take into account criteria of the International Standard for Social Accountability (SAI, Social Accountability International), an international non-governmental organisation. All legally agreed wages are to be paid within a reasonable period of time. We reject the payment of work fees or the payment of a deposit before starting work.

We also take our "We protect your health" principle seriously, especially with regard to our own employees. We therefore provide them with a safe and hazard-free working environment in addition to ensuring compliance with the occupational health and safety laws applicable at the respective site. We, the Dr. Schumacher Group, also expect the same from our business partners with whom we work.

We respect our employees' freedom of association and rights to collective bargaining. Our employees can establish or join organisations that represent the interests of employees in the workplace without being disadvantaged or discriminated against in any way for this activity.

We, the Dr. Schumacher Group, respect freedom of association, and the freedom of organisations to draw up their own articles of association and rules. We are prepared to enter into negotiations with legally-founded organisations and to implement decisions which are developed jointly thereby.

If we become aware of a violation of the aforementioned fundamental human and employee rights by a business partner of the Dr. Schumacher Group, in disregard of the labour law requirements applicable at the respective location of the business partner, we – the company of the Dr. Schumacher Group involved in the legal relationship – regard this as a serious breach of contract, which entitles us to terminate the contractual relationship immediately. In such a situation, we, the company of the Dr. Schumacher Group involved in the legal relationship, will only maintain the contractual relationship if the business partner concerned immediately takes measures to remedy the breach and prevent it occurring in the future, and gives the Dr. Schumacher Group the opportunity to satisfy itself of the measure taken and its effectiveness.


We do not tolerate child labour in any way and do not use it within the Dr. Schumacher Group. We do not employ any employees under the age of 15. In addition, we do not employ anyone under the age of 18 to perform dangerous or heavy work, unless this is legally permissible as part of an apprenticeship.

Should incidents of child labour be identified in an industry and the region of our suppliers, we, the Dr. Schumacher Group, will work to ensure that the supplier concerned initiates or participates in a programme that provides all children affected by child labour with a high-quality education until they are no longer children according to the International Labour Organisation (ILO) Convention.

Through our understanding of human and employee rights as well as occupational safety efforts, as laid down in this section of the Code of Conduct and lived in practice, we uphold for example the core labour standards of the FSC according to point 7 FSC-STD-40-004-V3-1.

## 12. Environment and Sustainability

At Dr. Schumacher, we see ourselves as part of society and therefore want to assume responsibility, even beyond the legally necessary extent. We are convinced that we can only continue to be successful as long as our social, ecological and economic responsibility, in addition to our values, forms the basis of our business activities. For this reason, the topic of "Corporate Social Responsibility" (CSR) is an important part of our corporate strategy and is also reflected in our vision: "Revolutionising hygiene - for a healthy life. Wherever, whenever."

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Our social responsibility begins with each individual employee, who makes their contribution to environmental and climate protection through careful use of natural resources. However, we also see our responsibility to society as being based on the fact that we provide healthcare with high-quality products and provide solutions, thus protecting the health of our fellow human beings. As a company in the chemical industry, we, the Dr. Schumacher Group, see ourselves as having a special responsibility to attach great importance to environmental protection and sustainable action at all our sites worldwide. The introduction to this Code of Conduct has already set out the commitment we make with regard to our own production activities. However, our commitment goes beyond this and extends from the development phase of a product to the selection of raw materials and their suppliers right down to the disposal of the products after their use.

The companies of the Dr. Schumacher Group use resources efficiently in their manufacturing and logistics processes and take care to ensure their actions have the lowest possible impact on the environment and climate. To this end we are aided by modern production and administration buildings and the most efficient machines available.

For us, corporate social responsibility is an ongoing development process that must be proactively shaped. To ensure this, we set ourselves ambitious goals and work together constantly on their implementation. The concrete objectives and measures to implement them are summarised and evaluated in the annual environmental report.

### **13. Collaboration with the authorities**

All companies of the Dr. Schumacher Group cooperate with all competent authorities at all times. This applies to regular activities as well as special situations (e.g. investigations, including against third parties).

### **14. Relationship with business partners**

Just as every business partner can rely on us, the companies of the Dr. Schumacher Group, to always act in accordance with the law, we also ensure that our business partners comply with the law and attach great importance to this in their supply chain. We do not tolerate non-compliance by our own companies or by our business partners with national and international laws in general, or the violation of national or international trade restrictions, import and export restrictions and the regulation of capital and payment transactions in particular.


### **15. Donations/sponsoring**

Our group of companies assumes social responsibility and is actively committed to the promotion of health and culture. Payments to staff, benefits in kind and cash benefits awarded here are in accordance with the applicable laws. In principle, no donation or sponsoring payment will be awarded to obtain economic benefits or to promote business initiation.

When accepting applications for funding as well as when promising sponsoring services and donations, the employees of the Dr. Schumacher Group ensure that our internal company guidelines and the applicable law are complied with and that there is no conflict involving corruption, money laundering or other economic crimes.

Rules on donation or sponsoring payments are determined by our management.

We, the Dr. Schumacher Group, do not make donations, in cash or in kind to political parties, public office holders or candidates of political parties, or to party-affiliated organisations.

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## **16. Conduct in tendering procedures**

We, the Dr. Schumacher Group, fundamentally support fair and legally compliant competition. We also uphold this principle in the case of public and private tenders. No employee of a company of the Dr. Schumacher Group uses illegal measures or means to win a publicly or privately tendered contract for us. Conversely, no company of the Dr. Schumacher Group enters into unlawful agreements or arrangements with customers, suppliers, competitors or other business partners that would prevent it from participating in a public or private tender.

## **17. Product safety**

We, the Dr. Schumacher Group, manufacture product systems that are used directly on humans. It has always been our aim to create safe and user-friendly products. Throughout the entire production process – from the selection of raw materials and incoming goods inspection to the final inspection – we ensure that our product systems can be used as intended and without risk. Traceability and post-market control ensure that hypothetical or actual complaints can be responded to immediately. The employees of the Dr. Schumacher Group take care to ensure the safety of manufactured product systems in order to meet the legal and regulatory requirements, confirm and expand the trust customers place in our company's product systems and provide users with the best possible solution. Secure product solutions that customers can rely on form the basis of satisfied customer relationships and constant growth.


## **18. Compliance with the Code of Conduct and monitoring**

All our employees – regardless of which sub-company and at which hierarchy level they work – are expected to comply with the laws and legal frameworks relevant to their activities and to comply with this Code of Conduct in their actions. Violations of applicable law and the provisions of the Code of Conduct will not be tolerated. In individual cases, the management will take suitable, necessary and appropriate measures to ensure the proportionality of sanctions in the event of violations of the Code of Conduct.

In relation to business partners of the Dr. Schumacher Group, the employees who are responsible for the interface between a company which is a part of the Dr. Schumacher Group and the business partner are also responsible for informing the business partner that the contents of this code of conduct are part of the fundamental basis of the collaboration. Communication can take place, for example, via the Code of Conduct for Suppliers, which is sent to the new supplier for signing as part of the validation process. In addition, business partners are made aware of compliance with the principles of the Code of Conduct via the General Terms and Conditions. During the course of the ongoing relationship with the business partner, the interfacing employees of the Dr. Schumacher Group are also responsible for ensuring compliance with the principles of this Code of Conduct by the business partner in an appropriate manner (for example, through contractually agreed audit rights).

Each company of the Dr. Schumacher Group has appointed a central contact person to whom all employees can speak – including anonymously – if they want to clarify questions about the legal compliance of their own behaviour or if they can report potential or actual violations of this Code of Conduct by employees of the Dr. Schumacher Group or by business partners. This central contact person can be found in the organisational chart of the respective company of the Dr. Schumacher Group. They will take up the concern raised with them in confidence, and in such a way that the employees who have contacted them do not suffer any disadvantages as a result.

In addition to the central contact person, all employees are also available to answer questions and concerns regarding our Code of Conduct and its observance with the direct managers, our human

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resources department, the legal department, the employee representation (ERC), external representatives and our managing directors.

Our managing directors and managers are responsible for handing over a copy of our Code of Conduct to all employees as part of the employment or employment contract with the Dr. Schumacher Group and for complying with and upholding their responsibilities as role models.