

Code of Conduct

Blue Seven, a brand of H. Obermeyer GmbH & Co. KG, has introduced this Code of Conduct in order to establish binding principles for ethical behavior and compliant conduct within the company.

The Code defines minimum requirements for integrity, transparency, and lawful behavior and serves as a guideline for all employees. It complements applicable legal regulations as well as internal policies.

The aim is to promote a working environment characterized by integrity, fairness, and professional conduct.

1. Bribery and Corruption Prevention

Blue Seven follows a zero-tolerance policy towards bribery and corruption.

It is prohibited to grant, accept, or promise unlawful advantages. This includes in particular:

- money payments
- inappropriate gifts
- inappropriate invitations or benefits
- other material or immaterial advantages influencing business decisions

2. Gifts, Invitations and Facilitation Payments

2.1 Facilitation Payments

Facilitation payments are not permitted.

2.2 Gifts

Gifts may only be accepted or given if:

- they have an appropriate, minor value
- they are in line with local customs
- they do not influence business decisions
- they comply with applicable law

BLUE SEVEN

The guideline value for permissible gifts is a maximum of EUR 200 per individual case, unless stricter local regulations apply.

2.3 Invitations and Hospitality

Invitations and business hospitality are permitted provided that they:

- are directly related to a business activity
- are proportionate
- do not create expectations of influencing decisions
- remain transparent and traceable

This includes e.g. business meals, events, or visits in a business context.

3. Conflicts of Interest and Confidentiality

3.1 Conflicts of Interest

Employees are required to avoid actual or potential conflicts of interest.

Business decisions must not be influenced by personal relationships. Relationships with relatives or close persons in a business context must be disclosed in advance and approved if necessary.

3.2 Confidential Information

Confidential information must be protected and may not be disclosed or used without authorization.

This includes in particular:

- financial and business data
- strategic planning
- customer and supplier data
- internal organizational information

Access to IT systems and data is personal and must not be shared.

4. Human Rights and Anti-Discrimination

4.1 Principles

Blue Seven respects internationally recognized human rights.

Discrimination based on, for example, gender, origin, religion, age, sexual orientation, or other protected characteristics is not permitted.

4.2 Due Diligence

The company carries out risk analyses regarding compliance with human rights standards within its capabilities.

These may relate to internal processes as well as parts of the supply chain and are supported by external standards (e.g., amfori BSCI).

5. Labour and Social Standards

5.1 General Standards

Blue Seven complies with applicable labour law provisions.

This includes in particular regulations on:

- working time and remuneration
- occupational safety
- vacation and leave
- protection against dismissal
- protection against harassment and bullying

5.2 Legal Basis

Employment relationships are based on applicable legal regulations as well as individual employment contracts.

5.3 Training and Development

Training measures are supported within operational possibilities. Relevant requests are reviewed by the responsible internal departments.

6. Supply Chains and Production Sites

Blue Seven works in parts of its supply chain with international audit and verification mechanisms (e.g., amfori BSCI).

The aim is to support improvement processes regarding labour and social standards in relevant production countries.

Audits may be conducted regularly or on an ad hoc basis.

7. Employee Feedback

The company regularly collects anonymized feedback on employee satisfaction.

The results are evaluated and incorporated into internal improvement processes.

8. Fair Recruitment and Equal Treatment

Blue Seven is committed to non-discriminatory and fair hiring processes.

The aim is to consider diverse backgrounds and promote equal opportunities.

9. Freedom of Association

The company respects the right to freedom of association and collective bargaining within applicable legal requirements.

10.Compliance and Enforcement

This Code of Conduct applies to all employees.

Violations of this Code may result in employment or organizational consequences.

Reports of violations may be submitted confidentially.

11.Competition Law, Intellectual Property and Product Safety

- Competition is conducted in compliance with applicable antitrust and competition law
- Intellectual property rights of third parties are respected
- Product safety requirements are taken into account within legal requirements
- Marketing activities are conducted in a compliant and responsible manner

12.Sustainability and Inclusion

The company takes sustainability and inclusion aspects into account in its business activities and is guided by applicable regulatory requirements and voluntary standards.