

## **CODE OF CONDUCT**

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**Status: December 2024**

## Foreword

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We, the EVP GROUP as part of the ADDVANCE Consumer Health Group (“ADDVANCE Group”), develop, produce and distribute products that help society achieve greater health and vitality.

Our top priority is to bring health-promoting, high-quality and safe products to the market that create added value for society. Our ambition is to be the best at what we do.

For us - in our various roles as an employer, employees, business partners and as part of society - people are always at the center of everything we do.

This Code of Conduct (CoC) sets out the principles and values on which our corporate actions are based. They reflect our corporate culture, guide us to act responsibly and help us to make the right decisions. The CoC serves as a guideline for all EVP GROUP employees. We also expect our business partners to take the relevant content into account as part of our collaboration and to recognize and uphold the corresponding principles.

As an employee, you play a crucial role in the success of the EVP GROUP - now and in the future. Together we use and develop the innovative power and strong brands of our company. The values and rules of the Code of Conduct provide a clear guideline - and make us proud to be part of the company.



Dr. Christian Zischek  
CEO



Johannes Langwieder  
CFO / COO

## General principles

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### Scope of application

The Code of Conduct sets out binding rules that must be followed by all employees of the EVP GROUP. In particular, the members of the Management Board and all supervisors are responsible for the active implementation of this Code of Conduct. They must act as role models in every respect. The Code of Conduct is the basis and guideline for overcoming ethical and legal challenges in our daily work. Any employee can contact their supervisor, the HR department or the management board with questions and/or comments in this regard.

### Integrity, credibility, transparency

The EVP GROUP bases its business actions and decisions on generally accepted ethical values, in particular integrity, credibility and respect for human dignity. It promotes transparency, responsible management and control within the company in an appropriate manner.

### Supply Chain

The EVP GROUP expects its suppliers to follow the guiding values of the Code of Conduct, supports them in this as best it can and calls on them to do the same in their supply chains.

### Compliance with laws

The EVP GROUP complies with the laws and other legal regulations of the countries in which it operates. This also specifically applies to national, European and international regulations as well as to embargo, customs and export control regulations.

## Behavior towards customers, competitors, business partners and third parties

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### Customers

As the EVP GROUP, we place the needs of our customers and consumers at the center of our product developments and services. We have set ourselves the goal of gaining and keeping the unreserved trust of our customers and consumers.

With our quality management system certified according to 'Good Manufacturing Practice' (GMP), ISO 13485, IFS Broker and ISO 9001, or our organic seal and our certifications according to IFS FOOD, BRC, IFS HPC, ISO 14001, SMETA and BSCI, we ensure that only products of the highest quality and safety are developed, produced and distributed.

A culture of product safety is a fundamental part of our company policy. This includes the responsibility of each employee and the management of purchasing processes. Furthermore, we maintain transparent communication with our suppliers and customers. This ensures that all externally procured goods and services meet the requirements for product safety and quality.

Our products and services are described in a transparent and comprehensible manner. Guarantees, rights of return and warranties are of course clearly communicated and adhered to.

### Competition and anti-trust law

The EVP GROUP respects the rules of fair and open competition and does not enter into any agreements that influence competition in an unlawful manner

Employees of the company are obliged to comply with the rules of fair competition. In particular, agreements, but also any coordinated behavior with competitors on the topics of prices and price components, conditions, customers, delivery areas, quotas and capacities, agreed market exits or coordination are prohibited.

### Tenders

If a contract is awarded on the basis of a formal invitation to tender, the company will neither discuss nor coordinate offers with other bidders. This applies to both public and restricted invitations to tender and regardless of whether it is a public or private procurement procedure.

### Corruption

The EVP GROUP is expressly opposed to all forms of corruption in Germany and abroad and avoids even the appearance of attempting to influence business decisions through unfair business practices. No employee may use the company's business connections for their own benefit or that of others, or to the detriment of the company. In particular, this means that no employee may grant or accept unauthorized private benefits (e.g. money, material assets, services) in business dealings that are likely to influence a proper decision. Every employee of the company is obliged to seek advice or assistance in the event of suspicions or legal doubts regarding the existence of corruption or white-collar crime. Support is provided by the respective supervisor, the HR department and/or the management board.

In this context, the EVP GROUP has introduced an independent digital whistleblower system ("Hintcatcher"), which accepts reports from employees, customers and suppliers, anonymously if desired.

The portal can be accessed at <https://report.hintcatcher.com/gYZGNlj6ocz2jTHvjgRj/>

## Granting and accepting benefits, invitations and gifts

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Invitations, e.g. to business meals or events, which are in line with normal business etiquette and appropriate, may be extended or accepted if they are not intended to show undue favoritism. The same applies to the acceptance or granting of gifts. If there is any doubt about a gift, the employee must first ask their supervisor, the HR department or a managing director.

### Public Officials

Benefits of any kind to civil servants and other public officials as well as to representatives of state institutions, including indirectly via third parties, are strictly prohibited, regardless of their value.

### Parties and elected representatives

Donations to parties and political organizations as well as to elected officials and candidates for political office may only be made in accordance with the applicable laws.

### Consultants and Agents

The commissioning of consultants, agents and other intermediaries may not be used to circumvent the ban on bribery.

### Donations and Sponsoring

Donations may only be made on a voluntary basis and without expectation of anything in return. Donations and sponsoring activities must not be designed to covertly promote decisions in the interests of the company. The donation must be transparent. The recipient of the donation and the specific use by the recipient must be known. It must be possible to account for the reason for the donation and the intended use at any time. Remuneration similar to donations must be avoided. These are donations that only appear to be granted as remuneration for a service, but whose value significantly exceeds the value of the service.

### Money laundering

The EVP GROUP does not tolerate money laundering. All employees are obliged to strictly comply with anti-money laundering laws. Furthermore, they must immediately report suspicious forms of payment or other transactions that indicate money laundering to the management board or the HR department.

### Tax law / customs law / foreign trade law

The company prepares tax returns and declarations truthfully. All dutiable goods are properly cleared through customs by the company. The company consistently complies with the legal requirements for export control and customs in the areas of foreign trade and customs law and ensures their proper implementation. The EVP GROUP expects its suppliers to provide export control and foreign trade data in a qualified and timely manner and to implement sufficient supply chain security standards as part of global customs security programs.

## Avoidance of conflicts of interest

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### Employee loyalty

The company expects loyalty from its employees. It ensures that its employees do not find themselves in situations in which their personal or financial interests conflict with those of the company or its business partners. The company's employees must immediately report any personal interest that may exist in connection with their work to their superiors.

### Secondary activities and shareholdings

Employees of the company are prohibited from managing a company or working for a company that is in competition with the EVP GROUP. This also applies to the participation of a close relative or life partner.

## Handling information

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### Business and trade secrets

The employees of the EVP GROUP are obliged to maintain confidentiality regarding company and business secrets and other internal matters. This applies specifically to information about contractual partners and customers that is not publicly accessible. The confidentiality obligation continues to apply after termination of the employment relationship.

### Data protection

In addition to the general confidentiality regulations (e.g. Section 17 Act against Unfair Competition), data protection in accordance with the GDPR must be complied with. In particular, it is prohibited to process, disclose, make accessible or otherwise use protected personal data without authorization for any purpose other than the respective lawful performance of tasks. This obligation to maintain data secrecy continues even after leaving the company.

### Duty of truthfulness

All reports and other written documentation must be drawn up correctly and truthfully. This applies regardless of whether the reports are internal or external. Data entries and other records must be based on the principles of proper accounting and must always be complete and correct.

## Principles of social and ecological responsibility

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### Social and ethical responsibility

Social responsibility is an indispensable component of corporate management based on values and an essential factor for sustainable corporate success.

Any form (verbal or physical) of harassment or discrimination against our employees, e.g. on the basis of nationality, origin, religion, gender, age, sexual orientation or similar, is prohibited. No employee may be discriminated against for exercising their personal rights.

This includes, in particular, the prohibition of child labor, forced labor, discrimination, bullying and physical disciplinary measures, compliance with safety regulations and occupational health and safety in the workplace, compliance with statutory working time regulations, fair pay in accordance with industry standards.

The company respects and supports internationally recognized human rights. In this context, we are also in constant dialog with our suppliers to ensure that our products do not contain raw materials from conflict regions.

The EVP GROUP promotes diversity and equal opportunities for its employees.

### Employee rights

Employees' freedom of association and freedom of assembly is recognized to the extent permitted by national law. The company observes the applicable national laws and labor standards with regard to appropriate remuneration and maximum working hours. This naturally also includes compliance with all provisions of the law governing a general minimum wage in the countries in which we have employees. The company ensures fair working conditions overall.

### Environmental and climate protection

Sustainable environmental and climate protection and resource efficiency are important corporate goals for us. Both in the development of new products and services and in the operation of production facilities, we ensure that all resulting effects on the environment and climate are kept to a minimum and that our products make a positive contribution to environmental and climate protection for our customers. Every employee has a responsibility to treat natural resources with care and to contribute to the protection of the environment and climate through their individual behavior.

### Consumer interests

Insofar as consumer interests are affected, the company complies with the regulations for the protection of consumers.

### Social commitment

The EVP GROUP contributes to the social and economic development of the country and region in which it operates.

## Compliance with the Code of Conduct

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### Communication

The EVP GROUP familiarizes its employees with the content of this Code of Conduct and explains the resulting obligations. The company communicates the principles of the Code of Conduct to its business partners.

### Guidelines and processes

The behavioral requirements set out in this Code of Conduct are binding for employees of the EVP GROUP as part of their employment contract and must therefore be complied with. The company takes all necessary steps to implement the basic values and requirements contained in this Code of Conduct through suitable organizational measures as well as appropriate guidelines and processes in all business areas.

### **Regular checks**

The EVP GROUP is committed to regularly monitor compliance with the Code of Conduct and to train its employees accordingly.

### **Notification of violations**

Every employee of the EVP GROUP is obliged to report any (potential, including imminent) violations of laws, internal regulations and this Code of Conduct that they may observe to the management board or the HR department without delay.

Reports of a violation of this Code of Conduct will be treated in strict confidence and will not have any negative consequences for the reporting employee, unless a false allegation has been deliberately made.

The “Hintcatcher” whistleblower system (see page 4) is available for this purpose.

### **Consequences of violations**

Depending on their severity, violations of the Code of Conduct and legal provisions may have consequences under labor and liability law and may also result in criminal sanctions.