

## Code of Conduct (employees)

Dear colleagues,

The corporate culture of all companies in the Luana Group (“Luana”) is characterized by our corporate values as well as by competence, enthusiasm, entrepreneurship and agility and our commitment to integrity and honesty as well as consistent compliance with legal and regulatory requirements. We expect this from our employees, executive bodies and managers as well as from our business partners.

This “Code of Conduct for Employees of Luana Group Companies” (Code of Conduct) brings together our important basic rules and principles in one document, which are binding for us both now and in the future. It provides a guiding framework and applies equally to all of us - to the executive bodies, managers and individual employees. It sets a standard for ourselves and is also a promise to the outside world for responsible behavior towards business partners. Together, we are responsible for the reputation of our company.

The misconduct of individuals can cause enormous damage to us all. We therefore ask you, dear colleagues, to read this Code of Conduct carefully and to join us in applying the basic rules and principles to our day-to-day conduct.



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**Marcus Florek**  
Management Board Luana AG

### **Preamble**

This Code of Conduct summarizes the essential principles and rules for Luana's actions. The content of this Code of Conduct is not exhaustive and is supplemented by guidelines and special work instructions as required. The Code of Conduct applies equally to all divisions and companies of the Luana Group. The Code of Conduct must always be applied in compliance with national laws and regulations. In the event that the Code of Conduct deviates from mandatory national law, national law shall take precedence.

Every employee, manager and board member (hereinafter collectively referred to as “employees”) is bound by this Code of Conduct.

### **1. Behavior in the business environment**

#### ***Compliance with the law***

Corporate responsibility entails the obligation to comply with the law and all applicable laws.

Every employee consistently and responsibly complies at all times with the laws and regulations that apply to them as well as Luana's internal guidelines and rules, including this Code of Conduct.

### ***Anti-corruption***

Corruption is not tolerated by Luana (zero tolerance). In connection with business activities, purchases or transactions with business partners or customers, no Luana employee may demand, be promised or accept personal advantages - in particular kickback payments, commissions, cash, gifts, entertainment, bribes or other benefits - which, according to objective assessment, are likely to have an unfair influence on business conduct. The same applies to the offering, promising or granting of personal benefits to third parties, in particular to business partners and customers, which, according to an objective assessment, are likely to have an unfair influence on business conduct. Even the appearance of such unfair, passive or active influence must be avoided. This applies in particular when dealing with public officials or public employees.

Violations will not be tolerated and will result in appropriate measures and sanctions against the persons concerned.

### ***Free competition***

Luana is a fair and responsible market participant and does not enter into anti-competitive agreements with competitors, business partners or customers. In any contact with competitors, employees ensure that no information is received or given that would allow conclusions to be drawn about the current or future business behavior of the provider of the information.

In discussions or other contact with competitors, employees avoid topics that are relevant to competition. These include prices, costs, pricing and business planning.

### ***Prevention of money laundering***

Luana complies with its legal obligations to prevent money laundering and does not participate in money laundering activities.

Every employee is required to report unusual financial transactions, in particular involving cash, which may give rise to suspicion of money laundering, to the responsible compliance officer in two cases. Employees must comply with national and international laws and regulations on the prevention of money laundering.

### ***Procurement***

Luana carefully selects suppliers and service providers according to objective criteria. This also applies to the purchase of products and services. Employees do not unilaterally favor a supplier or service provider without objective reason and avoid any conflict of interest. They do not purchase any products or services without having informed themselves in advance about the market and alternative providers.

### ***Occupational health and safety***

The health and safety of employees is a high corporate goal at Luana. The same safety standards apply to employees of Luana's suppliers as to employees of Luana. This is taken into account during selection and cooperation.

Every employee promotes safety and health protection in their working environment and complies with the regulations on occupational health and safety. All managers are obliged to instruct and support their employees in fulfilling this responsibility.

## **2. Behavior within the company**

### ***Integrity***

Luana understands integrity as the consistency of external actions with inner values based on righteousness and fairness. Integrity represents a kind of inner moral compass and provides guidance for decisions and actions that correspond to Luana's values and are consistent with a universal

understanding of integrity. Every employee always ensures that they behave with integrity in their day-to-day work.

#### ***Sustainable environmental and climate protection***

Sustainable environmental and climate protection and resource efficiency are important corporate goals for Luana. Luana takes care to ensure that all impacts on the environment and climate caused by Luana are kept as low as possible. 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.

#### ***Dealing with company resources***

All employees handle the resources made available to them by the company in a responsible, cost-conscious and careful manner. This applies in particular to the financial resources entrusted to them. Setting up or maintaining so-called “slush funds” is prohibited.

### **3. Handling information**

#### ***Reporting***

Luana attaches great importance to open and truthful reporting and communication on the company's business transactions to employees, customers, business partners and government institutions.

Every employee ensures that Luana's internal and external reports, records and other documents comply with the applicable legal rules and standards and are therefore always complete and accurate.

#### ***Data protection***

Luana protects the personal data of employees, former employees, customers, suppliers and other data subjects. Luana collects, collects, processes, uses and stores personal data only in accordance with legal requirements. Employees must comply with the relevant laws and company regulations with regard to personal data. Personal data may only be processed on a legitimate basis in accordance with the applicable laws. Any detected violations of data protection regulations must be reported immediately to the respective line manager or the compliance officer.

### **4. Implementation and contact persons**

#### ***Compliance with the Code of Conduct and violations***

The Code of Conduct forms the basis for all of Luana's internal regulations, which concretize it and must therefore be observed in addition. Each and every employee must be issued with this Code of Conduct. Managers are responsible for ensuring that the content of this Code of Conduct is comprehensible to all employees. Violations of the Code of Conduct may result in disciplinary measures as well as civil or criminal proceedings.

#### ***Whistleblowing***

Information on violations of legal or internal regulations must be addressed to the respective supervisor or the responsible compliance officer. To protect all parties involved, whistleblowers must act to the best of their knowledge. Improper or deliberately false reports will result in appropriate measures and sanctions.

#### ***Contact details***

Please send e-mails with questions or comments on the subject of compliance to the following address: Luana AG, An der Alster 47, D-20099 Hamburg, Germany.

***Entry into force***

This Code of Conduct comes into force on July 01, 2019. The current version of the Code of Conduct can be found at the following link: <https://www.luana-group.com/en/about-luana/downloads>.

I have read the above “Code of Conduct for Employees of Luana Group Companies”. I undertake to comply with the basic rules and principles of the group of companies.

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Place, date

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Signature

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Name of the employee in block capitals