



 **ESCHENBACH**
CORPORATE CODE OF CONDUCT

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Everyday ethics in professional business.

Although the male form was chosen in the text for reasons of readability, the information always refers to members of all genders.

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Table of Contents

Our purpose and our corporate values	6
Our conduct	10
Principles of conduct in the business environment	
Compliance with applicable legislation	10
Fair competition	10
Prevention of corruption	11
Dealings with public officials	11
Relationships with business partners	12
Product quality and product safety	13
Process safety and reliability	14
Conflicts of interest	14
Financial integrity	15
Public image and communication	15
Conduct towards colleagues	
Mutual trust and respect	17
Open communication	17
Occupational health and safety	19
Anti-discrimination	19
Diversity	20
Human rights	20
Welfare of employees	21
Human resource development	21
Managing information	
Protection of intellectual property	23
Business secrets	23
Data protection	25
Protection of company property	27
Protection of the environment and climate	29
Corporate Code of Conduct contact persons	30
Eschenbach Integrity Line	33

Dear Colleagues,

This Corporate Code of Conduct is a common guideline for our decisions and sets out binding minimum standards for responsible behaviour towards third parties, as well as for our conduct and our social interaction within the company. This Code is also intended to help identify legal risks and to avoid infringements of the law.

Reliability, professionalism and responsible behaviour are standards that our company strives to uphold. We are committed to compliance with the law in all our corporate actions. Integrity and lawful conduct towards employees and colleagues as well as all business partners and external third parties are an integral part of the Eschenbach Group's value culture and serve to protect the company. The Code of Conduct presented here specifies our principles of conduct and applies to all Eschenbach companies worldwide.

Behaviour is contagious. Each and every one of us plays an important role in ensuring compliance with laws and internal regulations. We are all obliged to comply with the principles laid down in this Corporate Code of Conduct. We are convinced that observance of these central values is becoming increasingly important in our everyday work and we thank you for making your contribution through the integrity of your personal conduct.

Your Executive Board



Dr. Peter Braunhofer



Matthias Anke







Purpose of Eschenbach

Why do we do what we do?

Eschenbach Optik's mission is to improve people's quality and enjoyment of life through optical products. Our products offer the best possible combination of design and function on the highest level of innovation. In addition, our offered services are based on our key competence and many years of industry knowledge.

How we achieve our mission

We offer a portfolio of brands and a range of reliable products and services for every consumer segment under the roof of one competent and experienced brand with a long history



DIVISION EYEWEAR

- ≡ We develop contemporary stylish products that function without compromise.
- ≡ We develop the best products in the dimensions of face-to-fit design, ergonomic comfort and durability.
- ≡ We sell collections that meet the taste of many consumers and can therefore be offered at fair prices at a high level of craftsmanship.

DIVISION OPTICS

- ≡ We offer with our analog and digital product range of the Optics Division individual solutions for special visual tasks – especially where the glasses are no longer sufficient for a user.
- ≡ We achieve global market leadership in the optics and optometry sector thanks to the highest level of innovation in the industry. Our market position is sustainably strengthened through in-house developments and high competence. This enables us to achieve the best consumer-relevant functionality and quality in combination with an excellent design.



Our corporate values

PROFESSIONALISM

Professionalism is our goal in all areas of activity. This includes the reliable and outcome-oriented management of our business processes, as well as a proactive entrepreneurial mindset on the part of our employees in the interest of all company stakeholders.

COMPETENCE

Eschenbach is a highly **competent** business partner. We work with enthusiasm and passion to ensure not only our own success, but also the success of our customers. We look back on more than a century of experience and incorporate this knowledge not only into each individual product but also into each of our partnerships. We strive for the best possible quality, design and **ever-increasing competence** in our products as well as our services.

FAIRNESS AND TRANSPARENCY

We make every effort to be **fair and transparent** towards all employees and stakeholders and to apply our guidelines consistently. For decades, our entire organisation has been characterised by **fair** competitive behaviour and business processes that are based on integrity and **transparency**.

We are convinced that internal and external relationships can only be fruitful over the long term when they are based on mutual trust, **fairness** and **transparency**. This is reflected in the implementation of the Eschenbach Integrity Line, the intelligent optimisation of processes and the integration of new digital possibilities to create added value within our partnerships.

RELIABILITY AND CONTINUITY

Our products are **reliable** everyday companions and are designed to increase people's happiness. We strive constantly to be absolutely **reliable** and **continuously** innovative and future-oriented towards our employees and business partners.

Continuity in relationships has a high economic and human value for us. We wish to build long-term business relationships based on **reliability** and trust.

QUALITY OF LIFE AND ENVIRONMENT

Our mission is to improve people's **quality of life** through our products.
To achieve this, we work and think creatively, proactively and in an outcome-oriented manner.

We aim to keep our impact on the **environment** as low as possible through sustainable solutions.



Our conduct

PRINCIPLES OF CONDUCT IN THE BUSINESS ENVIRONMENT

COMPLIANCE WITH APPLICABLE LAW

We comply with applicable law – both national and international.

- ≡ We consider compliance with all applicable domestic laws and regulations to be a fundamental principle of economically responsible activity – both at national and international level. Any infringement of applicable laws or regulations can have serious consequences, such as criminal prosecution, payment of damages or loss of reputation.
- ≡ All managerial staff are obliged to be aware of the basic laws, regulations, contracts and internal company rules (e.g. guidelines, company directives, work and process instructions, etc.) relevant to their area of responsibility and to implement them accordingly.
- ≡ In cases where there is any doubt about the legal appropriateness of a decision, an expert or one of the contact persons listed at the end of this Code must be consulted.

FAIR COMPETITION

We are committed to complying with applicable competition law.

- ≡ Relationships and agreements with competitors, suppliers, distributors and dealers that impair fair competition are prohibited by law in almost all countries. This includes, for example, price fixing and customer sharing as well as other unfair competitive practices. We are committed to fair competition and follow these laws and regulations.

PREVENTION OF CORRUPTION

Zero tolerance – we condemn all forms of corruption.

- ≡ All forms of bribery and corruption are prohibited in the Eschenbach Group. We do not offer or accept bribes. Corruption and anti-trust violations threaten our success factors and are not tolerated. We do not conduct business transactions at any price.
- ≡ Benefits (e.g. invitations, advertising) and/or gifts may only be accepted or granted where they serve a legitimate business purpose and are not accepted or granted in return for an unlawful advantage. The benefits or gifts must not be of an unreasonably high value and must not disproportionately exceed the limits of usual business practice.
- ≡ Requests for donations or sponsorship should be handled with care. Careful consideration must be given to such requests to ensure that these are not a covert attempt at bribery.

DEALING WITH PUBLIC OFFICIALS

We maintain correct and legally compliant relationships with all government and supervisory authorities and public officials.

- ≡ Business relationships with government bodies are often subject to particularly strict requirements. In our dealings with governments and public authorities, we always act openly, transparently and in accordance with applicable law. No gratuities or benefits are given to public officials.

RELATIONSHIPS WITH BUSINESS PARTNERS

We always act with integrity in our business relationships.

- ≡ Our business partners expect to be able to rely on the Eschenbach Group as a business partner that acts in compliance with the law. This also requires that we understand our contractual obligations towards our business partners.
- ≡ We also take care to ensure that our business partners, too, comply with the law in their business practices. We expect our business partners to be aware of this Code and to comply with it. Any person or organisation that does not share the principles of this Code of Conduct cannot be a business partner for us.
- ≡ National and international laws regulate imports and exports, domestic trade and capital and payment transactions. We take appropriate measures to ensure that transactions with third parties do not infringe relevant economic embargoes or regulations that govern trade, import and export controls or that combat the financing of terrorism.



PRODUCT QUALITY AND PRODUCT SAFETY

We develop and manufacture safe and reliable products and services of a consistently high quality for our customers.

- ≡ Our products and services must not have any functional or quality defects, nor hazardous materials that are not clearly labelled or explicit guidance about potentially unsafe uses.
- ≡ Our products are therefore developed in a process that is assessed and monitored by a strict quality management system (see also the section "Process safety and reliability"). We naturally ensure compliance with international and national standards such as the European Medical Device Regulation and the German Medical Device Act.
- ≡ We monitor our products during the production process, as well as after they have been placed on the market. We carefully evaluate all market feedback on potential quality defects and act promptly where necessary. We report potential safety problems immediately to the responsible authorities and take the necessary measures to ensure the safety of our products.



PROCESS SAFETY AND RELIABILITY

Professionalism is our goal in all areas of activity.

- ≡ This requires the reliable and outcome-oriented management of our business processes, as well as a proactive entrepreneurial mindset on the part of our employees working in the interest of our external and internal customers.
- ≡ In order to continuously improve in this area, we work according to a certified quality management system, which is monitored in annual external audits.
- ≡ We are committed to the principles of quality management, such as absolute customer orientation, the role model function and responsibility of management and fact-based decision-making. Of course, we also make effective use of important and helpful tools such as the PDCA cycle, internal and external audits and management reviews based on economic and key performance indicators.

CONFLICTS OF INTEREST

We are open about conflicts of interest and resolve them as swiftly as possible.

- ≡ We respect the personal interests and private lives of our employees. However, the personal or financial interests of individuals must not influence their business decisions.
- ≡ We avoid situations in which individuals' own personal interests conflict with the interests of the company or of our business partners. If such conflicts of interest nevertheless exist, we disclose them and seek a solution that does not harm the interests of our company.
- ≡ We strive to foster a culture that rewards hard work and achievement and results in a meritocratic management structure. Nepotism, which is the act of giving patronage or showing favoritism on the basis of a family relationship (such as the awarding of jobs to family members) and it can damage a business by affecting employee morale and discouraging achievement. We are committed to preventing nepotism in the workplace. Family members of existing employees will not be hired or promoted without the specific authorization of the management to ensure that all such decisions are merit-based and in the best interests of the company.
- ≡ Conflicts of interest may arise where, for example, employees have a stake in competing companies, are a member of the Board of Directors of another company, or have personal connections with business partners.

FINANCIAL INTEGRITY

We conduct our business and financial reporting in a proper manner.

- ≡ All business transactions and (accounting) records of our company must be kept correctly and appropriately. We record and document all business transactions, assets and liabilities in accordance with legal requirements.
- ≡ Maintaining the integrity of documentation and record keeping requires the highest standards of accuracy, completeness and accountability in all business processes.
- ≡ Financial accounts and documents must not knowingly contain false or misleading entries. All types of balance sheet manipulation are prohibited.

PUBLIC IMAGE AND COMMUNICATION

We protect the reputation of our company in the personal sphere.

- ≡ We respect the right to freedom of expression and the protection of personal rights and privacy. All employees should be aware that they may also be seen in the private sphere as part of and representatives of the Eschenbach Group and are therefore asked to protect the reputation and standing of the company through their conduct and activities in public. This also applies in the area of social media.





CONDUCT TOWARDS COLLEAGUES

MUTUAL TRUST AND RESPECT

We treat each other in a mutually respectful and trusting manner.

- ≡ Every individual is entitled to fair and respectful treatment. We are committed to equal opportunities and work to promote a workplace characterised by mutual respect and tolerance, and in which each employee is treated with courtesy and dignity. Harassment, bullying and intimidation are not accepted.
- ≡ We lead by example and show our colleagues and employees trust and mutual respect. We require all staff to respect the achievements and experiences of each person. This ensures that the individual pursuit of achievement and success serves everyone and is not at the expense of others. At the same time, it guarantees humanity and consideration within a company that is committed to success.

OPEN COMMUNICATION

We encourage our employees to discuss issues openly and free of the fear of negative consequences.

- ≡ The open discussion of concerns plays a key role in reducing the incidence of misconduct and/or ensuring that it is detected and corrected at an early stage. We therefore attach great importance to an open work environment in which employees can confidently raise issues or voice criticism with their supervisor, management or the other Code of Conduct contact persons.
- ≡ Attempts at intimidation and reprisals against employees who report actual or suspected misconduct in good faith will not be tolerated. 'In good faith' means that the employee believes that what they are asserting is true, whether or not this is confirmed by subsequent investigation of the matter.



OCCUPATIONAL HEALTH AND SAFETY

Ensuring fair working conditions and protecting the health of our employees are integral parts of our corporate culture.

- ≡ The health and safety of our employees are corporate objectives that are just as important as the quality of our products and economic success.
- ≡ We provide a healthy and safe working environment for our employees by complying with all applicable occupational health and safety laws and standards. Managers are obliged to instruct their employees regarding relevant occupational health and safety regulations and will receive effective support from our safety officers.
- ≡ We comply with the statutory regulations on fair working conditions, including those governing remuneration and working hours. We condemn forced and child labour and all forms of exploitation or discrimination and strictly comply with applicable laws.

ANTI-DISCRIMINATION

Discrimination is not tolerated.

- ≡ We do not tolerate discrimination against employees or applicants for employment on the grounds of ethnic origin, nationality, gender, marital or parental status, age, disability, religion or belief, sexual orientation or any other inappropriate grounds. Personal insults and sexual harassment will not be tolerated.

DIVERSITY

We live a culture of diversity and inclusion.

- ≡ We are committed to fostering, cultivating and preserving a culture of diversity and inclusion. We recognize that in order to serve the increasingly diverse consumers of today and tomorrow we will need an organization that reflects the same diversity. As such, we strive to ensure that our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations; and leadership development are built on the premise of diversity equity. Any employees found to have exhibited any behavior that is contrary to the success of others on the basis of gender, age, ethnicity, religion or any other unique characteristic may be subject to disciplinary action.

HUMAN RIGHTS

Respect for human rights forms an integral part of our corporate responsibility.

- ≡ We respect the dignity and individual rights of our employees and third parties with whom we have business relations. We promote the upholding of internationally recognised human rights.
- ≡ We are committed to ethical and socially responsible standards with regard to society and the environment. As a socially conscious company, we take specific measures to implement ethical and socially responsible business and corporate practices in our supply chains.



WELFARE OF EMPLOYEES

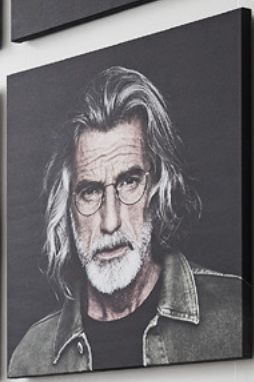
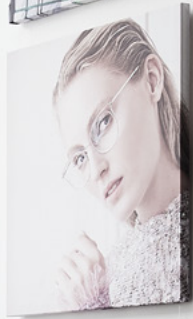
The success and welfare of employees is a paramount value for us.

- ≡ We succeed in the realization of our mission when our stakeholders' interests are aligned and we achieve success together. As such, Eschenbach considers the success and welfare of employees as a paramount contributor to the overall success of the company. Without our dedicated employees, we would not be able to support the livelihood of our channel partners and bring value and quality of life to our customers.

HUMAN RESOURCE DEVELOPMENT

We support our employees in their professional and personal development.

- ≡ We encourage and support all our employees in their personal development and professional training. We are also committed to the training of young professionals. We use our mistakes to improve ourselves.
- ≡ Professionalism is an important corporate value for us. We therefore coordinate the qualifications of our staff with the needs of our organisation and ensure the best possible induction, in-service and on-the-job training.



MANAGING INFORMATION

PROTECTION OF INTELLECTUAL PROPERTY

We respect and protect all forms of intellectual property.

- ≡ The protection of intellectual property is of particular importance to us. The intellectual property of our company represents a competitive advantage and therefore a valuable asset that we defend against unauthorised access by third parties.
- ≡ Protected intellectual property includes all products of the human mind, including brands and patents, product design and product development, individual software and innovative solutions with regard to materials and components. In particular, as a licensee, we respect the intellectual property of third parties at all times.

BUSINESS SECRETS

We protect our business secrets.

- ≡ We comply with relevant local and/or international laws and rules and take all necessary steps to appropriately protect confidential information and business documents from access and inspection by unconnected third parties.





DATA PROTECTION

We protect all personal data.

- ≡ When we process (e.g. collect, record, store, adapt or modify, transmit, delete or destroy) personal data (e.g. names, addresses, dates of birth) of employees, customers or third parties, we do so with great care and strict confidentiality in compliance with applicable law.
- ≡ Personnel involved in the processing of personal data receive advice and support from the responsible data protection coordinators and/or our external data protection officer.
- ≡ In our day-to-day business we use IT systems and we process data on a regular basis. This requires appropriate data security measures to ensure the protection of personal data. Failure to comply with necessary data security measures can have serious consequences, such as data loss, data theft or the infringement of the personal rights of employees, customers or other third parties.
- ≡ Since digital information can be disseminated and reproduced quickly and is therefore almost indestructible in practice, we take great care to protect such content through suitable technical and organisational measures.
- ≡ We commit ourselves to using the company's IT systems primarily for business purposes.
- ≡ The data security measures taken by our company are anchored in a separate Data Privacy Concept.
- ≡ We observe the general principles of data protection and the essential legal requirements that are laid down in a Data Privacy Guideline.
- ≡ The company has a Data Privacy Policy which aims, in particular, to protect the rights of employees and to ensure that all data processing procedures comply with data protection regulations.



PROTECTION OF COMPANY PROPERTY

We deal with company property and other assets of the company responsibly.

- ≡ We use the property and resources of the company carefully and appropriately and protect it from loss, theft or misuse.
- ≡ We attach particular importance to the responsible handling of all types of company property, such as products, work materials and intellectual property.
- ≡ We use the tangible and intangible company assets solely for official purposes and not for personal purposes unless this is explicitly permitted.





ESCHENBACH

PROTECTION OF THE ENVIRONMENT AND CLIMATE

We keep the impact on the environment and climate as low as possible in all areas of the company.

- ≡ Sustainable environmental and climate protection and resource efficiency are important corporate objectives for us. Both in the development of new products and services and in our day-to-day business, we ensure that all impact on the environment and climate is minimised.
- ≡ In the area of energy management, we are working systematically to reduce our energy consumption and we maintain a certified energy management system.
- ≡ Each employee has a responsibility to treat natural resources with care and to contribute to the protection of the environment and climate through their individual conduct.



Your Code of Conduct contact persons

Ask us. Tell us.

Concerns about workplace conduct can often be resolved through constructive dialogue between the relevant parties or with local contact persons. However, certain matters – particularly those involving illegal business practices – may be better raised outside the local workplace.

Employees who in good faith raise concerns about actual or suspected misconduct must not suffer any negative consequences as a result. Employees who have experienced such negative consequences are asked to contact our Compliance Officer.

COMPLIANCE CONTACT PERSON

If you are unable or unwilling to raise your concerns with any of the contacts listed below, or if you do not find adequate support there, you can always contact our Compliance Officer. He or she will be happy to assist you in issues relating to the Code of Conduct. Whenever information about violations of the Code of Conduct is received, we ensure maximum confidentiality and compliance with data protection regulations.

Ellen Scholze

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CONTACT PERSONS IN YOUR IMMEDIATE ENVIRONMENT

Effective cooperation based on trust is reflected in honest and open mutual support and information. You can contact individuals in your immediate working environment to ask questions about the Code of Conduct or to report violations of the Code.

These are ➤ Your Area/Department Manager

➤ Your Human Resources Department

➤ Your Branch Manager

➤ Your Executive Board

➤ Your Data Privacy Officer

as well as

➤ Your Data Protection Coordinators



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ESCHENBACH INTEGRITY LINE

SPEAK UP!

An anonymous BKMS® whistleblower system is also available for reporting material violations of the Code of Conduct – in particular, illegal business practices. This system has been set up in German and English and allows for confidential dialogue and is secured by special encryption:

WWW.BKMS-SYSTEM.COM/ESCHENBACH-GROUP



ESCHENBACH – YOUR COMPETENCE PARTNER

ANY OTHER QUESTIONS? WE'LL PROVIDE YOU WITH THE ANSWER.



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