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ZAHORANSKY Code of Conduct

Foreword

The ZAHORANSKY Group operates internationally and combines its technological leadership position with a strong, value-oriented corporate culture.

Over many years, we have earned an excellent reputation among customers, suppliers, business partners, shareholders and the public based on quality and reliability. Every employee bears the responsibility to maintain this reputation and to further strengthen it through his or her actions in the future.


For better readability, the masculine form is used in this document; it includes all genders.

1. Purpose and Scope

This Code of Conduct is a binding guideline for all employees, managers and members of the management of the ZAHORANSKY GROUP worldwide. It sets out our core values and defines standards for responsible, ethical and lawful behavior. The aim is to secure the trust of our customers, business partners and the public in the long term and to ensure a respectful, safe and supportive working environment.

2. Values and basic principles

- **Appreciative:**
We treat all people respectfully, openly and fairly. Different perspectives, experiences and opinions are recognized and valued. We promote a positive working environment in which cooperation, mutual support and constructive feedback are a matter of course.
- **Integrity and honesty:**
We always act sincerely, transparently and reliably – regardless of any immediate benefits for ZAHORANSKY. Every employee is obliged to comply with the laws applicable in his or her area of responsibility.
- **Responsibility and role model:**
Everyone is responsible for their actions. Managers have a special role model function and actively promote the implementation of this code.
- **Product quality, safety and sustainability**
We meet our customers' high expectations of quality and safety. We continuously improve our products and processes, act sustainably and always remedy defects in accordance with the law and contract.
- **Sustainability and social responsibility:**
We use resources in an environmentally conscious manner and take responsibility for the society in which we operate.

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3. Compliance with laws and guidelines

We are committed to complying with all relevant laws, regulations and internal policies, in particular:

- **Data protection:** Collection, processing and use of personal data only for legitimate purposes and in accordance with the GDPR and other data protection laws.
- **Export and trade regulations:** Compliance with all commercial regulations, including customs and import regulations.
- **Occupational health and safety:** Compliance with national and international standards for occupational safety and health.

4. Confidentiality and information security

- Trade secrets and confidential information are protected at all times and may only be disclosed with appropriate authorization.
- We use modern security measures to prevent data loss and cyberattacks.
- The duty of confidentiality continues even after the termination of the employment relationship.

5. Anti-corruption, gifts and invitations


- Bribery, kickbacks or other improper advantages, as well as anti-competitive practices, are strictly prohibited.
- Gifts and invitations may only be accepted or given within reasonable limits and must not influence business decisions.

6. Fair working conditions and human rights

- We respect the dignity of each individual and value diversity as a strength. Discrimination, harassment or unfair treatment based on personal characteristics will not be tolerated.
- We reject forced labor, child labor and discrimination in our supply chain.
- We invest in the further development of our employees, ensure fair remuneration, appropriate working hours and support the compatibility of work and family life.
- The right to freedom of association is respected within the framework of the applicable laws.

7. Conflicts of interest

- Personal or financial interests must not conflict with the interests of the ZAHORANSKY Group.
- Potential conflicts of interest (e.g. shareholdings in competitors, secondary activities) must be disclosed to the supervisor.

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8. Environmental and social responsibility

- We are committed to making our business activities sustainable and resource-efficient.
- We reduce emissions and waste, increase energy efficiency and support climate protection projects.
- We are socially committed and promote voluntary initiatives by our employees.

9. Handling company resources

- Company assets, IT systems, vehicles and financial resources are to be used carefully and exclusively for business purposes.
- Misuse, theft or improper use will not be tolerated.

10. Reporting breaches and protecting whistleblowers

- Violations of this Code or applicable laws must be reported immediately via the anonymous whistleblower system whistleblower@zahoransky.com or the external ombudsman.
- Whistleblowers enjoy protection against discrimination or retaliation (whistleblower protection).
- All reports are treated strictly confidentially and checked consistently.

11. Enforcement, review and sanctions

- The management regularly reviews this code and adapts it if necessary.
- Intentional misconduct is not tolerated and can have consequences under employment law or legal – regardless of the employee's position.
- Suppliers and partners who violate this Code must expect contract termination.

Todtnau, 13.11.2025

Ric Nachtmann

Dr. Heinrich Sielemann