



## 2.4 Code of Business Conduct (Document)

### 2.4.1 Preamble

*Nexus can only succeed in the long term with ethical and impeccable dealings and integrity.*

Within the Nexus Group, we value fair and respectful dealings with each other, because we believe that ethical conduct and integrity transactions should be core values in our organization. Contact with our customers and business partners should also meet this standard, because our public image is shaped by the appearance, actions and behavior of each of us. We are all responsible for ensuring that Nexus fulfills its commitment to entrepreneurial and social responsibility. Ethical and legally sound standards are guidelines for our dealings.

### 2.4.2 Scope of Validity

#### **Employees and business partners**

The Code of Business Conduct applies to all employees of the Nexus Group, regardless of their position in the Group. It is designed to help solve ethical and legal challenges in our daily work as well as shape our dealings with our business partners, employees, shareholders and the public. Each superior must ensure that his or her area complies with the requirements of the Code of Conduct. Business partners/third parties as well as their business partners in the supply chain are expected to comply with the legal and ethical standards of this Code of Business Conduct throughout the duration of collaboration.

#### **Countries & Regions**

The Code of Business Conduct applies to all countries in which Nexus operates. Where local directives provide for a stricter interpretation than the provisions governed here, the stricter rules shall apply in each case.

### 2.4.3 Guidelines for Our Actions Ethical guidelines

#### **Behavior and respect in dealing with each other**

*We value fair and respectful interaction with each other employee and with others*

Each employee represents Nexus and acts friendly, professionally and fair within and outside the Group. We commit ourselves to act with integrity, dignity, respect, competence, care and ethical integrity toward customers, potential customers, third parties, colleagues and the public.

#### **Discrimination or harassment**

*We value diversity, and objectivity shapes our working together*

NEXUS does not tolerate any form of discrimination, bullying or harassment. A person's individual work is judged only by objective criteria based on his or her performance and behavior. This applies regardless of individual factors such as age, disability, gender, sexual orientation, race or ethnic origin, political or religious views. For this reason, we do not tolerate defamation, intimidation or finger pointing. We foster a culture that values and encourages open communication, fault tolerance, and collaboration among all stakeholders.

Selection processes and recruitment decisions are based exclusively on objective criteria, such as qualification, performance, experience and professional aptitude. These processes are characterized by equal treatment and fairness.

### 2.4.4 Guidelines for our actions: Legal guidelines

*We adhere to the applicable rules*

All employees must understand and comply with all applicable laws, rules and regulations in their respective area of activity. In the event of a conflict between different legal requirements, the more each time stringent provision shall apply each time. It is prohibited to knowingly participate in or support any violation of such laws, rules or regulations. All external and internal business activities must be fully and flawlessly documented in accordance with statutory and, in addition, Nexus regulations. Moreover:

#### **Trade and Business Secrets**

*We protect confidential information*

In-house information and business secrets must be treated confidentially; this also applies to other information in the confidentiality of which Nexus, its contractual partners and customers have or could have an interest. Such information may not be disclosed to unauthorized persons without permission and must also be adequately protected from third parties and employees becoming aware of it who are not involved. If there is any uncertainty about the confidentiality of the information, employees must consult their managers about the evaluation of in-house information.

## **Conflicts of Interest, Separation of Private and Group Interests**

*We protect the interests of Nexus*

NEXUS expects its employees to be loyal to the Group. Employees must separate their private interests from those of Nexus. In the case of internal decisions or business relationships with third parties, only objective criteria count. Secondary activities, professional consultancy activities or significant financial interests in a competitor, customer or supplier are subject to a reservation of approval and must not adversely affect the interests of Nexus.

## **Bribery and Corruption**

*We insist on honesty*

Nexus takes a zero-tolerance approach to bribery and corruption and commits to act professionally, fairly and integrally in all business relationships wherever we operate.

## **Money Laundering**

*Our actions are always in line with applicable laws*

Nexus supports all necessary measures to prevent money laundering within its sphere of influence and does everything to avoid being misused for other illegal purposes in this respect.

## **Competition and antitrust law**

*We value fair competition*

Nexus only acts in accordance with global antitrust and trade laws as well as laws on competition, pricing and consumer protection. We will not attempt to work with competitors to distort trade or abuse a large market share position. We do not tolerate illegal agreements with competitors or other violations of competition law.

## **Transparency and Care**

*We act with the utmost care and always transparently*

Business relationships between the public/state and private sectors carry a certain risk in terms of stricter sanctions and higher penalties in the event of legal violations. Therefore, any business relationship with public officials must be transparent and handled with the utmost care.

## **Acceptance and Granting of Gifts and Other Benefits**

*We do not provide any opportunity for third parties to influence our decisions*

No employee may accept or grant benefits, in any form, including, but not limited to, personal gifts of inappropriate value, which, if viewed reasonably, must be assumed to influence business decisions or transactions. Invitations must be kept within the limits of normal business hospitality. The acceptance and granting of money are generally prohibited.

## **Insider Rules**

*We follow the rules on insider trading*

All employees are obliged to comply with the insider rules applicable to securities trading, for example the insider trading ban. In particular, employees are prohibited from using information that is not publicly known (insider information) for share purchases or sales or making it available to third parties.

## **Data Protection and IT Security**

*We treat data entrusted to us with the utmost care and in accordance with the applicable guidelines*

The informational right of self-determination of employees and business partners must be respected; all employees are obliged to comply with all data protection regulations and specifications.

## **Implementation of compliance rules**

*We always act in accordance with the Code of Business Conduct of the Nexus Group*

No employee may suffer a disadvantage in the company as a result of adherence to the above principles. In doing so, we act in accordance with the EU directive "on the protection of whistleblowers".

The Code of Business Conduct of Nexus is provided to each employee at the beginning of employment or at a later date. Each employee is obliged to inform him/herself of the existing internal and external regulations to ensure that he/she acts in accordance with them. If there are any doubts as to whether an event or action is in accordance with Nexus regulations, employees can always contact their superior or the Compliance Office in confidence.

## **2.4.5 Operationalization of the Code of Business Conduct**

The operationalization of the Code of Business Conducts is a critical factor in sustainably living our value orientation across all locations, levels and functional areas. That's why the "Corporate Compliance Organization Policy" defines how NEXUS ensures that our corporate values are actively lived and that employees are empowered to act in accordance with the law and regulations. In this way, we maintain the integrity of our organization as well as trust within and outside the group of companies.

## **2.4.6 Violations of the Guidelines**

Every employee is aware of the responsibility to report violations of the Code of Conduct immediately. This can be done to an employee's superior or [compliance@nexus.com](mailto:compliance@nexus.com). Entries can be made by name, or – if desired – anonymously, as provided for in the Sarbanes Oxley Act. For this purpose, a Whistleblower Reporting Tool is available via the Nexus intranet. Any follow-up to an issue raised via the Whistleblower Reporting Tool is coordinated with the Compliance Officer in the Supervisory Board.

If necessary, an objective investigation is carried out to ensure appropriate remedial action. Employees are expected to participate fully in the Group's investigations. The Group's investigations may be conducted by the Compliance Officer or other persons with appropriate training in the area of investigations.

Disadvantages for the employee due to reporting concerns or participating in an investigation are strictly prohibited. However, dishonest, malicious or otherwise abusive reporting (such as false personal attacks directed against certain individuals) is prohibited and can result in disciplinary action.

([www.nexus-ag.de](http://www.nexus-ag.de) under the heading Company / Investor Relations / Corporate Governance / Code of Conduct)