



ZIEGLERGROUP®



CODE OF CONDUCT



FOR ALL EMPLOYEES OF THE ZIEGLER GROUP

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PREAMBLE

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IN THE BUSINESS ENVIRONMENT

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Avoidance of conflicts of interest
Fair competition
International activity and export control
Money laundering prevention

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PREAMBLE

Dear employees,
As a globally active and modern family-owned company, ZIEGLER GROUP is committed to its social responsibility and its roots in the region.

We are convinced that a business policy based on ethical principles and in compliance with laws and principles is best in the long term for our own employees, as well as for our partners, their employees and ultimately for ZIEGLER GROUP itself.

This Code of Conduct defines the ethical standards and behavioral guidelines that are binding for all managers and employees of ZIEGLER GROUP. They are intended to serve as orientation and represent fundamental requirements in order to be able to make decisions and act accordingly in everyday professional life. The goal of the company's management is to comply with all legal and ethical standards, to ensure sustainable environmental and climate protection and to create a working environment that promotes integrity, respect and fair conduct. We feel committed to this.

The misconduct of individuals can cause extensive damage. We therefore ask you to read the Code of Conduct carefully and to use it together with us as a guide for our daily behavior.



I. CONDUCT

IN THE BUSINESS ENVIRONMENT

COMPLIANCE WITH LAW AND REGULATIONS

For us, compliance with laws and regulations is an essential basic principle of economically responsible action. We always observe the applicable legal prohibitions and obligations, even if this entails short-term economic disadvantages or difficulties for the company or individuals. If national laws contain more restrictive regulations than those applicable at ZIEGLER GROUP, national law takes precedence.

AVOIDANCE OF CONFLICTS OF INTEREST

At ZIEGLER GROUP, business decisions are made exclusively in the best interests of the company. Conflicts of interest with private interests or other economic or other activities, including those of relatives or otherwise related persons or organizations, should be avoided from the outset. If they nevertheless arise, they must be resolved in compliance with the law and applicable Group policies. The prerequisite for this is that superiors and the management are informed quickly in order to bring about a rapid clarification.

FAIR COMPETITION

Corruption and cartel violations are not tolerated (zero tolerance) and lead to sanctions against the persons concerned. Bribes or cartel formations and agreements are not a means for us to obtain a contract. All managing directors, all executives as well as all other employees must be aware of the extraordinary risks that a case of corruption or cartel can mean for ZIEGLER GROUP, but also for them personally.

INTERNATIONAL ACTIVITY AND EXPORT CONTROL

As a company operating in numerous markets worldwide, compliance with international agreements and national local laws as well as regulations controlling international trade transactions is a top priority. In particular, ZIEGLER GROUP complies with internationally and nationally applicable export and import laws as well as customs regulations. Particular importance is attached to the strict observance of all sanctions and embargoes as well as all other laws, regulations and official directives - to ensure this, an electronically supported export control system has been set up specifically for this purpose.

MONEY LAUNDERING PREVENTION

ZIEGLER GROUP complies with its legal obligations to prevent money laundering and does not participate in money laundering activities. Every employee is required to have any unusual financial transactions, in particular involving cash, which could give rise to suspicion of money laundering, checked by the responsible finance or legal department in case of doubt.

II. BEHAVIOR

TOWARDS COLLEAGUES AND EMPLOYEES

EQUAL TREATMENT AND NONDISCRIMINATION

We do not tolerate any discriminatory behavior towards employees or applicants on the grounds of ethnic or national origin, skin colour, gender, religion or ideology, disability, age, sexual identity or any other grounds covered by the prohibition of discrimination. We promote equal opportunities and prevent discrimination in the recruitment of employees and in the promotion or granting of training and further education measures. Each individual is responsible for creating a working environment characterized by tolerance, trust and respect.

HUMAN AND EMPLOYEE RIGHTS

ZIEGLER GROUP respects human dignity and is committed to respecting and protecting human rights. We strictly reject any form of forced labor and child labor. We recognize the right of all employees to form trade unions and employee representatives on a democratic basis within the framework of national regulations. The right to adequate remuneration is recognized for all employees. Remuneration and other benefits correspond at least to the respective national and local legal standards or the level of the national economic sectors/industries and regions. Every employee is obliged to ensure compliance with these generally applicable basic rights.

OCCUPATIONAL SAFETY AND HEALTH PROTECTION

The safety and health of our employees are equally important corporate goals alongside the quality of our products and our economic success. Occupational safety and health protection are an integral part of all operating processes. Each of our employees promotes safety and health protection in his or her working environment and complies with occupational health and safety regulations. Every manager is obliged to instruct and support his or her employees in fulfilling this responsibility. Employees are obligated to report violations of these principles immediately to the responsible departments within the company. Any grievances must be rectified immediately.

AGAINST SEXUAL HARASSMENT AND BULLYING

In accordance with the above principles, ZIEGLER GROUP prohibits in particular sexual harassment, other harassment/insulting and bullying of any kind by its employees and takes decisive action against sexual harassment and bullying to the detriment of its employees, also by external parties (customers, suppliers, etc.). We strive to create a workplace environment that promotes both respect and equal opportunity.

Employees as well as external parties are explicitly requested to report any suspicion of such actions. Disciplinary measures of a labor law nature against the person making the report are prohibited.

III. CONDUCT

WITHIN THE GROUP OF COMPANIES

ENVIRONMENTAL, CLIMATE PROTECTION AND ENERGY EFFICIENCY

In the course of its business activities, ZIEGLER GROUP strives to use natural resources responsibly and sustainably - after all, with our Sawmill Division, we rely on wood as a natural resource. We therefore always strive to obtain our raw materials from efficient and sustainable forestry management. Both in the development of new products and services and in the operation of production facilities, we ensure that any resulting impact on the environment and climate is kept to a minimum and that our products make a positive contribution to environmental and climate protection for our customers. Our employees are encouraged to use natural resources appropriately and sparingly and to ensure that their activities have as little impact as possible on the environment.

In order to limit the environmental impact of all production processes, ZIEGLER GROUP is committed to permanently reducing energy consumption per production unit and to sustainably increasing energy efficiency in a continuous improvement process in every part of the company. To implement these goals, an energy management system was established at an early stage and certified in 2012. By analyzing energy-relevant areas, energy management creates a sense of responsibility among all employees with regard to the daily implementation of savings potential. In this way, ZIEGLER GROUP contributes to global resource, climate and environmental protection.

APPEARANCE AND COMMUNICATION IN PUBLIC

We respect the right to freedom of expression and the protection of personal rights and privacy. Every employee should be aware that he or she can also be perceived in private as a part of and representative of the ZIEGLER GROUP and is therefore called upon to safeguard the image and reputation of the company through his or her behavior and appearance in public, especially in dealings with the media.



IV. DEALING WITH INFORMATION

REPORTING

ZIEGLER GROUP attaches great importance to open and truthful reporting and communication on the company's business transactions to investors, employees, customers, business partners, the public in general and government institutions. Each employee shall ensure that both internal and external reports, records and other documents of the Group are kept in and other documents of the Group are always complete and correct and are prepared in a timely manner and in accordance with the applicable legal regulations and standards.

CONFIDENTIAL COMPANY INFORMATION

ZIEGLER GROUP takes the necessary steps to protect confidential information and business documents from access and inspection by non-involved colleagues and other third parties in an appropriate manner.

DATA PROTECTION AND INFORMATION SECURITY

In the course of our business activities, we collect, process or use personal data of our clients, customers and employees. ZIEGLER GROUP considers the protection and responsible handling of this and other confidential data to be a basic prerequisite for business success. We actively implement and comply with the requirements resulting from the Data Protection Regulation (DSGVO) and other data protection regulations. Measures are taken that are suitable for the type of personal data to be protected. Within the ZIEGLER GROUP, compliance with data protection regulations is monitored by an appointed data protection officer, who has the necessary expertise. In his activities, the data protection officer is not subject to directives and reports directly to the management. No personal data may be collected or processed without legal authorization or the consent of the data subject.



V. PROTECTION

OF COMPANY PROPERTY AND PROTECTION OF INTELLECTUAL PROPERTY

The property of ZIEGLER GROUP is to be protected responsibly and appropriately against loss, theft or misuse. The private use of company property is prohibited unless it is expressly permitted by a separate agreement. Together with their superiors, our employees are responsible for ensuring that the type and scope of business trips are always in reasonable proportion to the purpose of the trip and that they are planned and carried out economically, taking into account time and cost aspects.

The protection of intellectual property in every respect is of essential importance to ZIEGLER GROUP. This includes confidential information, trade secrets or customer lists, but also copyrights, patents, trademarks or design rights. Both the intellectual property of ZIEGLER GROUP and the intellectual property of business partners and third parties are to be protected.

ZIEGLER GROUP actively promotes the communication of the Group guidelines and agreements underlying the Code of Conduct. The individual companies ensure that they are implemented and that no employee suffers any disadvantage as a result of complying with the guidelines or agreements. Our managers have a special role model function and their actions are measured against the Code of Conduct to a particular extent. They are the first point of contact for questions on understanding the regulations and ensure that all employees know and understand the Code of Conduct. As part of their management duties, they prevent unacceptable behavior or take appropriate measures to prevent violations of the rules in their area of responsibility. Trusting and good cooperation between employees and managers is reflected in honest and open information and mutual support. The central e-mail address **compliance@ziegler.global** is also available to all employees and third parties (customers, suppliers, etc.) for further questions relating to the Code of Conduct. All information is treated as strictly confidential. Employees who report violations do not have to expect any reprisals. This also applies if the report proves to be false, provided the employee acted „in good faith“.

VI. WHISTLEBLOWER SYSTEM

ZIEGLER GROUP has established the whistleblower system „rexx“ to facilitate the reporting of potential violations of laws, regulations, or our internal policies. We encourage all employees and managers to raise concerns and reports in order to maintain integrity and ethical practices in our company.

The whistleblower system provides a secure and confidential channel through which concerns or reports can be submitted anonymously or by name. It ensures that reports are treated confidentially and processed by specially authorized persons.

We encourage all employees and external persons to use the whistleblower system if they suspect or have observed a violation. The whistleblower system can be accessed via the following link: <https://hr.ziegler.global/whistleblowing/>.

Intentionally false or malicious reports will not be tolerated and may result in disciplinary action. We encourage all employees to submit reports in good faith and based on facts.

ZIEGLER GROUP is committed to carefully reviewing all reports and taking appropriate action when necessary. We protect the identity of whistleblowers and treat all reports confidentially.

For more information on the whistleblower system and the associated guidelines, please refer to our „Whistleblower System/Complaint Procedure“ rules of procedure, which are available at <https://www.ziegler.global/hinweisgeberportal/>.

Plößberg, December 2023

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CODE OF CONDUCT FOR EMPLOYEES
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