



Code of Conduct

Preamble

CODICO assumes responsibility by considering the consequences of entrepreneurial decisions and actions in economic, technological as well as social and ecological terms and by achieving an appropriate balance of interests.

CODICO makes a voluntary contribution to the well-being and sustainable development of society at the locations where we operate within the framework of the respective possibilities and scope for action. In doing so, CODICO is guided by generally valid ethical values and principles, in particular integrity and probity as well as respect for human dignity.

CODICO stands for:

- Socially responsible corporate governance
- Compliance with applicable laws and legal provisions
- Integrity and organizational governance

Scope

This Code of Conduct applies to all CODICO locations and subsidiaries. CODICO undertakes to promote compliance with the contents listed below among its suppliers and in the rest of the supply chain within the scope of its possibilities.



General

Social responsibility is an essential part of our corporate philosophy. The following defines the values, principles and practices that guide our business operations. Our goal is to uphold basic employee rights, respect ethical standards and create a work environment that promotes integrity, respect and fair conduct.

In addition, we emphasize that motivation and a high level of professionalism are an essential part of the company's foundation. The following principles of conduct are valid for the management, all employees as well as for all contractual partners (e.g. manufacturers).

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9. Legal compliance
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12. Implementation

We encourage all employees to contact the management if they have any doubts about the legality and appropriateness of measures or questions.

Sven Krumpel (CEO)

Karin Krumpel (CEO)

Perchtoldsdorf, 29.6.2022



1. Human and Labor rights

CODICO continuously strives to identify potential and actual negative human rights impacts in connection with its activities and business relationships and, if necessary, to implement appropriate corrective measures to ensure that CODICO's activities do not contribute to human rights violations:

Prohibition of forced Labor

CODICO strictly rejects any form of forced labor, bonded labor, slavery or human trafficking.

Equal opportunities

CODICO is committed to upholding and protecting human rights. The company rejects any form of discrimination based on race, skin color, gender and religion or other characteristics (e.g. nationality, age). Equal opportunities for all are a matter of course and all corporate decisions are free of any form of discrimination.

CODICO bases its actions on universally valid ethical values and principles, in particular integrity, honesty, respect for human dignity, openness and non-discrimination on the basis of religion, ideology, gender or ethnicity.

Harassment

CODICO will not tolerate harassment of any kind under any circumstances and in any form. In addition to psychological and verbal harassment of any kind, this also includes physical harassment, especially sexual harassment. This includes obvious advances, condescending comments, suggestive gestures or the showing of relevant pictures and video material in the company and its environment. Behavior that was not originally intended as such by the person acting and cannot be assumed to be intentional can also be classified as harassment.



Health and safety of employees

CODICO recognizes that health, safety and the environment are critical factors in the success of the company. Everyone who works for CODICO is required to take a responsible approach to health, safety and the environment.

CODICO does not tolerate any compromises in the area of health protection and with regard to the safety of employees in the workplace. No CODICO employee may expose himself or herself or other employees to risky situations that could damage their physical and mental health. Promoting health also includes ensuring a good working environment. Management and staff must take all necessary steps to facilitate a safe work environment.

We reject any form of exploitation or discrimination and ensure strict compliance with relevant laws. We comply with all applicable legal requirements to ensure fair working conditions, including regulations on remuneration, working hours and privacy.

Prohibition of child Labor

CODICO expects its suppliers to employ only workers who are at least 15 years old. This minimum age for employment is based on the conventions of the International Labor Organization (ILO) and the UN Convention on the Rights of the Child. These conventions regulate internationally valid lower limits. No person may be employed who is younger than 15 years of age (or 14 years of age in countries where legislation permits this) or younger than the minimum legal working age in countries where this is higher than 15 years.

We will only accept a minimum age of 14 years as an exception if a legal minimum age of 14 years applies in the country where the supplier in question has its place of business on the basis of Convention No. 138 of the International Labor Organization (ILO).

Furthermore, all legal restrictions regarding the employment of persons under the age of 18 must be observed. We point out that according to the UN Convention on the Rights of the Child, a person who has not yet reached the age of 18 is considered a child. We recognize the right of every child to be protected from economic exploitation, the performance of work that is hazardous, may interfere with the child's education, and may jeopardize the child's health or physical, mental, spiritual, moral or social development.



2. Environmental protection

One of our goals, which is also anchored in our corporate policy, is to maintain a clean environment. CODICO naturally complies with all official and statutory requirements, but we also try to achieve this goal through a wide range of other activities.

CODICO applies the following basic principles:

- not to pollute the environment
- to constantly optimize the use of resources.

CODICO is keen to continuously increase public confidence, whether through open reporting or consultation, in order to improve understanding of internal and external health, safety and environmental issues.

3. Assets

All employees and partners of CODICO are responsible for the proper and careful handling of the company's property. They are required to make efficient and appropriate use of company assets and resources to which they have access or which are entrusted to them in order to protect their value.

4. Corruption and bribery

CODICO strictly rejects corruption and bribery. It promotes transparency, acting with integrity and responsible management and control in the company in an appropriate manner.

All CODICO employees and contractual partners are committed to the highest levels of integrity, honesty and decency in all internal and external relationships. No one may directly or indirectly accept, solicit, offer or grant bribes, other "perquisites" (including gifts and gratuities, with the exception of business items that are generally accepted in the international environment) or other benefits, even in response to unlawful pressure.

Against this background, it is forbidden to offer business material, gifts or anything else that could violate laws or regulations or contradict this Code of Conduct or that could cause (image) damage to CODICO if it were to become known.



5. Selection of contractual partners (e.g. manufacturers).

In order to ensure the highest level of customer satisfaction, CODICO selects contractual partners according to their capabilities in terms of quality, innovation, costs and services. Since it is of primary importance to CODICO that its partners share the values of this Code of Conduct, all contractual partners must be selected using appropriate and objective methods, taking into account not only quality, innovation, costs and services, but also the values listed in the Code of Conduct.

Our employees are required to enter into consistent, transparent and partnership-based relationships with contractual partners.

CODICO complies with applicable laws and regulations of the countries in which it operates.

6. Embargo regulations and export controls

CODICO undertakes to ensure that its business activities do not under any circumstances violate international embargo regulations or export controls in the countries in which it operates.

7. Business secrets

Much of CODICO's business information is confidential, contractually or legally protected, so that there is a duty of confidentiality. Confidential information as well as confidential documents may not be disclosed to third parties or made accessible in any other way, unless authority has been granted to do so or the information is in the public domain.

The duty of confidentiality also applies in particular to intellectual property. This includes, but is not limited to, trade secrets, contracts, business and marketing plans, drafts, business papers, salary data, customer data and all other unpublished financial data and reports.

8. Competition

CODICO follows legit and accepted business practices and fair competition that is guided by professional conduct and quality work.



9. Legal conformity

In all business decisions and actions, CODICO ensures to comply with the applicable laws and regulations.. CODICO keeps a legal register in order to record all legal requirements for CODICO. This ensures that all conduct conforms to the law and that all applicable regulations are complied with.

10. Data protection

The protection of personal data is important to us. We therefore process the personal data of our employees, customers, interested parties and business partners in accordance with the applicable legal provisions on the protection of personal data and data security.

CODICO describes in its own data protection policy what types of personal data are collected, how this data is used, to whom it is transmitted and what choices and rights data subjects have in connection with our processing of the data. We also describe the measures we take to ensure the security of the data and how data subjects can contact us if they have questions about our data protection practices. This policy governs data protection-compliant information processing and the responsibilities that exist at CODICO in this regard. All employees are obliged to comply with the policy.

11. Responsible use of resources

The goal of a sustainable supply chain is to create long-term environmental, social and economic benefits for all stakeholders involved in manufacturing, distribution or marketing. To ensure we achieve our goals, we use the following tools in particular:

- 1) Due diligence of our suppliers
- 2) Commitment of existing suppliers to continuous improvement
- 3) Taking sustainability considerations into account when making purchasing decisions (for example, when bundling procurement processes or reducing product groups).

CODICO conducts comprehensive supply chain due diligence in cooperation with the respective manufacturers, within the scope of the options available to us. We encourage our suppliers not to use materials from conflict minerals that directly or indirectly finance or benefit armed groups in conflict and high-risk areas. CODICO expects its suppliers along the supply chain to adequately manage hazardous materials and to continuously work to avoid hazardous materials in products and reduce negative environmental impacts.



12. Implementation

The CODICO management ensures in an appropriate manner that employees are made aware of this Code of Conduct and comply with it.

The management must be notified of any violation of the Code of Conduct as soon as it becomes known. Reprisals against employees who report a violation of the Code of Conduct in good faith will not be tolerated. Violation of this Code of Conduct by employees may result in employment action, up to and including termination of employment, and other legal action.