

CODE OF CONDUCT OF THE INFRASERV HÖCHST GROUP

What matters to us



WHERE FUTURE TAKES PLACE

CODE OF CONDUCT
JULY 2025



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WHAT MATTERS TO US

Align your conduct with the seven principles of our value statement.

Infracore GmbH & Co. Höchst KG, including its subsidiaries and affiliates – hereinafter referred to as “Infracore” – is committed to the principles outlined in its value statement: appreciation, responsibility, leading by example, courage, open communication, excellence, focus. These are the principles underlying this Code of Conduct (“Code”).

Follow the spirit and letter of the law and other relevant regulations.

We are committed to following all applicable laws, contractual obligations, and internal company policies and guidelines. This commitment is known as compliance. Violations may have serious legal consequences, inflict severe damage on the company and erode the trust of business partners, shareholders, and the public at large.

Familiarize yourself with the Code of Conduct and the regulations that apply to your job.

This Code defines a binding framework for lawful and ethically responsible conduct at the company. It is not intended to provide a rule for every possible situation. Instead, it serves as a guide to help all employees take sound and appropriate actions and decisions in any circumstance. All employees are expected to familiarize themselves with this Code and with the laws and internal regulations relevant to their role, and to observe them in their daily work. Training courses help them meet this requirement.

We do not tolerate violations of the Code. No supervisor may issue instructions or permit actions that conflict with it. Violators cannot justify their actions by claiming to have acted in the company's interest. No one is exempt from disciplinary measures. Violations may result in disciplinary action, and in some cases, criminal or civil liability.

If you are unsure about your own conduct or become aware of a potential violation of this Code, contact your supervisor or the Chief Compliance Officer promptly. Infracore also has experts available for nearly every topic. Use their knowledge!

We do not tolerate violations of the Code.

Seek advice and assistance from your supervisors or the Chief Compliance Officer.



WE ARE COMMITTED TO FAIR AND ETHICAL LABOR PRACTICES

Zero discrimination.

No one may discriminate against others based on gender, sexual identity, national origin, skin color, nationality, appearance, physical condition, age, religion, disability, or any other reason. We do not tolerate insults or sexual harassment. We treat each other – and third parties – with kindness and respect.

Respect for human rights and environmental due diligence obligations.

We respect human rights and fulfill our environmental responsibilities. We provide access to remedies for individuals whose protected rights may be affected by our business activities.

Shop rules and shop-level agreements govern order within the company.

Order is maintained on the basis of shop-level agreements, including shop rules, which Infracore and all employees are required to follow.



WE FOLLOW SAFETY RULES AND TAKE RESPONSIBILITY

The company and all its employees have equal, shared responsibility for each individual's health and safety. All supervisors are required to instruct, supervise, and support their teams in fulfilling this responsibility. All employees must strictly follow all occupational health and safety regulations (such as regulations issued by statutory accident insurance and prevention institutions as well as Infracore's own safety policies and standards).

Most accidents happen on roads or walkways. Always be mindful of your safety when walking or using stairs and stay alert to potential hazards.

Traffic at Industriepark Höchst is subject to public traffic regulations, especially the German Road Traffic Act. Other sites may have different rules. Make sure you are familiar with the rules and regulations specific to your site.

All vehicles used at the park must be roadworthy and safe for operational use. This includes bicycles and vehicles that are not registered to be operated in public traffic. Industrial park rules must be followed.

Follow health and safety rules and regulations.

Industriepark Höchst is subject to the German Road Traffic Act (StVO) and to the industrial park rules.

WE AVOID RISKS TO PEOPLE AND THE ENVIRONMENT

Infracore acts responsibly to protect health and the environment.

Infracore is committed to the principles of sustainability.

We operate facilities and infrastructure at Industriepark Höchst and other locations in accordance with laws, regulations, technical standards, and internal company policies.

We are committed to the principles of sustainability in our relationships with employees, owners, customers, and the public. These principles include continuously improving our processes and services to meet the environmental goals of the European Union. In our business activities, we pay attention to climate protection, the conservation of natural resources, the efficient use of energy, and the prevention of risks to the environment, safety, and health. We regularly engage recognized independent auditors to certify our compliance with national and international standards and conformity to national and international corporate social responsibility standards in environmental protection, safety, health, quality, fair and ethical labor practices, ethical business practices, and sustainable operations.



All the diligence and precautions in the world cannot completely prevent accidents or incidents such as fires or chemical releases. To prepare for such events, we have developed corporate emergency response plans and coordinated them with the authorities. All employees receive regular training on how to respond appropriately to alarms and are required to report accidents and operational upsets immediately. No employee will face negative consequences for making such a report.

We maintain an open dialog with our neighbors and other stakeholders, collaborate transparently with government agencies, and keep employees and the public informed about our activities and their impact on people and the environment.

Report accidents and incidents immediately.

Infracore engages in open, constructive dialog with neighbors and the public and works in close cooperation with government agencies.

WE PREVENT HARMFUL CONFLICTS OF INTEREST

Infracore has zero tolerance for corruption.

Simple rules prevent conflicts of interest.

Use care in dealings with public officials and buyers.

Gifts and donations require prior approval.

Business activities always involve differing interests. However, decisions made by Infracore must never be improperly influenced by personal interests, especially through any form of corruption. We expect personal integrity from all employees and do not tolerate violations of this principle.

We follow simple rules when handling conflicts of interest: Our relationships with customers, suppliers, and other business partners are based exclusively on quality, performance, and reliability in a competitive market. Infracore does not engage in business involving the granting or acceptance of improper advantages.

No Infracore employee may unlawfully influence the decisions of business partners – or attempt to do so. The standards are particularly strict as they relate to buyers and public officials, including politicians, government employees, staff of public enterprises, and others in public service.

Infracore employees may not request, offer, grant, or accept personal benefits in connection with their professional duties. This includes all payments or non-cash benefits such as gifts, travel, and other personal perks, regardless of their value. Exceptions are only permitted with the prior written approval of the Chief Compliance Officer.

Employees must strictly separate personal and business interests and comply with all legal requirements and internal policies when performing their duties for Infracore. Notify your supervisor immediately if there is even the appearance of a conflict of interest.

Reciprocal business-related hospitality and entertainment are permitted, provided they are appropriate and in line with standard business practices. Supervisors must be informed. Before inviting public officials or buyers, check whether they are permitted to accept the invitation under their own rules.

Invitations without a business purpose – such as to cultural or sporting events, or product and sales presentations – must be approved in advance by the responsible head of the segment, business unit, or central service, or the responsible managing director. The scope of the event must be appropriate and participation in it must not conflict with the basic principles of this Code. Travel and overnight expenses must be submitted for reimbursement as set out in the travel policy. It is not permitted for business partners to cover the costs of travel, overnight stays, or Infracore-hosted events.

Donations are made exclusively within the framework of Infracore's donation program. Individual donations and sponsorships are approved by management. Details are set out in the Donations and Sponsorship Policy.

Employees must separate business and personal interests.

Inform your supervisor about any business-related invitations.

Invitations to cultural or sporting events, or product and sales presentations, require prior approval.

Decisions regarding donations and sponsorships are made by management.

WE VALUE FAIR COMPETITION

Infracore has zero tolerance for violations of antitrust law.

Sharing or disclosing business information may constitute illegal collusion.

We compete based on performance, customer focus, and the quality of our products and services. Antitrust laws prohibit unfair restrictions on competition and the abuse of dominant market positions. Violations could expose Infracore to serious fines, lawsuits for damages, exclusion from public contracts, and reputational damage. Responsible individuals may also face criminal prosecution. Anticompetitive behavior is never acceptable. Infracore employees are required to fully comply with competition law.

Prohibitions apply not only to agreements between competitors (“horizontal”), such as those involving price fixing or market allocation, but also to certain agreements between customers and suppliers (“vertical”), including long-term exclusive arrangements or restrictions that disadvantage third parties.

Even the exchange of information between competitors may be considered illegal under antitrust law if the information could be used to infer the disclosing party’s present or future market conduct. This must be remembered when making unilateral statements or participating in clubs or associations. Internal documents such as pricing, capacity data, or production plans must not be shared with competitors.

The legality of agreements often depends on their duration and the market position of the parties involved: the stronger a competitor’s market dominance, the more likely its actions may be considered abusive. At Industriepark Höchst, Infracore must be particularly vigilant. For example, we may not treat customers differently without valid reason (non-discrimination) or refuse essential services like energy or water.

Because the line between legal and illegal conduct can be case-specific, employees should use the training and resources provided by Legal Affairs, Auditing, Compliance and seek advice whenever in doubt.

Abuse of market dominance is prohibited.

Seek guidance early from Legal, Audit, Compliance.



WE ARE A RELIABLE AND TRUST- WORTHY BUSINESS PARTNER

Reliability, quality, and customer focus build trust with our business partners.

Our business is built for long-term stability, integrity, and growth. We are accessible for our customers and fulfill our contractual obligations reliably.

We carefully safeguard the property and other sensitive assets of our business partners – especially confidential information – that are entrusted to us as part of our business relationship, and protect them from unauthorized access.

Protect confidential information from unauthorized access.

Our competitiveness is rooted in the shared knowledge within our organization. That is why we protect confidential information from unauthorized access by third parties. Knowledge of internal projects and operations remains within the company and is not shared externally. All employees must follow the company's information security policies.

Safeguard our critical infrastructure and sensitive facilities.

Some of our facilities are classified as critical infrastructure or high-risk sites and are of special public interest. We establish measures to ensure their protection and security, including safeguarding the company against hybrid warfare and cybercrime.

Company facilities and equipment may only be used for business purposes and only on company premises. Exceptions require approval under applicable policies (e.g. a removal permit).

Some business purposes require us to collect, process, and use personal data, such as the names and addresses of business partners. Infracore respects privacy rights and ensures responsible use of artificial intelligence. We protect the security and confidentiality of collected data through appropriate technical and organizational measures.

Any Infracore employee who has doubts about a business partner's identity or suspects that assets may be linked to criminal activity or terrorism financing must immediately notify the Chief Compliance Officer. Suspicious transactions may not be carried out without supervisor approval.

We ensure that personal data is handled in a way that respects individual privacy rights.

Exercise caution if you suspect money laundering or terrorism financing.

WE CONTINUE TO EVOLVE AND LEARN FROM EXPERIENCE

Infracore is committed to continuously improving its performance.

Infracore's management system ensures clear responsibilities and continuous oversight.

Infracore is committed to continuously improving processes and corporate performance in order to improve efficiency, profits, customer satisfaction, environmental performance, and energy efficiency. We nurture our employees' potential and provide training tailored to their needs.

Our work involves daily opportunities and risks that affect our business goals. In these cases, we are guided by clear responsibilities and processes for managing our organization. We monitor the suitability, adequacy, and effectiveness of our management system, and continuously improve it. We learn from our mistakes and do better in the future.



We expect every leader to model and promote the values and guidelines outlined in this Code. Leaders should guide their teams in following these guidelines and encourage them to seek advice early and express concerns openly.

Anyone who reports violations of this Code or other relevant regulations is entitled to protection.

Therefore, all employees may report concerns through the whistleblower portal or other channels without fear of retaliation.

Leaders are role models and act as they expect others to act.

Your voice matters.

NOTES

Dear employees,

The success of this Code of Conduct depends on the commitment of each individual. As the senior management team, we invite you to actively live out our shared values and help strengthen them through your everyday actions.

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Dr. Joachim Kreysing


A. H.

Dr. Alexander Wagner

**YOUR DIRECT
CONTACT**

If you have questions about the Code or wish to report a concern, please contact:

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DIGITAL CODE OF CONDUCT



Click here to access the digital version of the Code of Conduct on our website.



Click here to view the internal version on the MIKA intranet.

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