

## **Code of Conduct for Dealing with Business Partners and Authorities**

### **1 Purpose**

This Code of Conduct defines binding minimum standards for ethical, lawful and fair conduct in dealing with business partners and authorities. It protects our freedom of action, our reputation and the trust of our customers and partners.

### **2 Scope**

The code applies to all employees of the entire Centravo Group – regardless of function, hierarchical level, place of work or form of employment.

### **3 Basic principle**

We use our economic influence exclusively in a lawful and competitive manner. In negotiations, we consistently pursue optimal service for our customers and the achievement of our financial and profitability goals. Compliance with applicable laws and integrity and responsible conduct always take precedence.

### **4 Principles of conduct**

#### **4.1 Cooperation with business partners**

- We act loyally, cooperatively and respectfully and promote trusting cooperation.
- We strive for long-term, performance- and value-oriented partnerships with sustainable development prospects.
- We comply with all legal provisions and do not encourage any violations of the law (in particular tax offences or bribery).
- We negotiate fairly, openly, according to objective criteria and in accordance with the principle of performance/consideration. The conditions granted are always matched by defined considerations on the part of the Centravo Group.

#### **4.2 Procurement policy: quality, sustainability, suppliers**

- We respect all legal quality requirements and, where appropriate, define additional quality requirements in consultation with our business partners.
- Decisions on offers are based on a holistic assessment of the contribution to performance and value creation.
- Partners whose distribution policy contributes to the differentiation and profiling of the Centravo Group are given preference over otherwise comparable market services.
- Where performance is comparable, we give preference to companies producing domestically over foreign manufacturers (to the extent permitted by law).
- We expect compliance with the applicable national environmental, animal welfare and social laws.
- We are committed to sustainability in the sense of long-term resource management and expect compliance with human rights and socially acceptable working conditions.

## **5 Market economy and fairness**

- We are committed to fair competition; customer benefit and the competitiveness of the Centravo Group are our top priorities.
- We use our market influence in such a way that there is no abuse of power and market partners are not treated differently without objective reason.
- We resolve disagreements with customers, suppliers, market partners and business partners amicably wherever possible.
- In the event of serious incidents or suspected violations of this code, we enable business partners to escalate the issue to the superior of the responsible employee.

## **6 Prohibition of personal enrichment (gifts, invitations, benefits)**

### **6.1 Principle**

Our decisions are made independently. Employees must not feel obliged in any way towards suppliers or other business partners. Any direct or indirect personal enrichment is prohibited.

### **6.2 Unacceptable benefits**

In particular, commissions, loans, cash payments, gifts, preferential prices or other financial or material benefits are not permitted if they exceed minor, socially acceptable gestures or could give the impression of influencing decisions.

### **6.3 Binding rules (amounts per person; per business partner and calendar year)**

The following rules are binding and must be observed:

- Monetary amounts: Cash must be returned immediately. The superior must be informed immediately.
- Individual/group invitations outside the daily routine: Such invitations require prior approval by the line manager.
- Small gifts (gifts in kind/vouchers): Gifts up to a total value of CHF 50 are permitted. In the case of generous or recurring gifts, the management of the respective department shall decide.
- Invitations: If the expected value exceeds CHF 50, the approval of the line manager is required.
- Private trips abroad outside of business activities: Such offers are declined.
- Gifts/benefits to business partners: The Centravo Group does not offer any gifts or benefits exceeding CHF 50.
- Attempts to influence: Any attempts to influence (e.g. through cash, gifts or incentive trips) will result in the business relationship being terminated.

## **7 Dealing with authorities and public officials**

Holders of political office and representatives of authorities or public institutions (public officials) are committed to the common good. Therefore, they may not be offered or granted gifts, benefits or other material or immaterial advantages, either directly or indirectly; likewise, public officials may not accept such advantages.

The only exceptions are appropriate, occasion-related gifts (e.g. at Christmas) that are legally permissible, comply with recognised social rules of courtesy, do not impair respect for the office and are in line with national customs.

## **8 Enforcement, reporting, sanctions**

### **8.1 Sanctions**

Violations of this code will be punished in accordance with the relevant provisions of labour law. In the event of suspected criminal behaviour, the competent state investigative authorities may be called in.

### **8.2 Contact points / Reporting channels**

Anyone who observes or becomes aware of actions that could violate this code, internal regulations or laws should inform their superior.

In case of doubt, the next higher superior or the Human Resources department should be informed.

This Code of Conduct was approved at the management meeting on 20 January 2026 and comes into force with immediate effect. Communication will take place via Centranet.