



CODE OF CONDUCT

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Business Conduct Guidelines of DECOR SERVICE FORTMÜLLER HANDEL GMBH

I. Principles and objectives

The public image of Decor Service Fortmüller Handel GmbH is essentially shaped by the appearance and behaviour of each individual employee. Therefore, each individual employee is also responsible for ensuring that his or her actions and omissions do not damage the environmentally and socially conscious image of Decor Service Fortmüller Handel GmbH, but rather promote it.

The Business Conduct Guidelines are binding rules that apply to every employee. They are intended to help employees overcome ethical and legal challenges in their daily work. Every employee can contact the relevant supervisor at any time with questions and comments in connection with the Business Conduct Guidelines.

In order to simplify the regulations of the Business Conduct Guidelines, the word "employees" is used below as a neutral term for workers.

II. Basic behavioural requirements

1. Law-abiding conduct

Compliance with the law is a top priority for our company. Every employee must observe the legal and internal regulations governing his or her activities, within the framework of which he or she acts. Violations of the law must be avoided at all costs, especially violations that are punishable by imprisonment, fines or penalties.

Every employee must expect disciplinary consequences in the event of a violation - irrespective of the sanctions provided for in the law - because of the violation of his or her duties under the employment contract.

2. Responsibility for the reputation of Decor Service Fortmüller Handel GmbH

The reputation of Decor Service Fortmüller Handel GmbH is essentially shaped by the appearance and behaviour of each and every one of us. Inappropriate appearance or behaviour of even one employee can already cause considerable damage to the company.

Every employee is required to take care of the public image of Decor Service Fortmüller Handel GmbH. The performance of his or her duties must be oriented towards this in all respects.

3. Mutual respect, honesty and integrity

We respect the personal dignity, privacy and personal rights of each individual. We work together with women and men of different origin, nationality, culture, religion and skin colour. We do not tolerate discrimination and sexual or other personal harassment or insult.

We are open, honest and have integrity and stand by our responsibilities. We are reliable partners and only make commitments that we can keep.

These principles apply both to internal cooperation and to conduct towards external partners.



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We strive for fair employment conditions, pay fair wages and consider the needs of employees in operational measures.

4. Leadership, responsibility and supervision

Every supervisor bears responsibility for the employees entrusted to him or her. He or she must earn their recognition through exemplary personal conduct, performance, reliability and social competence. He or she sets clear, ambitious and realistic goals, leads through trust and gives employees as much personal responsibility and freedom as possible. He or she or the HR department is also approachable for employees in case of professional and personal concerns.

Every supervisor has organisational and supervisory duties to fulfil. He or she is responsible for ensuring that no violations of the law occur in his or her respective area of responsibility, which could have been prevented or made more difficult by proper supervision. He or she also retains responsibility for delegation of individual tasks.

In detail, the following applies with regard to leadership, responsibility and supervision:

1. The supervisor must carefully select employees according to personal and professional suitability. The duty of care increases with the importance of the task the employee has to perform (duty of selection).
2. The supervisor must set the tasks precisely, completely and bindingly, especially with regard to compliance with the legal provisions (duty to instruct).
3. The supervisor must ensure that compliance with the legal provisions is continuously monitored (duty to monitor).
4. The supervisor must clearly communicate to employees that violations of the law are frowned upon and have consequences under labour law.

III. Dealing with business partners and third parties

1. Observance of competition law and antitrust law

Only fair competition enjoys the right to develop freely. The imperative of integrity also applies in the struggle for market share.

Every employee is obliged to comply with all rules of fair competition. In particular, employees may not engage in discussions with competitors, in which prices or capacities are agreed. Furthermore, agreements with competitors on waiving competition or on submitting sham bids in tenders are not permitted.

We grant our suppliers fair contractual conditions and appropriate compensation, but we also expect them to behave fairly and correctly towards their employees and suppliers.

2. Offering and granting benefits

We fight for orders with the quality and price of our innovative products.

No employee may offer or grant unauthorised benefits to others in connection with business activities - directly or indirectly - either as monetary payments or in the form of other benefits.



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Gifts and gratuitous benefits to employees of business partners must be selected so as to avoid any appearance of dishonesty or impropriety on the part of the recipient. In case of doubt, the recipient should be asked to obtain prior approval for the receipt from his or her supervisor. If the recipient resists this, it shows that he or she considers the receipt to be incorrect.

Employees, who conclude contracts with consultants, intermediaries, agents or comparable third parties, must ensure that these also do not offer or grant any unauthorised benefits.

3. Requesting and accepting benefits

No employee may use his or her official position to demand, accept, obtain or be promised advantages. This does not include the acceptance of occasional gifts of small value; other gifts must be refused or returned.

4. Special rules for the award of contracts

Anyone, who applies for a contract, expects us to examine their bid fairly and without bias. Employees involved in awarding contracts must observe the following rules in particular:

Any personal interest that may exist in connection with the performance of official duties must be reported immediately to the supervisor.

Gifts from business partners are to be refused and returned, unless they are insignificant occasional gifts of low value (maximum € 100.00).

No employee may have private orders carried out by companies, with which he or she has business dealings if he or she could gain advantages from this.

5. Donations and sponsorship

As a company, Decor Service Fortmüller Handel GmbH grants donations in cash and in kind for education and science, for art, culture, sport and for social causes. Our company receives requests for donations from a wide variety of organisations, institutions and associations.

The following rules apply to the allocation of donations:

Requests for donations from individuals are to be rejected on principle. Payments to private accounts are not permitted.

Under no circumstances may a donation be made to persons or organisations, which do not enjoy an impeccable reputation or whose objectives are incompatible with those of Decor Service Fortmüller Handel GmbH.

The donation must be transparent. The recipient of the donation and the specific use by the recipient must be known. It must be possible to account for the reason for the donation and the intended use at any time. The donations should be tax deductible.

IV. Avoidance of conflicts of interest

1. Principle of avoidance

The company attaches importance to ensuring that its employees do not have conflicts of interest or loyalty in the course of their work. Such conflicts may arise if an employee works for or has an interest in another company. Therefore, the principle of avoiding conflicts of interest applies.



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2. Non-competition clause

Employees are not permitted to operate a business that competes with Decor Service Fortmüller Handel GmbH in whole or in part.

Furthermore, direct or indirect participation in a non-listed company that competes with Decor Service Fortmüller Handel GmbH in whole or in part is not permitted.

Prior written permission is required for participation in a company that is a business partner of Decor Service Fortmüller Handel GmbH. Permission is granted by the management and documented in the personnel file. Permission is not granted or can be withdrawn again if the employee is involved with the respective company on official business.

Any participation by close relatives in a competitor company or another of the aforementioned companies must be reported in writing by the employee to the Human Resources Department if he or she is aware of this and must be documented in the personnel file.

3. Secondary activities and assumption of political office

Decor Service Fortmüller Handel GmbH has a fundamentally positive attitude towards active participation in politics and the assumption of political office. The management must be informed in writing in advance of the commencement of any secondary employment in return for remuneration and of the assumption of any political office. The secondary employment can be prohibited if it leads to an impairment of the work performance, contradicts the duties in the company or if there is a risk of a conflict of interests.

V. Dealing with facilities and information

1. Use of facilities

The equipment and facilities in offices and workshops (e.g. telephone, copier, PC including software and Internet/Intranet, machines, tools) may only be used for official business. Exceptions and, if applicable, payment shall be regulated locally. Under no circumstances may information be accessed or passed on that incites racial hatred, glorification of violence or other criminal offences or has content that is sexually offensive against the respective cultural background.

No employee is permitted to make recordings, files, visual and audio documents or reproductions without the consent of his or her supervisor unless this is directly related to the professional activity.

2. Records and reports

Open and effective cooperation includes correct and truthful reporting. This applies equally to the relationship with employees, customers, business partners as well as the public and government agencies.

All records and reports made internally or given externally must be accurate and truthful. According to the principles of proper accounting, data collection and other records must always be complete, correct, timely and systematically accurate. The requirement for truthful information also applies to expense reports.



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3. Confidentiality

Confidentiality shall be maintained with regard to internal matters of the company, which have not been disclosed to the public. This includes, for example, details concerning the organisation of the company and its facilities as well as internal reporting figures.

The obligation to maintain confidentiality shall continue to apply after termination of the employment relationship.

4. Data protection and data security

Access to the Intranet and Internet, electronic information exchange and dialogue, electronic business transactions - these are crucial prerequisites for the effectiveness of each one of us and for business success as a whole. However, the advantages of electronic communication are associated with risks for personal privacy and data security. Effective precautions against these risks are an important part of IT management, the leadership task and also the behaviour of each individual.

Personal data may only be collected, processed or used insofar as this is necessary for defined, clear and legitimate purposes. A high standard of data quality and technical protection against unauthorised access must be guaranteed. The use of data must be transparent for the data subjects, and their rights to information and correction and, if applicable, to objection, blocking and deletion must be safeguarded.

VI. Environment, society, safety and health

1. Environment, society and technical safety

Protecting the environment and conserving its resources are corporate goals of high priority.

Every employee must work towards exemplary performance in these areas.

Our company is committed to its shared responsibility for general public concerns. We support socio-political measures, stand up for the disadvantaged within and outside society and enable our employees to engage meaningfully in community tasks.

2. Occupational safety

Responsibility towards employees and colleagues demands the best possible precautions against accident hazards. This applies to the technical planning of workplaces, facilities and processes as well as to safety management and personal behaviour in everyday work. The working environment must meet the requirements of a health-oriented design.

Every employee must pay constant attention to safety.

VII. Complaints and tips

Any employee may raise a complaint with the supervisor or management in the event of a violation of the Business Conduct Guidelines. The matter shall be thoroughly investigated. Suitable action shall be taken where appropriate. All records shall be kept confidential. Retaliation of any kind shall not be tolerated.

Employees should exhaust the internal possibilities of conciliation.



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VIII. Implementation and control

The management of Decor Service Fortmüller Handel GmbH actively promotes the broad communication of the Business Conduct Guidelines and ensures their sustainable implementation.

Compliance with the law and observance of the Business Conduct Guidelines are to be regularly monitored in all organisational units of Decor Service Fortmüller Handel GmbH.

To ensure fair and corruption-free competitive behaviour, officers are appointed in all areas.

These Business Conduct Guidelines were issued by the Management Board of Decor Service Fortmüller Handel GmbH on 11 May 2022 and came into force immediately.

Managing Director

Daniel Fortmüller