

Code of Conduct

of

Fox4Pets GmbH & Co. KG

– hereinafter referred to as „**Fox4Pets**“ –

Preamble

Fox4Pets GmbH & Co. KG and its affiliated companies (as defined in §§ 15 ff. of the German Stock Corporation Act (AktG)) (hereinafter collectively referred to as “**Fox4Pets**”) are committed to social and environmental responsibility and establish as a standard for themselves and their business partners that the principles of ecological, social, and ethical conduct are upheld and practiced. Fox4Pets relies on adherence to these principles particularly to fulfil its contractual obligations toward partners, especially those bound by the Supply Chain Due Diligence Act (LKSG).

The following provisions apply to the collaboration between Fox4Pets and its business partners (hereinafter: “**Code of Conduct**”). This Code of Conduct serves as the foundation for all current and future framework and individual contractual relationships between Fox4Pets and the business partner.

The business partner agrees to comply with the principles and requirements of this Code of Conduct and will endeavour to contractually obligate its own business partners to observe the standards and regulations outlined in this Code of Conduct.

A violation of this Code of Conduct by the business partner may, depending on the specific circumstances and severity of the violation and/or its recurrence, constitute grounds for Fox4Pets to terminate the business relationship, particularly to avoid impairing or endangering relationships with other contractual partners.

I. Human Rights and Labour Standards

Fox4Pets is fully committed to upholding inalienable human rights. The business partner is likewise fully committed to complying with the following human rights standards:

1. Prohibition of Child Labour

Fox4Pets does not tolerate child labour. Under no circumstances may child labour be used at any stage of work. The age of any employee must not be lower than the age at which compulsory schooling ends under the applicable law of the place of employment, and in all cases, employees must be at least 15 years old. The rights of young workers must be protected. Employees under the age of 18 must not be assigned to work that is hazardous to their health, safety, or morals. Special, applicable protective regulations must be observed. Should children be found working, the business partner is required to document the circumstances, including the measures taken to rectify the situation, particularly to enable the children to attend school.

2. Prohibition of Forced Labour

Fox4Pets does not tolerate forced labour, slavery, or any comparable practices. All work must be undertaken voluntarily and without threat of punishment. Employees must be able to terminate their work and/or employment relationship at any time with appropriate notice. No psychological hardship, sexual or personal harassment, and/or humiliation is permitted. The use of security forces is prohibited if it results in the inhumane or degrading treatment of individuals, inflicts injury, or restricts freedom of association.

3. Fair Working Hours

Fox4Pets insists on compliance with fair working hours. Working hours must conform to applicable national laws, regulations, or industry standards. Overtime is only permitted on a voluntary basis and must not exceed 12 hours per week. Regular weekly working hours should not exceed 48 hours, and total weekly hours must not exceed 60 hours. After six consecutive workdays, employees must be given at least one day off.

4. Fair Compensation

Fox4Pets insists on fair compensation. Wages for regular and overtime hours must meet the statutory minimum wage level or the minimum industry standards, whichever is higher. Overtime pay must exceed the rate for regular hours. If the compensation is insufficient to cover the cost of living and allow for a minimum level of savings, it must be increased to meet this standard. Employees must receive at least the legally mandated benefits. Wage deductions as disciplinary measures are prohibited. Employees must also receive clear information about the composition of their wages.

5. Respect of Collective Employee Rights

Fox4Pets upholds collective employee rights. The right to form and join organizations of their choice without prior approval and according to their own rules must be guaranteed. The rights to collective bargaining and to strike must be respected within the limits of the law. In cases where freedom of association and collective bargaining rights are legally restricted, alternative means for independent and free association should be provided. Employee representatives are protected from discrimination. Employees must not be discriminated against for establishing, joining, or belonging to employee organizations. Employee representatives must have free access to their colleagues' workplaces to ensure they can exercise their rights lawfully and peacefully.

6. Occupational Health and Safety

Fox4Pets insists on ensuring a safe and healthy work environment. The business partner shall implement and maintain appropriate occupational safety systems to prevent accidents and health risks that may arise in connection with employee activities. The business partner shall take suitable measures to prevent physical or mental fatigue of employees. Employees must be regularly informed about applicable health and safety standards as well as necessary protective measures, particularly through regular training. The business partner shall ensure employees have access to an adequate supply of drinking water and to clean sanitary facilities.

7. Prohibition of Discrimination

Fox4Pets does not tolerate discrimination. Discrimination and unequal treatment of employees or other individuals is prohibited unless such differentiation is justified by the requirements of the job. This prohibition particularly applies to discrimination based on gender, national, ethnic, or social origin, disability, health status, political opinion, religion, ideology, age, pregnancy, sexual orientation, skin colour, and race. The personal dignity, privacy, and individual rights of each person must be respected.

8. Complaint Mechanisms

The business partner guarantees that complaint mechanisms are in place for employees, accessible to the entire workforce, while ensuring confidentiality and effective protection against retaliation.

II. Ecological and Environmental Standards

Ecological business practices and environmental protection are essential elements of Fox4Pets' corporate policy. Collaboration with business partners requires that they also assume responsibility for ecology and environmental protection and take the necessary steps to engage in resource-conserving practices. The following principles apply:

1. Compliance with Environmental Laws and Regulations

The business partner shall comply with all applicable environmental laws and regulations at its locations of performance and operational or work sites, particularly concerning the handling of hazardous substances, waste management, environmental protection, water regulation, and emissions control.

2. Energy Consumption

The business partner shall monitor and document its energy consumption. In cases of excessive energy usage, the business partner shall strive for economically viable solutions to improve energy efficiency and reduce energy consumption.

3. Emissions / Harmful Environmental Impacts

The business partner shall strive to avoid harmful environmental impacts with the diligence of a prudent businessman. The business partner shall monitor, review, and treat wastewater from operational processes as necessary. Additionally, measures should be implemented to reduce wastewater generation. The business partner shall routinely monitor, review, and treat general emissions from its operations (air and noise emissions) as well as greenhouse gas emissions. The business partner shall monitor its exhaust gas purification systems and commits to regularly assessing throughout the business relationship whether and to what extent emissions of any kind can be minimized.

4. Waste Management

The business partner shall take all legally required measures for waste treatment, particularly for hazardous materials, and in all other respects act with the diligence of a prudent businessman.

The business partner shall avoid and minimize waste under its control wherever possible and, where waste has been produced, systematically identify, treat, recycle, and responsibly dispose of it. The prohibitions on the export of hazardous waste under the Basel Convention of March 22, 1989, must be respected. The business partner shall identify chemicals or other materials that pose a risk to the environment upon release and, where necessary, handle them to ensure safety during handling, transport, storage, usage, recycling, reuse, and disposal. Mercury shall be used in accordance with the prohibitions of the Minamata Convention of October 10, 2013. Persistent organic pollutants shall be managed in compliance with the Stockholm Convention of May 23, 2001, as amended.

The business partner shall avoid or reduce the use and consumption of resources and the generation of all types of waste, including water and energy, to the best of its ability, ideally at the source. This may include modifying production and maintenance processes or internal operations that are not in line with the state of the art, as well as using alternative materials, implementing savings, recycling, or reusing materials.

III. Obligations Related to Business Ethics

Fox4Pets and the business partner are committed to uphold a high standard of business ethics in their collaboration and agree to comply with the following principles:

1. Fair Competition

The laws and regulations governing fair business practices, advertising, and competition must be adhered to, including compliance with antitrust laws. This entails, in particular, that agreements or other actions affecting prices or terms are prohibited in dealings with competitors, as are agreements intended to limit customers' freedom to autonomously determine their resale prices and other terms. All business activities must be conducted with the highest standards of integrity, applying a "zero-tolerance" policy for any form of bribery, corruption, extortion, and/or embezzlement. Compliance with anti-corruption laws is mandatory.

2. Foreign Trade / Import and Export

The business partner must comply with foreign trade, import, export, and sanctions laws and regulations. This includes adherence to German, EU, and U.S. laws and regulations, with respect to U.S. laws only insofar as compliance does not violate applicable German or EU laws.

3. Confidentiality / Data Protection

The protection of private information is a top priority. Laws on data protection and information security, along with regulatory requirements, must be observed in the collection, storage, processing, transmission, and disclosure of personal information.

4. Intellectual Property

Intellectual property rights must be respected. Technology and Know-how shall only be transferred in such a way that intellectual property rights and customer information are protected.

IV. Implementation / Review

Compliance with this Code of Conduct is ensured as follows:

- The business partner shall identify risks within its business operations and take appropriate measures to ensure adherence to this Code of Conduct.
- In the event of a suspected violation, the business partner shall promptly inform Fox4Pets and, upon request, regularly report on any violations, risks, and the measures taken in response.
- Fox4Pets reserves the right to verify compliance with this Code of Conduct at its reasonable discretion. This verification may include the use of questionnaires and audits at the business partner's operating and work sites. The business partner agrees that Fox4Pets is entitled to conduct both regular and specific audits based on particular circumstances. The business partner may object to individual audit measures if they would necessarily infringe upon data protection regulations.
- If a violation of this Code of Conduct is identified, Fox4Pets will inform the business partner in writing, giving the business partner the opportunity to respond and, if necessary, align its business practices with the provisions of this Code of Conduct. If remediation is not possible within a foreseeable timeframe, the business partner must notify Fox4Pets and work jointly to develop a plan, including a timeline, to eliminate or minimize the violation.
- Fox4Pets reserves the right to terminate the business relationship and all contracts if the continuation of the relationship is deemed unreasonable due to violations of this Code of Conduct, taking into account the interests of both parties. This applies particularly if no less severe remedy is available, in cases where a deadline set to address violations has passed without result, in cases of serious culpable violations, or if remedial measures based on a jointly created plan do not yield effective results.
- Specific termination rights under individual framework and specific contracts remain unaffected, as do any claims of Fox4Pets in connection with violations of this Code of Conduct, particularly claims for damages.
