

Appendix - Norevo Code of Conduct

Introduction and scope

The present Norevo Code of Conduct is based on the BSCI Code of Conduct. It reflects our commitment to international conventions and principles in terms of human rights, labour rights, the environment, and anti-corruption incorporated in United Nation's Universal Declaration of Human Rights, the Children's Rights and Business Principles, OECD Guidelines for Multinational Enterprises, UN Guiding Principles for Business and Human rights, the Ten Principles of UN Global Compact, and ILO Declaration on Fundamental Principles and Rights at Work.

We expect all our employees, regardless of their position or function, to support these principles and act consistently in accordance with them.

Compliance with the law

We comply with all local laws and regulations and act in line with fair competition. In countries where domestic laws and regulations conflict with or set a different standard of protection than the code of conduct, ways should be sought to abide by the principles that provide the highest protection to our workers and the environment.

Business Integrity

We do not practice or tolerate bribery, corruption, extortion, or embezzlement of any kind. We do not offer or accept, grant, or demand any form of improper monetary or other incentives. We conduct our business transactions openly, honestly, and correctly. Our principles are based on fair cooperation and mutual trust. We avoid situations in which personal interests conflict, or might conflict, with those of our companies.

Data protection and information security

We protect and take measures to safeguard the confidential and personal information that we hold. We collect, store, process, and share the data in strict compliance with applicable laws on data protection, and our own data policies and practices.

For further details and information, we refer to our [Privacy Policy](#).

Diversity and inclusion

At Norevo we treat one another equally, fairly, and respectfully. We welcome diversity and do not tolerate any form of discriminative behaviour, verbal, physical, psychological, or sexual harassment.

We recruit, train, and promote talent based on a person's skill, qualification, and performance, without regard to non-job-related characteristics. Norevo provides equal opportunity to all people regardless of their skin colour, national or ethnic origin, gender, disability, religion, belief, philosophy of life, age, sexual orientation, political or philosophical conviction, union membership, marital status, pregnancy, diseases, or any other condition that could give rise to discrimination.

Fair Remuneration and decent working hours

We comply with applicable labour laws and provide our employees with fair compensation and benefits that are sufficient for them to have a decent living for

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themselves and their families. All employees are provided with written and understandable information about their employment conditions in respect of wages and working hours. Wages are paid in a timely manner. The level of wages is to reflect the skills and education of our employees and are related to the regular working hours. The working hours of our employees comply with local legal requirements. We take active measures to support a good work-life balance by providing our employees with flexible working hours and mobile working possibilities for part of the time.

Training and Career Management

We offer dual trainee programs in Wholesale and Foreign Trade as well as Office Management. Additionally, trainees have the opportunity to obtain the qualification "Betriebswirt im Außenhandel". Alternatively, a dual study program in "Business Administration B.A." is available, with alternating three-month phases of academic studies and practical experience.

We are committed to the professional development of our employees. To support this, we provide language courses, an annual training budget, and company-wide workshops on topics such as discrimination, allyship, and IT. Continuous learning is also an integral part of our annual feedback discussions.

Health and Safety

The occupational health and safety of our employees are the top priority at Norevo. We comply with applicable health and safety regulations to protect our employees from any kind of hazard at the workplace. Necessary measures are implemented and assessed regularly to prevent and minimize accidents, injuries, and damage to health as a result of or related to conditions during work. Our employees receive regular, documented health and safety training, equipment, and necessary safety drills.

Freedom of Association and Collective Bargaining

All our employees, without distinction, have the right to join or form trade unions of their choosing and to bargain collectively. Worker's representatives shall not be discriminated against and have access to carry out their representative functions at work. In countries, where the rights of freedom of association and collective bargaining are restricted under law, this principle shall be respected by allowing workers to freely elect their representatives with whom Norevo can enter into a dialogue about workplace issues.

No Child Labour

We do not use, nor do we tolerate illegal child labour. It is prohibited at Norevo to employ children directly or indirectly, below the minimum age of completion of compulsory schooling as defined by law, which shall not be less than the age of fifteen.

No Forced Labour

We do not engage, nor do we tolerate any form of servitude, forced, bonded, indentured, trafficked, or non-voluntary labour. Workers are allowed to leave work and

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freely terminate their employment with reasonable notice to their employer in accordance with their written contract.

Social Commitment

We operate responsibly to make a positive impact on the communities where we work and live. We support good causes and initiatives throughout the world in our supply chain to improve the living standard of our suppliers in the origin and the communities where we do business.

For further details and information, we refer to our [Sustainability Brochure](#).

Environment Protection

We acquire our products from and build our business on nature. Environmental stewardship is an integral part of our business strategy. We are committed to complying with environmental law and regulation in all our operations and taking necessary measures to avoid environmental degradation; assessing the environmental impact of our business activities; taking a proactive approach to reduce our impact on the environment by implementing adequate measures to minimize or prevent adverse effects on the community, natural resources, and the overall environment; defining targets for the reduction of waste, water usage, and emissions along our supply chain. For further details and information, we refer to our [Sustainability Brochure](#).

Product Quality and Safety

We offer our customers products that meet their requirements and comply with applicable laws and regulations. We are committed to delivering safe and high-quality products, services, and solutions. Certifications regarding quality and safety are updated regularly.

Reporting violations

In case of violations, the following contact points can be contacted:

- » Supervisors
- » the HR department
- » compliance@norevo.de
- » Whistleblower portal: <https://norevo.mhl-hinweisportal.de/>

You could also report your complaints anonymously in a sealed envelope addressed to

- » Norevo GmbH, "corporate compliance - private and confidential"
Völckersstraße 14-20, 22765 Hamburg Germany

We believe that any report of a possible violation is made in the best interests of the company. We do not tolerate retaliation of any kind for someone reporting the violation.

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