



**Walter Lang GmbH**  
**Compliance Guidelines**



# Walter Lang

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## A. General explanations and definitions

### 1. On the use of gender-neutral language

In these guidelines and in all company documents, gender-specific formulations ('his/her', 's/he', etc.) will not be used until further notice. There are two main reasons for this: Firstly, they would impair the readability of our texts; secondly, in the German version there are no established terms and formulations for the third (non-binary) gender.

All generic terms such as 'employees', 'supervisors', 'suppliers', etc. are understood to be inherently gender neutral. We intend them to apply to all genders (m/f/x) equally.

### 2. The definition of 'compliance' in the context of these guidelines

'Compliance' means the adherence to laws, legal requirements, regulations, directives, and internal policies and instructions by our company and all of our employees and, to some extent, by third parties such as business partners, suppliers, service providers, etc.

### 3. Purpose

What are the goals and purpose of these compliance guidelines? These Walter Lang GmbH Compliance Guidelines are a comprehensive set of rules addressing all of the issues and topics listed under section **A.5 Scope**. They are meant to convey the company's understanding of compliance, the company's management of compliance, and the company's approach to compliance, both inside and outside the company. They provide all of our employees, affiliated third parties and other stakeholders with a uniform basis of information so they can act appropriately as far as these guidelines directly concern them.

### 4. Ethical standards

These compliance guidelines also function as ethical standards for the company. This applies to all of the company's business activities. These guidelines are furthermore meant to serve our employees as a compass for ethical conduct. This applies to conduct within the company, that is, between colleagues and departments, as well as to our employees' conduct outside of the company as far as their work activities involve external contacts. An employee, regardless of position, is always an ambassador for the company and will be perceived as such.

### 5. Scope

These guidelines comprise the following topics: basic conduct; employees; interaction in the company; occupational safety & sustainability; equal treatment & discrimination; bribery & corruption; conflicts of interest; gifts & hospitality; dealings with customers & suppliers; importation & exportation; behaviour towards competitors; data protection; and rules and consequences in the event of violations.

Should the occasion arise, these guidelines can be extended or revised, but the fundamental principles shall remain unchanged.

## B. Basic conduct

### 1. Supervisors

All employees whose responsibilities in the company place them in a position of authority over one or more other people (as supervisors), including the managing directors, serve as role models to their staff.

This entails adhering to these Compliance Guidelines and consciously putting them into practice themselves.

They have a duty to manage their staff in accordance with these guidelines, to support staff members in complying with and applying these guidelines, and to monitor whether they meet these guidelines in their daily work.

All supervisors must ensure that they and all employees under their management familiarise themselves with the guidelines, understand them and apply them.

Supervisors are furthermore expected to be receptive to feedback, ideas, questions and comments from their staff and colleagues, and to pass this information on to the corresponding departments of the company as appropriate.

In general dealings with their staff, supervisors furthermore have a duty to evaluate staff members solely on the basis of their performance. The comportment of staff members whose job involves external contacts with third parties plays an important additional role, as they represent the company.

Should supervisors have any questions about these guidelines, they can consult the compliance officer. General questions can be addressed to their own supervisors and/or the managing directors.

This company regards itself as a company with a culture that encourages questions.

### 2. Employees

All employees of Walter Lang GmbH, regardless of their position in the company, are required within their sphere of responsibility to consistently adhere to these guidelines as well as to generally applicable laws.

Interaction with colleagues and supervisors should always be based on fairness, trust and respect.

In dealings with external parties, employees must take the reputation of the company into consideration and enhance it through their conduct.

The property of the company, and therefore all work equipment and materials it provides, is to be treated with care. Resource conservation is an important issue that is high on the agenda of the company's sustainability efforts. Taking good care of rooms and items that belong to the company or are rented by it greatly contributes towards this aim.

Within their sphere of activity, all of the company's employees have a duty to strive for constant improvement to the company in all areas, from occupational safety to sustainability.

Every employee is additionally required to report violations of these guidelines to the appropriate parties (see [I.1 Reporting violations](#)).



## **C. Employees**

Employees are one of our company's most important resources. A responsible and respectful relationship with our employees is imperative.

All statements concerning employees apply to both of our company's locations.

### **1. Working hours**

Our employees' working hours are in conformance with the legal requirements. They are described in detail in the company's guideline on working hours. This guideline is available for all employees to read. Working hours and individual provisions are additionally set down in writing in the employment contracts.

### **2. Vocational training and continuing education**

The company is committed to providing its employees with vocational training and continuing education. The company currently trains employees in two professions: industrial clerks (m/f/x) and specialists in warehouse logistics (m/f/x). The number of apprenticeships and trainees can vary.

Employees participate in mandatory training sessions. At our company, these include internal training sessions on topics such as sustainability in addition to those that are legally mandated. Employees also receive specialised professional training as required by their job. Every employee is provided with the necessary equipment to carry out their work. According to our understanding, this includes the corresponding professional knowledge.

### **3. Equal treatment, harassment & discrimination**

Discrimination of any kind based on a person's geographic or ethnic background or origin, nationality, skin colour, gender, religion, sexual orientation, gender identity, disability, age, social status, marital status, appearance or other characteristics is not tolerated.

This equally concerns direct and indirect discrimination, instructions to discriminate, and any form of (sexual) harassment or bullying. Furthermore, any kind of verbal, psychological or physical (bodily) abuse is strictly forbidden.

This applies to interaction among colleagues as well as to dealings with employees, business partners or other third parties.

This particularly concerns interactions involving the hiring, promotion or dismissal of employees.

Violations will have immediate consequences.

### **4. Occupational safety**

In our daily work the company makes sure that all of our employees work under non-hazardous and safe conditions. This directly contributes to the prevention of accidents and personal injury and thus to the protection of our employees. Regularly scheduled, mandatory training sessions ensure that our employees possess the necessary knowledge. We record and keep track of when these take place.



Our company is committed to meeting all national legal occupational safety standards and to fulfilling the basic requirements of the occupational health and safety standard ISO 45001:2018 as part of EcoStep certification.

Every employee is required to comply with occupational safety laws, regulations and standards at the workplace.

## **5. Sustainability**

Every employee is made aware of the importance of sustainability as soon as they enter the company, and the issue is taught in regularly scheduled sustainability training sessions. We record and keep track of when these internal, mandatory training sessions take place and are repeated.

All employees have a duty to be aware of sustainability issues within the scope of their activities. They are furthermore required to comply with environmental legislation.

As conveyed in the training session, all employees are encouraged to analyse their activities, related processes and the equipment they use in the context of sustainability and suggest potential improvements to the sustainability officer, their supervisors or the managing directors.

Violations of our sustainable work and business practices must also be reported.

Walter Lang GmbH has committed itself to a continual improvement process with regard to sustainability. Since the managing directors only rarely observe the details of individual daily work routines, they depend on the cooperation of all employees.

## **6. Political and community engagement**

Employees are free to participate in public and/or political affairs. This includes the right to engage in political and/or social advocacy during their free time.

In all such activities it must be clearly recognisable that the employees do not act on behalf of the company, nor do they represent the company during their activities / advocacy efforts.

Political activities may for instance encompass a person's membership and participation in a political party or being a voluntary office holder, either within a political party or as a representative of a party at the local/municipal government level.

Should the company learn that an employee has violated any applicable laws while carrying out their activities or is a member of a prohibited organisation, such cases shall be considered separately.

## D. Corruption, conflicts of interest, fraud, theft

### 1. Corruption

#### 1.1 Definition

What does 'corruption' mean? Terms often used in this context include 'bribery', 'venality', 'benefit acceptance' and 'benefit granting'.

The organisation Transparency International defines corruption as 'the abuse of entrusted power for private gain'.

Most importantly, corruption is not a peccadillo, even if colloquial terms like 'favours' or 'palm greasing' might suggest otherwise. Corruption is a criminal offense. There are a number of laws in the German Criminal Code on this issue. The EU Bribery Act and other legislation also apply.

The corruption of public officials counts as bribery. (See [D.1.4 Dealings with public officials](#))

#### 1.2 Forms of corruption

There are various forms of corruption. In the following, the six most important ones are briefly explained.

**Active corruption:** 'Active corruption' is when a person offers, promises or gives money or other 'favours' to obtain a deliberate action or decision.

**Passive corruption:** 'Passive corruption' is when a person requests, receives or accepts benefits or bribes in exchange for taking a deliberate action or decision.

**Situational corruption:** 'Situational corruption' occurs spontaneously: for example, when a drunk driver offers a police officer money to avoid a penalty.

**Structural corruption:** 'Structural corruption' is planned and under certain circumstances repetitive: for example, when a driver pays a parking garage attendant a monthly bribe for access to parking places in order to avoid a more expensive monthly rent.

**Direct corruption:** 'Direct corruption' means personally offering someone money or the like in exchange for an action or decision, or personally accepting such an offer.

**Indirect corruption:** 'Indirect corruption' means bribing someone through a third person or accepting a bribe offered through a third person.

### 1.3 Our company policy on this issue

Walter Lang GmbH forbids bribery and corruption in any form, irrespective of the individual involved or their position. This applies to active and passive as well as direct and indirect forms of corruption.

Among other things, it is prohibited to:

- aid and abet the commission of unlawful activities by third parties
- engage in unlawful activities with the help of third parties (relatives, colleagues, friends, consultants, etc.)
- accept (illicit) personal benefits
- bribe public officials (see the section on 'Dealings with public officials')
- accept money or compensation for an action or decision that benefits another party (an individual, public authority, company, etc.)  
For example: accept a valuable watch for the conclusion of a contract with a supplier;
- offer money or compensation to another party for an action or decision that benefits the company or oneself.

### 1.4 Dealings with public officials

Particular caution must be exercised in dealings with domestic or foreign public officials (judges, civil servants, mayors, etc.) and their family members. Bribing public officials, i.e., offering, promising or granting a personal benefit in exchange for the performance or omission of an official act, is not only prohibited by our company. Bribing or corrupting a public official is a criminal offense that carries more severe penalties than bribing other individuals.

In foreign countries especially, corruption may still be deeply embedded in everyday life despite laws to the contrary. It can happen, for instance, that a public servant demands money for an act or service that the company has already applied for in a legitimate manner using the appropriate forms and documents, and which has already been approved by the competent authorities. Such a demand should never, under any circumstances, be obeyed.

## 2. Responding to offers of corruption

Accepting or making offers of corruption/bribery is always prohibited.

Whenever there is any uncertainty as to whether a particular behaviour/situation constitutes corruption/bribery, the following applies:

- Do not decide what to do under pressure or in haste.
- Do not decide what to do on your own.
- Use common sense.
- Ask yourself if the behaviour/situation could cause harm.
- Ask yourself how an outside observer would judge the behaviour/situation.
- Ask yourself how, for instance, the media would report on the behaviour/situation.
- Ask the compliance officer, your supervisors or the managing directors for help.

### 3. Conflicts of interest

#### 3.1 Definition

A conflict of interest occurs when an individual is in a situation in which two competing interests clash. For example: An employee is supposed to award a contract to an installation company. One of the possible companies belongs to the employee's brother. On the one hand, the employee has a duty to act in the interest of the company. On the other hand, the employee would like to do something nice for their brother. Therefore, these could be two competing interests.

#### 3.2 Our company policy on this issue

The company requires its employees to keep their private interests strictly separate from the interests of the company.

Every employee must absolutely avoid any possible, actual or even perceived conflicts of interest in connection with their work activities. It is essential to keep checking whether there may be any relationship between one's private interests and one's professional obligations.

Conflicts of interest must always be disclosed to one's supervisor or the managing directors. As a result, activities related to the conflict may be monitored and stricter oversight applied.

This will not only protect the company but will also protect the employee against possible accusations by colleagues or supervisors.

#### 3.3 When to exercise particular caution

Particular caution is required when awarding contracts to relatives, friends or other close associates. The same goes for awarding contracts to companies in which the employee or their relatives, friends or other close associates are stakeholders.

Another conflict of interest arises when an employee is involved in the hiring of family members or other close associates.

In such cases, the hiring decision is only valid if prior approval has been obtained from the managing directors.

Employees who hold or intend to acquire a financial stake in a competing company must report this to the managing directors of Walter Lang GmbH.

#### 4. Fraud and theft

All employees have a duty to respect and protect the property of colleagues, employees, the company itself or third parties at all times.

To prevent fraud and theft, all employees are required to:

- safely stow their belongings against theft
- securely lock doors and windows, including those of vehicles
- treat property of the company in an appropriate manner during all business activities. This also includes product samples, for instance.
- Similarly, employees may only take damaged products with the prior approval of the managing directors, which must be obtained via their supervisors.
- Work materials such as pens, pads of paper, coats, etc. are property of the company and are only provided for workplace use. They may not be removed from the company for personal purposes.
- Employees should generally stay alert in situations that could facilitate theft or fraud.

Actual or attempted instances of theft and fraud must be reported to supervisors and/or the managing directors immediately.

#### E. Gifts, hospitality

Hospitality, gifts and the like are common courtesies that belong to polite human interaction in most cultures and countries.

Employees may extend invitations and give gifts as long as these are of a kind that is not prohibited in the framework of these guidelines. Such gifts or invitations require the prior approval of the managing directors.

As a general rule, gifts and hospitality must be given or take place in a setting that is appropriate for business purposes.

The types of gifts and invitations that may never be accepted are set forth in section **E.4 Prohibited**.

##### 1. Giving gifts

Costs incurred for gifts should be settled through an expense claim unless they were invoiced to the company. The expense claim must specify the recipient.

Only gifts worth up to 35 euros per person and year are tax-deductible.

Gifts may not, under any circumstances, be given in exchange for something in return. (See **D.1 Corruption**.)

##### 2. Accepting gifts

Employees are allowed to accept gifts as long as they do not exceed a cash value of 35 euros per person and year. The company has adopted the tax-deductible limit as an appropriate value limit for gifts.



Gifts must always be reported to one's supervisor, in part to preclude the possibility of later accusations, for instance of a conflict of interest.

In the case of gifts that clearly exceed the above-specified value limit, employees must explain at the moment of personal delivery that they are not permitted to accept the gift and must therefore refuse it. One possible way to express this is to say, 'Thank you for this kind gesture. According to our Compliance Guidelines, I am not permitted to accept such a gift. Nevertheless, I am gratified that you so value our working relationship that you would like to give me a gift.'

In the case of gifts that exceed the above-specified value limit but were delivered by mail or courier, the employee must notify the compliance officer and they should work together to find a polite solution.

Gifts must be refused if they are given with an apparent or suspected expectation of receiving something in return (= corruption).

Gifts that violate the law or these Compliance Guidelines must likewise be refused.

In the case of either event, this must be reported to one's supervisor, the compliance officer or the managing directors immediately.

Gifts may never, under any circumstances, be solicited (= corruption).

### **3. Invitations and events**

As a rule, invitations may be extended or accepted as long as they are appropriate for and conducive to the business relationship. This includes, for instance, business meals or invitations to industry events and trade fairs.

#### **3.1 Extending invitations**

Costs incurred for invitations should be settled through an expense claim unless they were invoiced to the company. Entertainment receipts must be filled out and submitted for invitations extended by employees that involve hospitality expenses.

When employees of this company extend invitations to others, the same rules apply as are specified in the following section on the topic of **3.2 Receiving invitations**.

#### **3.2 Receiving invitations**

Invitations to social or entertainment events that are received in a business context must remain within appropriate limits. For example, an invitation to a local football game is considered more appropriate than an invitation to the opera in Milan or a seat in FC Bayern Munich's VIP lounge.

All invitations require prior discussion with the managing directors, either on a case-by-case basis or in order to determine an individual rule based on the employee's activity. In the event of spontaneous invitations, the compliance officer or the employee's supervisor can be consulted should the managing directors not be available.

Under no circumstances may invitations create the impression of a conflict of interest or corruption.



Invitations to places or events that overstep the bounds of good taste and/or propriety, or that promote or celebrate discrimination or racism, must be refused.

Invitations that are clearly inappropriate must be refused at the moment of their personal delivery. One possible way to express this is to say, 'Thank you for thinking of me. Such a generous invitation goes against our Compliance Guidelines, so I cannot accept it. Nevertheless, I feel very honoured.'

In the case of invitations that are clearly inappropriate and are delivered by e-mail, mail or courier, the employee must notify the compliance officer and they should work together to find a polite solution.

#### **4. Prohibited**

Employees of our company are expressly forbidden to accept or give/extend the following kinds of gifts or invitations, regardless of their value:

- cash
- cash equivalents (cheques, lottery tickets, cryptocurrency [e.g., bitcoin], foreign currency...)
- antique objects (coins, figures, weapons, paintings...)
- adult entertainment (printed matter, films, live shows, sexual acts...)
- illegal gifts (drugs, weapons, counterfeit products...)
- animals, live or taxidermied
- When abroad: plants, stones, sand, seed

Any offers of the kinds of gifts or invitations included in this list must be reported to the compliance officer and/or the managing directors immediately.

## **F. Donations & sponsorships**

Our company is in a position to support social, political, and community organisations, sports clubs and other associations, events, foundations, etc. through donations or sponsorships.

Donations or sponsorships by our company are never bestowed to individual persons.

They may never create the impression of seeking an unfair business advantage (= corruption/bribery). The same applies to conflicts of interest.

In all cases, it must be ensured in advance that donations and sponsorships are in line with our corporate aims and these Compliance Guidelines (see also **E.4 Prohibited**), enhance the image of our company, and do not violate applicable laws.

### **1. Definitions**

A 'donation' is a contribution of money or goods to an organisation that is entitled to issue donation receipts. Such support by the company is of a purely philanthropic nature. In return, the company receives a donation receipt and at most an image boost if the donation was made public by one of the two parties.

A 'sponsorship' is when an organisation receives a contribution of money or goods as part of a sponsoring contract or agreement. The recipient organisation must stipulate in advance what it offers our company in



return. For example: Our company covers the costs for a football club's new jerseys. In return, the club prints our company logo on the jerseys and displays our company name on a donor recognition wall in the stadium. The sponsor—our company—receives a proper invoice from the football club for the transaction, and upon payment is entitled to receive the rewards that were agreed upon by contract in advance.

## **2. Donations**

All contributions of money or goods, regardless of whether for non-profit, charitable, political or other purposes, require the prior approval of the managing directors.

A donation receipt must be issued to the company for every donation, irrespective of its value. In the case of donations in kind, the recipient must be informed of the value of the goods. Depending on the quantity, this must be determined in advance by the supervisor and/or the managing directors. The value must be indicated on the donation receipt as 'goods worth ...'.

Before transferring a company logo, it is essential to make sure that the current version of the logo is used.

## **3. Sponsorships**

All sponsorships of events, associations or other organisations require the prior approval of the managing directors.

The terms and conditions of the sponsorship contract or agreement must be determined prior to the commencement of sponsoring activities. An original copy of the contract or agreement must be delivered to our accounting department. The company will only make a payment once it has received a proper sponsorship invoice.

Unless it is already the executing department, the marketing department should be consulted in determining what consideration the company will receive in return for its sponsoring activities. Before transferring a company logo, it is essential to make sure that the current version of the logo is used.

## **G. Suppliers, customers, competitors**

### **1. Dealings with competitors, suppliers and customers**

Employees are not allowed to share with third parties internal or sensitive company information such as price lists, supplier contacts, customer data, sales figures outside of the annual report, innovations, or the like. These data are an immaterial part of our company's assets. They significantly contribute to its commercial success. Their leakage would constitute a substantial loss for the company.

Exceptions to this are price lists, offers or the like in the context of a direct business relationship with a customer.

Walter Lang GmbH only cooperates with business partners who share our company's values. We insist on compliance with national laws as well as unconditional recognition of the international labour and social security standards of the International Labour Organization (ILO). Four of the fundamental conventions of the ILO are: 'Freedom of Association and Protection of the Right to Organise', 'Abolition of Forced Labour', 'Minimum Age' and 'Discrimination (Employment and Occupation)'.



Our company prioritises fairness and honesty in our own interactions with suppliers and business partners as well as in our partners' interactions with their employees and other stakeholders. This fosters close cooperation, confidentiality and discretion, and equitable remuneration. We do not tolerate bribery and corruption. (See **G.3 Code of Conduct**.)

## **2. Before commencing collaboration**

Prior to commencing collaboration with potential customers, suppliers or service providers, it is necessary to check whether they appear to be engaged in dubious or unethical business activities. If there is any reason for suspicion, this calls for immediate consultation with one's supervisor and/or the managing directors.

A business relationship with such a party could cause lasting damage to the image of our company.

## **3. Code of Conduct**

Our Code of Conduct comprises the rules set out by Walter Lang GmbH governing how our company and all of its suppliers, service providers et al. are required to behave. A copy of the Code of Conduct, which is an extract from these Compliance Guidelines, is presented to each party for signature. By signing the Code of Conduct, each agrees to conform to the requirements of Walter Lang GmbH. Any violations of this code carry immediate consequences, up to the termination of our business relationship.

### **3.1 Contents of the Code of Conduct**

The signature of the Code of Conduct commits the signee to uphold the following points, in accordance with ILO core conventions and other recognised standards:

1. compliance with all applicable national and international laws
2. compliance with international trade regulations
3. zero tolerance or use of active or passive corruption/bribery
4. respect for human rights
5. the right to freedom of association
6. the right to collective bargaining
7. zero use or tolerance of child labour
8. special protection of minors and pregnant persons as well as persons who are vulnerable or in need of protection
9. voluntary, regular work without compulsion
10. equal treatment of all employees (no discrimination)
11. protection of the health and safety of all employees, including seasonal or migrant workers
12. compliance with all applicable national and international laws concerning occupational safety, environmental protection and data protection

These points also apply in their entirety to all employees of Walter Lang GmbH.

#### 4. Importing/exporting, foreign trade

As part of its business operations, Walter Lang GmbH trades with business partners located abroad. It is essential to ensure that all foreign trade activities are conducted in strict compliance with all applicable laws and regulations. These include the following:

- export licences
- customs regulations
- customs documents
- accompanying shipping documents
- respecting import or export bans

The responsible employee must carefully check the accuracy of all documents and information and immediately notify their supervisor in case of any doubt.

Any avoidance of requisite documentation through cash payments or the like (= bribery) is prohibited.

#### 5. Dealings with customers

Dictating retail prices or minimum prices to customers is fully impermissible. It is equally impermissible to dictate particular business conditions to a customer's company. These may include specifying how shops should be arranged, product placement, etc.

However, it is always possible to offer advice or come up with collaborative solutions.

With regard to pricing, it is permissible under applicable law to state a 'non-binding recommended price'. This provides customers with a useful point of reference, but it is not a binding specification, nor may it be demanded.

#### H. Data protection

As a modern company, we use various (digital) information and communications technologies as an indispensable part of our business operations. This in itself necessarily entails using and saving various kinds of personal data, beginning with telephone numbers.

All employees are required to handle personal data with care at all times.

Collecting, using and saving such data must always be performed in conformance with applicable legislation. This applies to employee data as well as to data from customers, suppliers or other persons.

Our company requires that all personal data must be handled with care and as little as possible. Any processing of such data must be performed as necessary for our business operations, or not at all.

## I. Reporting violations & consequences of violations

### 1. Reporting violations

All employees are required to report violations of these guidelines. Before reporting a suspected violation / a situation, employees should exercise common sense to verify and assess it.

In the event of concerns, questions or reports about rule violations by oneself or a third party, the following contact points can be consulted:

- supervisors
- the HR department
- the compliance officer (compliance@walter-lang.de)
- the managing directors

Anonymous reports of violations are also possible. They should be enclosed in a sealed envelope addressed to Walter Lang GmbH, '**Compliance Officer – private and confidential**' and either put in a company post box or sent by regular mail. By writing the words 'private and confidential' on the envelope, the letter falls under the 'privacy of correspondence' that is guaranteed by Article 10 of the Basic Law for the Federal Republic of Germany. Any violation of that privacy of correspondence is a punishable offence. Therefore, only the compliance officer is permitted to open the letter.

However, our company encourages employees, customers, suppliers and concerned third parties to discuss these issues openly, since that is the only way to clarify cases quickly and optimally.

Individuals may understandably fear retaliation from the 'accused'. Our company takes appropriate steps to protect employees who report violations from retaliation.

All employees are strictly prohibited from taking retaliatory actions at any time.

### 2. Consequences of violations

Violations of these Compliance Guidelines that fall within the competence of the company can be dealt with through internal disciplinary procedures. Sanctions must be consistently imposed—that is, an offence cannot be punished in one instance and disregarded the next—and must be commensurate with the violation.

Mitigating circumstances can be considered when determining disciplinary action. In-house disciplinary measures shall be handled with the greatest confidentiality. Incidents and sanctions shall be documented and recorded in the personnel file.

Violations of these Compliance Guidelines that breach applicable laws must be reported to the responsible authorities and will be prosecuted accordingly.

#### 2.1 For employees

The following sanctions are possible, depending on the severity of the violation and whether applicable laws were breached:

- warning

- dismissal
- damage claims by our company
- damage claims by a third party
- fines
- financial penalties
- prison sentences of up to 10 years

## 2.2 For the company

The following sanctions are possible, depending on the severity of the violation and whether applicable laws were breached:

- damage to the company's image
- lawsuits
- court and legal fees
- damage claims by a third party
- fines
- disgorgement of profits

## 2.3 For involved third parties (e.g., business partners)

- immediate termination of the business relationship
- reporting of the violation to the responsible authorities, which may lead to subsequent prosecution and related penalties ranging from fines to prison sentences

## J. Responsibility for these guidelines

These Compliance Guidelines are issued by

Walter Lang GmbH  
Am Alten Sicherheitshafen 2-4  
28197 Bremen  
Germany

which is represented by Alexander Drees, Managing Director.

Walter Lang GmbH is a medium-sized food company located in Bremen, Germany. We have processed honey and alternative sweeteners such as agave syrup since 2008. More than 80% of our products are certified organic.

In addition to our head office in Bremen, Germany, the company has a branch office in Drebber, in the state of Lower Saxony, Germany. At the time of writing these guidelines, Walter Lang GmbH employed around 110 people.

Should individual aspects of these guidelines no longer be up to date, for instance due to legislative changes, the Compliance Guidelines nevertheless remain fully in effect until such time as a revision is made.



Our company's fundamental approach to the aspects and issues contained in these Compliance Guidelines shall remain unchanged.

Signed by:

On: 1 October 2020

In: Bremen, Germany

Alexander Drees - Managing Director

Disclaimer: This is a translation from German provided for informational purposes only. In the event of discrepancies between this version and the original German version of these Compliance Guidelines, the latter shall prevail.