



Prym Group

Code of Conduct

1

Compliance with the law

Compliance with law, rules and regulations is for us an essential basic principle of responsible business conduct. We adhere to legal prohibitions and requirements at all times, even if this involves short-term business disadvantages or difficulties for the Company or individuals.

2

Avoiding conflicts of interest

At Prym Group business decisions are made exclusively in the best interests of the Company. Any conflicts of interest with personal matters or other business or non-business activities, including those of relatives or other related parties have to be avoided. Should such conflicts nevertheless occur, they must be resolved in accordance with the law and Group policies. Conflicts must be dealt with openly and transparently.

3

Fair competition

Our conduct on the markets is based on the Compliance Manual issued by the Management Board of Prym. Our company stands for honesty, fairness, business integrity, customer orientation and motivated, responsible employees. These factors are the basis of our high reputation and the long-term economic success of the Group in global competition. Corruption and antitrust violations threaten these success factors and will not be tolerated (zero tolerance). For us, bribes and cartel agreements are not a means of winning business. All Management board members and employees must be aware of the extraordinary risks which corruption and antitrust violations can signify for Prym as well as for them personally. All employees are requested to contribute actively in their areas of responsibility in implementing the Prym Compliance Manual.

4

Equal treatment

A culture of equal opportunities and mutual trust and respect is of great importance to us. We promote equal opportunities and prevent discrimination in the recruitment, promotion, training and development of employees. We treat all employees equally, regardless of gender, age, disability, skin color, culture, ethnic origin, sexual identity, religion or world view.

5

Preventing money laundering

Prym Group fulfills its legal obligations to prevent money laundering and does not participate in money laundering activities. In cases of doubt, all employees are obliged to report unusual financial transactions, especially those involving cash, which could give grounds to suspect money laundering, to the responsible finance, legal or compliance department for review.

6

Human and labor rights

Always be alert to possible human rights violations.

Prym Group recognizes the importance of maintaining and promoting fundamental human rights in all of our operations and throughout our supply chain. We orient ourselves towards the core labor standards of the International Labor Organization (ILO). Our Values, Code, talent sustainability strategies and employment policies work together to support the following principles,

- Provide fair and equitable wages, benefits and other conditions of employment in accordance with local laws
- Recognize employees' rights to freedom of association
- Provide humane and safe working conditions
- Prohibit forced or child labor
- Promote a workplace free of discrimination and harassment

We expect our suppliers and business partners to uphold these principles as well. Employees must check their actions to ensure that they do not violate or contradict any of the basic human rights principles noted above. If an employee suspects a human rights abuse within Prym Group operations or supply chain, the employee has to speak up and report it.

7

Occupational health and safety

The safety and health of our employees are a corporate objective. Occupational safety and health protection are an integral part of all business processes. All employees must promote safety and health in their work environment and comply with the health and safety regulations. All managers are obligated to instruct and support their employees in meeting this responsibility.

8

Protection of environment

For us, sustainability, environmental and climate protection and resource efficiency are key corporate objectives. When developing new products and services and when operating production equipment, we ensure that all environmental and climate impacts are kept to a minimum and our products make a positive contribution to environmental and climate protection for our customers. Every employee bears responsibility for conserving natural resources and helping protect the environment and climate through their individual behavior.

9

Data protection

The protection of personal data in particular of employees, customers and suppliers, is of particular importance to Prym Group. We collect and process personal data only when this is absolutely necessary to perform work-related tasks or when required by law. Personal data may be collected or processed only with the consent of the person concerned and where permitted by law.

10

Protection of company property

We use the Company's property and resources correctly and carefully and protect them from loss, theft and misuse. Our Company's intellectual property represents a competitive advantage for Prym Group and is therefore a valuable asset which we protect against all unauthorized access by third parties. We use the Company's tangible and intangible assets exclusively for business purposes and not for personal reasons except where expressly permitted. Our employees bear joint responsibility with their supervisors for ensuring that business trips are always appropriate in nature and scale to the purpose of the trip and are efficiently planned and carried out taking time and cost aspects into account.

11

Reporting

We attach great importance to being open and truthful in our reporting and communications on the Company's business transactions to investors, employees, customers, business partners, the general public and government institutions. Every employee must ensure that both internal and external reports, financial records and other documents of the Group comply with the applicable legal rules and standards and are therefore complete and correct.