

CODE OF CONDUCT

RULES AND REGULATIONS

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CODE OF CONDUCT

Why does Nutz GmbH need a Code of Conduct?

At **nutz**, we are certain that we can only achieve the highest quality and performance for our customers as a well-coordinated team. That is why we create a trusting company atmosphere for our colleagues, in which appreciation and mutual responsibility are our highest principles.

The reputation and continued success of the Nutz GmbH depend on the behavior of all employees. Every employee as the guardian of **nutz**'s reputation in business and society, every employee has a personal responsibility to protect and promote our Code of Conduct. The Code of Conduct defines the fundamental values and standards of conduct that characterize the corporate culture of the **nutz** family.

Acting lawfully and responsibly is firmly anchored at **nutz** and is essential for our long-term corporate success

What does the Code of Conduct mean for the people at nutz?

The rules and standards described here serve as an ethical compass for the daily conduct of our employees at all locations. Our Code of Conduct is binding and applies to all employees worldwide.

Each individual is required to respect applicable law, comply with norms and standards and actively live our principles of conduct in their daily working life. Violations of these guidelines will not be tolerated.

We therefore trust that every member of our global teams actively and resolutely supports our values and principles of conduct.



*Christian Gruber,
Managing Partner, on the
benefits and objectives of a
Code of Conduct.*

How were the principles of conduct defined?

Our Code of Conduct and the principles of behavior anchored in it were developed in a multi-stage process by an interdisciplinary team. This team has further refined our corporate values and ensured that they fully reflect the needs and values of **nutz**.

What advice do you give to employees who are not sure how they should behave or who observed misconduct in the company?

In everyday life, whether in a private or professional context, we are confronted with a multitude of decisions. Often the first recommendation we are given is to listen to our inner voice. In most cases, you are right.

Our intuition can often show us the path that is best for us. It is a valuable tool for evaluating situations and making decisions.

Nevertheless, it is important to emphasize the importance of sound decision-making. If possible, it is advisable to clarify the situation with the people involved to clear up misunderstandings or obtain additional information before drawing conclusions or taking actions.

If you are unsure about what to do, do not hesitate to seek advice from your manager, a compliance representative or other relevant authorities. Companies often provide specific channels, such as internal grievance procedures, to address such issues.

As an employee, you have a significant responsibility for maintaining an ethical and respectful work environment. If you ignore misconduct, you indirectly contribute to its perpetuation. Therefore, all employees are required to take their responsibilities seriously and act accordingly to foster an environment based on integrity and respect.

„If you are unsure about what to do, do not hesitate to seek advice from your manager, a compliance representative or other relevant authorities.“

What goal is Nutz GmbH pursuing with the introduction of the Code of Conduct and how do these goals fit into the overall culture of the company?

With the introduction of the Code of Conduct, **nutz** is pursuing several objectives that are closely linked to our overall culture and core values. On the one hand, we strive to promote ethics and integrity and ensure compliance with legal regulations in order to strengthen the trust of our customers, partners and stakeholders.

On the other hand, we aim to use our corporate values to create a positive working culture in which employees feel valued and can develop their skills. This helps to create an environment of trust and collaboration in which innovation and excellence can flourish.

In addition, the Code of Conduct serves as a guideline for our daily actions and underlines our commitment to ethical business practices and social responsibility. By consistently implementing these principles, we can ensure that our company is not only successful in the long term but also contributes positively to society and sets an example for other companies in our industry.

„The Code of Conduct serves as a guide for our daily actions and underlines our commitment to ethical business practices and social responsibility.“

WE SET HIGH STANDARDS AT ALL OUR LOCATIONS.

AREA OF APPLICATION

The Code of Conduct applies to all members of the **nutz** team at all locations and to all subsidiaries. It is therefore binding for all **nutz** employees worldwide, regardless of their position, function or type of employment. This Code is complemented by other documents such as guidelines and behavioral instructions.

We also pass on our own standards to our business partners and share them with subcontractors. We expect our business partners to recognize and appropriately implement our principles of conduct and prevention measures, especially distributors, retailers and consultants who work for **nutz**.

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*Frankfurt
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Heinrich-Rohlmann-Str.
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*Prag
Nutz Czech s.r.o.
Pujmanové 1753/10a
140 00 Praha 4*

*Rosenheim
Oberaustraße 16a
83026 Rosenheim*

*Zürich
Nutz Swiss AG
Bernstr. 60
8952 Schlieren*

WE LIVE VALUES.

CORPORATE VALUES

Since 1978, we at **nutz** have been certain that we can only achieve the highest quality and performance for our customers as part of a well-coordinated team. That is why we create a trusting and informal company atmosphere in which appreciation and mutual responsibility are our highest principles for our colleagues. This has given us the expertise and commitment to satisfy our customers in Europe for decades.

→ *Honesty, family, health, joy of life, sustainability, Quality awareness, appreciation, reliability*

In a time characterized by increasing complexity, speed, digitalization and networking, it has become more important to focus on what defines us as a **nutz** family. Our responsible actions and future-oriented commitment in all areas are rooted in eight core values. They serve as guidelines and provide stability. They support us in making the right decisions and successfully mastering the challenges of the future.



Honesty



Family



Joy of life



Health



Sustainability



Quality awareness



Appreciation



Reliability

WE ARE COMMITTED TO FREE, FAIR AND OPEN COMPETITION.

COMPLIANCE

Business success and integrity are inextricably linked at **nutz**. We strictly adhere to all applicable rules, laws and the principles of good corporate governance.

In doing so, we refer to both national and international laws, regulations, standards and our Group's internal guidelines. Our actions are always legally compliant and responsible, which forms a firm basis for our long-term business success.

For (supposed) Violations of our Code of Conduct, company guidelines or applicable law, we are obliged to address our concerns promptly. More on this on page 18.

FAIR COMPETITION

nutz is fully committed to the principles of free competition, including fair treatments with business partners and third parties. It is of crucial importance for us to strictly adhere to the rules of antitrust and competition law. We therefore do not engage in any agreements with competitors regarding the prices of services and products or other anti-competitive agreements.

WE PROTECT PERSONAL DATA.

DATA PROTECTION AND CONFIDENTIALITY

nutz always acts in accordance with the applicable data protection laws.

Protecting the privacy of individuals is important to us. Company documents may contain personal data, such as address, age, gender or the IP address used by an individual.

Personal data of employees, customers and suppliers or other individuals will only be processed, collected or transferred in accordance with the applicable data protection laws.

No superfluous personal data is stored, personal data is not used for purposes other than those for which it was originally collected and is not stored for longer than is necessary for the purpose of the data or required by law .

Copies that are or have been backed up as part of standard IT security measures (backups) shall be treated confidentially for the period of their storage in accordance with the principles set out in this agreement.

A high standard of data quality and technical protection against unauthorized access is guaranteed. The use of data is transparent for the data subjects, their rights to information and correction and, if applicable objection, blocking and deletion are safeguarded (the guidelines of the DSGVO must be observed).

We treat the personal data of our customers, employees, partners, etc. as we would our own: carefully, responsibly and discreetly.

nutz regularly conducts data protection training for its employees.

→ You can contact our data protection officer via email at: datenschutz@nutz.com

WE CREATE TRUST.

FINANCIAL INTEGRITY AND FRAUD PREVENTION

Accounting and financial records are kept in reasonable and truthful detail and in accordance with generally accepted and approved accounting principles, practices and procedures and applicable government regulations.

For **nutz**, true to its value of honesty, it is a matter to create and maintain complete, accurate and trustworthy records of business activities.

It is not permitted to demand, be promised or accept gifts or other benefits from individuals or companies seeking or maintaining a business relationship with the company.

Invitations from business partners may only be accepted if the occasion and scope of the invitation are appropriate and refusing the invitation would be contrary to the principle of courtesy. Minor gifts with a value of less than € 25, - per calendar year, such as pens, pocket calendars, etc., are excluded from this.

nutz cultivates a culture of appreciation and relationship-building with customers. Gestures in this context must be perceived as a „sign of goodwill“ and not as „influence“. Bribes, payments, gifts, commissions, questionable consulting fees or other favors are not permitted and will lead to consequences under labor law.

nutz is committed to free, fair and open business competition. Influencing or attempting to influence public officials is prohibited.

Bribery and corruption are never condoned and have no chance in our company.

WE TREAT OTHERS WITH RESPECT AND FAIRNESS.

RESPECTFUL TREATMENT

Cooperation within the company is based on mutual respect, openness and objectivity. Nutz GmbH relies on collegial behavior and consideration for the personal and professional interests of others. All employees respect the personal dignity, privacy and personal rights of everyone. **nutz** works with all genders, ethnic origins, religions and beliefs, disabilities, ages and sexual identities. Discrimination based on race, ethnic origin, religion and belief, disability, age and sexual identity is not tolerated.

nutz wants to create a work environment that is respectful, inclusive and safe for everyone. Our aim is to maintain an environment without discrimination, harassment, bullying or sexual harassment. **nutz** respects the individuality of each person and strives to ensure that all people can develop their full potential. Diversity is valued and seen as an asset to the company.

Sexual or other personal harassment or insults towards employees, trainees, applicants, business partners or customers are a violation of this policy and of the law and will be punished under (labor) law.

We ensure that our products and work areas are designed to be accessible. Accessibility is intended to ensure that all people, regardless of their abilities, have the same access to physical and electronic environments and resources.

Differences of opinion arising within the company can only be resolved within the company through resolution of conflicts. Every employee is required to observe regulations of the legal system in which he/she is acting. These principles apply both to internal cooperation and to our conduct towards external partners. We expect the same from our suppliers and manufacturers.

We provide stability in times of rapid change, increasingly complex tasks and growing responsibility.

*Because family and appreciation have always come first at **nutz**.*

WE FOCUS ON COOPERATION.

FEEDBACK AND ERROR CULTURE

Within Team Nutz, we practice a transparent exchange and give each other constructive feedback. We do not shy away from either positive or negative aspects and live an open error culture in our working environment.

We strive for growth through continuous learning and thus achieve top performance.

SOCIAL PARTNERSHIP

We strive for trusting cooperations with our social partners. This means that we approach employee representatives on an equal footing in order to unite the interests of the company and the employees in the best possible way.

COOPERATION

nutz focuses on an open exchange and cooperative collaboration with external partners such as customers, suppliers and specific interest groups. We are also actively involved in relevant industry initiatives.

WE UPHOLD HUMAN RIGHTS.

HUMAN RIGHTS

True to our values of family, appreciation and joy of life, we see it as a matter to uphold the human rights of our employees and to treat them with dignity and respect. This applies to our permanent employees as well as to temporary workers, students in our company, temporary workers / employees of subcontractors and any other workers.

It is extremely important to us that our partners only employ staff who do their work voluntarily and do not do so under threat of penalties or sanctions.

We see it as a matter of principle that employees are paid in accordance with the applicable wage laws and that legal social benefits are provided. We expect the same from our suppliers and manufacturers.

We are committed to complying with internationally recognized labor and social standards.

We treat others fairly, considerately and with respect.

CHILD LABOR

Child labor is prohibited. The term „child“ refers to the respective national legal definitions. All applicable regulations regarding the minimum age for employment must be complied with.

Workers under the age of 18 may not perform any work that could endanger the health and safety of young workers.

nutz considers violations of the rights of children and young people to be particularly reprehensible. For this reason, **nutz** reserves the right to immediately terminate the cooperation if violations of the rights of children and adolescents become known.

WE ACT RESPONSIBLY.

OCCUPATIONAL HEALTH AND SAFETY

Our employees are our greatest asset. That is why the safety, health and well-being of our employees is our top priority.

We are committed to providing a safe and healthy environment wherever we operate.

All our employees receive regular training in occupational health and safety. We also attach great importance to having several trained first aiders in each department and on the construction sites. Therefore, we regularly organize first aid training courses.

Our occupational safety officers ensure safe conditions both within the company and on construction sites. Regularly inspected and maintained work equipment and appropriate protective equipment are provided to ensure safe work processes.

RISK MANAGEMENT AND HAZARD PREVENTION

Due to our comprehensive risk management, we can cope with the constantly increasing complexity and react flexibly to unforeseen events in our business processes. We use established work routines to identify and mitigate risks at all levels. to take appropriate measures.

We have a total of 78 first responders and firefighters in the company (as of June 2024).

Every trainee completes training as a first aider and fire safety assistant at the start of their career.

WE WANT TO INSPIRE OUR CUSTOMERS.

RELIABILITY AND QUALITY AWARENESS

We constantly try to set a good example in everything we do.

No success without performance - this principle applies to **nutz** as a whole and to each individual in our company. Together, we set ourselves ambitious goals and strive to achieve them. Our work is characterized by excellence; we do not give up until we have achieved the desired result.

Recognition and appreciation for good performance are particularly important to us and are a matter of principle. We promote a culture of recognition and reward special achievements appropriately.

In addition to professional expertise, social skills also play a crucial role for our employees. We attach great importance to qualities such as honesty, credibility, team spirit, assertiveness, resilience, flexibility, critical faculties, empathy and tolerance. In order to make the best possible use of our performance potential as a company, we encourage a high degree of initiative and personal responsibility.

In line with defined goals, we offer our employees extensive freedom to act and make decisions. We stand for a culture of empowerment that enables our employees to continuously develop and improve their performance profile. For us, challenge and encouragement are closely linked.

The customer is always at the center of everything we do. We want to inspire them, which is why it is essential to know and understand the challenges our customers face and to offer a suitable solution on this basis.

We solve problems before they become problems

Inner striving for growth gives us the motivation to give our all.

WE STRIVE FOR AN EXEMPLARY ENVIRONMENTAL AND ENERGY BALANCE.

ENVIRONMENT

When it comes to the environment, **nutz** focuses on dynamics and innovation, always ready to question established conventions and welcome new developments. Our success has always been based on a pronounced innovative strength. We therefore continuously invest in research and development in order to optimize our range of services and processes, develop new solutions and tap into new markets.

*Progress is in the nature of man. **nutz** means more innovation for our future.*

For us, sustainable business is a social responsibility that employees at **nutz** are aware of. Based on our sustainability strategy, we are striving to make our actions increasingly sustainable. We act with foresight by always looking beyond our own horizons. As a company, we set ourselves ambitious, long-term goals and communicate them transparently. We develop systematic strategies to achieve our goals and measure our success accordingly.

For us, sustainability means a holistic concept. As a company in the electrical engineering sector, we bear a special responsibility for environmental and climate protection. Our aim is to make buildings as climate-friendly as possible and strive for continuous improvements in key areas such as resource and energy efficiency.

nutz is committed to protecting the natural environment and is committed to the principles of sustainability and minimal impact. We focus on the environmental aspects of waste, hazardous substances, water and paper consumption, as well as the energy aspects of electricity and fuels.

WE TAKE RESPONSIBILITY.

DEALING WITH RULE VIOLATIONS

Violations of our Code of Conduct can have serious consequences and cause considerable damage to **nutz** and its employees. These can range from fines and claims for damages for compliance violations to reputational damage. There is also the risk of personal liability and other legal consequences.

In order to avoid damage to **nutz** and its employees, it is important to recognize and address alleged violations. We are therefore committed to a corporate culture in which questions, concerns and uncertainties can be addressed openly. Employees who report a suspected violation in good faith will not suffer any disadvantages.

Any retaliation against individuals who report violations of our policies is contrary to our Code of Conduct and will be considered a violation. This also applies to reports that falsely accuse someone as we do not tolerate accusations.

If you have any concerns regarding compliance with our Code of Conduct at **nutz** or if you observe possible violations, there are various contact points and reporting channels available to you. You can contact your direct manager in confidence at any time. We have also set up a special whistleblower system that can be used to report violations, even anonymously.

The protection of whistleblowers is guaranteed in accordance with the applicable provisions of the EU Whistleblower Directive. We assure you that we will fully investigate every reported lead to the full extent of the law and will always take mandatory protective measures for whistleblowers.

*Our whistleblower system can be found at:
www.nutz.com/meldeformular-hinweisgeber*



FINAL PROVISION

The Code of Conduct is the foundation and benchmark for all other guidelines and regulations that ensure responsible and ethical conduct within the Group.

Together with those responsible for the topics, we regularly review whether the standards set out in the Code of Conduct still meet current requirements, for example due to changing international regulations or legal norms.

Changes to the Code of Conduct are decided by the Management of Nutz GmbH.

This version was approved by the Management Board on June 17, 2024. has been adopted.



Christian Gruber
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Thomas Wimmer
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