



MVI Code of Conduct

The Code of Conduct of MVI Group GmbH

Contents

Preface
Environmental Protection
Human Rights and Labor Laws
Corporate Ethics

Preface

Our most valuable asset is the trust of our customers and other stakeholders in MVI companies and their associated services and products. We aim to act with integrity, adhere to ethical principles, and conduct ourselves in our professional environment based on our convictions.

We have established the MVI Code of Conduct for ourselves to justify this trust and commit to its compliance.

You may contact your management if you have questions regarding the MVI Code of Conduct.

The MVI Code of Conduct applies to all MVI companies.

For issues involving more than your MVI company, the following contact is available to you:

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Head of Sustainability
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The MVI Code of Conduct is based on the fundamental principle of sustainability. This principle consists of three dimensions: economic, social, and ecological. Accordingly, the MVI Code of Conduct is divided into three main topics.

Environmental protection

- **Environmental protection and resources**

For the companies of MVI, protecting the environment and its resources is an essential part of their social responsibility.

The MVI companies strive to improve the environmental compatibility of their products and services continuously. They shall ensure that resources are used sparingly. Sustainable resources shall be used wherever possible. All applicable environmental laws and regulations of the countries in which the MVI companies operate shall be complied with to avoid and prevent environmental and health damage.

- **Contribution of MVI companies**

The MVI companies endeavor to avoid or minimize environmental and health damage. They meet ecological challenges with care and foresight and pay attention to the economic use of energy and raw materials. Preference shall be given to the use of renewable resources. MVI companies pay attention to waste prevention. They support recycling measures and the environmentally friendly disposal of residual waste.

- **Contribution of the employees**

The MVI companies require their employees to pay attention to environmental protection and the careful use of resources.

There are many ways to do this in everyday working life. For example, electronic devices should only be powered when needed. Daylight should be used preferentially; lights should be switched off when leaving a room. Printing on demand or double-sided printing also saves resources.

Defects, such as a dripping tap, should be reported immediately.

It is necessary to avoid the creation of waste. For example, snacks can be packed in lunch boxes instead of aluminum foil. Using public transport or a bicycle to commute to work is also an essential contribution to environmental protection.

Human Rights and Labor Laws

- **Human rights and labor Laws**

The companies of MVI respect the globally applicable regulations for protecting human rights, children's rights, and labor laws.

Internationally recognized human rights are the foundation of all business relationships of MVI companies.

Human rights protect the dignity of every individual. These rights apply to all people without exception.

The companies of MVI are committed to respecting the rights of employees and other stakeholders as well as treating them per the regulations of the international community.

- **Child labor**

Child labor is prohibited by law.

Child labor is defined as work for which children are too young, which is dangerous or exploitative, harms physical or mental development, or prevents children from attending school.

MVI companies comply with national child labor legislation and regulations.

- **Young workers**

The legal minimum age for employment in Germany is 15 years.

Employees are considered young workers until they reach the age of 18. They shall be protected against working conditions that harm their health, safety, ethics, or development.

MVI companies are committed to complying with the "International Labour Organisation" (ILO) provisions on the health, safety, and morality of young people between the ages of 15 and 18.

- **Wages and benefits**

MVI companies shall comply with applicable regulations regarding minimum wages and statutory social benefits for employees.

All applicable national laws and regulations are also complied with when using third parties' temporary workers or labor services.

Excursus: If there are no legal regulations for a region, the industry-specific locally customary compensation and benefits that ensure an adequate standard of living for employees and their families are used as a guideline. This includes expenses for housing, food, education, and technology.

- **Working hours**

The working hours in the MVI companies shall at least comply with the national legal provisions or the minimum standards of the respective national industry.

Break times shall comply with the regulations of the national labor laws.



The MVI companies shall grant employees at least the legally required number of holiday days.

- **Modern slavery**

The use of all forms of modern slavery and human trafficking is prohibited.

The MVI companies distance themselves from any form of human trafficking or modern slavery, such as child labor, bonded labor, or forced labor.

The MVI companies are committed to guaranteeing free choice of employment and not to permit any form of forced or compulsory labor.

All employment relationships must be voluntary based on voluntariness and can be terminated by workers in compliance with the applicable time limits at their own free will.

Overtime shall always be voluntary and not compulsory.

- **Freedom of association**

MVI companies shall respect the right of employees to form employee representation or to join a trade union. In Germany, freedom of association is guaranteed in Article 9 of the Basic Law.

The MVI companies recognize the right to collective bargaining, provided a collective bargaining affiliation exists.

- **Harassment and non-discrimination**

The working environment in the MVI companies shall be free from hostility, discrimination, and harassment.

The companies of MVI do not tolerate any form of discrimination, especially on the grounds of ethnic origin, skin color, gender, religion, nationality, sexual orientation, social background, age, physical or mental disabilities, or pregnancy.

Sexual harassment and bullying are strictly prohibited.

The selection, recruitment, and promotion of employees in MVI companies are always based on their qualifications and skills.

Corporate ethics

- **Corruption**

Corruption is defined as the abuse of entrusted power for one's benefit or the benefit of third parties.

Corruption does not only pertain to public officials but also to actors in the business sector. Corruption is a criminal offense - worldwide.

- **Gifts and hospitality**

The fundamental principles regarding gifts and hospitality guide the companies of MVI.

Gifts and hospitality must serve a legitimate and appropriate business purpose. They must be given as part of the ordinary scope of business. They must be appropriate and transparent, e.g., in social terms. Objective criteria must be applied in the selection of the recipient.

Gifts and hospitality must not have any impact on ongoing contract negotiations. Relevant compliance guidelines and local tax regulations must be observed, and there must not be a negative impact on the company's reputation.

Avoid inappropriately frequent invitations as well as gifts!

Do not make gifts and invitations during ongoing business decisions, and avoid any conflicts of interest based on employees' personal or financial interests!

The 5 compliance rules for gifts

1. Small giveaways (e.g., promotional items) are usually okay.
2. No gifts to private addresses
3. No cash gifts or vouchers
4. No gifts as part of a contract initiation
5. Particular caution with public officials

- **Conflicts of interest**

Conflicts of interest exist when employees' personal or financial interests influence or appear to influence their business decisions.

MVI companies and their employees should always make decisions based on sound business judgment, not clouded by favoritism based on personal relationships and opinions.

Separate private and business interests:

For example, do not participate directly or indirectly in a selection process if personal relationships exist.

Be transparent: Formally disclose personal relationships in the business area.

In case of doubt, business dealings require the prior approval of the supervisor and the management.

- **Fair Competition**

In the spirit of fair competition, MVI companies shall strictly comply with



the legislation and regulations of the applicable competition law. They shall not enter into anti-competitive agreements or arrangements with competitors, suppliers, customers, or third parties. Employees of the MVI companies shall not exchange any competition-relevant information with these. They shall not abuse a possible dominant market position. Price information, geographical and percentage market shares, or customers fall under anti-competitive agreements and arrangements. The exchange, use, or attempted use of business-related or confidential information originating from a competitor or a former employer is not permitted.

The laws and regulations on fair competition must also be observed in relations between the individual companies of MVI!

- **Intellectual property**

Intellectual property is attributable to creative, intellectual achievements. Employees and managers are responsible for the appropriate use of the assets and resources of the MVI companies.

Disclosing confidential company information to third parties or other unauthorized employees is prohibited. Management must examine exceptions to this rule in advance on a case-by-case basis.

The use of information obtained during professional activities for personal matters is not permitted.

- **Whistleblowing and protection against retaliation**

A whistleblowing system is a system that helps to identify serious violations of laws and regulations at an early stage and, at the same time, preserves the anonymity of the whistleblower and the persons involved. When processing information, it is essential to proceed with fairness and sensitivity.

In the spirit of good corporate governance, the MVI whistleblower system is open to information from any party regarding rule-breaking behavior by employees of MVI companies.

MVI whistleblower system: <https://mvi-group.vispato.com/>