

# CODE OF CONDUCT

June 2025

#### Corporate code of TANN GROUP

#### Legal notice

This Code of Conduct contains the fundamental mindset of the TANN GROUP. However, it cannot be understood to be the basis for demanding a certain type of behavior from the TANN GROUP or for establishing contractual claims against the company.

If you have any questions about the Code of Conduct, please contact: info@tanngroup.com



#### **Corporate Code**

At TANN Holding GmbH and its subsidiaries (hereinafter "TANN GROUP"), we are committed to maintaining the highest standards of ethics and integrity in all of our business activities. This Code of Conduct sets out the principles and guidelines we expect all employees, suppliers, contractors, and partners to follow in order to ensure a respectful, fair, and responsible work environment. Our commitment to ethical conduct extends to compliance with legal requirements, promotion of human rights, fostering diversity and inclusion, and the pursuit of sustainability in all areas of our business.

We take pride in maintaining an environment of mutual respect, trust, and responsibility. This Code of Conduct is not only a reflection of our values but also a commitment to acting responsibly and transparently in all our interactions.

We expect all individuals associated with TANN GROUP (hereinafter "we") to adhere to this Code and to report any concerns or violations.

Where appropriate, the following principles are augmented by corresponding guidelines and training courses intended to support and concrete implementation.

### **Quality**

Where appropriate, the following principles are augmented by corresponding guidelines and training courses intended to support and concrete implementation.

#### Compliance with the law

We comply with all applicable laws and regulations of the countries in which we do business and observe the respective standards, codes of conduct and, where applicable, voluntary commitments.

The obligation to comply with the law also includes, for example, compliance with all trade sanctions and embargoes applicable to the respective business relationships, including compliance with processes to ensure sanctions compliance by our business partners.

#### **Human Rights Policy Statement**

We respect and support the protection of internationally recognized human rights. TANN GROUP is committed to treating all individuals with dignity and fairness. We do not tolerate discrimination, harassment, or any other violation of human rights in the workplace or in our supply chain and reject any form of forced labor and discrimination within our own company and among our business partners.

TANN GROUP continuously analyzes its supply chain with regard to (potential) violations of human rights. In case of violations, fast and targeted measures can be taken in order to further minimize the risk of human rights violations in the future.

#### Labor Rights and Child Labor

In the context of labor rights, we attach particular importance to compliance with the International Bill of Human Rights, the ILO Core Labor Standards, the Guiding Principles of the UN Global Compact Initiative, and the principles of the OECD Guidelines for Multinational Enterprises. These principles are an integral part of our supplier selection process and are continuously monitored by us.

We reject child labor in our own company and at our business partners regardless of local laws. As a minimum standard, we are guided by international standards (in particular ILO Conventions C 138 and C 182) and ensure that our employees are of the minimum age required by law.

# Mutual respect, equal treatment, Promotion of Diversity

We promote a culture of respect, equality, and diversity in the workplace. Discrimination based on race, gender, age, nationality, disability, sexual orientation, or any other characteristic is strictly prohibited.

We are dedicated to creating an inclusive environment where all individuals feel valued, respected, and able to reach their full potential.

Employees and applicants are assessed in accordance with the principle of equal treatment.

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## Relationship with employees and Employee Representatives

We respect the rights of our employees to freedom of association. We strive for a long-term constructive dialog with employee representatives.

#### Working hours and remuneration

We observe the applicable regulations on working hours in all companies of our GROUP.

We are committed to fair and equitable compensation for all employees. Working hours must comply with applicable labor laws and industry standards. We ensure that employees receive compensation that meets or exceeds the minimum wage and benefits standards established by local law.

#### **Health and Safety**

We prioritize the health and safety of our employees and stakeholders. TANN GROUP ensures that its operations meet or exceed all local health and safety regulations.

We provide a safe working environment and take all reasonable steps to prevent accidents, injuries, and health hazards.

The applicable standards for health and safety in the workplace are complied with. Our goal is to continuously improve health and safety in the workplace with appropriate measures, such as ongoing evaluation and training.

#### **Drugs / Alcohol**

TANN GROUP maintains a zero-tolerance policy toward the use of illegal drugs and the abuse of alcohol in the workplace.

Employees are expected to perform their duties free from the influence of substances that impair their ability to work safely and effectively. Violations of this policy may result in disciplinary action, up to and including termination of employment.

#### Conflicts of interests, Combating Corruption

Employees, suppliers, and partners must avoid any situation that may lead to a conflict of interest.

Personal interests should never interfere with professional duties or the interests of TANN GROUP.

We prohibit all forms of corruption, bribery, and unethical business practices. Any gifts or incentives received in the course of business should not influence business decisions or relationships. No bribes or any other form of unlawful payment or financial benefit may be accepted, offered or paid.

We make decisions on the basis of reasonable economic considerations in accordance with laws and standards.

Benefits that our employees accept, offer or grant - be it directly or indirectly - within the framework of their business activities must be appropriate; this includes customary hospitality and events, as well as gifts of low value.

### Competition, conduct in the market

We comply with all applicable competition and antitrust laws. We prohibit any anti-competitive behavior, including price-fixing, market sharing, or other practices that restrict fair competition.

Employees and business partners must always conduct business in a manner that fosters fair competition.

We commit to unrestricted, fair competition with our competitors, business partners, and other market participants. We undertake to comply with the laws against cartels and other restrictions of competition of all countries in which we do business.

#### References / Reports

TANN GROUP is committed to protecting those who report violations of this Code of Conduct or any illegal or unethical behavior. We provide a safe and confidential way for employees and third parties to report concerns without fear of retaliation. All reports will be investigated thoroughly, and appropriate actions will be taken to address any violations.

For the reporting of breaches of provisions of this Corporate Code, other internal guidelines and regulations of TANN GROUP or legal



requirements, a reporting channel in accordance with the applicable legal requirements (in particular Directive (EU) 2019/1937) has been established <a href="https://app.loupe.link/whistleblowing/579b13f6-4010-41c2-992c-171b530eba84">https://app.loupe.link/whistleblowing/579b13f6-4010-41c2-992c-171b530eba84</a>.

## Information technology and Data Protection

We are dedicated to protecting the privacy and confidentiality of personal data in compliance with all applicable data protection laws and regulations. Employees and partners must handle personal data responsibly and ensure that information is collected, stored, and processed in a secure manner.

### **Ecological Responsibility**

We recognize the importance of environmental sustainability in our operations. TANN GROUP is committed to minimizing our environmental impact by using resources efficiently, reducing waste, and adopting sustainable practices wherever possible.

We encourage employees, suppliers, and partners to take steps to improve sustainability and contribute to a healthier planet.

#### **Business Partners**

Our business partners shall always comply with this Code of Conduct, all legal regulations and industry standards in their cooperation with us and encourage their Supplier or business partners to implement and apply similar principles of responsibility where possible.

By adhering to the principles set forth in this Code of Conduct, we not only comply with legal and ethical standards but also contribute to the overall success and reputation of TANN GROUP.

Management of TANN Holding GmbH