

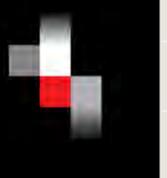
Code of Conduct

FOR BUSINESS PARTNERS OF SERVICEPLAN GROUP

AS OF MARCH 26

SERVICEPLAN GROUP
HOUSE OF COMMUNICATION





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I. Foreword by the Management Board

Dear Business Partners,

as a globally operating group of companies, we feel responsible for the impact of our actions on the environment, society and the economy. This is expected of us. With the trust placed us by our employees, Business Partners, and the public, we have the opportunity to make a significant difference, to shape, and to change.

The Serviceplan Group, together with all its employees, contributes to social justice, a sustainable environment, and offers sustainable service and workplace opportunities. Responsible and ethical conduct in our interactions with each other, our Business Partners, society, and the environment is a fundamental part of our value system.

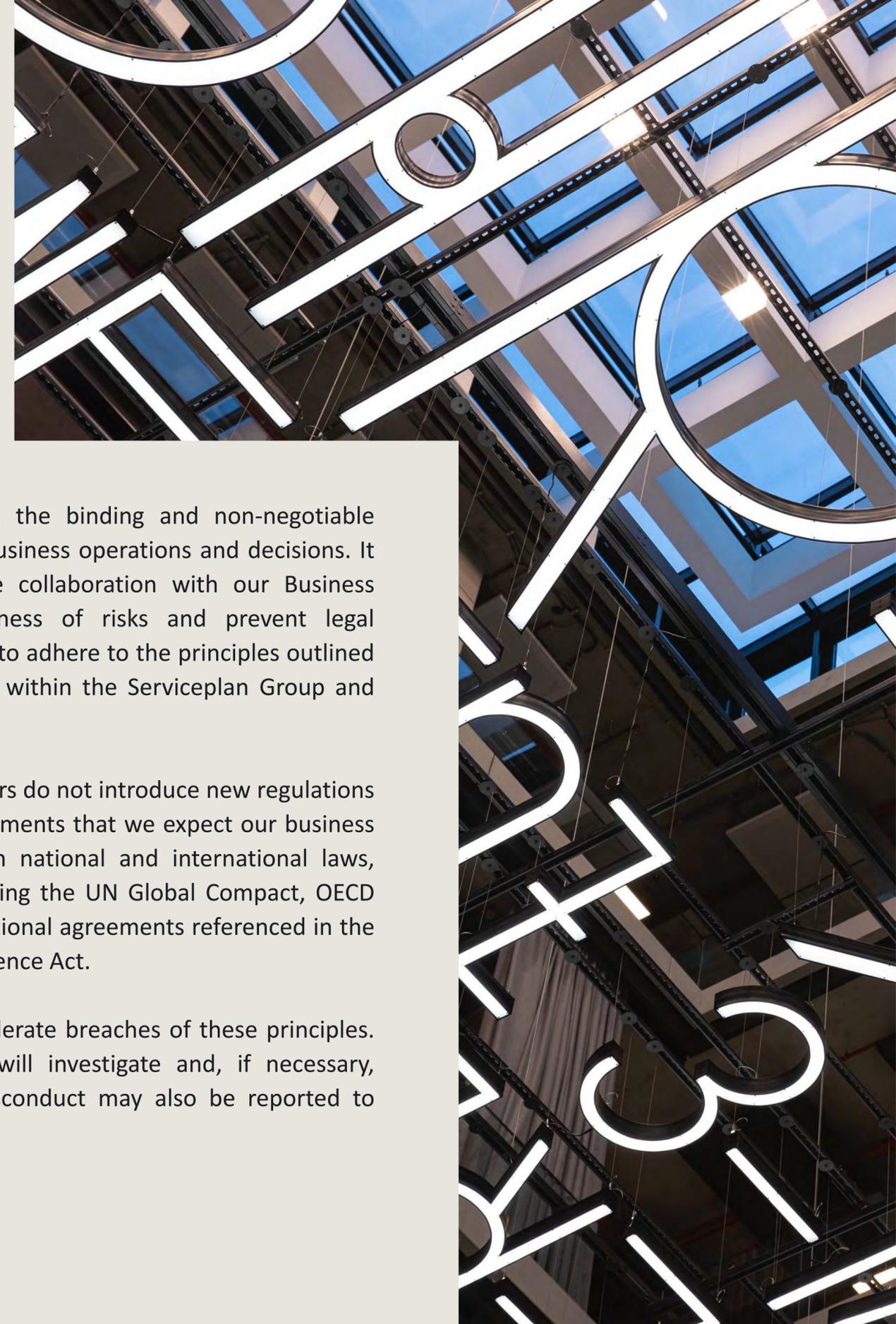
Compliance with laws and regulations is integral to our business practices.

Violations are not only inconsistent with our values but may also lead to severe legal consequences, harming us all.

This Code of Conduct establishes the binding and non-negotiable minimum standards for our daily business operations and decisions. It serves as a guide for responsible collaboration with our Business Partners, aiming to raise awareness of risks and prevent legal infringements. We are all obligated to adhere to the principles outlined below, applicable to all companies within the Serviceplan Group and our Business Partners.

These principles for Business Partners do not introduce new regulations but illustrate existing (legal) requirements that we expect our business partners to meet. They align with national and international laws, guidelines, and conventions, including the UN Global Compact, OECD Guidelines, and particularly international agreements referenced in the annex to the Supply Chain Due Diligence Act.

The Serviceplan Group does not tolerate breaches of these principles. Upon learning of violations, we will investigate and, if necessary, impose appropriate sanctions. Misconduct may also be reported to authorities.

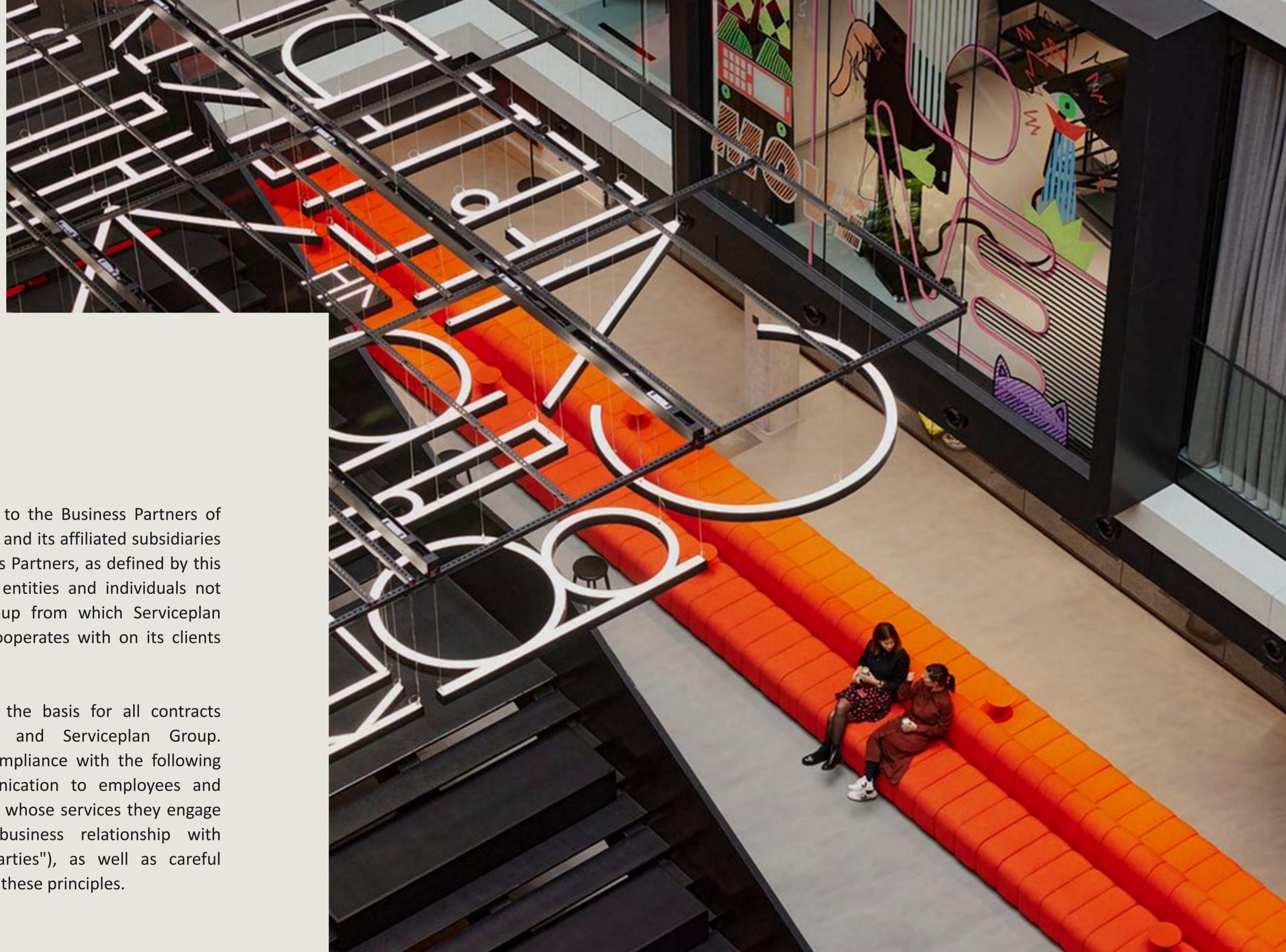




II. Scope

This Code of Conduct applies to the Business Partners of Serviceplan Group SE & Co. KG and its affiliated subsidiaries ("Serviceplan Group"). Business Partners, as defined by this Code of Conduct, include all entities and individuals not belonging to Serviceplan Group from which Serviceplan Group procures services or cooperates with on its clients ("Business Partners").

The Code of Conduct forms the basis for all contracts between Business Partners and Serviceplan Group. Serviceplan Group expects compliance with the following provisions and their communication to employees and suppliers of Business Partners, whose services they engage in connection with their business relationship with Serviceplan Group ("Third Parties"), as well as careful monitoring of compliance with these principles.





III. Fundamental Principles

Business Partners are obliged to comply with the applicable laws and regulations of the country in which they enter into a business relationship with companies of the Serviceplan Group or its clients. They must also make every effort to comply with national, international, and industry-specific standards and best practices.



IV. Human Rights and Social Standards

Business Partners commit to adhering to the ten principles of the UN Global Compact and the four core principles of the International Labour Organization (ILO), and ensure their employees and business partners do the same. Compliance is an essential contractual obligation.

Elimination of Forced Labour

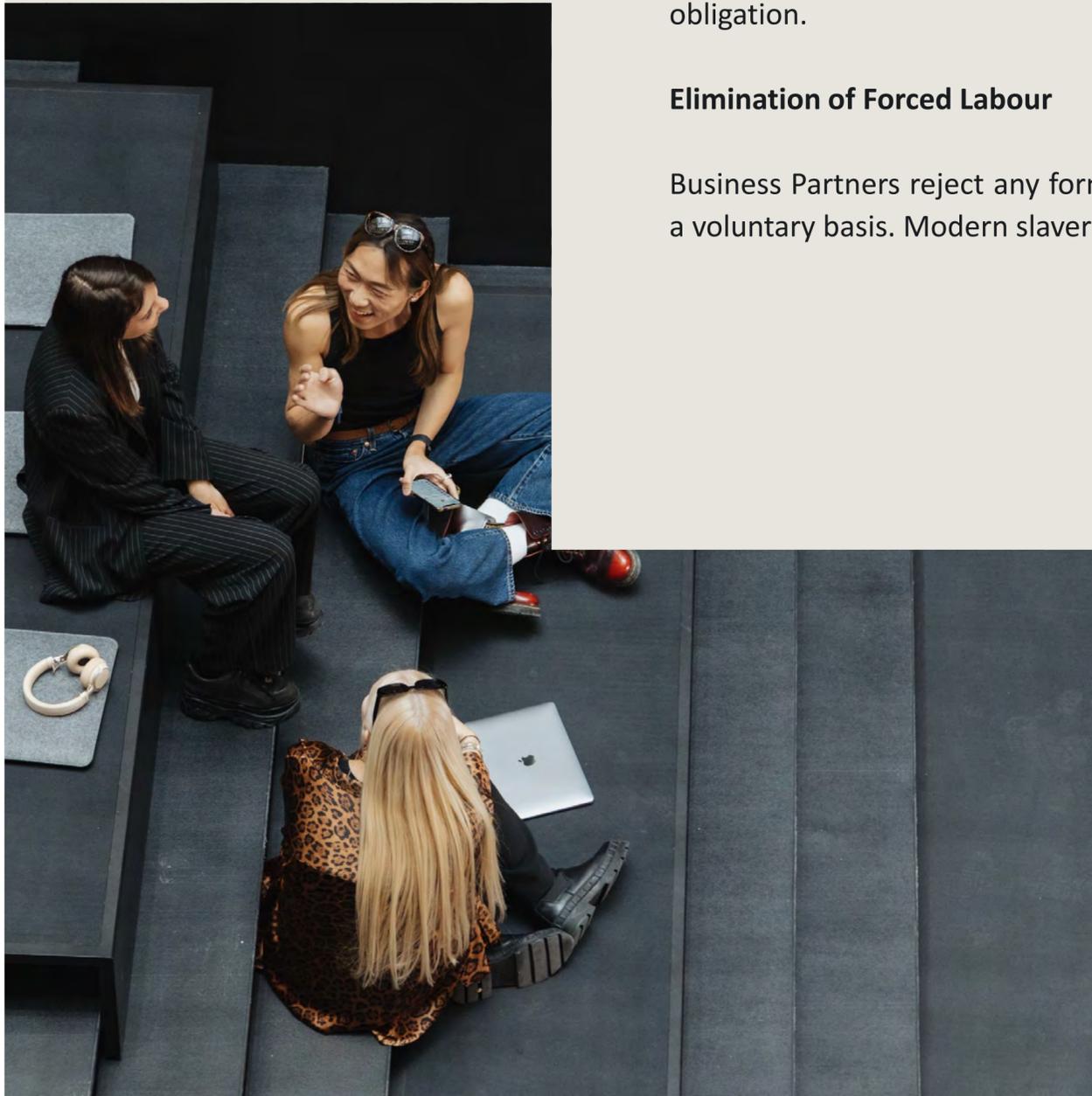
Business Partners reject any form of forced labor. All work is done on a voluntary basis. Modern slavery and forced labor are refrained from.

Elimination of Child Labour

Business Partners comply with the respective local regulations on the minimum age for employment and ensures this through appropriate verification measures at the start of the employment relationship.

If local regulations do not specify a higher age limit, no persons who are still of school age or younger than 15 years of age shall be employed, unless the employment is for training purposes or is in accordance with the Youth Employment Protection Act and the Child Labor Protection Ordinance or other applicable legal provisions. Employment for educational purposes must not be such that it prevents children from attending school or participating in educational programs or impairs their ability to follow classes.

Persons under the age of 18 may not be employed for work that is harmful to the health, safety, morals or development of children. Persons under the age of 18 shall not work overtime or at night.





Non-Discrimination in Employment

Employees must be treated fairly and with respect. Discrimination based on gender, race, age, religion, family status, sexual orientation, origin, or affiliation with certain groups is prohibited. Employment decisions such as hiring, promotion, compensation, and benefits must be based solely on merit and qualifications.





IV. Human Rights and Social Standards

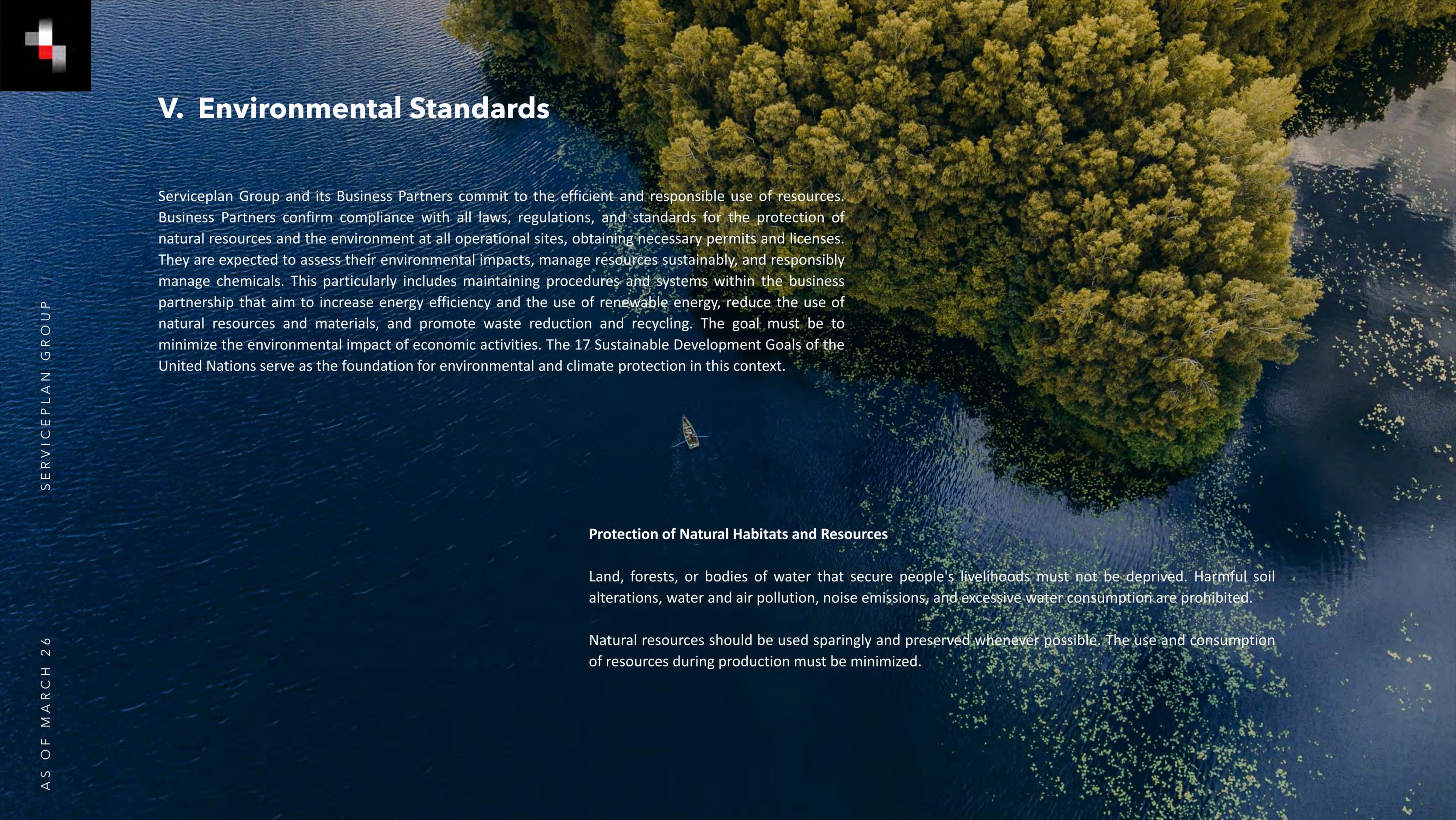
Compliance with Occupational Health and Safety Standards and Rights of Workers

Business Partners are committed to protecting the health and safety of their employees by regularly assessing hazards and health risks and implementing necessary protective measures, including employee training. They must establish and apply appropriate occupational safety systems to prevent accidents and health risks related to their activities. Measures should prevent excessive physical or mental strain.

Business Partners confirm that employee compensation, including wages, overtime, and benefits, complies with applicable laws and regulations. Compensation for full-time employment should be sufficient to meet employees' basic needs. They also undertake to comply with all legal requirements of the Minimum Wage Act (MiLoG), as well as obligations arising from the Posted Workers Act (AEntG) and the Temporary Employment Act (AÜG). When contracting with Third Parties, Business Partners ensure their compliance with these laws. Local regulations on working hours must also be observed.

Business Partners guarantee workers the right to freedom of assembly and respect their right to collective bargaining



An aerial photograph of a lush green forested island in a deep blue lake. A small wooden boat is visible on the water near the island. The water is dark blue with some lily pads in the foreground. The sky is not visible.

V. Environmental Standards

Serviceplan Group and its Business Partners commit to the efficient and responsible use of resources. Business Partners confirm compliance with all laws, regulations, and standards for the protection of natural resources and the environment at all operational sites, obtaining necessary permits and licenses. They are expected to assess their environmental impacts, manage resources sustainably, and responsibly manage chemicals. This particularly includes maintaining procedures and systems within the business partnership that aim to increase energy efficiency and the use of renewable energy, reduce the use of natural resources and materials, and promote waste reduction and recycling. The goal must be to minimize the environmental impact of economic activities. The 17 Sustainable Development Goals of the United Nations serve as the foundation for environmental and climate protection in this context.

Protection of Natural Habitats and Resources

Land, forests, or bodies of water that secure people's livelihoods must not be deprived. Harmful soil alterations, water and air pollution, noise emissions, and excessive water consumption are prohibited.

Natural resources should be used sparingly and preserved whenever possible. The use and consumption of resources during production must be minimized.



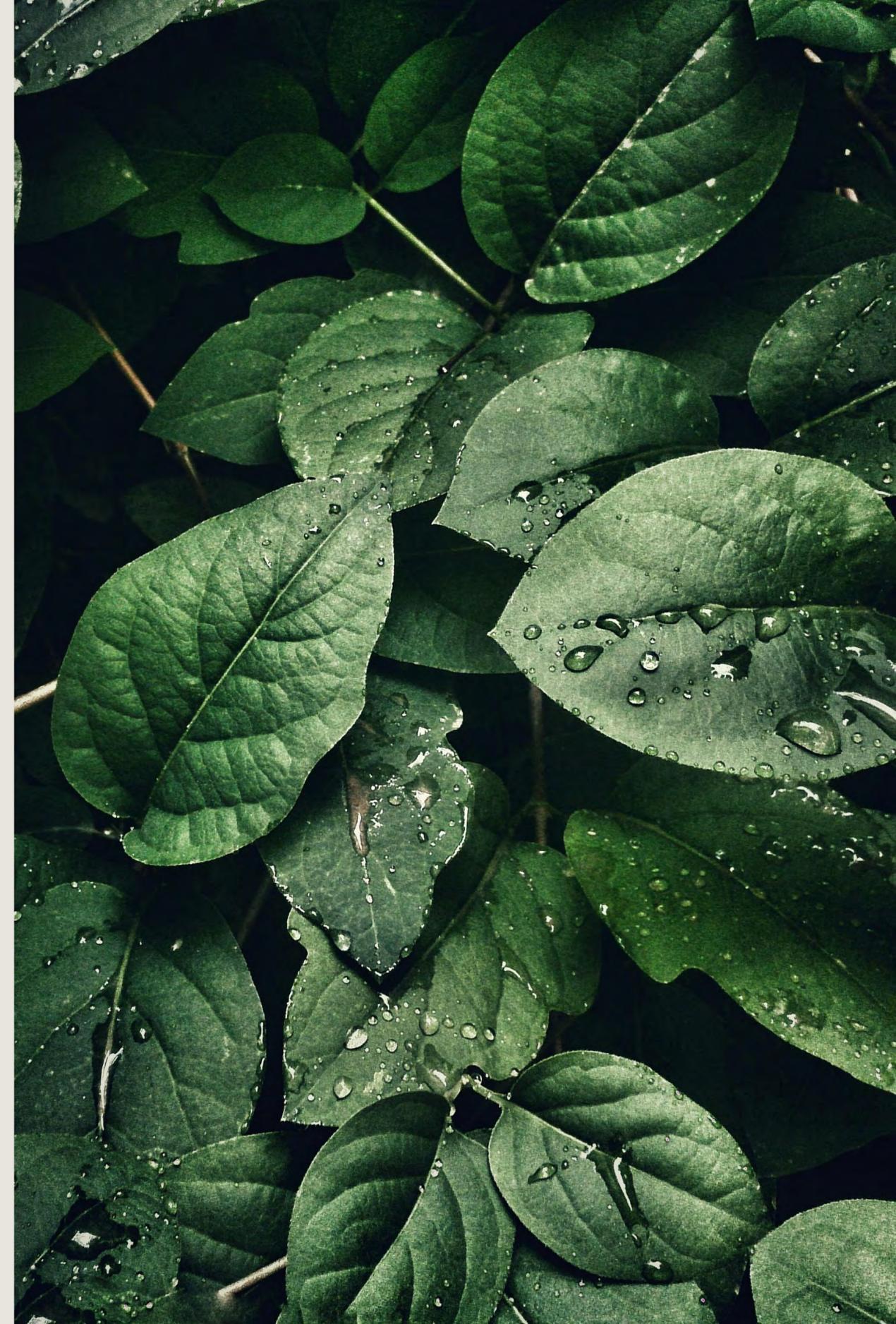
V. Environmental Standards

Compliance with Waste Regulations

Business Partners must comply with local laws and regulations regarding the generation, storage, disposal, and recycling of waste, emissions, and effluents, including the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal. Waste, wastewater, and emissions should be minimized as much as possible.

Compliance with Regulations on Hazardous Substances

The production of products containing mercury and the use of mercury and mercury compounds in manufacturing processes are prohibited. Similarly, persistent organic pollutants or chemicals prohibited at national or international levels must not be produced or used. Business Partners must comply with environmental regulations applicable at their place of operation.



VI. Compliance Standards

Money Laundering and Terrorism Financing

Business Partners undertake to comply with the applicable legal provisions for the prevention of money laundering and terrorist financing, in particular the German Money Laundering Act (GwG) and the EU Directive (EU) 2015/849 in its current version.

They take appropriate measures to ensure that no financial resources from illegal sources are introduced into the economic cycle or used to finance terrorist activities.

Business Partners therefore identify and verify the identity of their own business partners and their beneficial owners as part of a risk management system.





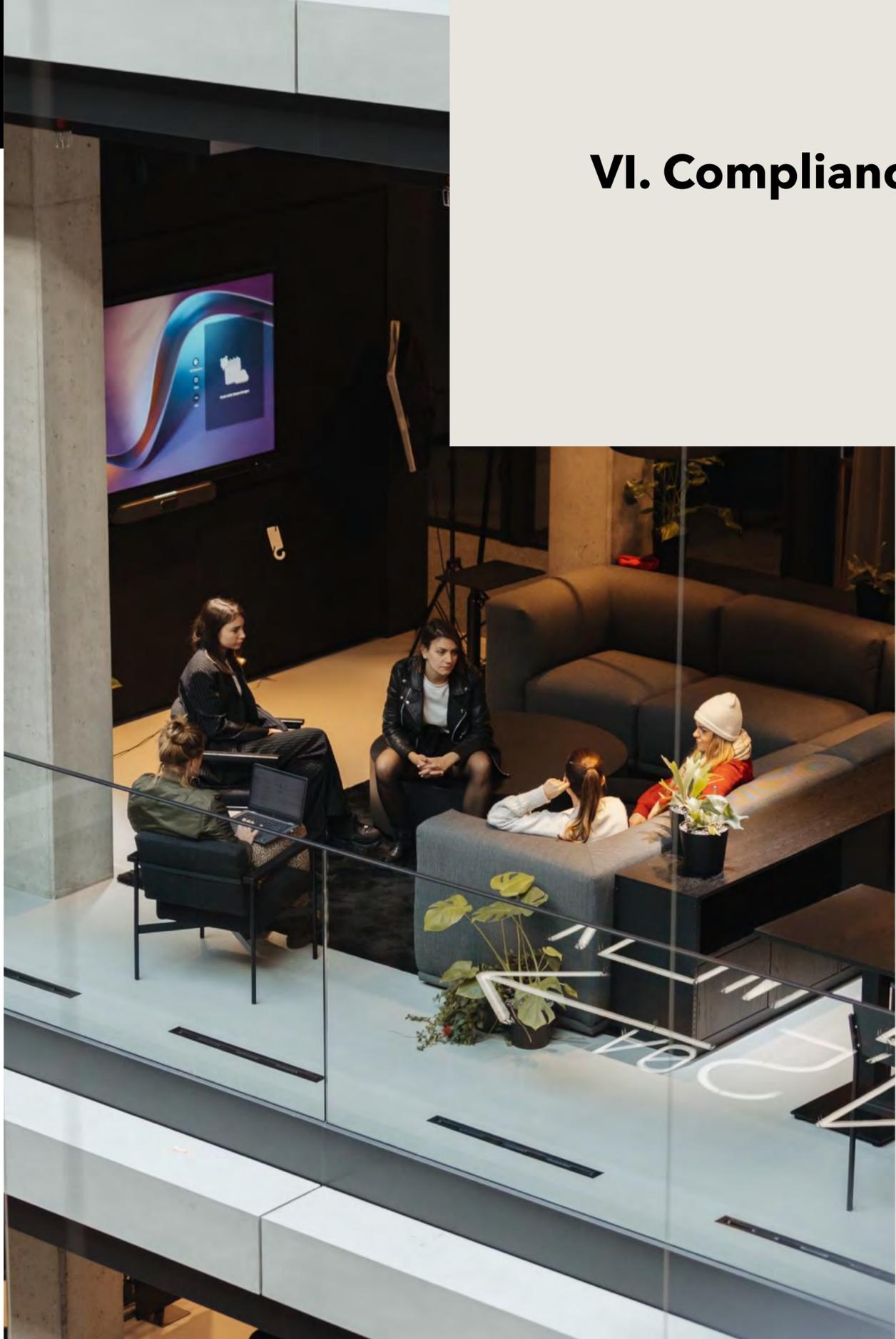
VI. Compliance Standards

Anti-Corruption

Business Partners do not tolerate any form of corruption or white-collar crime. No form of taking or granting advantages (bribery and corruptibility) is accepted. This also includes facilitation payments (accelerated payments for routine official acts).

Business Partners take suitable measures that are necessary and appropriate to prevent corruption. They conduct all business transparently and with integrity. This is promoted by responsible management and control throughout the business of each Business Partner.

Business Partners ensure that their suppliers who directly or indirectly provide services for Serviceplan Group are selected and commissioned in accordance with these guidelines and that these suppliers do not grant, offer or accept bribes or kickbacks, improper donations or other improper payments to or from our employees, public officials or other third parties.



VI. Compliance Standards

Fair Competition

Business Partners adhere to applicable competition and antitrust laws (UWG). They do not engage in anti-competitive agreements or arrangements that are capable of unfairly restricting competition. Dominant market positions are not abused. They ensure that all business actions are conducted in a manner that does not or cannot unlawfully restrict competition.

Protection of Intellectual Property, Data Privacy, and Use of Artificial Intelligence

Business Partners respect intellectual property rights and protect relevant data. Business secrets and personal data are collected, processed, secured, and deleted in accordance with applicable data protection laws. There is no unauthorized disclosure to third parties.

If they use artificial intelligence, they ensure that AI-based developments comply with regulations on data protection and security.

Conflicts of Interest

Conflicts of interest in the course of our work for Serviceplan Group are to be avoided. Decisions should therefore be made solely on the basis of factual considerations. Personal interests should not guide decisions.



VI. Compliance-Standards

Risk Analysis, Transparency and Audits

Serviceplan Group regularly conducts risk assessments on its supply chains, both pre-contractually and during ongoing business relationships ("risk analysis").

Serviceplan Group has the right to conduct audits annually or as needed to verify compliance with social standards, human rights, and environmental standards. Audits may include self-declarations, certificates, or information from Third Parties and may be conducted at the Business Partners' premises ("Audit").

Business Partners agree to disclose information about their supply chains upon request for risk identification, analysis, and auditing purposes ("transparency requirement"). They also pass on this obligation to their own business partners.



VIII. Complaints Procedure and Whistleblowing System

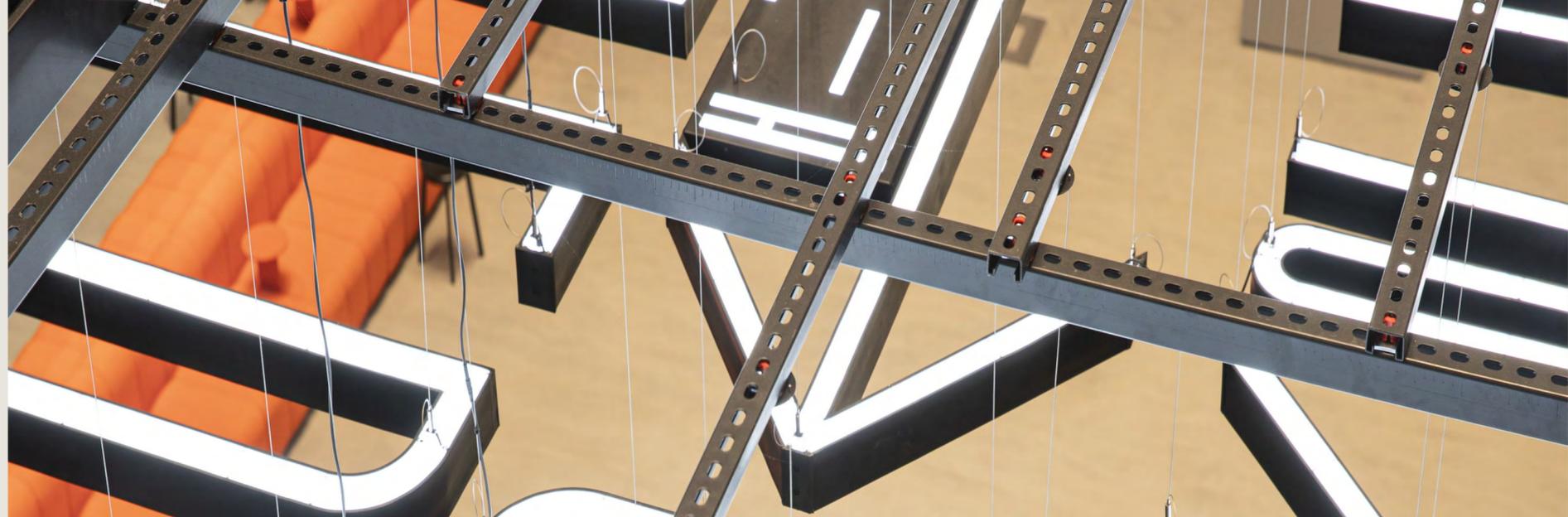
Business Partners establish a suitable complaints procedure enabling the reporting of concerns or issues related to compliance with social standards, human rights, environmental rights, or other legal requirements outlined in this Code of Conduct. Reports can be made anonymously, confidentially and without fear of retaliation.

Serviceplan Group places importance on receiving relevant information about potential misconduct by Business Partners, employees, or other Third Parties and has established a whistleblowing system aligned with the characteristics of the complaints procedure mentioned. All information and contact options are available at <https://serviceplan.integrityline.com/frontpage>.

IX. No Third-Party Beneficiaries

This Code of Conduct exclusively governs the relationship between Serviceplan Group and its Business Partners. Third Parties are not included in the scope of protection of this Code of Conduct and cannot assert any rights under it.





Serviceplan Group SE & Co. KG
represented by
Serviceplan Group Management SE
represented by

Electronically signed by:
Florian Haller
Date: Mar 10, 2026
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Florian Haller
Chairman of the Board

Electronically signed by:
Fabian Prüschenk
Date: Mar 9, 2026
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Dr. Fabian Prüschenk
Member of the Board