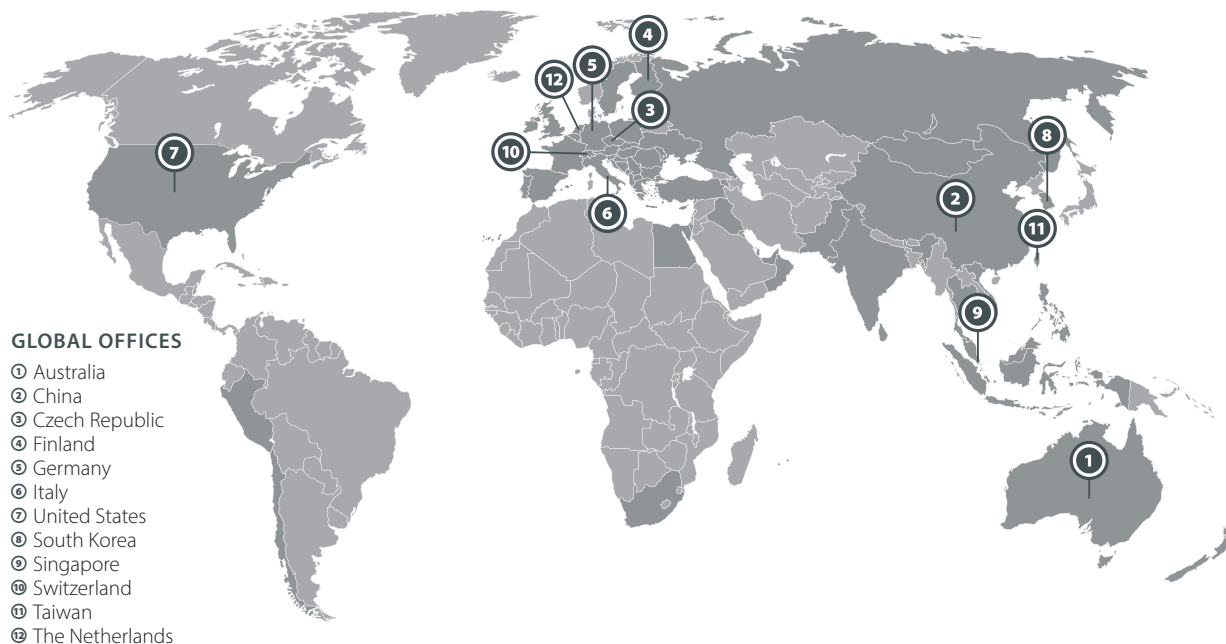


DR·WOLFF·GROUP



# Code of Conduct

# The Dr Wolff Group



**① DR WOLFF AUSTRALIA PTY LTD**  
Level 6, 8 Spring Street, Sydney NSW 2000 Australia

**② Dr. Wolff (Shanghai) Trading Co., Ltd.**  
28 Fl., Huai Hai Plaza 1045 Huai Hai Road  
200031 Shanghai China

**③ APREMEDA s.r.o.**  
Sirotkova 45, 616 00 Brno, Czech Republic

**④ Dr. Wolff Finland Oy**  
Technopolis Innopoli 2, Tekniikantie 14, 02110 Espoo

**⑤ Dr. August Wolff GmbH & Co. KG Arzneimittel**  
Sudbrackstraße 56, 33611 Bielefeld  
**Dr. Kurt Wolff GmbH & Co. KG**  
Johanneswerkstraße 34-36, 33611 Bielefeld  
**eWolff GmbH**  
Johanneswerkstraße 34-36, 33611 Bielefeld

**⑥ Dr. Wolff Italia S.r.l.**  
Via C. Ravizza 34/1 int. 7 20149 Milano

**⑦ Dr. Wolff USA Distribution Inc.**  
228 Park Ave S. #25124, New York. NY 10003-1502, USA

**⑧ Dr. Wolff Korea Ltd.**  
4F, 405, Seocho-daero 398, Seocho-gu, Seoul,  
Republic of Korea

**⑨ DR. WOLFF SINGAPORE PTE. LTD.**  
20 Upper Circular Road, The Riverwalk, Unit 02-21B  
Singapore 089614

**⑩ Alcina AG**  
Neue Bahnhofstrasse 160, 4132 Muttentz/BL

**⑪ DR. WOLFF TAIWAN TRADING CO., LTD.**  
19F-10, No. 333, Keelung Rd., Sec. 1 Taipei 11012, Taiwan

**⑫ Alcina Cosmetic Nederland BV**  
Industrieweg 1, 4181 CA Waardenburg

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## Foreword by the Management Boards



*From left to right:  
Ass. jur. Christoph Harras-Wolff  
Dipl. Ing. Eduard R. Dörrenberg  
Dr. oec. Christian Mestwerdt*

Dear Colleagues

In its history of more than 100 years, the Dr. Wolff Group has succeeded in going its own way. The companies of the Dr. Wolff Group have not only held their own in competitive markets, but also established themselves permanently there and achieved considerable business successes. We want this to continue in the future, too.

### **Why do we need a Code of Conduct?**

In addition to the professional performance of the Dr. Wolff Group employees and the quality of the products, lawful conduct of the directors, managers and all employees is a key foundation for the successful business activity of the Dr. Wolff Group. This is because legally compliant behaviour demonstrates reliability and credibility and underlines our good reputation.

Irrespective of the goal of continuing to be successful in business and wanting to maintain the conditions for this, as a family company it is very important to us that business success never takes precedence over complying with the law in our activities. Illegal transactions and activities are always and without reservation unacceptable to the Dr. Wolff Group – wherever we are involved, in Germany and in other countries.

Moreover, we are convinced that behaviour with integrity is a key element of the good corporate culture of the Dr. Wolff Group. We want to preserve this culture – together with you, the employees of the Dr. Wolff Group.

In order to further raise our employees' awareness in connection with business conduct with integrity, this Code of Conduct presents important principles of business conduct with integrity at the Dr. Wolff Group. They are based on what is important to us, in particular integrity, honesty and openness, reliability and credibility and on trusting and respectful dealings with each other.

#### **Who does our Code of Conduct apply to within the Dr. Wolff Group?**

This Code of Conduct applies for an unlimited period of time to all employees of the Dr. Wolff Group, at all locations and business units, in Germany and abroad. It is supplemented by internal processes and specific behavioural requirements, especially in the form of guidelines and instructions.

The Dr. Wolff Group expects its employees at all levels of the company to comply with the applicable national and international legal regulations. In addition, the principles laid down in this Code of Conduct must be observed.

#### **What applies if foreign legal regulations are different from the regulations of our Code of Conduct?**

It is possible that foreign legal regulations may differ from the regulations of this Code of Conduct in individual cases. In such a case, the more stringent regulations must always be observed.

#### **What do we expect from our business partners?**

The Dr. Wolff Group also requires its business partners to comply with the principles of conduct laid down in this Code of Conduct. They are communicated internally and externally by the Dr. Wolff Group.

#### **Particularly important is also:**

The managing directors and executives of the Dr. Wolff Group act as role models when it comes to setting an example of legally impeccable conduct with integrity.

Bielefeld, 31.12.2022

Dipl. Ing. Eduard R. Dörrenberg  
Ass. jur. Christoph Harras-Wolff  
Dr. oec. Christian Mestwerdt

## I. Prevention of active and passive corruption

The Dr. Wolff Group explicitly rejects all forms of corrupt conduct and already eschews the mere semblance of such conduct.

The employees of the Dr. Wolff Group may not offer, promise or grant business partners in Germany or abroad any advantages so that the Dr. Wolff Group is given preferential treatment in the competition. Similarly, they may not demand, be promised or accept any advantages from business partners if this creates the appearance that they will favour them in the competition. The above-mentioned principles may become relevant, in particular in connection with gifts and invitations to meals and events.

Additional requirements apply to dealings with members of the medical profession or officials in order to avoid the appearance of corrupt conduct. The same applies to donations and sponsoring activities.

### **Wolff's instincts**

*Why is a current or potential business partner sending me an invitation to such an event?*

*Am I sure that I am not offering or sending my business partner any illegal advantages?*

*Could I or the Dr. Wolff Group, get into difficulties if my plans became known publicly or were noticed by the auditors?*

### **Wolff's instincts**

**Whom can I approach in cases of doubt?**

*Please find contact details in section XI. on page 9.*

## II. Avoiding conflicts of interest

The Dr. Wolff Group expects employees to strictly separate their own private interests from the interests of the Dr. Wolff Group. Business opportunities that the Dr. Wolff Group is entitled to, must not be used by employees for their own purposes. Business decisions must be based exclusively on the interests of the company.

### **Wolff's instincts**

*Could others think that I am gaining a personal advantage through what I am intending to do?*

*Could others view my business decision as having been influenced by a personal relationship?*

## III. Prevention of money laundering

The companies in the Dr. Wolff Group only conduct business with reputable business partners who pursue lawful activities. We act in compliance with the statutory requirements in combating money laundering and the financing of terrorism.

### **Wolff's instincts**

*Have I done everything necessary to check the identity and seriousness of the business partner?*

*Would I feel safer if I were to discuss the business or payment with my superior?*

## IV. Fair competition

The Dr. Wolff Group is obliged to maintain fair competition in all of its business activities. The Dr. Wolff Group convinces with the quality of its products and not through unfair measures. In particular, it ensures that no prohibited agreements on prices or sales terms, market/customer or territory allocations that restrict competition, are made with competitors, customers or suppliers. The same applies to coordinated practices, in particular mediated via the exchange of information relevant to competition with competitors. Rather, corporate decisions are made autonomously and independently at the Dr. Wolff Group.

### **Wolff's instincts**

*Am I sure that the intended contract is compatible with all of the cartel regulations?*

*Have I discussed a possible anti-competitive procedure, such as a cooperation or just a meeting with a competitor with the contact person on the list on page 9. Wouldn't it be better to do that?*

## V. Trade controls

Particularly, as a company with a national and international focus, the Dr. Wolff Group complies with the applicable statutory requirements on trade control, including embargoes.

### *Wolff's instincts*

*Have I taken the time to understand what trade control compliance is all about?*

*Are there export restrictions with respect to our products, the destination country or the customer?*

*In case of doubt, have I spoken to the contact person responsible?*

## VI. Fair working conditions, occupational health and safety

The Dr. Wolff Group observes the applicable laws, regulations and provisions on working hours. It requires the same of its business partners.

The Dr. Wolff Group does not tolerate discriminatory conduct under any circumstances. Employees may not be discriminated against or given preferential treatment on the basis of their gender, ancestry, ethnic origin, language, homeland and origin, faith, religious or political views or an existing disability.

Employment decisions, including hirings and promotions, remuneration, training, dismissals and terminations are always made without discrimination.

Not least, in order to guarantee sustainable success, it is particularly important to the Dr. Wolff Group to maintain the health and safety of its employees. Accordingly, the operational processes must be arranged correctly and in line with the applicable health and safety legislation.

The Dr. Wolff Group provides its employees with safe and healthy working conditions in order to avoid accidents and personal injury.

The Dr. Wolff Group expects its employees to follow the following basic rules of conduct:

- All employees are required to achieve the common goal of health protection and safety in their work environment.
- The employees of the Dr. Wolff Group undertake to adhere to the requirements of health and safety at work.

### *Wolff's instincts*

*Do I possibly have any behaviours at work that others could see as detrimental, disruptive or discriminatory?*

*How can I help to create a work environment that is viewed positively by me and my colleagues?*

*Do I know the best possible way to prevent workplace accidents?*

*Do I know what to do if an accident happens at work?*

*Do I sometimes have the tendency to view safety measures at work as annoying and even incorrectly circumvent them?*

## VII. Environmental protection, human rights

The Dr. Wolff Group gives is committed to responsible and sustainable dealings with natural resources.

The promotion and further development of environmentally friendly technologies and business processes is the focus of the Dr. Wolff Group's corporate activity. It is therefore natural that the Dr. Wolff Group complies with the statutory regulations and standards for environmental protection.

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### *Wolff's instincts*

*Am I sufficiently aware of the importance of resource-conserving energy consumption and sustainable activities at the workplace?*

*What contribution to environmental protection can I meaningfully make at the workplace?*

corporate activity. It is therefore natural that the Dr. Wolff Group complies with the statutory regulations and standards for environmental protection.

All employees are called upon to contribute to environmental protection with their individual behaviour and to develop appropriate ideas. In particular, we strive for economical energy consumption and sustainability.

The Dr. Wolff Group respects and observes human rights in accordance with international standards. In particular, we do not tolerate any violence, threats of violence or other forms of coercion. We strictly reject forced and child labour.

## VIII. Protection of company property, protection of business secrets

The employees of the Dr. Wolff Group treat tangible and intangible company property responsibly and with care. Company property may only be used in line with its approved intended purpose. The employees shall not use company property for their own, inappropriate or non-approved purposes.

In this respect, business secrets of the Dr. Wolff Group have overriding economic importance. It is precisely their protection that is a pre-requisite for the company's sustainable business success.

### *Wolff's instincts*

*Does my use of company property serve the business purposes of the Dr. Wolff Group?*

*Am I doing everything necessary to protect the company property from damage?*

*Do I always use company property appropriately?*

## IX. Data protection and data security

The Dr. Wolff Group is aware of the great importance of data protection and data security. By handling the data to which it has access carefully and responsibly, it maintains the trust of its business partners and employees. The Dr. Wolff Group not only takes technical and organisational measures to achieve as high a level of data protection and data security as possible. In particular, all employees are required to act in the interests of the protection and security of data in line with the relevant applicable laws and legislation.

### *Wolff's instincts*

*Do I have access to other people's personal data, and do I handle these data correctly? Would I feel comfortable with this handling if it were my personal data?*

*Have I done everything necessary to protect the data from unauthorised access by third parties?*

## X. Complying with the law and internal regulations

Violations of the law, this Code of Conduct, internal guidelines and instructions, such as the Standing Operating Procedures (SOP) can have serious consequences for individuals and for the Dr. Wolff Group.



The Dr. Wolff Group will not tolerate violations of the law, violations of this Code of Conduct or internal guidelines/instructions, which may lead to sanctions against the people involved (including sanctions under employment law). This also applies if the misconduct was carried out for the supposed benefit of the Dr. Wolff Group.

We would rather forego a supposedly lucrative business opportunity than break the law.

## **XI. Conduct in case of doubt**

If there is any doubt as to whether certain conduct is permitted, do not continue with the conduct for the time being or contact the Compliance Officer or the legal department.

Compliance Officer *compliance@drwolffgroup.com*,

Data Protection Officer *dpo@drwolffgroup.com*,

Legal Department *legal@drwolffgroup.com*

Further contact information can be found on the intranet "Wolffi" in the "Legal & Compliance" section.

## **XII. Cooperation, whistleblower system**

All employees of the Dr. Wolff Group are encouraged to inform the Compliance Officer without undue delay of any dubious business transactions that they observe with respect to another person. For example, this can be a suspicion of corrupt conduct. The Dr. Wolff Group assures its employees that employees who report possible misconduct of another person in good faith shall not experience any disadvantages whatsoever from companies in the Dr. Wolff Group. Naturally, this is also the case if it is subsequently shown that no misconduct took place.

In this respect, the Dr. Wolff Group supports and encourages all Group employees to handle dubious and suspicious cases openly and transparently. To ensure this, the Dr. Wolff Group has provided a whistleblower system.

You can access the system online at <https://whistleblowerreporting.pwc.de/a7188ac53c> and by telephone at +49 69 9585 1001. Of course, anonymous reports are also possible.

Or you can also turn to your superiors or the legal department in confidence at any time.

