

Code of Conduct

stick lembke

Date: 07.03.2023
Version: 1.1

Contents

- Editorial 3
- I. Scope 3
- II. How is the code of conduct applied correctly? 3
- III. Reporting concerns 4
 - 1. Working conditions 4
 - 1.1. Health and safety 4
 - 1.2. Violence at the workplace 4
 - 1.3. Discrimination and harassment 4
 - 1.4. Data protection 5
 - 2. Human rights, environment and product safety 5
 - 2.1. Human and Labour Rights 5
 - 2.2. Respecting the environment 6
 - 2.3. Product safety 6
 - 3. Conducting business with integrity 6
 - 3.1. Conflict of interests 6
 - 3.2. Preventing corruption and bribery 7
 - 3.3. Competition and anti - trust 7
 - 4. Protecting our company 8
 - 4.1. Intellectual property, confidentiality and other assets 8
 - 4.2. Using communication systems 9
 - 4.3. Communication 9
- IV. Training and sanctions 10

Editorial

As a rule, stick & lembke runs a business with friends for friends. We do not regard this as an empty phrase, but as a daily lived reality. This also applies when business transactions are aimed at achieving an economic advantage. We want fairness and offer a practicable framework for action. Ethically impeccable behavior is our top priority. The following guideline gives all employees an indication of what we want and how we want to ensure this. These guidelines are binding for every employee.

I. Scope

This Code of Conduct (hereinafter referred to as the "Code") describes our principles and guidelines for acting ethically. It is intended to help us make the right decision for the company itself, our stakeholders and also our brand when faced with legal uncertainties and ethical issues. It provides guidance on how to identify, assess and address issues. And it includes safeguards without fear of reporting ethical misconduct.

The Code applies equally to all employees, staff and managers. National laws, other guidelines, contracts, regulations and other rules, such as stick & lembke's procedural instructions or work instructions, as well as these principles of the Code must be respected. Exceptions based on custom are not permitted. Of all applicable regulations, the one that is most suitable for achieving the protective purpose shall always prevail.

Everyone has a duty to read the Code, to comply with it, to provide information to the responsible company representatives in the event of investigations and to report violations. Managers have a special role to play here. They serve as role models and support all employees with questions or concerns about compliance with legal and internal requirements as well as our ethical principles. They promote an open and constant exchange and offer advice and guidance.

II. How is the code of conduct applied correctly?

As our field of activity is very diverse, it is possible that our Code does not cover all laws, regulations or situations regarding ethically correct behavior. Therefore, to behave appropriately nonetheless, we should also use our common sense. We can use the following questions when we are unsure about what behavior would be ethically correct in a situation:

- Is the action in line with the principles of the Code of Conduct?
- Is the action legal and compliant with generally applicable law?
- Is someone's safety at risk or could it cause physical or mental harm to someone?
- How would I have acted in the situation?
- Would it be good if it were reported in the media?
- What would I advise a friend, my parents, or children to do?
- What is my gut feeling? Do I have a bad feeling, should I report the case?

If these questions have not helped in the decision, management should be informed to discuss a decision and the possible way forward

III. Reporting concerns

Respectful and fair treatment of each other promotes the corporate culture and fosters our success. We have a duty to investigate all reports and violations as quickly as possible. That is why anyone who reports a violation can be sure that we will take every case seriously:

- We take every case seriously.
- All reports will be treated confidentially and thoroughly investigated.
- The anonymity of the reporting person, if not involved, will be protected.
- We do not tolerate acts of retaliation against reporting persons.
- Wrongly accused persons are protected.

Requirements of human rights, social and environmental due diligence in the supply chain can be found in the documents of the supplier and service provider agreement (Supplier Code of Conduct).

1. Working conditions

1.1. Health and safety

Our employees are our most valuable asset. Therefore, we are committed to providing a healthy and safe working environment for our employees. Everyone must comply with all occupational health and safety regulations, attend regularly offered training and be aware of emergency plans. All employees are expected to work free from substances (including illegal drugs, alcohol or other controlled substances) that could affect our work. Unsafe working conditions or accidents must be reported immediately to the appropriate person and corrective action taken.

1.2. Violence at the workplace

Violence in the workplace will not be tolerated. Workplace violence includes any incident against the employer, employees, customers, suppliers or other third parties who are insulted, threatened or physically assaulted in a way that explicitly or implicitly endangers their health, safety or well-being. Subject to applicable laws and in order to comply with this policy, employees are prohibited from bringing firearms, other weapons, explosive devices and/or other dangerous materials onto company premises.

1.3. Discrimination and harassment

Discrimination:

In all areas of the company and in all decisions, any form of direct or indirect discrimination is prohibited. Thus, no one may be discriminated against on the basis of age, gender, sexual

orientation, pregnancy, disability, nationality, ethnic origin, skin colour, religion or world view, political conviction, social background or marital status.

Harassment:

Harassment in all its forms is prohibited. Harassment is defined as unwanted conduct of a sexual nature that takes an unwanted verbal, non-verbal or physical form with the purpose or effect of violating the dignity of the person concerned. In particular, when an environment of intimidation, hostility, humiliation, degradation and insult is created.

1.4. Data protection

The protection of personal data as well as data of customers and the individual's right to privacy and integrity are very important to us. We take all reasonable technical and organizational measures to ensure that personal data is protected and processed correctly in accordance with the applicable laws.

Confidential conversations should be conducted in such a way that unauthorized third parties do not gain knowledge of them. This also applies to telephone calls or video conferences with sensitive content.

To protect the right to informational self-determination, it is not permitted to record conversations or to eavesdrop on them using covert listening devices. Recording for information purposes is only permitted with the prior consent of all parties involved.

2. Human rights, environment and product safety

2.1. Human and Labour Rights

As an internationally operating company, we are aware of our influence on the conditions under which people in the supply chain are treated and work. We as stick & lembke expect employees and business partners to respect the fundamental principles and rights at work (according to ILO 1998):

- freedom of association and the effective recognition of the right to collective bargaining
- elimination of all forms of forced and compulsory labour
- effective abolition of child labour
- elimination of discrimination in respect of employment and occupation

We support and respect these principles through our Supplier Code of Conduct, CoC, which is part of our supplier approval process. The CoC forms the basis for upholding labour standards and humane conditions in the supply chain.

2.2. Respecting the environment

We respect the regulations and standards for the protection of the environment and set up appropriate measures and mechanisms. Furthermore, as a company, we set ourselves the goal of making an effective contribution to reducing CO2e emissions. Although this is not always easy, we try to minimize any environmental impact from our business activities as much as possible and continuously expand our activities to protect the climate and the environment.

We want to support climate and environmental protection through a precautionary approach and take initiatives to further strengthen the sense of responsibility of employees as well as suppliers.

The protection of nature and the environment is a major issue for us. That is why we also oblige our business partners to comply with internationally applicable environmental standards. They are required to work continuously on avoiding and reducing environmental pollution, especially greenhouse gas emissions. Applicable regulations and standards for waste management, the handling of chemicals such as pesticides as well as the protection of fresh water and waste water treatment are to be complied with. Special consideration shall be given to the protection and conservation of natural resources.

2.3. Product safety

As a trader of exclusively organic tea, we are aware of our responsibility to supply safe and high-quality products. In addition to constantly ensuring that international, national and customer-specific requirements are met, we are particularly concerned with the responsible use of resources and environmental protection. With our hand-picked teas, we also try to make our packaging more and more sustainable through constant further development. However, as consumer protection always comes first, it may be that product safety takes precedence over sustainability.

3. Conducting business with integrity

3.1. Conflict of interests

All employees are obliged to behave in the best interests of the company within the scope of their work for stick & lembke. In doing so, the decisions made, our capability to make objective decisions for the company, should not be influenced by personal interests or private relationships.

In the event of potential conflicts of interest, the only proper solution is to notify and fully disclose the facts to stick & lembke's management. Should a member of the management find himself or herself in a conflict of interest, the managing partner of stick & lembke will make that decision.

3.2. Preventing corruption and bribery

All stick & lembke employees are responsible for complying with the laws and regulations against bribery and corruption applicable in the countries and regions in which stick & lembke operates.

Bribery is defined as a material or immaterial advantage given to public officials, business partners, customers, or suppliers to influence their decisions and improve one's own economic or personal situation. Tangible benefits may include gifts of money, free or discounted business trips, tickets to events, other gifts of value, loans, discounts, holidays, bonuses, or other extra income. Intangible benefits may include career advancement, the awarding of honorary positions, but also sexual favors.

Gifts or invitations can create the impression that the giver or invitee wishes to gain advantages. It can also damage the reputation of stick & lembke or the person concerned. In case of doubt, the issue should be discussed with the management. Organizational measures are generally taken to prevent irregularities, e.g. the application of the dual control principle and the separation of crucial functions such as decision-making, execution and controlling.

As a matter of principle, every employee of stick & lembke is prohibited from offering, granting, soliciting or accepting benefits from persons, companies or other business partners with whom we work or seek to work together. Exceptions to this are socially appropriate benefits, in other words gifts that are generally customary in business dealings, recognized as a courtesy or favor and therefore accepted as social practices. These include, but are not limited to, promotional gifts, dinner invitations or invitations to sporting or other cultural events within reason. Cash payments, lavish hospitality or events in the red light milieu are not considered socially appropriate. Furthermore, repeated, or regular gifts or invitations should be avoided. The value of promotional gifts should be such that their acceptance does not place the recipient in a position of obligatory dependence or create the appearance of influence (in case of doubt, obtain the decision of the management).

If employees are offered a gift, meal or other invitation, the guidelines described above must be followed and regional practices must be respected. If the return of a gift would offend the giver, or if the circumstances surrounding the gift prevent its return, the employee may accept the gift, but should inform management. If the gift offered is wholly contrary to our principles, the employee should politely decline and explain the company policy.

3.3. Competition and anti - trust

Competition is protected in its freedom and from unfair business acts by various laws at national (Cartel Law - GWB, Law against Restraints of Competition and Fair Trading -UWG, Law against Unfair Competition) and European level as well as by other international guidelines. Stick & lembke is committed to fair competition in compliance with applicable competition and antitrust law.

Employees of stick & lembke are prohibited from the following actions:

- Influencing a customer's freedom of choice by exerting pressure or other undue influence.
- Restrict the freedom of customers or suppliers with regard to pricing or establishing supply relationships with their own customers or suppliers.

Agreements with competitors and concerted practices for the purpose of preventing or restricting competition are prohibited.

In general, the following points may not be discussed with competitors:

- Information about customer relations
- prices, planned price changes, discounts, terms or conditions of sale
- Confidential market information
- Internal calculations, delivery quantities or plans
- Production or sales quotas
- Breakdowns of customers, territories, markets, or product programs

The restrictions apply not only to formal agreements but also to concerted practices and informal exchanges that aim at or bring about a restriction of competition.

When dealing with competitors, it must be ensured that no information is given out or received that would allow conclusions to be drawn about the current or future market behavior of the information provider. If necessary, competitively sensitive information must be anonymized so that the source of the information can no longer be identified and any influence on market developments can be ruled out.

All employees respect existing industrial property rights (patents, trademarks, designs, copyrights, etc.) and will not exercise such rights without authorization.

To comply with all applicable laws, we adhere to the following practices:

- We do not engage in unfair, deceptive, or misleading practices.
- Products and services are always presented in an honest and upright manner.
- Information about competitors is collected, shared, and used only in a lawful and ethical manner.
- Information gathering is not done through theft, trespassing, eavesdropping, computer hacking, invasion of privacy, etc.

In doubt, employees should contact management.

4. Protecting our company

4.1. Intellectual property, confidentiality and other assets

Intellectual property is a valuable asset and contributes significantly to the success of the company. This asset must be protected. Intellectual property of stick & lembke includes all ideas, strategies, processes and trade secrets relating to service providers, customers and suppliers that employees develop during their work or with the help of stick & lembke resources.

All employees should contribute to the protection of this information and keep confidential information concerning the company secret. Also, this information must not be disclosed to unauthorized third parties - including friends and family. Subject to applicable laws, these principles shall be upheld even after termination of employment with stick & lembke. Exceptions apply if:

- written permission has been obtained from stick & lembke
- this information may lawfully be disclosed to the public.
- there is a legal order to disclose this information.

To protect this information, files and data shall be protected from access by unauthorized persons. To this end, passwords shall be used appropriately, updated regularly and not disclosed. It must be ensured at all times that no one can influence data files, not even when the employee leaves the workplace.

All employees are responsible for the assets of the company. All company property supplies and equipment must be protected from damage, destruction and theft and used only for business purposes. Personal use of these assets is only permitted with prior approval. Using assets for personal gain or for purposes unrelated to our business is not permitted. In the event that employees are authorized to dispose of company assets, such actions may only be taken in the interest of the company.

4.2. Using communication systems

Our reputation and brand depend on the behaviour of everyone. With regard to the use of electronic media (email, internet, social media), any improper use for the following purposes and actions is prohibited:

- any kind of illegal purpose
- non-company business for personal gain or profit
- posting, storing, transmitting, downloading, sending libelous, defamatory, pornographic, sexual, or obscene material of any kind
- participating in chain letters
- any action that could discredit the company
- sending anonymous messages or messages under a false name
- sending an unreasonably large number of private emails, or those with large attachments, which could result in interference with the Company's email system;
- participating in a news forum or other discussion groups.
- the use of the business e-mail address for private purposes

Employees who use the company's email system to send private emails agree that these emails will be stored with the company's email correspondence for the time required by law. Private use of telephone and e-mail is generally permitted.

4.3. Communication

All information released to the public or the media must be communicated correctly, transparently, on time, clearly, openly and with equal treatment. It is important to prevent confidential information from being published without prior agreement. If individual opinions are expressed, this should also be clearly communicated. For communication to the public, please forward all requests to the authorised employees (management).

When data, presentations or other information are prepared for distribution to customers, suppliers or the public, the corporate design must be respected regarding the presentation of the company name, logo or other visual elements.

IV. Training and sanctions

All employees share responsibility for upholding our values and the reputation of the company. The basis for this is that all employees receive annual training on this code and all new employees receive training on this code when joining the company.

The obligation to comply with the principles described in this Code arises from generally applicable law, internal instructions, guidelines and regulations of stick & lembke and, as a subsidiary obligation, from the employment contract. Every new employee is handed this Code of Conduct as a contract-accompanying document when signing the contract. Deliberate violations may lead to appropriate disciplinary measures within the framework of applicable labour law.

Kai Lembke

Thorsten Stick