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1. Introduction

Julius Fröbus GmbH has stood for excellence in media production since its foundation in 1873. As a traditional service company, we are aware of our role with regard to our customers, suppliers, business partners, employees and society. For us, business integrity, transparency, sustainability and long-term customer and employee relationships are core values to which we are committed.

This Code of Conduct describes our minimum requirements for ethical and responsible action and has been agreed between the management and the works council as well as the shareholders. Our shareholders, managers and employees undertake to comply with the following principles.

In doing so, we want to consider the areas of social interaction, occupational safety, business integrity, in particular behaviour towards third parties such as customers or suppliers, compliance with legal regulations, human rights, data protection and handling information as well as sustainable & ecological action.

2. Social interaction

We respect and appreciate one other irrespective of gender, age, sexual orientation, religious affiliation, nationality, disability or political attitude, role within the company or length of service.

Our actions are guided by generally accepted values, in particular integrity and human dignity. Every opinion is important to us, can help us move forward and will be heard. We live by an open error culture, which sees mistakes as an opportunity for improvement so that they cannot be repeated. Constructive criticism is always welcome and promotes transparency and trust.

Professional expertise, passion for our work and a friendly, helpful interaction with each other are the hallmarks of our employees. We expect reliability, honesty and morally and legally sound conduct from both ourselves and our business partners.

We do not tolerate discrimination of any kind, and offer the possibility to report misconduct at any time (including anonymously) via the works council in order to be able to promptly remedy the situation.

We respect human rights and also expect our suppliers, subcontractors and business partners not to promote, operate or profit from child or forced labour, and not to tolerate these in their own supplier circles.

We routinely select an employee representative who agrees the interests of the employees with the management in company agreements. Our wages are agreed with the employees based on the current negotiated wages of the agreements for the printing industry at the **Vereinte Dienstleistungsgewerkschaft ver.di e.V., District of North Rhine-Westphalia, Karlstr. 123-127, 40210 Düsseldorf, Germany.**

The weekly working time is 37.5 hours. We balance overtime with free time, in accordance with a distribution agreement between the works council and the management. Annual leave is usually 30 working days. Individual contracts may deviate from this by mutual agreement. The Federal Leave Act (BUrLG) applies. Employees are offered voluntary social benefits such as direct insurance.

Our social responsibility is an indispensable part of corporate management and contributes to our long-term corporate success.

3. Occupational health and safety

A variety of measures are in place to ensure the safety and health of our employees.

An internal safety officer regularly checks the operational conditions and processes according to occupational health and safety aspects, and points out any defects, which are then remedied as soon as possible. Every employee is trained electronically on the topics of occupational safety and ergonomic working at the computer workstation.

We always comply with applicable laws, including in the areas of occupational health and safety, such as the Law on the Implementation of Occupational Health and Safety Measures to Improve the Safety and Health Protection of Employees at Work (ArbSchG - Occupational Health and Safety Act) of 7 August 1996 (Federal Law Gazette I P. 1246), as last amended by Article 1 of the Law of 22 December 2020 (Federal Law Gazette I, P. 3334), contained in the publication GV02 of the BG ETEM (Energy, Textile, Electrical and Media Products Trade Association), and the relevant regulations, rules, ordinances, principles and laws of the DGUV (German Statutory Accident Insurance). Furthermore, the General Data Protection Regulations (GDPR) as well as laws applicable at the place of business regarding working hours according to the Working Hours Act of 6 June 1994 (Federal Law Gazette I P. 1170, 1171), last amended by Article 6 of the Law of 22 December 2020 ((Federal Law Gazette I P. 3334) must be complied with.

We regularly check the air quality in the vicinity of our company, and maintain it by regular ventilation in accordance with the legal requirements of workplaces Rule A3.6 Ventilation (ASRA3). Smoking is forbidden in all rooms throughout the company's building.

Our occupational health and safety measures are regularly checked and optimised by an external service provider.

Julius Fröbus GmbH also ensures a sufficient number of company first-responders and their training, as well as continuous updating of knowledge. A sufficient number of fire protection officers, the regular maintenance of our fire extinguishers by an external specialist company and regular training of conduct in case of an emergency also ensure safety.

4. Business integrity

Our employees are required to comply with the general rules of fair competition. We are strongly opposed to any form of corruption and unfair competition. No employee may allow themselves to be influenced in their business decisions by third parties (e.g. by accepting monetary or material assets). This does not apply to generally accepted business practices such as business lunches or participation in business events. Invitations may be issued and accepted (if appropriate).

All employees are expected to behave in a spirit of trust, loyalty and integrity. We categorically reject violations of local and international laws or human rights. These include, in particular, taking advantage, bribery, violations of fair competition and money laundering.

Our business activities are carried out in strict compliance with all antitrust and competition laws and regulations.

We expect all employees to act in the best interests of the company at all times.

Of course, we also respect the compliance regulations of our customers and suppliers, provided that they go beyond the standards agreed here. If possible, we also check whether our business partners act in accordance with our principles when selecting them.

We do not work for manufacturers or distributors of weapons of war as well as publications that promote or spread incitement, racism, sexism or prostitution.

5. Privacy

As a company, we attach great importance to the sensitive handling of data, in particular personal or customer-transmitted data. All employees are contractually obliged to handle data confidentially and must keep company secrets as well as the internals of customers, suppliers or other business partners confidential. This duty of confidentiality shall remain in force even after termination of the employment relationship.

Naturally, the General Data Protection Regulation (GDPR) also applies in our work. External data protection officers check compliance with the legal requirements.

Information that we receive from third parties is generally not passed on, unless this is required or permitted by law.

6. Environment/Sustainability

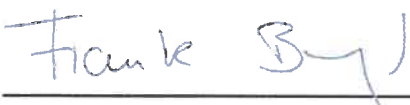
We are aware of our responsibility for the environment, the climate and our planet. We act sustainably wherever possible. We design our business activities in such a way that negative effects on the environment and the climate are as low as possible. We hope that every employee internalises this resource-saving principle.

In the near future, our energy needs will be covered 100% by renewable energies. External data centres that we use should also be supplied with "green" electricity.

Where possible, we travel by train instead of by air or by car for business trips. Wherever possible, we use digital means of communication such as video conferences to avoid unnecessary business trips. We intend to gradually convert the vehicle fleet to e-mobility wherever possible.

As a sustainably operating company, we monitor our procedures, processes and conduct to ensure considerate consumption of resources such as paper, water and energy. Our communication is predominantly paperless, which also leads to a reduction in water consumption.

Violations of this Code of Conduct are assessed individually and, depending on the severity, may entail consequences under labour and liability law.



Frank Bayerl (Managing Partner)



Daniel Bietenbeck (Chairman of the Works Council)