

## Corporate Governance Policy

Blue Seven recognizes the importance of effective corporate governance in ensuring the responsible management of the company's affairs and the protection of stakeholders' interests. While we do not have a traditional board of directors, we are committed to upholding high standards of corporate governance through alternative structures and practices.

We have a policy that recognizes our commitment to approving, at the board or senior leadership level, our environmental, social and governance programs and/or strategies to achieve our targets.

Our corporate governance policies and equivalent documents regulate the following topic areas: Data privacy protection, tax contribution, anti-corruption and bribery, environment, social and governance performance and incentives, board or senior leadership management and accountability.

### 1. Governance Structure

Blue Seven employs a unique governance structure that emphasizes collaborative decision-making and transparency. Instead of a traditional board of directors, we have established the following governance mechanism

- 1) Chief Executive Office ('CEO'): The CEO is responsible for the strategic direction and overall management of the company. The CEO has various functional tasks. These are outlined in the 'Blue Seven Management Folder' and are revised by the Corporate Social Responsibility (CSR) team.
- 2) Stakeholder Engagement: We actively engage with our stakeholders, including employees, customers, suppliers, and investors, to incorporate their input into decision-making processes. Regular feedback sessions and open forums are in place to ensure that stakeholder perspectives are considered.

## 2. Ethics and Integrity

Blue Seven places a strong emphasis on ethical conduct and integrity in all aspects of its operations:

### 1) Code of Conduct

All employees are required to adhere to a comprehensive Code of Ethics that outlines ethical principles and behavior expected within the company.

### 2) Whistleblower Policy

We maintain a confidential whistleblowing policy to encourage employees to report any unethical behavior, violations of the law, or other concerns without fear of retaliation. These concerns may be addressed to [v.rohrbach@blueseven.com](mailto:v.rohrbach@blueseven.com).

### 3) Risk Assessment and Management

We maintain a process to regularly update the risk assessment of corporate priorities in response to changing business or external circumstances.

We have established a risk management framework to identify, assess, and mitigate risks that could impact the company's operations or stakeholder interests.

Blue Seven has created a risk assessment strategy that identifies corporate governance areas of focus. We maintain a process to regularly update the risk assessment of corporate priorities in response to changing business or external circumstances. Risk assessments are conducted periodically by the CSR Department of Blue Seven and is documented.

### 4) Transparency and Accountability

The company maintains accurate and transparent financial records and reports in compliance with applicable laws and regulations.

### 5) Compliance & Due Diligence

Blue Seven complies with all relevant laws, regulations, and industry standards. Compliance is monitored and reviewed regularly. We have implemented a program or strategy to ensure compliance with our own policies related to employment risks and opportunities as applicable. Documents are revised yearly and after breaches of policies.

### 6) Sustainability and Social Responsibility

We are committed to sustainable business practices and minimizing our environmental footprint. Blue Seven actively engages in corporate social responsibility initiatives that benefit the communities in which we operate. Our

# BLUE SEVEN

procurement practices for goods-not-for-resale (GNFR) are aligned with our environmental, social, and governance policies and targets. We have mechanisms in place to implement environmental, social, and governance due diligence policies in our business processes.

## 7) Equality:

Gender Equality Commitment: We have formally set and approved principles concerning gender equality at the board or senior leadership level, meeting or exceeding regulatory requirements. The targets are set internally at Blue Sevens Management level.

## 8) Succession Planning:

In the absence of a traditional board of directors, the CEO oversees succession planning to ensure a smooth transition of leadership roles within the company.

## CONCLUSION

Blue Seven is dedicated to upholding high standards of corporate governance, even without a traditional board of directors. Our governance structure, ethical principles, transparency, and commitment to stakeholder engagement reflect our commitment to responsible and sustainable business practices. This policy will be reviewed periodically to ensure its continued effectiveness and relevance.

# BLUE SEVEN

## Q&A:

For all queries concerning our Business Policies, we refer to the following contacts:

Hannah Burger (CSR) - [h.burger@blueseven.com](mailto:h.burger@blueseven.com)

Viktoria Rohrbach (CSR Manager) - [v.rohrbach@blueseven.com](mailto:v.rohrbach@blueseven.com)

Andreas Burger (CEO) - [burger@blueseven.com](mailto:burger@blueseven.com)

Employees surveys are conducted via [Lama Poll](#) yearly.

Our [Data Protection Policy](#) is outlined separately.

## Imprint:

H. Obermeyer GmbH & Co.KG

Immenstädter Straße 6-8

D-87534 Oberstaufen

Executive Manager: Andreas Burger (CEO)

VAT ID NUMBER: DE 811131911

[www.blueseven.com](http://www.blueseven.com)