



CODE OF CONDUCT

BASIC PRINCIPLES

As a family-owned company, we are committed to legally compliant and socially responsible corporate governance. Sommer GmbH complies with the applicable laws and other legal regulations of the countries in which it operates and thus conducts itself in a legally compliant manner.

We consider compliance with the laws applicable in each country to be a minimum requirement. In certain countries, we may establish principles of corporate practice that go beyond the respective national regulations. For Sommer GmbH, compliance means not only legal compliance, but also ethical values such as integrity, fairness and sustainability, which we live transparently both internally and externally.

This Code of Conduct sets binding framework conditions for our global activities and defines the ethical behaviour of our employees in accordance with the management system.

Sommer GmbH is obliged to issue binding minimum rules. The Code of Conduct may be supplemented by other national or company-wide guidelines.

1. CONFLICTS OF INTEREST

We take care to ensure that our own interests do not conflict with those of the company.

A conflict of interest arises when one's own interests conflict with those of the company. Sommer respects the private interests and activities of each employee, who in turn behave with unconditional loyalty towards the company. Our employees are guided solely by the interests of the company in the fulfilment of their professional obligations and avoid activities that conflict with the business interests or the fulfilment of these obligations. They therefore do not misuse their position, company information or property at Sommer for personal gain or to obtain inappropriate advantages for third parties. In order to avoid risks associated with conflicts of interest or the appearance thereof, our employees report any actual or potential conflicts of interest to their respective supervisor, the responsible department or a committee, which then decides how to deal with the conflict of interest.



2. COMPANY PROPERTY

We protect the company's property, assets and business opportunities.

The company's property and assets, such as know-how, patents, trademarks, real estate and work equipment, represent value created by our employees through decades of work and form the basis of our business activities. To ensure our business success and the sustainable development of the company, all Sommer employees must preserve and protect the company's property and assets.

3. COMPANY INFORMATION

We protect our company's trade secrets through confidentiality and also require our business partners to maintain confidentiality when we disclose trade secrets to them.

We protect our employees' data from unauthorised access and handle it with care in accordance with the applicable rules. The data and information available to Sommer represent a great value for our company. We therefore protect these trade secrets. These trade secrets are the result of our investments, in particular in research and development, and must be labelled accordingly. Documents and (digital) data carriers containing trade secrets must be stored in such a way that they are not accessible to unauthorised persons. We protect confidential and personal data through appropriate organisational and procedural measures, in particular against unauthorised collection, use and processing.

4. EQUAL OPPORTUNITIES AND FAIR WORKING CONDITIONS

We respect diversity in all business and employee-related decisions and avoid unequal treatment and discrimination on the basis of race, age or appearance, ethnic origin, gender, religion or belief, disability or sexual identity, as well as any other characteristics protected by law.

Sommer GmbH is committed to its responsibility to uphold and promote human rights. Sommer wants to benefit from cultural diversity. Diversity and equal opportunities are part of our corporate philosophy and an element of our global success. In particular, the diversity of our employees is one of our greatest strengths, making us attractive as a company to employees worldwide. We want to attract and retain the best employees and therefore offer a wide range of entry-level and career opportunities as part of our personnel development programme. In addition, we want to create an atmosphere that takes into account the legitimate needs of all employees and customers, regardless of where we do business.

5. ENVIRONMENTAL PROTECTION



We see sustainable management of natural resources as a contribution to environmental protection for present and future generations.

Compliance with all environmental protection regulations and respect for the environment oblige us to use nature's limited resources carefully in order to ensure sustainable corporate success. For us, a commitment to environmental protection and the economical use of energy are an integral part of world-class production.

6. WORK SAFETY

Creating a safe working environment for all employees is a matter of course for us. Occupational safety is achieved in all areas of the business through the exemplary behaviour and sense of responsibility of our employees.

Our managers ensure that our employees are comprehensively trained in occupational safety measures, thereby guaranteeing compliance with the relevant occupational safety regulations. The misuse of addictive substances, knowledge of intimidation, violence and harassment are reported directly to managers and appropriate measures are taken. Our occupational health and safety management systems guarantee the implementation of our high standards.

7. PREVENTION OF CORRUPTION

We are committed to adhering to the highest standards in our global business activities. We do not grant or accept any illegal or unauthorised advantages. Fraud, embezzlement, money laundering and other unfair or misleading business practices are not tolerated.

At Sommer GmbH, we adhere to integrity and fairness in all our business activities. Every employee is obliged to refrain from any corrupt behaviour. They may therefore not offer or provide any inappropriate benefits to third parties, authorise such benefits, or accept such unfair benefits themselves. This includes money, goods or services as well as other unauthorised benefits. This obligation extends to all business activities, including those of our business partners and other parties acting on our behalf. Gifts may only be given and accepted in accordance with the statutory provisions and Sommer's gift rules, taking into account the principles of gift-giving (separation principle, documentation principle, transparency principle, equivalence principle). No business deal, no matter how favourable, justifies a violation of the law.

8. FAIR COMPETITION

We achieve our business success through outstanding performance and fair and honest conduct in competition, not through unethical or illegal business practices. This also includes all national and international export and embargo regulations.

Sommer GmbH is committed to fair conduct towards customers, competitors, patients, authorities and employees. Sommer



GmbH accepts free competition and faces the resulting challenges in a fair and open manner. We trust in the persuasive power of the quality of our products and services and therefore strictly reject unfair and anti-competitive market influences, in particular concerted practices with business partners to impair free competition. We also observe the export and other trade restrictions imposed by some countries, including the United Nations. In order to combat organised crime and terrorist financing, Sommer GmbH undertakes to comply with the necessary measures to conduct business only with business partners who comply with the law.

9. PRODUCT SAFETY AND QUALITY

As a system partner, we develop, manufacture and distribute high-quality products and services that are safe and reliable.

Our products comply with all legal and regulatory requirements as well as our internal safety and quality regulations. Customer satisfaction forms the basis for our sustainable business success. Our customers can therefore rely on the safety and reliability of Sommer GmbH products and their high quality at all times. To maintain the trust of our customers, all Sommer employees are responsible for product and service quality.

All Sommer employees must report any possible violations or other breaches of the law. We undertake to carefully examine all reports and, where necessary, to initiate corrective measures. Sommer GmbH undertakes to avoid any discrimination against employees who report possible violations in good faith.

10. Approval

This Code of Conduct has been approved by the management of Sommer GmbH.

Status: 08.01.2024

On behalf of the management

Steffen Theurer

Dirk Theurer