

CODE OF ETHICS AND CONDUCT

of usd AG

1. Preamble

usd is committed to its responsibility in the economic, ecological and social sense in the pursuit of a sustainable business orientation. The long-term goal of usd is that all contractual partners also show efforts and implement measures to meet this responsibility in the course of the business relationship.

In sections 2. to 5., this Code of Ethics and Conduct describes the minimum standards of internationally recognized regulations for the promotion of economic, ecological and social responsibility as well as business ethics. It is based on the 10 principles of the United Nations Global Compact (UNGC) and, since the adoption of the United Nations 2030 Agenda for Sustainable Development, also the 17 Sustainable Development Goals (SDGs). The relevance of each of the 17 SDGs is undisputed. Taking usd's corporate strategy and business purpose into account, five of the 17 sustainability goals were prioritized and taken into focus. This focus enables targeted implementation of the defined measures and transparent monitoring via defined key performance indicators (KPIs).

By signing this document, the contractual partner undertakes to comply with the defined principles in accordance with the German Supply Chain Duty of Care Act (Lieferkettensorgfaltspflichtengesetz, LkSG).

2. Basic principles

The contractual partner is obliged to comply with all legal requirements and international human rights. Furthermore, the contractual partner is aware of their social responsibility and

considers it their duty to fully meet this responsibility in all entrepreneurial activities. The contractual partner is committed to proactively pursue the issue of sustainability and for this purpose strives to continuously optimize operational processes.

3. Ethical responsibility

Bribery & corruption

The contractual partner shall act and make decisions free from the influence of extraneous considerations and interests and shall comply with the applicable anti-corruption provisions in this respect. The contractual partner may not offer, promise, demand, grant or accept any services in business transactions unless they are appropriate in the context of direct cooperation. The contractual partner is also obliged to disclose any dubious cases that could be regarded as corruption.

Fraud & money laundering

The contractual partner is obliged to refrain from any kind of intentional deception with the aim of obtaining an unfair or illegal financial advantage. The contractual partner shall not take part in actions that aim at the inflow of illegally obtained assets into the legal cycle of the financial and economic world.

Conflicts of interest & impartiality

The contractual partner separates their entrepreneurial interests from their own interests that would result in a conflict. Conflicts may arise in the context of personal relationships, financial advantages and/or cooperation with competitors. The contractual partner decides and acts without being influenced by commercial, financial or other pressure.

Anti-competitive practices

The contractual partner shall comply with the standards of fair competition. For this purpose, the contractual partner shall comply with the applicable laws that regulate dealings with competitors with regard to agreements and activities that influence prices and performance.

4. Social responsibility

Prohibition of discrimination

The contractual partner shall at all times comply with all provisions of applicable laws prohibiting discrimination. Accordingly, the contractual partner does not tolerate any form of discrimination or unequal treatment on the basis ethnic origin, gender, religion, ideology, disability, age, pregnancy, sexual orientation and identity or any other protected characteristics. The personal dignity, privacy and personal rights of each individual shall be respected.

Health & safety at work

The contracting partner shall ensure occupational safety and health protection at the workplace so that the physical integrity and general health of the employees is not endangered at any time.

Minimum wage & working time

The contractual partner assures that wages comply with the applicable statutory minimum requirements and industry standards and are not subject to any unauthorized deductions. The contractual partner shall ensure that applicable local working time restrictions are complied with and correspond to industry practice.

Freedom of association

The contractual partner shall respect the right of freedom of association of the employees within the framework of applicable rights and laws.

Child and forced labor

The contractual partner rejects any form of slavery, forced labor or bonded labor and guarantees its employees the right and the possibility to voluntarily give up employment. The contractual partner is obliged to comply with the international regulations on the minimum age for admission to employment and the prohibition and immediate elimination of child labor. Stricter national regulations concerning child labor are to be applied with priority.

5. Sustainable responsibility

Environmental protection

The contractual partner declares environmental and climate protection to be an integral part of responsible corporate management. The contractual partner is committed to the long-term goal of environmental protection for present and future generations. To this end, the contractual partner shall comply with national legal standards.

Environmental management

usd welcomes efforts by the contractual partner to establish, plan or operate an environmental management system that prevents, mitigates or compensates for potentially negative impacts, including raw material consumption, greenhouse gas emissions, water, waste, air quality and biodiversity.

Renewable energy

usd welcomes the use of renewable energy sources by the contractual partner in the value creation process.

6. Cooperation

This Code of Ethics and Conduct is signed as a supplement to the existing contract between usd and the contractual partner. usd considers compliance with these standards and an honest and sincere communication in this regard to be essential for cooperation with the contractual partner. The contractual partner shall make this declaration available to all companies affiliated with it in accordance with §§ 15 ff AktG. usd also advocates the application of this declaration to subcontractors and suppliers. In case of justified mistrust, usd reserves the right to verify compliance by means of a survey. In the event of a confirmed breach of the provisions of this Code of Ethics and Conduct, usd reserves the right to draw consequences with regard to the contractual relationship with the contractual partner after a detailed assessment of the respective breach.

7. Final Provisions

This Agreement, amendments or supplements must be made in writing or in electronic form via the provider DocuSign (or a comparable provider). This also applies to the waiver of the written form requirement or the requirement of electronic form via the provider DocuSign (or a comparable provider) itself.

CREDITS

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