UNIWELL Group Code of Conduct

The companies of the UNIWELL Group and the people employed by them are expected to comply with the requirements of all applicable laws and regulations, and to behave in an ethical manner at all times, wherever they may be. Our suppliers and business partners are also expected to act accordingly. This code of conduct constitutes a voluntary self-commitment.

Furthermore, the UNIWELL Group conducts its business with a focus on corporate social responsibility. This Code of Conduct defines the rules that apply to business relationships between all UNIWELL companies and their business partners.

It encompasses the implementation of, and compliance with, appropriate guidelines and procedures, the allocation of necessary resources, training for employees, the introduction of a reporting system for complaints and transgressions and process improvement measures, such as the implementation of internal audits and investigations with subsequent corrective action.

Moreover, the UNIWELL Group expects its suppliers to ensure that their respective suppliers and subcontractors also accept the standards laid down in this Code of Conduct, that they also comply with the requirements of all applicable laws and regulations, and that they behave in an ethical manner at all times, wherever they may be.

Failure to comply with the requirements laid down in this Code of Conduct may jeopardise the supplier's business relationship with the UNIWELL Group to such an extent that it may result in the termination of the supply relationship.

Reporting non-compliance or transgressions

The ability to discuss concerns openly makes a crucial contribution towards ensuring that cases of misconduct occur less frequently and ensuring that they are recognised and rectified at an early stage. We therefore attach great importance to the establishment of an open atmosphere, in which employees can approach their supervisors or the management trustingly and without hesitation, even when raising issues that may be critical or controversial. Management personnel encourage open discussions, support their employees, and follow up addressed concerns fairly and without prejudice.

HUMAN RIGHTS

We respect the rights of every person who works for us.

Anti-discrimination
We do not discriminate against any of our employees on the basis of race, national or ethnic origin, ancestry, gender, religion or belief, disability, age, pregnancy or maternity, marital status, sexual orientation, gender identity or expression, or political or personal views. Also refer to §1 and §2 of the General Act on Equal Treatment (AGG).

Anti-harassment
We establish a working environment that is not only free from molestation and harassment of any description, but also free from any other offensive or disrespectful behaviour.

WORKING STANDARDS

We comply with the requirements imposed by the labour legislation of the countries and regions in which we operate, as well as international standards as specified by the International Labour Organization (ILO). In the event of any discrepancies between internationally acknowledged standards and the laws of the specific country concerned, compliance with the more stringent requirements shall be assured.

Rejection of forced labour
We do not tolerate forced labour, debt bondage, penal labour, slavery or human trafficking.

Rejection of child labour & protection of junior employees
We do not employ children at any stage of the product manufacturing or service provision processes. The term "child" refers to any person under the age of 15 or under the minimum age for employment in the country concerned. We do not employ "minors" or persons under the age of 18 for any work that, by virtue of the nature of the activity or any other circumstances, may be detrimental to the health, safety, or morals of the young person concerned.

Working hours & wages
We do not expect employees to work longer than is permitted by law, and they will be paid no less than the statutory minimum wage.

Freedom of assembly
We guarantee freedom of assembly and the right to collective negotiations. All employees are at liberty to join and form employee groups to represent their interests within the framework of applicable legislation.

SAFETY AND HEALTH

We provide a healthy safe working environment for our employees. This is in accordance with international, national and industry standards.

ENVIRONMENT

We comply with the requirements of regional and international environmental protection laws, regulations, and principles. We do everything in our power to protect the environment and promote environmentally friendly processes and the development of environmentally friendly products in order to minimize the environmental impact of our business activities.

FAIR BUSINESS PRACTICES

We are committed to fair, ethical and responsible business practices in accordance with prevailing rules.

Anti-corruption
We comply with the requirements of the anti-corruption laws and regulations that apply to our business activities. Nothing of any value may be transferred — directly or indirectly — to a third party or a third party's employee for the purpose of gaining unlawful advantages in any transactions with the UNIWELL Group or otherwise involving the UNIWELL Group. This ban also applies to bribes, backhanders and other benefits.
Furthermore, suppliers shall not offer UNIWELL members any benefits, including gifts or entertainments, which could raise suspicions of dishonesty.

Conflicts of interest
We ensure that personal relationships are never exploited in order to influence the business decisions of a UNIWELL member. If a supplier or a supplier's employee is related to a UNIWELL member or has any other relationship with a UNIWELL member that could potentially give rise to a conflict situation, the supplier should report this to the UNIWELL Group without delay.

Fair competition
We comply with the requirements of all antitrust and competition laws and regulations and do not engage in any illegal anti-competitive practices. In particular, our suppliers may not participate in any actions that could be regarded as being anti-competitive between the UNIWELL Group and its competitors.

International trade controls
We adhere to international trade controls and sanctions.
We neither do business with sanctioned countries/regions or individuals nor operate from such countries/regions.

Prohibition on dealing with criminal organizations or individuals
We do not take part in criminal activities or maintain relationships with criminal organizations or individuals.

Proper accounting and finances
We are committed to truthful, accurate and complete accounting and compliance with tax legislation.

PROTECTION OF DATA AND PROPERTY

Data protection
We comply with the requirements imposed by the data protection laws and regulations of the countries and regions in which we operate, particularly with respect to the handling of personal data.
UNIWELL's IT guidelines contain all of the necessary measures relating to data security and access security. UNIWELL documents, reviews, corrects and invests in the necessary IT security measures.

Intellectual property
We do not use the intellectual property of third parties without the consent of the rightful owner. Intellectual property includes patents, designs, copyrights, trade secrets, know-how, and trademarks.

Assets of the UNIWELL Group
When customers make assets available to the UNIWELL Group, they are exclusively used for the designated business purpose. Apart from this, we also ensure that confidential information relating to our business partners is protected and not disclosed.

Applicable law
This declaration is subject to the substantive law that also governs deliveries and payments. Unless otherwise agreed, this declaration is subject to German law with Ebern being the place of jurisdiction.

Reporting non-compliance or transgressions
In the event of any transgressions against the aforementioned principles or laws, employees or business partners are at liberty to contact the responsible supervisors, the management or the works council.

Ebern, July 21, 2026