



fielmann  
group

CODE OF CONDUCT

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## Foreword

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Dear employees,

In just one generation, we have grown from one optical store in Germany to the third largest optical and acoustics provider in the world. In the process, "You are the customer" has remained our guiding principle for over five decades. We serve our customers the way we would like to be served ourselves: in a fair, friendly and competent manner. This clear customer orientation is the basis of our success; it stands for our sincere, empathetic interest in our customers and our social approach to one another. This foundation of values forms the compass with which we further develop our family business and perform our daily work for the benefit of everyone.

We do not tolerate any illegal or unethical actions affecting our customers, employees, society or the planet.

At the same time, it is essential for the further development of the Fielmann Group to give everyone the opportunity for creativity, initiative and personal responsibility. This is the only way we can improve and grow every day. In doing so, we trust in the integrity and sense of responsibility of each individual. This Code of Conduct and our guidelines cannot replace individual responsibility, but they shall serve as guiding principles and provide us with orientation in our daily work. For the Management Board of the Fielmann Group, these guidelines as well as general principles of corporate responsibility and integrity have a particularly high priority. It is our conviction that our company can only be successful in an intact social and

natural environment. This is why we follow ethical principles of conduct. In particular, we adhere to all applicable laws, rules and guidelines (compliance).

Please familiarise yourself with this Code of Conduct and take it into account in your daily work. If you have any questions, please contact your manager or our Compliance Team.

Your Management Board



Marc Fielmann



Steffen Bätjer



Katja Groß



Dr. Bastian Körber



Georg Alexander Zeiss





Basic principles

# 1. Basic principles

As a family business, we are committed to ethically responsible and legally compliant corporate governance in accordance with our philosophy and values. Every company in the Fielmann Group complies with the applicable laws of the countries in which it operates and thereby ensures legal compliance. We regard compliance with the rules and laws applicable in the respective country as a minimum requirement of ethical behaviour. This is done in accordance with our Purpose, which reminds us of what we stand for:

**We help everyone hear and see the beauty in the world.**

In doing so, we are guided by our values, which are the basis of our daily work:



Based on this, the Code of Conduct summarises the key legal and ethical principles and rules governing our actions and sets out the standards we expect of everyone with regard to our customers, employees, business partners and other stakeholders.



# 2

Compliance  
with law and  
order



## 2. Compliance with law and order

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Compliance with the law is a matter of course for us and the basis of responsible business conduct. We comply with the legal requirements and prohibitions of all countries in which we do business. This applies even if we suffer economic disadvantages as a result or are unable to achieve certain goals. If the legal requirements in individual countries differ from the rules of this Code of Conduct, the stricter rules shall apply in each case.





**Human and  
employee rights**

# 3

### 3. Human and employee rights

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We respect human rights and the dignity of each and every individual in our global value and supply chains. Our goal is to enforce human rights and prevent any violations to them. Together with our employees, customers, business partners and stakeholders, we work to promote human rights and are particularly committed to fair business practices and good working and living conditions.



Read more in our “Declaration of Principles on Human Rights” and our “Supplier Code of Conduct”

#### **a. Respect and equal treatment**

We treat others as we would like to be treated ourselves. We treat customers, employees, business partners and stakeholders fairly, respectfully and in a spirit of trust. We actively encourage diversity since we believe that the best business results are achieved by incorporating many different viewpoints. No one may be disadvantaged or discriminated against on the basis of ethnic origin, gender, religion or beliefs, political views, disability, age, appearance or sexual identity. Bullying, abuse of power, intimidation, threats and other forms of harassment will not be tolerated.

#### **b. Cooperation with employee representatives**

The Fielmann Group maintains a constructive and respectful dialogue with employee representatives and trade unions. The Management Board and business leaders work closely and in a spirit of trust with works councils in order to take appropriate account of the interests of employees.

#### **c. Occupational safety and health protection**

As a family company, the Fielmann Group attaches particular importance to the safety of its employees in the workplace and to health protection. We therefore create safe working conditions and integrate occupational health and safety into our operating procedures. Managers ensure the safety of their employees through instruction, training and supervision. We avoid safety risks and occupational accidents by acting prudently and responsibly.

# 4

Strict  
customer  
orientation



## 4. Strict customer orientation

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### **a. You are the customer**

With our philosophy, “You are the customer!”, we have always put people first. Our philosophy is our highest maxim and determines our daily actions. We serve our customers the way we would like to be served ourselves: fairly, friendly, competently and regardless of the price.

### **b. Product safety and quality**

We offer our customers safe products of impeccable quality at the best prices. The Fielmann Group is a healthcare provider. Almost all the products we provide – such as lenses and frames for glasses, contact lenses and hearing systems – are medical products that must meet strict standards and requirements. With our own manufacturing facilities, we ensure that our customers can rely on the highest standards of quality and competence. We only distribute other manufacturers’ products if they meet our high-quality standards in addition to the legal requirements. We regularly monitor this through appropriate certifications.





**Conduct in the  
business environment/  
business relations**



## 5. Conduct in the business environment/ business relations

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### **a. Combating corruption and bribery**

We do not tolerate corruption or bribery of any kind. The acceptance or granting of personal benefits such as cash payments, non-cash benefits or gifts in kind in connection with the initiation, awarding or handling of business relationships is prohibited. Exceptions to this are invitations or gifts that are within the scope of "socially customary benefits" and are not intended to provide unlawful preferential treatment. If you have any questions about social customs, please contact the Compliance Team. As a general rule, no benefits may be granted to public officials.

### **b. Avoiding conflicts of interest and private activities**

We make business or personnel decisions exclusively in the interests of the Fielmann Group. Private or personal interests of employees, such as from their own secondary employment, honorary activities or family relationships, may conflict with this. To avoid such conflicts, secondary employment is subject to approval. In addition, other conflicts of interest must be disclosed, and the decisions affected by them must be passed on to colleagues or the manager.

### **c. Fair competition**

We are committed to fair competition and do not take any actions that could restrict competition. In particular, we do not enter into agreements with competitors on competition-determining factors such as prices, terms and conditions, sales areas or exchange information on these. In addition, we do not make any untrue or misleading advertising statements about our products and comply with the requirements of the German Health Services and Product Advertising Act (HWG).

**d. Financial integrity**

We accurately and completely reflect all business transactions in books, balance sheets and tax returns. The supporting documents for these are documented in a traceable manner and archived for the duration of the statutory retention obligations.

**e. Anti-money laundering**

We comply with our legal obligations to combat money laundering. Employees are required to investigate and report any indications of money laundering.

**f. Anti-terrorism**

We are committed to compliance with all applicable anti-terrorism financing and asset control laws, regulations, rules, and executive orders as well as applicable sanctions against any individuals, organisations or governments.

**g. Fraud, waste and abuse**

We are committed to complying with all applicable laws, regulations and other requirements pertaining to fraud, waste and abuse in the healthcare sector, including all applicable laws relating to bribery, corruption and self-referral. The Fielmann Group will not tolerate healthcare fraud, waste and abuse among its employees and in any of its relationships with external partners. It will identify, report, monitor and refer for prosecution situations in which fraud, waste and abuse occurs.



# 6

**Handling  
of information**

## 6. Handling of information

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### **a. Data protection**

We comply with the applicable data protection laws and respect the rights of the persons whose personal data (for example, name, address, date of birth, health data) we process. In doing so, we take the utmost care to comply with the principles of data protection and, in particular, maintain strict confidentiality. We ensure data security through appropriate technical and organisational measures. In addition, employees who process personal data receive regular trainings to ensure that this data is handled carefully and responsibly. Where required by law, data protection officers are appointed. These officers inform and advise the companies of the Fielmann Group with regard to their obligations under data protection law and monitor compliance with the legal requirements.

### **b. Information security**

The Fielmann Group is active at many levels of value creation in the optical and acoustics fields. As a product developer, manufacturer, wholesaler and retailer, we rely on the automated processing of data and information. All essential processes are significantly supported by information technology (IT). This simultaneously results in an increased risk in the event of a disruption or failure of our IT systems. Against this background, we are working together to ensure an appropriate level of information security throughout the Fielmann Group.

**c. Protection of business secrets**

We protect our business secrets such as prices, inventions, know-how, knowledge of the market and strategies. We oblige our employees and business partners to maintain confidentiality and we disclose confidential information to them only to the extent necessary for the specific activity or cooperation. We treat the business secrets of our business partners with the same confidentiality.

**d. Insider information**

As a stock corporation, we protect our investors by maintaining confidentiality with regard to insider information. Insider information is information which is not yet known to the market and which, if it became known, could have a significant impact on the share price. This includes, for example, information on corporate acquisitions, financial results, and important contracts. Insider information is only disclosed to those employees who need the information for their specific activities. The employees concerned are also included in an insider list and undertake not to disclose this information to third parties, either directly or indirectly (for example by recommending purchases or sales) and not to buy or sell any shares in Fielmann Group AG themselves until the information becomes known.





**Responsibility**

## 7. Responsibility

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### **a. Society and the environment**

We are committed to social responsibility because we are convinced that a company can only be successful in the long term in an intact and socially balanced environment. Sustainable, honest business conduct is part of our self-image. It is also an essential part of our philosophy. The Fielmann Group attaches great importance to protecting natural resources and nature. For decades, we have been planting a tree for every employee every year in line with our environmental pledge of 1986 – to date more than 1.7 million trees and bushes. We are committed to nature conservation, environmental protection and the preservation of historical monuments. We also support kindergartens and schools and promote popular sports. In addition, we consistently work towards ever more sustainability in our product assortment and our supply chain.



**Read more in our “Corporate Social Responsibility Report”**

### **b. Handling company property / Protection of company assets**

We handle company property responsibly and, as a matter of principle, only use it for company purposes. We protect tangible and intangible property as well as confidential information of the Fielmann Group from theft, loss or misuse. We make decisions affecting company assets after careful consideration of the cost-benefit ratio.





**Implementation,  
contact persons  
and reporting  
system**

## 8. Implementation, contact persons and reporting system

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### **a. Implementation of the Code of Conduct**

All employees of the Fielmann Group are responsible for compliance with this Code of Conduct in their respective areas of responsibility. They are supported in this by training courses, guidelines, instructions and briefings from superiors as well as advice from the responsible contact persons. Our managers act as role models in this respect and live up to the regulations in this Code of Conduct. They also ensure that employees are aware of and comply with the requirements of this Code of Conduct and take appropriate measures to prevent breaches of the rules in their area of responsibility.

### **b. Contact persons**

For questions regarding the application of this Code of Conduct, the respective managers are the first points of contact. For further questions, please also contact our Compliance Team.

### **c. Reporting system for violations**

We encourage all employees to seek advice from the contacts listed above if they have any doubts about their own conduct or the conduct of other employees. Alternatively, they can also use our whistleblower reporting system at the following internet address:



<https://fielmanngroup.integrityline.com>.

All concerns are taken seriously and can be made anonymously if desired.

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**"We help *everyone* hear and see  
the beauty in the world."**

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