



**ORGANISATIONAL, MANAGEMENT AND
CONTROL MODEL OF
A. LOACKER AG
IN ACCORDANCE WITH LEGISLATIVE DECREE
NO. 231/2001**

**FOR THE PREVENTION OF ENVIRONMENTAL CRIMES, NEGLIGENT
HOMICIDE, AS WELL AS SERIOUS AND PARTICULARLY SERIOUS BODILY
HARM IN CONNECTION WITH VIOLATIONS OF THE HEALTH AND SAFETY
REGULATIONS**

**PART V
CODE OF ETHICS AND CONDUCT**

CONTENTS

Premises

1. GENERAL PRINCIPLES

- 1.1. Objectives
- 1.2. Principles
- 1.3. Addressees
- 1.4. General control and reporting
- 1.5. Control tasks of the Supervisory Body
- 1.6. Disciplinary procedures and measures
- 1.7. Reporting of injuries / further information

2. HUMAN RESOURCES AND RECRUITMENT POLICY

3. HEALTH AND SAFETY AT WORK

- 3.1. Health and Safety Management System (HSMS)
- 3.2. Obligations of Addressees in the area of health and safety at work

4. ENVIRONMENTAL POLICY

- 4.1. Environmental Protection Management System (EPMS)

5. CONDUCT AS REGARDS THIRD PARTIES AND BUSINESS RELATIONSHIPS

- 5.1. Principles
 - 5.1.1. Conflicts of interest
 - 5.1.2. Gifts and other benefits
- 5.2. Relations with public authorities
- 5.3. Relations with consultants
- 5.4. Relations with political and trade union institutions
- 5.5. Relations with customers
- 5.6. Relations with suppliers and subcontractors
- 5.7. Relations with competitors
- 5.8. Relations with mass media, research institutes, trade associations and similar bodies
- 5.9. Relations with the community

6. CONDUCT IN CORPORATE GOVERNANCE

- 6.1. Relations with shareholders
- 6.2. Relations with the Supervisory Board
- 6.3. Capital and equity investments
- 6.4. Transparency of accounting

7. PROTECTION AND USE OF BUSINESS ASSETS

- 7.1. Business information systems
- 7.2. Industrial property and confidentiality

8. DATA SECURITY AND DATA PROTECTION



Premises

A. Loacker AG (hereinafter also the “Company”) is a public company whose legal domicile is located at Gastererweg 3, Unterinn, Ritten, 39045 (BZ), Italy, registered with the Bozen Chamber of Commerce, Industry, Crafts and Agriculture under the number 00187320213.

The Company carries out the following activities:

- production and sale of waffles, confectionery and other foodstuffs;
- operation of hotels and of catering establishments in general.

A. Loacker AG has always aimed to base its decisions upon ethical and operational values. The Company is aware of its social responsibilities and is committed to sustainable business management, taking into account all interest groups, the general public and the legal provisions of the respective countries in which it operates.

For this reason, this Code of Ethics and Conduct (hereinafter the “Code”) has been drafted as part of the Organisational, Management and Control Model pursuant to Legislative Decree no. 231/2001 as amended; as such it is of fundamental importance both for the functioning and reliability of the Company and for the protection of its image, good name and know-how.

This document sets out the core values and codes of conduct that must be observed by any person and/or stakeholder upon making contact with A. Loacker AG.

1. General principles

1.1. Objectives

The Code of Ethics and Conduct is intended to ensure that the activities of A. Loacker AG are conducted ethically and on a long-term basis, taking account of its social responsibilities and the following fundamental principles.

All persons working and acting on behalf of A. Loacker AG are within the field of their respective tasks and areas of responsibility obliged, without exemption or exception, to observe and monitor compliance with these principles. All actions, business dealings, negotiations and general conduct by the Addressees (as described in more detail in Section 1.3 below) must comply with the applicable laws and internal procedures, in particular the process descriptions.

The Code of Ethics and Conduct also seeks to ensure that employees focus their activities on achieving the Company’s main objectives and perform their work and tasks correctly, so that no unauthorised actions are performed and that unauthorised actions within the meaning of Legislative Decree no. 231/2001 are prevented.

Training and information measures will ensure that all Addressees are aware of the existence and the content of this Code of Ethics and that the ethical objectives are achieved. Communication and co-operation are indispensable in order to convey to all Addressees the values set out in this Code.

1.2. Principles

In order to achieve the specified objectives, the entire workforce of A. Loacker AG will be required to adapt their activities to the following principles:

- **Compliance with the law:** The Company undertakes to do business in all countries in which it operates in compliance with all applicable laws, as well as with integrity and with the aim of increasing its reputation.
- **Respect for human rights:** All activities must take into account human dignity and be performed with respect for human rights. The Company complies with both the Universal Declaration of Human Rights of the United Nations and the basic accords of the ILO (International Labour Organisation) and does not permit child labour either at its own facilities



or at those of its suppliers and/or subcontractors. The management of the workforce must be based upon the principles set out in this Code and the applicable Italian legislation. In particular, the Company will in no way tolerate discrimination against or among employees on the basis of their gender, sexual orientation, disability, religion, colour, nationality, race or ethnic origin.

- **Health and safety of the workforce:** All workplaces must meet the applicable health and safety standards, laws and regulations. They must in particular meet the highest possible safety standards and be designed to prevent accidents and minimise any risk factors affecting employee health.
- **Respect for the environment and awareness of environmental impacts:** The Company undertakes to respect the applicable standards and laws for environmental protection. The risks to the environment caused by its activities through products and resources used, waste, emissions, etc. will be identified and the risks assessed accordingly. Appropriate measures will be taken to avoid or minimise any possible negative effects on the environment.
- **Moral responsibility and honest business practice:** The Company conducts its business in compliance with the laws and regulations governing competition, intellectual property, copyright, trademarks and patents. The Company does not endorse any form of bribery, blackmail in office, extortion or similar payments received from or made by third parties. All employees must be duly informed to ensure that they do not conclude any business that could create a professional or personal conflict of interest. All business units and employees of A. Loacker AG are required to observe this Code of Ethics and the operating regulations as well as the rules of conduct for third parties and in business relationships described under Section 5.
- **Transparency of commercial transactions:** All transactions carried out will be fully and carefully recorded in accordance with best practice for the external and internal accuracy and clarity of the reports. For this purpose, all employees are obliged to observe the internal work processes of A. Loacker AG regarding control and reporting.
- **Data protection and security:** Business assets will also be safeguarded through the protection of confidential information. The Company and its employees are required to maintain secrecy and confidentiality in respect of the information and data collected in the course of their activities.
- **Disclosure, information and training:** The entire workforce will be specifically and appropriately trained to perform their duties and roles in a professional manner, as well as to comply with the provisions of the Organisational Model pursuant to Legislative Decree no. 231/2001 and this Code of Ethics. Training will also cover environmental protection, accident prevention and health and safety at work. The Company requires the suppliers and subcontractors with which it works to comply with the provisions of this Code of Ethics and Conduct. In particular, they are required not to tolerate any form of child labour or discrimination at their production facilities and to comply with the regulations governing health and safety at work and environmental protection.

1.3. Addressees

This Code of Ethics and Conduct is addressed to the directors, management, employees and collaborators of the Company (such as consultants, agents, external employees, suppliers, subcontractors), hereinafter referred to as the "Addressees".

Each Addressee is required to have knowledge of the contents of this Code, to actively contribute to its implementation and promotion, and to report any defects in and/or violations of its provisions. A. Loacker AG for its part undertakes to facilitate the understanding of the Code by means of appropriate information and training procedures. The Code will be distributed to all those with whom A. Loacker AG conducts business relations.



A. Loacker AG condemns any behaviour that conflicts with the values, principles and provisions of this Code, even if such conduct is believed to have been for the benefit or in the interest of the Company. Compliance with the provisions of the Code constitutes an integral part of the contractual obligations of the Addressees, in particular of employees, including in the sense and for the effects of Articles 2104 and 2105 of the Civil Code.

For the purpose of full compliance with this Code each Addressee may, in the manner provided for by Section 1.7, contact the supervisory body (the "Supervisory Body") established by the Company pursuant to Legislative Decree no 231/2001.

1.4. General control and reporting

The Addressees of this Code of Ethics and Conduct are obliged to comply with it in full. Addressees are in addition required to monitor the adherence to the Code of other Addressees at all levels. A. Loacker AG has for this purpose introduced a reporting and control procedure for compliance with the Code of Ethics and Conduct to allow all employees in good faith to report any violation, including on the part of higher-level employees.

Any Addressee wishing to report an infringement (or suspected infringement) of the Code of Ethics and Conduct may address a report in writing or verbally to the appropriate appointed persons who will then further notify A. Loacker AG within the meaning of Legislative Decree no 231/2001.

Alternatively, the Addressee may, pursuant to Section 1.7 of this Code, directly notify the Supervisory Body.

1.5. Control tasks of the Supervisory Body

In addition to its general control of the Code of Ethics and Conduct, which is applicable to every employee, A. Loacker AG has also, pursuant to Legislative Decree no. 231/2001, established a supervisory body (hereinafter the "Supervisory Body"). This collegiate body, appointed by the Board of Directors, is responsible for the monitoring, control, application and updating of the Organisational Model as well as of this Code of Ethics and Conduct.

The tasks and powers of the Supervisory Body are listed in a dedicated section of the Organisational, Management and Control Model.

1.6. Disciplinary procedures and measures

Failure to comply with the standards of this Code of Ethics, whether as an intended infringement or a failure to take prescribed actions, may mean non-performance of the employment contract. This will entail the consequences and/or disciplinary actions in accordance with the applicable provisions and collective agreements. This will also apply to any loss of employment as well as to the obligation to pay compensation for any prejudice suffered by A. Loacker AG.

The types of disciplinary action are set out in the existing rules and collective agreements and adjusted to the gravity of the infringement. No penalty may be such that it would be a violation of human dignity, however.

The penalties for non-compliance with this Code of Ethics by consultants, agents, employees or suppliers are set out in the relevant contracts.

1.7. Reporting of injuries / further information

Directly related to the general control of the observance of the rules of conduct and work processes developed by A. Loacker AG is the authority and duty of each employee to report any infringement on the part of his/her fellow employees.

On receipt of each report the Supervisory Body will initiate an internal investigation to examine and verify the report. Should the investigation lead to the reprimanding of an employee, s/he has the right to submit his/her comments within a reasonable time as well as to petition the responsible authority. The report concerns any commission or omission on the part of an employee that results in one or more of the following:

- criminal offences;
- non-compliance with legal provisions;
- endangering the health and safety of others;
- environmental damage;
- inaccurate accounting or non-compliance with the prescribed procedures with regard to the auditing of accounts;
- any material breach of the provisions of this Code of Ethics;
- any breach, even suspected, of the Organisational Model;
- concealment or suppression of information concerning the reporting of injuries.

Reporting on other employees will in no way lead to any reprimand, civil or criminal consequences, except where such reports are found to be groundless following a thorough examination by the Supervisory Body and where they have been submitted both intentionally and in bad faith. The reporting employee will suffer no consequences in the form of retaliation, discrimination or revenge where a report is made in all honesty. The confidentiality of the personal details of an employee who has reported in good faith will be guaranteed subject to the provisions of the law and the protection of the wrongfully accused.

Should the employee be the victim of any reprisal, harassment or discrimination on the part of the accused employee as a result of a report made in accordance with the procedures set out in this document, disciplinary procedures will be initiated against the latter; these may also result in dismissal.

Each Addressee is obliged to report in writing any violation of the provisions contained in the Organisational Model or in the Code of Ethics to one of the following:

- to the Supervisory Body, including by e-mail to the address specifically created for this purpose odv@loacker.com;
- to the responsible supervisory personnel specifically appointed by A. Loacker AG.

2. Human resources and recruitment policy

Human resources are an essential and integral part of A. Loacker AG.

The Company offers all employees equal opportunities for work and career development and will ensure that all are treated without any form of discrimination and solely on the basis of merit. The Company is committed to promoting the skills and competencies of employees in order that individuals can express their energy and creativity and thus realise their own potential through their work.

Employees can rest assured that all personnel decisions are based solely on merit, competence and strictly job-related criteria. Selection, recruitment, training, remuneration and leadership are carried out without discrimination.

A. Loacker AG will protect the mental and physical integrity of its employees, as well as respecting their personalities, and will prevent them from being subjected to unlawful interference or unjustified discomfort.

The management of the Company expects employees to co-operate with each other and with external collaborators to create an atmosphere within the Company that respects the dignity, honour and reputation of each individual. Everyone is required to prevent offensive or defamatory behaviour.



Every employee and collaborator has the right to work in an environment that is free from all discrimination as regards their race, social class, age, nationality, disability, language, religion, gender, or their ethnic, trade union, political or other affiliations.

A. Loacker AG requires that both internal and external working relationships should be characterised by the highest degree of probity with no room for harassment of any kind, whether for creating an intimidating, hostile or isolating working atmosphere or for the obstruction of individual development or career opportunities for reasons of personal competition or other discriminatory grounds.

3. Health and safety at work

The health and safety of employees and all those who work for A. Loacker AG are an absolute priority for the Company.

The Company pursues a “zero accidents” policy and is committed to providing a safe working environment. Measures for accident prevention and the minimisation of health risks aim to prevent occupational diseases and accidents at work. This in particular applies to the specific risks associated with working in production facilities and on construction sites.

For this purpose the Company continuously and systematically assesses both the risks and hygiene conditions in the working environment as well as the work risk management.

3.1. Health and Safety Management System (HSMS)

A. Loacker AG undertakes to promulgate a preventive safety culture through the establishment of a health and safety management system (HSMS) that aims to increase the awareness of risk and promote responsible behaviour among Addressees.

The Company is in constant contact with internal Addressees as well as with external parties such as suppliers, contractors, trading partners and other companies in order to establish the necessary synergies for the continuous improvement of the health and safety management system (HSMS). The Company will also ensure the continuous training and regular information of both employees and external collaborators, partners and third parties in the area of health and safety at work.

A. Loacker AG will provide adequate financial resources and human resources to ensure the implementation of all planned and necessary measures, drawing upon external resources in all cases where the required skills are lacking within the Company.

The Company in addition agrees to abide by the provisions of OHSAS 18001 and of all related laws.

3.2. Obligations of Addressees in the area of health and safety at work

In virtue of their position and collaboration with A. Loacker AG, all Addressees are, under the health and safety management system (HSMS), obliged:

- to ensure their own health and safety and that of employees;
- to work together with their employer, managers and supervisors to ensure that the standards, laws, regulations, work processes and internal operational rules regarding safety and health standards are observed;
- to comply with the provisions and instructions of A. Loacker AG for the purposes of communal and individual protection;
- to use all equipment, means of transport, other tools and protective equipment correctly and appropriately;
- to report any defect in plant, equipment and/or machinery and any other sources of danger of which they become aware and, in the event of emergency, to act directly within their remit and abilities to remedy or reduce such defects or dangers;



- not to remove or modify any safety, alarm or control devices without authorisation;
- not to carry out any work at their own initiative nor to take any measures that lie outside their areas of responsibility or that could jeopardise their own safety or that of third parties;
- to participate in the training and education programmes organised by the employer;
- to undergo medical examinations and hygiene controls as required by the applicable legislation.

Each Addressee must not only ensure his or her own health and safety, but also that of those other persons working in A. Loacker AG who may be affected by his or her acts or omissions.

The control of the adequacy and effectiveness of the health and safety procedures implemented in the workplace will be performed as follows:

- regular external audits;
- inspection by the director of occupational safety and health;
- inspection by the Supervisory Body.

4. Environmental policy

Respect for the environment is of fundamental importance to A. Loacker AG; limiting the negative impacts of its activities on the environment is a top priority.

In order to carry out its activities in a manner that is sustainable in terms of energy and the environment, the Company has adopted the following fundamental ethical principles:

- the Company will verify and avoid water pollution, emissions of pollutants, the production of harmful waste products and all other activities that are potentially harmful to the environment;
- the Company will respect the national environmental regulations in the area of waste management, from its storage, holding and transport through to its disposal, in order to prevent any environmental pollution;
- in the area of waste management the Company will work only with service providers who are authorised to dispose of the waste delivered to them in the actual case in accordance with the applicable national provisions pursuant to Legislative Decree no. 152/2006 and the regulations to which it refers;
- the Company will continually and appropriately monitor and evaluate the environmental risks associated with its own activities;
- the Company is furthermore committed to contributing to the protection of the environment with all stakeholders, such as the relevant authorities, business associations and the local community.

4.1. Environmental protection management system (EPMS)

A. Loacker AG undertakes to disseminate a culture for the protection of the environment, aimed at prevention, by means of the establishment of an Environmental Management System (EPMS). Risk awareness should thus be strengthened and the responsible behaviour of the Addressees should be fostered.

The Company is in constant contact with internal Addressees as well as with external suppliers, contractors, trading partners and other companies in order to establish the necessary synergies for the continuous improvement of the environmental protection management system (EPMS). The Company will also ensure the continuous training and regular information of both employees and external collaborators, partners and third parties in the area of environmental protection.



A. Loacker AG will provide adequate financial resources and human resources to ensure the implementation of all planned and necessary measures, drawing upon external resources in all cases where the required skills are lacking within the Company.

The Company in addition agrees to abide by the provisions of ISO 14001:2015 and of all related laws.

5. Conduct as regards third parties and business relationships

5.1. Principles

A. Loacker AG adheres to the principles of legality, loyalty, honesty, probity, transparency, efficiency and market opening in the conduct of its business and relationships.

Each business action and transaction must be properly registered, authorised, verifiable, lawful, consistent and appropriate.

Addressees whose actions can be attributed to A. Loacker AG are obliged to behave correctly in transactions conducted in the interests of the Company as well as in relations with the public administration, irrespective of the competitive strength of the market and the importance of the respective matters.

Neither the economic resources nor the assets of the Company may be used for any purpose that is unlawful, dishonest or of otherwise dubious transparency. The Company may not derive any advantage from any unlawful actions nor from any illegal financial or other benefits.

5.1.1. Conflicts of interest

Addressees are obliged to pursue the objectives and general interests of A. Loacker AG in the exercise of their respective activities. They will thus refrain from engaging in activities whereby they (or their immediate family members) come or may come into conflict with the interests of A. Loacker AG. In addition, the ability to make impartial decisions in the best interests of the Company and in full compliance with the provisions of this Code may not be adversely affected.

However, if a conflict of interest is unavoidable, any directors, management or employees facing a conflict of interest are required promptly to inform the relevant corporate bodies. In particular, members of the Board of Directors are required to inform the other members of all interests that they might have in respect of themselves or of any third party in any particular business of the Company. The directors, management and employees will abide by the decisions made by the Company in this regard.

5.1.2. Gifts and other benefits

It is prohibited in the exercise of activities or on behalf of A. Loacker AG – even where there is no intention to receive any advantage or benefit – to grant or to offer any gift, payment, material benefit or other benefit of any kind, whether directly or indirectly, to customers, suppliers, public officials or third parties in general.

Commercial favours such as free copies or hospitality gifts are permitted provided they are of little value and will not compromise the integrity or reputation of either party. Moreover, they must not give the impression to an impartial observer that they have been granted for the purpose of obtaining any unlawful advantage. Such expenditure must in any case always be approved by the responsible business unit and adequately documented.

Addressees working for A. Loacker AG who receive gifts or are treated favourably where this cannot be attributed to normal courtesy must, pursuant to Section 1.7, immediately notify their line manager and/or the Supervisory Body.



5.2. Relations with public authorities

In relations with domestic and foreign authorities and public institutions, all Addressees acting on behalf of and for A. Loacker AG are obliged to act transparently and in accordance with the law, and in all cases to observe the principles of this Code.

A. Loacker AG will ensure that both trained personnel and newly appointed staff are continually informed of any new laws and appropriately trained in this regard.

The Company will strictly adhere to the national, regional and local legislation as regards the issuance of authorisations, licences and concessions.

When applying for public funding, tax or social allowances or other public grants or benefits, A. Loacker AG expressly undertakes to act truthfully, correctly, transparently and in full compliance with the applicable legal provisions. Should such benefits be granted, A. Loacker AG also undertakes to allocate the funds to the specifically agreed purpose and to inform the public authority formally and without delay should any basic condition for the funding/allowance cease to exist.

All bribery, unlawful preferential treatment, unlawful collusion, direct and/or indirect use of personal benefits and career advantages for oneself, for A. Loacker AG or for third parties are strictly prohibited and may lead to disciplinary measures being taken.

5.3. Relations with consultants

A. Loacker AG will adhere to the following principles when dealing with and appointing consultants:

- the Company will review the suitability of the consultant before awarding a consultancy contract;
- the conditions of the relationship will be governed by a written agreement in accordance with the applicable provisions;
- commissions and/or payments will be reasonable and proportionate to the service provided;
- the agreement will provide for specific deadlines for the performance of services, as well as for the respective rights of the parties with respect to the termination of the agreement;
- all payments must be made in the manner and within the time limits stipulated in the agreement;
- no cash payments are permitted.

5.4. Relations with political and trade union institutions

A. Loacker AG makes no direct or indirect contributions, in whatever form, to any political or trade union parties, movements, committees or organisations, nor to their representatives or candidates, except in the context of applicable laws and regulations and in respect for the principle of transparency.

5.5. Relations with customers

A. Loacker AG is committed to the success of the Company by providing high-quality products and services in compliance with applicable law while observing the protection of the market, customers and consumers.

A. Loacker AG will in its relations with customers act according to the principles of courtesy, equal rights and impartiality. The Company will ensure that customers receive high-quality products and services and obtain all the information about the services offered in order to permit informed decisions to be made.

This in particular means that:

- contractual relationships will be clearly defined (costs, fees);



- contractual conditions will be strictly adhered to;
- communication will be polite, swift and timely;
- sensitive data will be handled in a professional manner.

5.6. Relations with suppliers and subcontractors

Within their area of responsibility, employees of A. Loacker AG are obliged to check that suppliers and subcontractors also continually observe the ethical guidelines of this Code.

The meticulous selection and control of suppliers and subcontractors is essential for the marketing of high-quality, safe and competitive products and services. Should any reasonable doubt exist regarding the ethical behaviour or compliance with the above principles of a supplier or subcontractor, A. Loacker AG will immediately take appropriate measures.

When selecting suppliers and subcontractors, employees of A. Loacker AG are required to comply with all legal provisions and internal procedures with regard to quality, safety and costs.

5.7. Relations with competitors

A. Loacker AG bases its business conduct on the principles of loyalty, legality, probity, transparency, efficiency and reliability.

In particular, A. Loacker AG seeks business success by offering innovative and competitive products and services while respecting all national and international rules for the protection of fair competition. In this regard, the activities of A. Loacker AG and the behaviour of Addressees acting in the name and on behalf of the Company must be fully autonomous and independent of the behaviour of competitors on domestic and foreign markets.

5.8. Relations with mass media, research institutes, trade associations and similar bodies

Information that is directly or indirectly related to A. Loacker AG must be accurate, complete, truthful and transparent.

Both the relationships with the mass media, research institutes, trade associations and other comparable bodies and the transmission of information will be the sole responsibility of the members of the Board of Directors or, under their authority, of the person assigned to this duty.

5.9. Relations with the community

A. Loacker AG undertakes to establish correct and transparent relationships with public and private entities, including at local level, in order to create training and employment opportunities.

In this context, A. Loacker AG also commits itself, in co-operation with local authorities, trade and industry associations, as well as academic and professional organisations, to promoting the health and safety culture at work and the protection of the environment, as well as strengthening the sense of responsibility of each individual in relation to these issues.

6. Conduct in corporate governance

6.1. Relations with shareholders

The directors must manage the Company in accordance with the principles of probity, transparency and legality while pursuing the interests and well-being of shareholders.



The directors will refrain from any behaviour that might unlawfully influence the voting rights of the shareholders.

6.2. Relations with the Supervisory Board

At the request of the Supervisory Board, the members of the Board of Directors must provide accurate, transparent, precise and truthful information and co-operate fully with the members of the Supervisory Board in order to facilitate their audit and control activities.

6.3. Capital and participation transactions

The Board of Directors, the Supervisory Board, the management and employees are all required to act correctly, honestly, transparently and in accordance with the civil law provisions governing the maintenance of the financial guarantees of creditors where they are concerned with the following activities:

- distributions of profits and reserve;
- capital transactions (capital increases and decreases) and related activities such as deposits in the form of property and valuations thereof;
- mergers, divisions and conversions.

When preparing the relevant documents and/or reports, the Board of Directors, the Supervisory Board, management, employees and collaborators are required to ensure the completeness, clarity and truth of the information and to take the utmost care in preparing the information and data.

6.4. Transparency of accounting

The principle of transparency will apply to all accounting processes. This concerns not only the activities of the management and the administrative apparatus, but also the work of every employee in all areas of activity.

Accounting transparency is based upon the truth, clarity and completeness of the information upon which the corresponding accounting entries are made.

Management and employees are encouraged to co-operate so that all events can be recorded accurately and correctly in the accounts. For each business transaction the corresponding documents will be kept as proof. Each entry must exactly reflect what is shown by the underlying documents.

It is the responsibility of the management and all employees to ensure that the documents are easily retrievable and are filed according to comprehensible criteria that comply with the procedures established by the Company.

7. Protection and use of business assets

The operating assets of A. Loacker AG consist of tangible assets, such as equipment, facilities, tools, vehicles, machines, computers; and of intangible assets, such as confidential information, know-how, technical knowledge developed and disseminated by and for the Board of Directors, management and workforce, as well as licences.

The security, protection and preservation of these assets are fundamental to the interests of A. Loacker AG.

The Board of Directors, the Supervisory Board, the management and each employee all have a personal responsibility to maintain the security of the tangible and intangible assets by observing and disseminating the specific operational preventive measures relating to the fraudulent use or misuse of business assets.

The use of business assets by the Board of Directors, management or workforce must always be purpose-oriented and may relate only to operating activities, or must be approved by the responsible business unit.

7.1. Business information systems

Effective rules of conduct for the information and telematics systems are indispensable for protecting the information that A. Loacker AG deals with on a daily basis and are crucial for the sustainable development of corporate policy and strategy.

Electronic and telematic operating resources must as a matter of principle always be used with care and probity. Addressees using the business information systems are also required to observe the additional internal rules to avoid any unintentional and/or incorrect behaviour that might harm the Company, other Addressees or business partners.

7.2. Industrial property and confidentiality

The know-how and technical knowledge developed and disseminated by and for the Board of Directors, management and workforce, as well as licences, constitute the central and indispensable business assets.

The security, protection and preservation of these assets are fundamental to the interests of the Company.

All information about the Company's organisation, negotiations, financial and commercial transactions as well as all other know-how (contracts, documents, reports, notes, studies, drawings, photographs, software), obtained by Addressees in the exercise of their business or working relationships with A. Loacker AG will remain the exclusive property of A. Loacker AG. Following termination of the employment relationship or collaboration with A. Loacker AG, irrespective of the reason for termination, all employees, collaborators or business partners are obliged to return all documents and data media as well as all other materials to the Company, as well as to maintain strict secrecy and confidentiality in respect of all business information and technical and commercial knowledge, even after the contractual relationship has ended.

Addressees are prohibited from using the above information for their own benefit or that of third parties, or to disclose it to third parties, or to make use of it such that A. Loacker AG might be harmed.

8. Data security and data protection

In the course of its business A. Loacker AG acquires, stores, handles, transmits and distributes documents and other data that contain personal information regarding employees, customers, suppliers, subcontractors, collaborators and business contacts. A. Loacker AG also keeps confidential documents and information concerning negotiations or transactions, projects and proceedings.

The trust of those persons who hand over their data to A. Loacker AG, and the maintaining of confidentiality in regard to them and the data that they have entrusted, represent fundamental values for A. Loacker AG. The Company is committed to the correct handling of all information received and processed in the course of its business activities.