

VIEGA CODE OF CONDUCT

viega



COMPLIANCE – HIGH STANDARDS FOR SUSTAINABLE SUCCESS.

Dear employee,

The term „compliance“ is ubiquitous in business life today. Compliance refers to a company's obligation to adhere to existing laws and rules set by legislators and supervisory authorities and to ensure their observance with appropriate measures. This also includes rules that a company and its owners impose on themselves.

Compliance plays an important role for us: On the one hand, domestic and foreign legislators, authorities and insurers, banks, customers and suppliers place high demands on us in terms of compliance. On the other hand, we at Viega have also always attached great importance to compliance with the law as well as fulfilling our own rules and our high ethical standards as a family business. Of course, all requirements can only be met if everyone at Viega pulls together – and if, in addition, the organization is set up accordingly to enable or facilitate our compliance with all rules. We are consistently committed to this.

The basis for this is formed by our Viega values, which can only be lived if we behave according to the law and the rules.

This Code of Conduct gives you a good overview of what we pay particular attention to in compliance and which rules are decisive for us – also in our dealings with each other and with others. It is binding for every single employee.

We expect you to familiarise yourself with our Code of Conduct and to actively support us in its implementation in the future.

Best wishes,



Walter Viegener Anna Viegener Franz Viegener Claus Holst-Gydesen



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01

OUR RESPONSIBILITY FOR COMPLIANCE.

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Compliance encompasses more than just adherence to laws and rules. These are merely minimum requirements. Compliance must be seen as a process, and this process only works if we all constantly check it for suitability, up-to-datedness, and adherence.

It is therefore the responsibility of all of us to familiarise ourselves with the contents of this Code of Conduct, to incorporate it into our conduct, and to take it into account when making decisions. Failure to comply with the guidelines set out in this Code of Conduct can have negative consequences, both for Viega and for individual employees or business partners. The Code of Conduct is therefore binding for all employees, managers, and shareholders – we do not tolerate violations.

At Viega, we leave no one alone with the continuous examination of our compliance culture. The Chief Compliance Officer is available to answer any questions. In addition, he conducts training sessions at regular intervals and provides e-learnings on the topic of compliance to convey important content to employees, raise their awareness and thus ensure proper compliance with the regulations.

We inform new employees about the contents of our Code of Conduct in training courses and during the onboarding process.

In addition to processing tips, the Chief Compliance Officer develops and coordinates compliance activities at Viega and supports the management and executives in implementing compliance measures.

Please do not hesitate to contact the Chief Compliance Officer if you have any questions.



02

THE VIEGA VALUES.

The basis for compliance are the Viega values. Respect, trust, responsibility, courage, and clear goals promote compliant behaviour. On the other hand, the values are only actually fulfilled and lived if everyone behaves by the law and the rules. Compliance is the basis for values-oriented behaviour. Behaviour that does not comply with the law violates the values.

A common understanding of values – a corporate culture that is supported by everyone – is the fundamental basis. Our Viega values are the foundation that gives us orientation and acts as a signpost.

Our values are in line with our purpose: „Installing the lifelines for the buildings of tomorrow“. We reliably shape the future – and are always committed to the highest quality.

03

OUR SOCIAL RESPONSIBILITY.

a. Human rights

We are aware of the great importance of fundamental human rights. We respect, protect, and promote the applicable regulations for the protection of human and children's rights as fundamental and universally applicable guidelines. We condemn child labour and reject any kind of forced labour or work under unfair or unsafe conditions. We respect the minimum age for the employment of children and prohibit activities that endanger their health and safety.

In particular, we base our approach on the following standards and frameworks:

- United Nations Universal Declaration of Human Rights (UN-UDHR)
- Conventions and recommendations of the International Labour Organisation (ILO) on labour and social standards
- Principles of the United Nations Global Compact (UNGC)
- German Supply Chain Act (LkSG)

In addition, we comply with local laws wherever we operate.

We also expect our business partners to act by the law and our principles. In this context, it is important to us that human rights are also respected in our supply chains. We, therefore, select our suppliers carefully and take all necessary measures to minimize any human rights risks or prevent them from arising.

b. Anti-discrimination

We are committed to prohibiting or taking firm action against any form of discrimination. We do not tolerate discrimination – neither based on skin colour, gender, age, nationality, political or religious conviction, social or ethnic origin, disability, or sexual orientation.

We attach great importance to respectful interaction. Harassment of a physical, sexual, psychological, or verbal nature shall not be tolerated and shall result in consequences under service or labour law.



c. Sustainability

As a traditional family business, the sustainability of our actions is particularly important to us. We want to improve the standard of living of today's generation without curtailing the ability of future generations to improve their standard of living. This principle requires a long-term perspective when making important decisions.

Our sustainability strategy is aligned with the 17 Sustainable Development Goals of the United Nations. Three focal points form the focus of our sustainability activities:

1. Our products and solutions empower our customers to live more sustainably.
2. We continuously reduce our consumption of energy and resources to protect the environment and the climate in particular.
3. We report transparently and regularly on our results and integrate sustainability goals into our corporate actions.

With our sustainability efforts, we are pursuing a concrete goal: Viega shall become climate-neutral by 2035. We consider responsibility as the key to success and are taking the path together with all employees. We create positive incentives for this, are binding in our commitments, and promote a joint exchange on this.

We are committed to contributing to environmental and climate protection and to taking a precautionary approach to all business activities concerning their environmental and climate impact. In doing so, we comply with all applicable national and international environmental laws and regulations and hold all necessary permits and/or licences.

04

OUR RESPONSIBILITY AS A BUSINESS PARTNER.

a. Integrity in business transactions

At Viega, we observe the strict separation of the private interests of the individual and the interests of the company. This includes making decisions about company matters objectively and free from influence by purely private interests, and always disclosing possible conflicts of interest to the relevant manager.

b. Anti-corruption

Corruption is a social problem in many industries and countries. Corruption and bribery are also morally wrong and prohibited by law in most countries. We are convinced that employee performance and product quality are crucial for business success and therefore strictly reject corruption and bribery. It is in the interest of Viega to reject any kind of bribery or dishonest granting of advantages, whether directly or indirectly, in the private sector or in the government sector, and to sensitize employees and business partners to this. This applies both to benefits from employees to business partners and those from business partners to our employees.

Particular caution is required when dealing with public officials or elected representatives, e.g. civil servants, judges, notaries, and persons who are in an official relationship under public law or who perform public administration tasks. Even small donations are not permitted here. In addition to bribery, the acceptance and granting of benefits are also punishable.

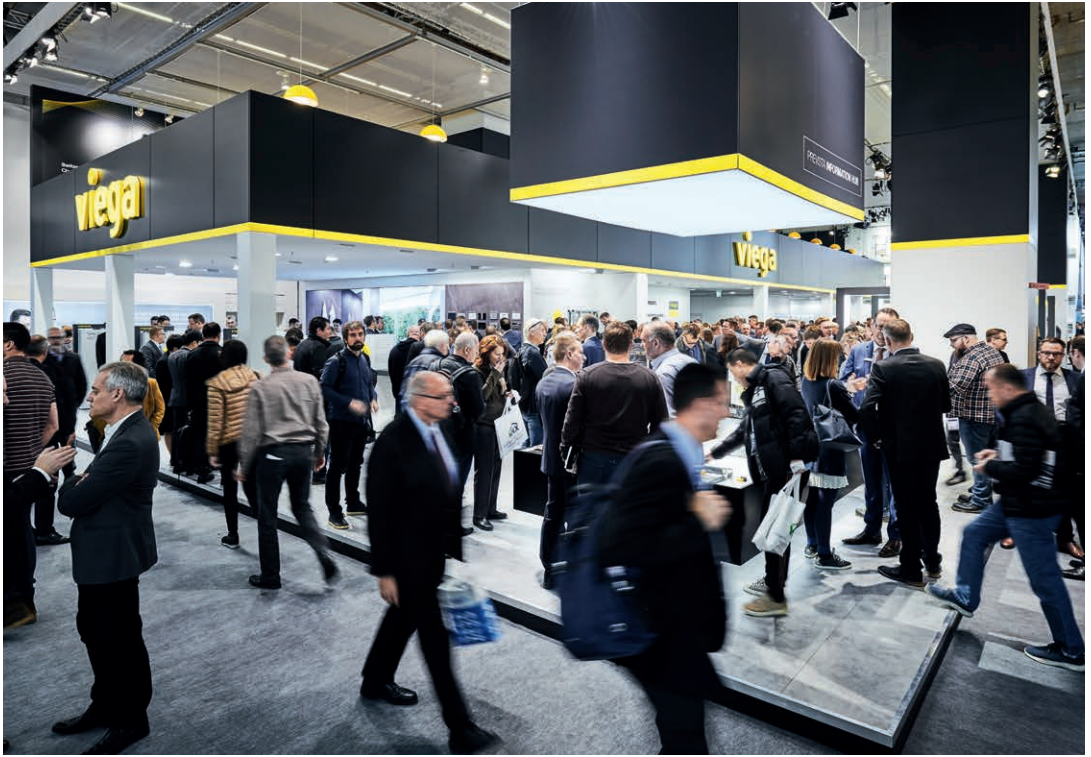
All employees are responsible for ensuring that all anti-bribery and anti-corruption laws are complied with. This commitment includes the expectation that each individual shall behave according to applicable laws and Viega's Compliance Guidelines. Bribery is not a mean for us to win a contract. We would rather forego business and achieve internal goals than violate the law. Each individual is required to inform himself/herself about Viega's compliance regulations and, in cases of

doubt or suspicion, to contact the Chief Compliance Officer according to these regulations.

c. Fairness in competition

We are expressly committed to fair competition and compliance with applicable antitrust and competition laws. We are in constant exchange and contact with customers and partners. However, the exchange and cooperation between representatives of competing companies or with customers may under no circumstances lead to the restriction or even exclusion of regular and fair competition.

Therefore, the exchange of strategic information, as well as concerted practices with competitors regarding market or customer allocation or comparable unfair practices, are prohibited. Strategic information includes but is not limited to, prices, customer lists, production figures, sales figures, concrete quantities and turnover, capacities, quality, marketing plans, investments, or technologies. Third parties must also not be induced to provide us with confidential information about competitors.



d. Product Compliance

Our products and services are characterized by their outstanding quality, following our principle „Viega. Connected in quality.“ The basis for this is compliance with laws, directives, and specific standards. We are constantly developing, producing, and optimizing our products per these regulations.

Due to our participation in trade associations and committees, we always have our finger on the pulse. In the context of product compliance, we consider not only the requirements of the regulations that apply to us but also the requirements of our international customers. As a globally active company, we must identify and analyse the internationally binding regulatory requirements and to incorporate the resulting requirements into our processes – from the holistic system to the smallest material component. For this purpose, we have established the „Product Compliance Circle“ to specifically examine aspects relevant to product liability and to take any necessary measures quickly and reliably. The Product Compliance Circle as well as the Product Compliance Officer are available as contact persons, e.g., if you become aware of non-compliant behaviour in our product area.

e. Foreign trade and tax Compliance

As the Viega Group, we are subject to foreign trade, tax, and customs law, among other things. We are committed to complying with the applicable laws and fulfilling the corresponding legal obligations. In this context, entrepreneurial activities, planning, and decision-making are also carefully followed up and checked from a tax and customs law perspective.

We ensure that there is no unauthorized reduction of duties and taxes. We fully comply with our obligations to cooperate and declare.

We undertake to comply with trade bans, embargoes, and other restrictions on the international movement of payments and goods.

We have established processes to comply with all tax and customs regulations. These processes are part of a tax compliance management system and are regularly reviewed and adjusted as necessary.

05

OUR RESPONSIBILITY IN THE WORKPLACE.

a. Protection of know-how and business assets

Viega owns extensive trade and business secrets, as well as technical know-how. Such confidential information is the basis of Viega's business success. It is therefore in the interest and responsibility of all employees that this confidential information is not disclosed to unauthorized third parties. This also applies beyond the termination of the employment relationship.

The fair competition also includes the protection of intellectual property and respect for the trade and business secrets of others. We shall not use or disclose such confidential information without the permission of the rights holder.

b. Health protection and occupational safety

Viega is aware of its responsibility to its employees. A safe working environment for all employees worldwide is a central concern here. This includes, in particular, promoting the health of employees and minimizing risks for employees by ensuring a high standard of occupational safety.

We ensure that the national and international regulations for occupational health and safety applicable at the place of employment are complied with. We also constantly strive to improve and further develop working conditions. Furthermore, we ensure that:

- employees are instructed in particular in general safety regulations, emergency measures, and safe machine operation;
- a safe working environment exists, and, in addition, measures are taken to contain workplace hazards;
- necessary protective equipment is provided, and its use is explained.

c. Documentation (accounting)

To ensure the company's success, employees make business decisions based on a responsible, commercially sensible, comprehensible weighing of benefits and risks, and appropriately document this.

Every individual is also aware that documentation that meets the legal requirements also contributes to the protection of business assets. In particular, clear, comprehensible and, last but not least, complete document and file management is indispensable for this. Circumstances relevant to accounting must be documented completely and correctly, as well as transparently following internal guidelines.

The destruction of documents takes place exclusively by the law and internal guidelines. Destroying documents to withdraw them from the knowledge of authorities or public bodies is prohibited.

d. Information security

We are aware of the challenges of the information society and the opportunities and risks associated with digitalization. The protection of business secrets is a high priority for us. We treat our business secrets and those of our business partners confidentially and do not pass on confidential information to unauthorized third parties.

We are committed to protecting our information and the information that is entrusted to us. In doing so, we strive to actively support information security and implement the rules in our business. Our managers have a special responsibility to raise awareness among their employees and to ensure and enforce compliance with the company's rules.

Information technology is an important foundation for Viega's business activities. We are aware of possible security risks. Therefore, we use our e-mail accounts,



the Internet, and other information systems responsibly and have established measures to prevent cyber-attacks.

e. Data protection

The internationally increasing regulation of data protection with simultaneous increasing networking of business processes, e.g., through cloud services and division of labour across organizations, poses challenges for many companies. Viega overcomes these challenges through forward-looking action and cross-process risk management. We attach great importance to the secure and legally compliant transfer of personal data and strive to achieve the implemented, European level of data protection at an international level as well.

We are convinced that everyone has a right to privacy and respect it accordingly. We strive to process personal data only for the purposes for which we collected it, to prevent unauthorized persons from transmitting and learning about it, and to carry out international transfers by the applicable rules of European legislation.

f. Dealing with social media

We are aware of the importance of social media – and we also use various channels. Only employees authorized by Viega must be allowed to make and publish official statements. In addition, employees always express their personal opinions, for which they are fundamentally responsible. They should, of course, treat each other politely and respectfully. Competitors, colleagues, or other persons are not negatively highlighted, and the opinions of others are respected.

In addition, we also pay attention to legally compliant handling in social media. Data protection rights are considered in the same way as competition and trademark rights as well as copyrights and personal rights to images, photos, texts, videos, etc. Information requiring confidentiality is also treated confidentially here. We observe the internal instructions for dealing with social media.

06

SUPPORT AND WHISTLE-BLOWING SYSTEM.

If you have discovered vulnerabilities or other circumstances that could lead or have already led to legal or compliance violations, please contact:

- your leader,
- the management,
- the Chief Compliance Officer or
- use the electronic reporting portal.

Information and the identity of whistleblowers are treated confidentially during the examination and processing. This does not apply if the whistleblowers expressly agree to the disclosure of their identity or if a law, a judicial or official decision requires the disclosure of the identity of the whistleblower or the information. Viega assures whistleblowers that in case of an anonymous report, no steps shall be taken to identify the whistleblower.

Please also note the information on the reporting system on our Compliance intranet page „Compliance@Viega“.

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