



INTRODUCTION



Acting responsibly and in compliance with the law is a fundamental part of our corporate culture and a guiding principle by which we measure ourselves in our day-to-day business.

This Code of Conduct is binding for the management and all employees of Bärwolf GmbH & Co. KG and forms the basis for a trusting and integrity-based working relationship. It forms a framework for our corporate decision-making processes and is the guideline that shapes our actions.

The management and the entire workforce of the company are obliged to observe this Code of Conduct, to live by it in their day-to-day business and, in case of doubt, to seek additional advice and information from the appropriate sources.

The values of our company enshrined in this Code of Conduct are intended to assist our business partners, and in particular our production and service partners, in achieving a successful and ethical collaboration.

At the same time, these values form the foundation of a continuous improvement process that promotes the development of sustainable processes and thus supports the future viability of the company and the people associated with it.

Thomas Höfges

Managing Director

Michael Scholze

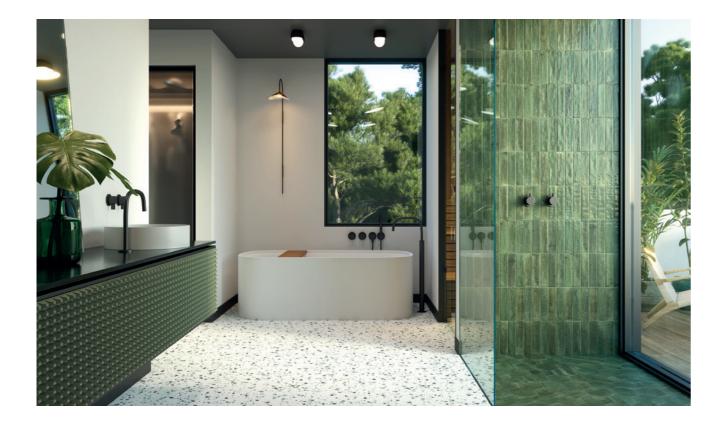
Managing Director

COMPANY PORTRAIT

The development, production and marketing of trend-oriented wall and floor coverings for designing high-quality accent surfaces in private and public projects as well as commercial spaces with a focus on qastronomy and lifestyle has been a pillar of our company's success since 1985.

Our focus is on surface coverings made of ceramic, natural stone and glass or mixtures thereof in the form of high-quality mosaics and small-format tiles for designing individual and atmospherically impressive surfaces.

In addition to our products, our logistics and merchandising expertise for our business partners at home and abroad is at the forefront. International procurement on the one hand and permanent 24-72 hour availability of goods at the POS within Europe on the other hand characterise our activities.



The universal applicability of our sustainable products takes into account the individualisation efforts of building owners. Market-oriented sales aids for our distribution partners' points of sale effectively support our joint marketing efforts.

The permanent availability of all components enables a 24-72 hour delivery service and a 24-hour express sampling service for our partners in project planning and interior design. Personal contacts on site round off our commitment to our business partners.

Our sales activities from the logistics hub in Herne, Germany, are supported by our European subsidiaries with sales locations in France and Poland.

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1. EMPLOYEE AND HUMAN RIGHTS

We value and respect the dignity of our employees, customers and business partners. Our actions are guided by mutual appreciation and respect.

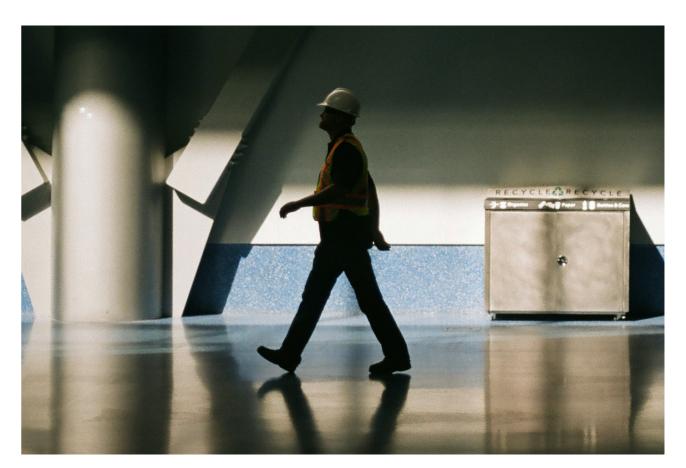
As an international company, we always ensure that our actions are in accordance with the UN Charter of Human Rights and the respective national legislation on labour law and social standards. We categorically reject any form of child labour, forced labour, human trafficking and exploitation.

We do not accept any form of discrimination based on age, gender, origin, ethnicity, nationality, disability, religion, sexual orientation or political views.

Every employee has the right to a workplace free from harassment or abuse of any kind. This includes, in particular, verbal harassment, insults, bullying, and sexual assault, whether physical or verbal. We do not tolerate mental or psychological coercion.

Equal pay for men and women is a fundamental principle. The right to rest and regular paid leave is firmly established in our area of responsibility. We guarantee the right to freedom of opinion and expression.

Social security is important to us.



2. OCCUPATIONAL HEALTH AND SAFETY

It is important to us to promote and maintain the health and safety of our employees.

Legal frameworks for occupational health and safety, accident prevention and workplace ergonomics form the basis on which we meet our standards and continuously expand them in the interests of our employees and the company.

To ensure and monitor existing standards, an occupational health and safety management system consisting of internal and external specialists has been established to guarantee independent monitoring and further development in our area of responsibility.

The health and well-being of our employees contributes to the long-term success of our company.



3. ENVIRONMENTAL PROTECTION AND PRODUCT SAFETY

Environmental protection is important to us. As a European trading company with international procurement, we strive to make the overall impact of our business activities, and thus the services we offer, as well as our product development and procurement, as environmentally friendly and responsible as possible.

Our goal is to continuously reduce the negative environmental impact of our actions and, where possible, to neutralise it by 2030. Wherever possible, we rely on environmentally friendly technologies and supply partners with a high level of environmental awareness, which is reflected in their day-to-day business through environmental protection expertise and ambitious goals.

Due to their nature and raw material composition, our products themselves are free of harmful substances and contribute to an excellent indoor climate and thus to healthy living. Their durability and recyclability also contribute to the conservation of resources.

Our products and services are marketed in accordance with the applicable EU laws and standards for product safety.



4. DATA PROTECTION AND DATA SECURITY

In times of rapidly advancing digitalisation, data protection and data security are of existential importance. At Bärwolf, the protection of data and operational systems is a top priority. In order to meet the challenges of today and tomorrow, the IT Strategy Implementation Process reports directly to the management.

To ensure data availability, integrity, confidentiality and compliance, the Bärwolf data protection policy and the BW R001 data processing policy, based on the legal requirements of the German General Data Protection Regulation (GDPR), form the foundation.

Supplemented by modern defence and security systems as well as system and data redundancy that is available at all times, we secure our goods availability and day-to-day operations, and thus our business relationships in the interests of the company, our staff and our business partners.

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5. ETHICAL AND LEGAL FOUNDATIONS OF OUR BUSINESS PRACTICES

Anchored in Europe, compliance with applicable EU law and the legislation of individual EU member states, as well as compliance with legal practices in third countries that we consider to be our sales or procurement markets, are among the fundamental principles of our management activities.

Fair competition — a cornerstone of sustainable success.

As an internationally active company, we are in constant competition. Fair competition is essential for us. The sustainable success of our company can only be guaranteed through lawful and honest competition. Competition law provisions serve as a guideline for our actions.

We do not enter into agreements with market participants on factors relevant to competition and will not tolerate such agreements. Competition-sensitive information is neither exchanged nor disseminated.



Bärwolf GmbH & Co. KG and its employees are committed to combating all forms of corruption and bribery.

Objective criteria in business negotiations and persuasion form the basis of our long-term success. We therefore refrain from granting, accepting, demanding or promising material or immaterial advantages in return for the purchase of products or services.

Bärwolf supports legislation to combat money laundering and has set itself the goal of only entering into business relationships with verifiably reputable partners who run their companies and operations in accordance with the relevant legal regulations.



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