



## **Witt Business Ethics Policy**

In today's complex and interconnected global marketplace, ethical business practices are paramount for sustaining trust, fostering growth, and driving positive change. Witt Invest and subsidiaries (hereinafter referred to as "Witt") recognize the profound impact of our actions on consumers, stakeholders, and society at large. Guided by our unwavering commitment to integrity, transparency, and corporate responsibility, we have developed the Witt Business Ethics Policy as a guiding framework for our operations.

### **Scope**

This policy applies globally to the management, employees, and contract workers of all entities of Witt. The policy also applies to situations where Witt employees are working at external locations.

### **Transparent communication with consumers.**

At Witt, we are committed to fostering trust, transparency, and inclusivity in our interactions with consumers and society at large. Our Business Ethics Policy is guided by the following principles:

#### 1. Commitment to Transparent Communication with Consumers:

We provide consumers with accurate, honest, and transparent information about our products, services, and business practices. We believe in open dialogue, two-way communication, and active engagement with consumers to address their concerns, answer their questions, and solicit their feedback.

We commit to using clear and understandable language in our communication materials, ensuring that consumers can make informed choices and decisions. Additionally, we provide accessible channels for consumers to access information, raise complaints, and seek assistance, demonstrating our commitment to accountability and responsiveness.

#### 2. Commitment to Ensuring Consumer Safety and Well-being:

We prioritize the safety, health, and well-being of consumers in all aspects of our operations, from product design and development to manufacturing, distribution, and post-purchase support. We adhere to stringent quality and safety standards, regulatory requirements, and industry best practices to mitigate risks and ensure product safety.

We are committed to promptly addressing any issues or concerns related to product safety, quality, or performance, conducting thorough investigations, implementing corrective actions, and

communicating transparently with affected consumers. Additionally, we provide clear instructions, warnings, and precautions to help consumers use our products safely and responsibly.

### **Business Conduct:**

At Witt, we hold ourselves to the highest standards of ethical conduct, integrity, and accountability. Our Business Conduct policy is grounded in the principles of transparency, fairness, and respect for all



stakeholders. We are committed to fostering a positive corporate culture, ensuring ethical business practices, and maintaining compliance with legal and regulatory requirements. Our policy addresses the following key areas:

1. Positive Corporate Culture:

We recognize the importance of fostering a positive corporate culture characterized by trust, integrity, and respect. We promote open communication, collaboration, and inclusivity to create a workplace environment where employees feel valued, empowered, and supported.

2. Whistleblower Protection Mechanisms:

We have established robust whistleblower protection mechanisms to encourage employees to report concerns or violations of ethical standards without fear of retaliation. We ensure confidentiality, impartiality, and prompt investigation of whistleblower complaints, and we take appropriate corrective actions to address any wrongdoing.

3. Ethical Marketing Practices:

We are committed to conducting marketing activities with honesty, transparency, and integrity. We adhere to ethical marketing practices, including truthfulness in advertising, respect for consumer privacy, and compliance with relevant regulations and industry standards.

4. Fair and Responsible Relationships with Suppliers:

We maintain fair and responsible relationships with our suppliers, treating them with respect, dignity, and fairness. We adhere to ethical sourcing practices, uphold labor standards, and promote environmental stewardship throughout our supply chain.

5. Zero-Tolerance Approach to Corruption and Bribery:

We uphold a zero-tolerance approach to corruption, bribery and unethical conduct in all forms across our operations. Our company strictly complies with all applicable anti-corruption laws and regulations, ensuring that our business dealings remain free from any form of bribery, extortion, or improper influence.

We prohibit any form of bribery—whether direct or indirect—and do not tolerate unethical practices such as kickbacks, illicit payments, or the abuse of power for personal gain.

While maintaining professional relationships, we recognize that gifts, hospitality, and entertainment may be offered or received in good faith. However, we place strict limitations on these practices. Therefore no offer or acceptance of gifts, hospitality, entertainment, or customer-related travel and expenses may exceed the cumulative value of USD 200 per person/relationship in any twelve-month period.



#### 6. Measures for Data Security:

We implement and focus on robust measures for data security to protect the confidentiality, integrity, and availability of sensitive information. We adhere to best practices for data protection, including encryption, access controls, and regular security audits and we are committed to continuously improve our security on Active Directory/ Microsoft Entra ID.

Witt is committed to providing awareness training programs for all employees with a strong focus on IT security. We aim to ensure that at least 95% of employees have completed their training at any given time.

#### 7. Compliance with Legal and Regulatory Requirements:

We are committed to compliance with all applicable legal and regulatory requirements, including environmental regulations, labor laws, and consumer protection statutes. We monitor changes in laws and regulations to ensure our business practices remain in compliance.

#### Monitoring and Reporting:

We are establishing a system for monitoring and measuring performance in each area of our Business Ethics Policy. We will track key performance indicators, conduct internal audits, and engage external stakeholders to assess our progress and identify areas for improvement.

We maintain transparent reporting mechanisms to communicate our progress internally and externally. We will provide annual updates to stakeholders through sustainability reports and corporate communications.

#### Employee Training and Awareness:

We implement employee training programs to raise awareness about our Business Ethics Policy and empower employees to uphold ethical standards in their day-to-day activities. We provide training on relevant topics, including ethics, compliance, and sustainability, to ensure that employees are equipped to contribute to our organizational goals.

#### Stakeholder Engagement:

We recognize the importance of stakeholder engagement in achieving our environmental goals. We actively seek input and feedback from stakeholders, including employees, customers, investors, and community members, to inform our decision-making processes and improve our performance.

#### Review and Update:

We commit to regularly reviewing and updating our Policies to reflect changing circumstances and priorities. We conduct periodic reviews to ensure that our policies and practices remain effective, relevant, and aligned with our values and objectives.

All employees, partners and suppliers can report breaches of this Policy, which can be done in confidence, to our Whistleblower platform on <https://witt.indberet.nu/>



### **Conclusion and Commitment:**

At Witt, we are deeply committed to upholding sustainable and responsible practices across all aspects of our operations, as outlined in our Business Ethics Policy. This policy serves as a cornerstone of our organizational values, guiding us in conducting business with the utmost integrity, transparency, and accountability.

Our commitment to transparent communication with consumers underscores our dedication to fostering trust, transparency, and inclusivity in all interactions. We prioritize providing accurate, honest, and transparent information about our products, services, and business practices, ensuring that consumers can make informed choices and decisions. Additionally, we are committed to ensuring consumer safety and well-being by adhering to stringent quality and safety standards, promptly addressing any concerns related to product safety, and providing clear instructions and warnings.

We encourage all employees and stakeholders to actively contribute to the implementation of our Business Ethics Policy, fostering a culture of integrity, responsibility, and ethical conduct throughout our organization. Through transparent communication, fair and responsible relationships with suppliers, zero-tolerance for corruption and bribery, and compliance with legal and regulatory requirements, we strive to build trust, create shared value, and drive positive change in the world.

Together, we can uphold high standards of ethical conduct, transparency, and accountability, and make a meaningful difference in promoting sustainability, fairness, and social responsibility in all our endeavors.

A handwritten signature in black ink, appearing to read 'A. Witt', with a long horizontal stroke extending to the right.

Allan Witt – Founder and CEO