

Leifheit Code of Conduct

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Directive

1 Introduction

As a long-established, globally active company, Leifheit is committed to acting in a socially and ethically responsible way. Consequently, Leifheit’s business practices are based on integrity, honesty, fairness and compliance with current laws.

Leifheit AG, Germany and its affiliated companies comply with the applicable laws and other legal provisions of the countries in which they operate, thus ensuring adherence to the law. We regard compliance with the laws applicable in the respective country as a minimum requirement.

The Leifheit Code of Conduct (hereinafter referred to as the “Code”) sets out basic rules which are intended to help us to act in accordance with the principles set out below at all times. It is intended to support and serve as a guide to all Leifheit employees in their day-to-day work.

The Code is binding on all Leifheit employees and sets out minimum standards for conduct in key sectors. It does not claim to cover all conceivable situations. Rather, it defines a standard by which all conduct is to be measured. In addition to this Code, there are more detailed internal company guidelines for individual areas (e.g. antitrust law).

Ultimately, however, it is the responsibility of each individual employee to act correctly. This duty cannot be delegated.

Misconduct and breaches of our Code of Conduct may cause considerable damage to Leifheit’s reputation and also result in significant financial losses for the company.

Therefore, breaches of the Code will not be tolerated and will result in the employee concerned being subject to disciplinary action, labour law and/or criminal prosecution.

Employees must first seek advice from their superiors if they are unclear about how to proceed in certain situations. Depending on the circumstances, other departments such as Human Resources and Legal may also be consulted.

Where this Code refers to “employees”, this means all employees at all levels as well as all company representatives of Leifheit AG, Germany and its affiliated companies (hereinafter referred to collectively as “Leifheit”).

2 Laws and Policies

For Leifheit, complying with laws and regulations is a fundamental principle of economically responsible conduct. Leifheit and all persons acting on behalf of Leifheit are bound by the relevant laws, whether at local, national or international level. This is the only way to ensure long-term business success.

In addition to statutory regulations, Leifheit's other internal company policies and agreements must also be complied with. If the Code conflicts with such internal company policies or agreements, the more stringent regulation shall apply.

Any breach of applicable laws or rules may result in serious consequences (e.g. liability to pay damages, damage to our company's reputation or even criminal liability for the employee involved). As Leifheit is also represented in many foreign markets, it is the responsibility of each individual employee to inform themselves about the legal regulations that apply in each case.

3 Human Rights, Discrimination

At Leifheit, it goes without saying that we treat each other and our customers, suppliers and other business partners with respect. The individual dignity, privacy and other personal rights of every person must be respected at all times.

Leifheit rejects all forms of forced and child labour and adheres to laws and rules for the protection of human rights and fair working conditions, statutory minimum wages and other labour law standards.

Exploitation and disregard for labour rights will not be tolerated. Discrimination or harassment of individuals on the basis of their ethnic or other origin, nationality, gender, age, health, religious beliefs or sexual orientation will not be tolerated.

In accordance with the Leifheit principles and the labour laws of the countries in which we operate, we do not tolerate any discrimination on the basis of these characteristics.

The company does not tolerate sexual harassment or other personal attacks on individuals. This also applies to verbal or other non-physical assaults or inappropriate comments.

These principles apply both to cooperation within the company and to conduct vis-à-vis external partners.

If circumstances arise that call compliance with these basic principles into question, employees should contact the head of the HR department, their manager or use the Integrity Line at any time (see section 16).

4 Occupational Health and Safety

Along with product quality and economic success, the safety and health of all employees is one of Leifheit's primary corporate goals. Leifheit ensures a healthy and hazard-free working environment for all employees, in which laws and rules governing health and safety in the workplace are complied with.

In particular, it is the responsibility of managers to ensure that appropriate procedures and protective measures to guarantee health and safety in the workplace are in place and are adhered to. However, every employee is also responsible for ensuring health and safety in their work environment and for complying with the regulations. Every employee is obliged to report matters and incidents that may endanger health and safety to their line manager.

5 Sustainable Environmental and Climate Protection

Leifheit attaches great importance to sustainable environmental and climate protection and the efficient use of resources. Both when developing new products and operating our production plants, we ensure that any impact on the environment and climate is kept as low as possible and that our products make a positive contribution to environmental and climate protection for our customers. Each employee has a responsibility to use natural resources sparingly and to contribute to environmental and climate protection by means of their individual conduct.

6 Commitment in the Supply Chain

With regard to the above, Leifheit observes the provisions of the Business Social Compliance Initiative (BSCI), the conventions of the International Labour Organization, the United Nations Universal Declaration of Human Rights, the UN Conventions on the Rights of the Child and on the Elimination of All Forms of Discrimination against Women, the principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises in respect of its production methods and production locations. Leifheit also obliges suppliers to comply with all legal regulations as stipulated in the German Supply Chain Due Diligence Act (*Lieferkettensorgfaltspflichtengesetz*) via a Supplier Code of Conduct.

Breaches of these regulations can be reported via the Integrity Line (see section 16) in accordance with the provisions of the German Supply Chain Due Diligence Act. A special channel within the reporting system is provided for this purpose. The reports are received by the Compliance Officer and a QM employee.

7 Confidential Information

All Leifheit employees protect the company's confidential information and trade secrets and safeguard the confidential information of third parties.

It is only by strictly maintaining confidentiality with regard to our trade secrets, business figures, manufacturing and production, product development, product designs, industrial property rights and expertise as well as all other sensitive information that Leifheit's success as a company can be ensured.

Therefore, all Leifheit employees are obliged to protect such confidential information and to maintain confidentiality, both during and after their employment at Leifheit. In case of doubt, information should only be passed on both internally and externally to the extent that it is essential for the recipient to know or use such information.

Under no circumstances may Leifheit's confidential business information, including information on Leifheit's business partners, be used for personal gain or otherwise misused for unauthorised purposes.

In addition, employees must do everything in their power to prevent the inadvertent disclosure of such information. This also applies in particular to the use of social media and to conversations in a social setting.

Employees may only communicate with the authorities and the media if they are authorised to do so. Corresponding enquiries must be forwarded to the Legal department and the Management Board.

8 Safeguarding the Results of R&D Activities

The results of our R&D activities constitute valuable assets for Leifheit. Safeguarding these developments in law, for example by means of patents and the right to the exclusive use of our inventions, is one of the key outcomes of our investment in R&D. Therefore, the utmost care must be taken to ensure adequate legal protection. When developing products, consideration must be given to the legal situation in respect of any third-party property rights.

9 Product Safety

Leifheit regards itself as a partner to its customers. We are committed to supplying our customers with products that are safe, free from defects and of the highest quality. Compliance with safety standards is a matter of course. Therefore, it must be ensured that our products do not contain any defects that could endanger the health or safety of customers.

10 Records and Reports

Transparent and effective cooperation requires accurate and truthful reporting. This also applies to relations with shareholders, employees, customers, business partners, the general public and all government offices. Employees who perform management tasks or work in accounting have a special responsibility in this regard.

Given that the trust of the general public in Leifheit is based to a large extent on the accuracy and regularity of its reporting, all records, data collection, reports and financial statements that are prepared internally or presented to public authorities or the general public must be complete, correct, accurate, timely and comprehensible and comply with all applicable regulations. All payment transactions must be clearly documented.

Business documents, including emails, must be archived in accordance with the relevant statutory retention periods and Leifheit's internal retention guidelines. Leifheit company records may not be altered or destroyed without the approval of a line manager.

11 Capital Market Law

11.1 Insider trading

As a listed stock corporation, Leifheit is subject to special regulations on insider trading. Any purchase or sale of Leifheit shares or securities (insider securities) and recommendations to purchase or sell them are prohibited if they are based on insider information. The unauthorised disclosure or unlawful disclosure of insider information is also prohibited.

Insider information is information of a precise nature that has not been made public and relates to circumstances that have already occurred or may reasonably be expected to occur in the future, or to an event that has already occurred or may reasonably be expected to occur in the future. The information must relate (directly or indirectly) to the issuer, i.e. Leifheit AG, or a financial instrument, i.e. the Leifheit share. In addition, the information must have the potential to significantly influence the price of the Leifheit share if it were made public.

This potential to influence the share price applies if a reasonable investor could be expected to use the information as part of the basis for their investment decisions. Even intermediate steps can be deemed to be precise information in the case of processes that are spread out over time and therefore constitute insider information.

Insider information may consist, for example, of new acquisitions or withdrawals from core business areas, significant structural measures such as merger agreements, acquisition or sale of investments, takeover bids, capital measures, significant changes to the dividend rate, quarterly/half-year/annual results, deviations from the forecast, conclusion of particularly significant contracts, issuance of important patents, significant product liability cases, major legal disputes.

Leifheit maintains case-related insider lists of Leifheit employees, service providers and other parties who act on behalf of or for the account of Leifheit and who work for us and who have access to insider information as part of their professional duties. Please note that any breach of insider trading prohibitions constitutes a criminal or administrative offence which may incur a fine or a prison sentence of up to five years. Attempting to do so also constitutes a criminal offence.

Guideline AV VW 004 (“Insider Guidelines”) must be observed in this context.

11.2 Market manipulation

Leifheit is also subject to the prohibition on market manipulation. Among other things, it prohibits making incorrect or misleading statements on valuation-relevant circumstances, such as the company’s earnings, or concealing such valuation-relevant circumstances in contravention of existing disclosure obligations. The disclosure or concealment of information in this context have to be capable of influencing the stock exchange or market price of a financial instrument. It is not necessary for the incorrect or misleading information to be disclosed publicly or to a large group of people. All that is required is for the disclosure to reach the public domain and for at least one other person to gain knowledge of it. Transactions that send false or misleading signals about the supply, demand or price of a financial instrument are also prohibited. However, other acts of deception also constitute market manipulation if they are capable of influencing the price of a financial instrument.

Leifheit complies with the law in this respect. All employees are obliged to report any indications of possible market manipulation to their line manager. Please note that manipulation that can be proven to have influenced the stock exchange or market price constitutes a criminal offence which may incur a fine or a prison sentence of up to five years. Even attempting to do so also constitutes a criminal offence.

12 Fair Competition and Antitrust Law

Leifheit is committed to the principle of fair competition vis-à-vis its competitors and conducts all business transactions in a lawful and ethical manner. In particular, it complies with all legal provisions prohibiting unfair competition.

All Leifheit activities are conducted within the limits of antitrust law. The codes of conduct in this regard are set out in the “AV RT 001 Antitrust Compliance” guideline. Each employee is

responsible for complying with the principles laid down in the Code within the scope of their professional duties.

In principle, any coordination, discussions or agreements with competitors that have the effect of preventing or restricting competition are prohibited. As legal judgement is difficult in individual cases, the Legal department should be consulted in cases of doubt.

13 Corruption

Leifheit takes decisive steps in respect of attempted corruption in all areas of business within the Group. We are committed to maintaining the highest standards in our global business activities.

Employees may not directly or indirectly accept, offer or promise personal, financial or other benefits in order to establish or maintain a business relationship or other benefits with a third party. Furthermore, such benefits may not be accepted as a quid pro quo for preferential treatment by third parties. Employees must refrain from any activities that could even suggest such conduct or attempted conduct.

In principle, the meaning of “benefits” in this context may constitute anything that is of value to the recipient (hospitality, invitations to events, reimbursement of travel expenses). This does not apply to conduct that is expressly defined as permissible in this Code of Conduct.

The following types of benefits to third parties/customers are not permitted under any circumstances (i.e. possible exceptions do not apply):

- Benefits of any kind to civil servants or other public officials in Germany and abroad
- Benefits that are aimed at the conclusion of contractual agreements
- Cash gifts or non-cash benefits (e.g. vouchers, loans)
- Gifts that require something in return

If employees have reason to believe that other employees are involved (be it actively or passively) in bribery or other corrupt practices, or that they are considering becoming involved in such practices, they should report this to the Legal department, the Ombudsman or via the Integrity Line (see section 16). Employees must also report any evidence that third parties working with Leifheit are not behaving in accordance with the principles set out above. All decision-makers, including employees and authorised representatives, are also obliged to document business transactions and payments accurately and transparently.

14 Invitations, Meals/Hospitality and Gifts

Employees must not be influenced by courtesies/gifts of any kind. It is also not permitted to influence third parties by granting such courtesies.

This does not apply to customary invitations, hospitality and occasional gifts if these are not likely to create a sense of obligation on the part of or influence the recipient. The acceptance of gifts in connection with the conclusion/awarding of contracts is strictly prohibited.

To enable you to verify independently if a benefit is permissible or not, please note the following:

- The recipient’s impartiality must not be influenced, for example, by the value and frequency of hospitality or invitations that could create a sense of obligation on their part.
- Should the employee feel uncomfortable discussing an invitation or hospitality with colleagues or their line manager, for example, the appropriateness and therefore permissibility of this may already be in doubt. The decisive factor is whether a third, impartial party would regard the

invitation as an attempt to exert influence.

Invitations/hospitality/gifts are permitted within the following framework **after** the individual has verified it independently as described above:

- Occasional and generally customary hospitality provided for business partners or by business partners if there is a business-related reason for doing so, provided that the employee could also use their own salary to cover the costs of the hospitality. The absolute limit for hospitality is €100 (total value, per business partner, within one year). If the hospitality exceeds this amount, the employee must make up the difference with their own money and document this accordingly.
- Occasional invitations to attend low-value sporting, theatre or other cultural events within the customary scope, provided that the prior written consent of the Board of Management has been obtained.
- Low-value gifts (e.g. pens, calendars or small promotional gifts) that do not exceed a gross value of €50 (total value, per business partner, within one year). The acceptance or granting of gifts in excess of this value requires the written consent of the Board of Management. Gifts are also permitted if they are work-related (manuals, work samples), provided that they become the property of the company.
- Provision of products to customers as part of in-house raffles, e.g. for an employee Christmas party, barbecue, etc., provided the total gross value does not exceed €50.

If employees receive gifts with a gross value of more than €50 (total value, per business partner, within one year) and the Board of Management has not approved their acceptance, they must be declined or returned immediately. In exceptional cases, the respective line manager may decide that gifts exceeding the value should be donated to charity. Such an exception may apply, for example, if declining or returning a gift could be perceived as a slight by the giver.

It is not permitted to take any action aimed at circumventing the requirement to obtain approval.

Where gifts with a gross value exceeding €50 are given to third parties (non-employees), the CFO must be informed in all cases because these gifts are not tax-deductible.

Leifheit employees are obliged to maintain transparency when accepting and awarding benefits and to comply with internal guidelines and legal regulations.

15 Conflicts of Interest

In everyday business life, it is possible for conflicts to arise between an employee's personal interests and work-related decisions in the interests of Leifheit. Such conflicts of interest on the part of the employee may result in the employee being biased and therefore not acting in the interests of Leifheit. Each employee must avoid such conflicts.

If an employee identifies an actual or potential conflict of interest, they must contact their line manager so that a transparent, fair and speedy solution can be found.

In principle, the following applies:

- Employees may not represent the company in a transaction or business relationship in which the employee or a member of their family has a personal financial interest;
- Employees may not conduct private business with Leifheit customers or suppliers if there is a risk or the impression that this could give rise to undue influence;
- Employees may not exploit their position at Leifheit or Leifheit property for their own personal gain.

Without the approval of their line manager or HR management, employees may not take on any secondary employment outside Leifheit that could adversely affect the fulfilment of their duties at Leifheit or the interests of Leifheit. A secondary employment must be authorised by HR and the employee's line manager.

16 Whistleblower System

As a general rule, any employees who have concerns can turn to the relevant points of contact within the company, such as their line manager, the works council, HR/Legal department, Internal Audit or the compliance officer.

In addition, Leifheit has appointed an ombudsman to implement the requirements of the Corporate Governance Code and the Whistleblower Protection Act (HinSchG). This role is currently performed by Mr Holger Krüger, Chairman of the works council at the Nassau location. Moreover, Leifheit has established a whistleblower system that also enables employees to make anonymous reports.

All employees are required to report and/or provide information to the ombudsman directly or via the whistleblower system, while maintaining their anonymity, on matters that constitute or could constitute legal infringements (potential or suspected infringements).

This can be done in a confidential discussion with the ombudsman (verbally) or via the internal reporting office at <https://leifheit-group.integrityline.app/> (in writing). Reports of compliance breaches received by this system are processed by the Head of Legal/Internal Audit/compliance officer and the ombudsman.

The whistleblower system is accessible via a link on the intranet landing page and on the Leifheit website.

Whistleblowers can use the internal reporting office or an external one. The Federal Office of Justice (*BfJ*) is the central external reporting body BfJ – whistleblower office ([bundesjustizamt.de](https://www.bundestjustizamt.de)).

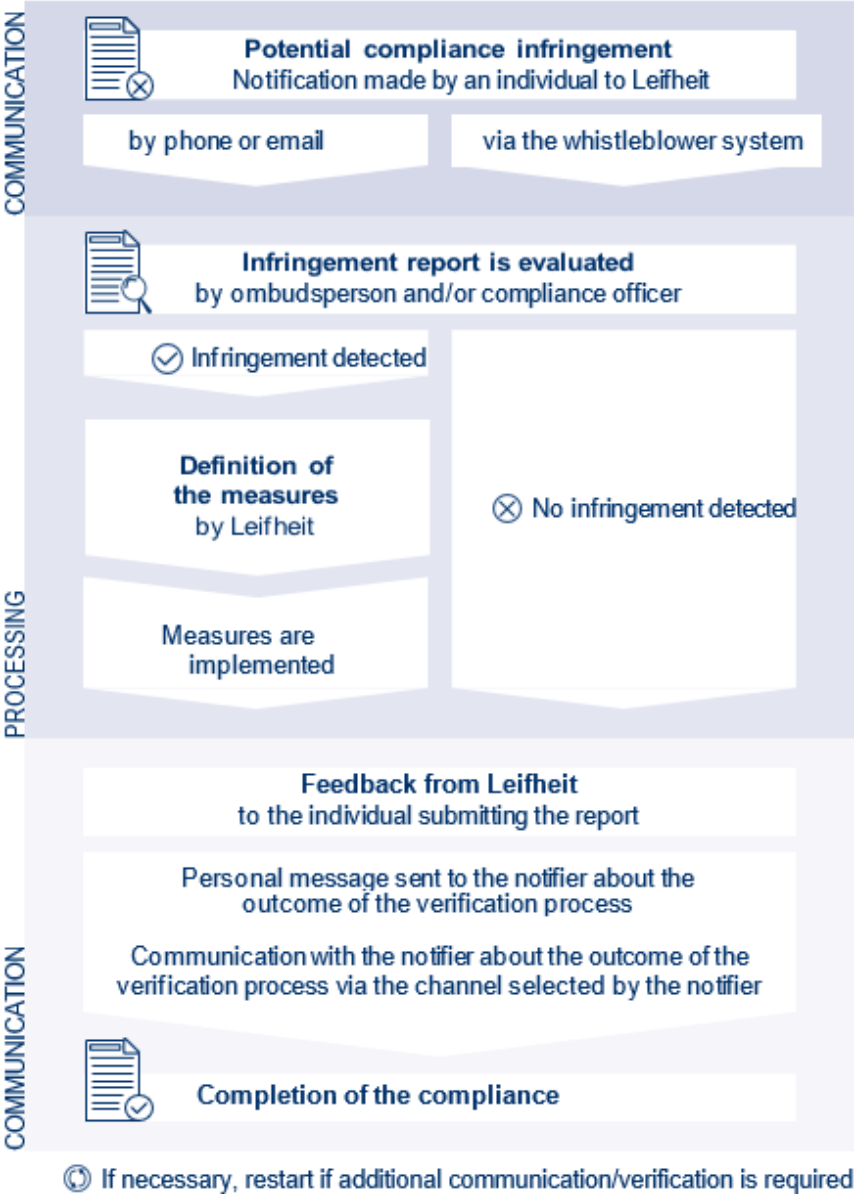
While both reporting offices are considered equivalent, preference should be given to the internal reporting office. Leifheit undertakes to record all reports and, if necessary, to take corrective action and deal with them pursuant to HinSchG. In addition, Leifheit undertakes to ensure that an employee who reports a potential infringement in good faith is not disadvantaged in any way. The whistleblower system is also accessible to third parties outside the company for the purpose of reporting legal infringements committed by Leifheit employees.

The procedure for internal reports is as follows: The internal reporting office will confirm receipt of a report at the latest within seven days and verify if the reported breach falls within the material scope of application of section 2 HinSchG. During this time, the internal reporting office remains in contact with the individual who made the report. The validity of the report received is verified and, if necessary, the internal reporting office requests further information from the

individual making the report. The internal reporting office will then take the necessary follow-up measures pursuant to section 18 HinSchG.

The internal reporting office will provide feedback to the whistleblower within three months of confirming receipt of the report. The feedback includes information on any follow-up measures that are planned or have already been taken and the reasons for them. Feedback may only be provided to the whistleblower if this does not interfere with internal enquiries or investigations and does not affect the rights of the individuals who are the subject of a report or who are named in the report.

The following figure illustrates the reporting process:



17 Data Protection

Leifheit carefully observes the applicable legal provisions, including when collecting, storing, processing and transmitting the personal data (names, addresses, etc.) of its employees, customers, suppliers and third parties. Employees are obliged to support and apply the measures taken by Leifheit.

The data protection officer is the correct point of contact for any queries regarding data protection. If any employee detects or suspects a breach of data protection, they are obliged to report this to the data protection officer without delay.

18 Responsibility for Compliance with the Code

All employees are responsible for complying with the Code and the relevant legal regulations at all times. Every employee is responsible for reporting any unlawful conduct or conduct that is contrary to the Code to their direct line manager, the ombudsman or to the head of HR or the Legal department. Where the nature of the matter suggests it is appropriate, reports should be submitted to the Board of Management directly.

As part of their duty to set an example, Leifheit managers are required to communicate this Code to their employees and to put it into practice. Managers are responsible for ensuring that the Code is adhered to by their employees. For this reason, they also monitor and review compliance.