



**CIAG
CODE OF CONDUCT**

Scope of application:

Constantia Industries

Version 2.0 – February 2026

For internal and external use

Approved by:

Two handwritten signatures in blue ink. The signature on the left is for Erfried Taurer, and the signature on the right is for Johannes Liechtenstein. A horizontal line is drawn across the signatures.

Erfried Taurer (CEO)

Johannes Liechtenstein (CFO)

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1. Introduction & Purpose

Constantia Industries AG is a globally operating group that currently consists of the three group companies FunderMax, Isovolta and Icotec, each of which in turn owns a number of subsidiaries. Due to its international activities, the Constantia Industries Group is subject to a wide range of social, political and legal frameworks that must be observed. Violations of these frameworks, in particular those that interfere with the legal order of a country or supranational law, may cause considerable financial disadvantages to our company and sustainably damage the reputation of the company and the entire Group.

This Code of Conduct ("Code of Conduct" or "Code") forms the basis for all business activities and decisions of the Constantia Industries Group. It is the basis for morally, ethically and legally impeccable behaviour of all employees of our company and describes the fundamental values, principles and standards of conduct that define and guide our company. It serves as an orientation framework for how we act, communicate and decide – both in day-to-day business and in complex or critical situations.

Our goal is to create a working environment characterized by trust, integrity and a sense of responsibility. All employees and managers contribute to respecting and actively living the standards set out in this Code. By complying with these rules, we not only protect the reputation and interests of the company, but also promote respectful and sustainable cooperation. Through the lived example of each individual, it shall be an essential part of our corporate culture.

In the event of a violation of statutory provisions, internal policies, rules and instructions or provisions of this Code of Conduct, disciplinary consequences are to be expected. In addition, violations may also result in criminal and civil law consequences for the individual concerned, such as fines or claims for damages.

This Code of Conduct is updated, if necessary, by resolution of the Management Board of Constantia Industries and, if required, supplemented by specific guidelines, which may also apply only to certain countries or regions.

2.Values, Vision & Corporate Identity

In accordance with our corporate vision, we see ourselves as a company built on trust, honesty, transparency, loyalty, respect and responsibility. Trust for us means that we trust our employees and believe in their ability to act with integrity even in difficult situations. Honesty means always acting honestly and openly and making decisions according to moral principles. We create transparency by ensuring that our actions and decisions are comprehensible and free of hidden motives. We demonstrate loyalty through our commitment to our company – especially in difficult situations. Respect is shown in how we treat one another as well as in our behaviour toward customers, partners and society. Responsibility is reflected in how we use resources, how we protect the environment, and how we ensure the safety and well-being of our employees.

3.Scope & Binding Effect

This Code applies to all employees of the Constantia Industries Group, regardless of their position, employment relationship or place of assignment. External specialists, consultants, interns, as well as contractually bound business partners and suppliers are also encouraged to comply with the standards described herein.

The Constantia Industries Group includes all companies in which Constantia Industries AG directly or indirectly holds at least 50% of the shares or otherwise exercises control. All other companies in which Constantia Industries AG directly or indirectly holds at least 25% without exercising control are provided with the Code with the request to give it effect through independent acknowledgment within their corporate decision-making structures.

The binding nature of the Code is beyond question: any deviation may entail legal, organizational or disciplinary consequences. The Code supplements national and supranational legislation and internal guidelines without replacing them.

4.Principles of Responsible Conduct & Implementation

We always make decisions with the greatest possible care, transparency and traceability. Every action must comply with applicable laws and be consistent with this Code. Responsible conduct means identifying risks at an early stage, addressing them openly and actively

minimizing them. We act professionally and in the interest of the company – and not in the interest of individual persons.

Each individual employee is responsible for compliance with and implementation of the Code.

Managers of the Group must lead by example through lived practice in implementing the contents of the Code. They must also instruct employees in dealing with the Code, monitor compliance and, if necessary, provide training with the support of the responsible internal bodies.

In interpreting the rules of the Code, employees should also be guided by common sense and consider whether, based on reasonable ethical and moral standards, a specific course of action could give rise to criticism. In doing so, particular consideration must be given to the values to which we have committed ourselves in our corporate vision. Country-specific standards and practices must also be taken into account. Where statutory norms, requirements or prohibitions apply, there is no scope for discretion.

In the event of questions or uncertainties, every employee may contact their supervisor, the responsible HR and Legal departments, as well as executive management, Group Human Resources or the Group Management Board at any time. In matters of dispute and interpretation, the Group Management Board is the highest authority for binding interpretation of the Code after the respective executive management.

5. Legal Compliance & Governance Structures

We consistently comply with all relevant legal requirements, including labour law, commercial and tax law, antitrust and competition law, environmental, emissions and waste regulations, data protection laws as well as import and export regulations. To ensure compliance with these obligations, we have established clear governance structures that define responsibilities, control mechanisms and escalation paths. Regular internal audits, risk assessments and compliance measures are an integral part of our corporate governance.

All employees are required to comprehensively inform themselves about the laws, other regulations and internal policies applicable to their respective areas of responsibility and, in cases of doubt, to contact the responsible internal bodies.

6. Human Rights, Labour Rights & Social Responsibility

We respect human dignity and are committed to complying with international human rights standards. This includes the clear rejection of child labour, forced or compulsory labour and any form of exploitation. Fair working conditions and appropriate remuneration are a matter of course for us. Employees have the right to participation and protection from discrimination. We promote social responsibility within our company and along our entire value chain.

7. Integrity, Ethical Conduct & Conflict Prevention

Our company expects loyal and ethically correct behaviour at all times. Manipulation, deception or the deliberate misleading of colleagues, managers, customers or authorities contradict our principles. We cultivate a working environment in which constructive criticism is possible and conflicts are resolved objectively and fairly. Employees should address problematic situations at an early stage and involve appropriate internal bodies.

8. Working Culture, Diversity & Inclusion

Based on the UN Charter and the European Convention on Human Rights, human rights are regarded as fundamental values that must be respected and observed by all employees.

We attach great importance to a working culture that promotes diversity and respects people regardless of gender, origin, religion, physical disability, age, sexual orientation or political views. Discrimination, harassment or bullying have no place in our company. We create conditions that enable every employee to develop their potential and feel safe and valued.

Sexual harassment in any form, for example through overt advances, degrading comments, jokes, obscene expressions, suggestive gestures or the display of relevant images in the company's business and production facilities, is expressly prohibited. Such behaviour may be classified as harassment even if it was not intended in this form.

9. Health, Safety & Well-being

The safety of our employees is our top priority. We expect strict compliance with all safety regulations as well as active participation in measures to prevent accidents and health risks. This includes regular safety briefings, the wearing of appropriate protective equipment and the immediate reporting of potential hazards. We also promote mental and physical well-being through preventive health programmes and safe working conditions.

10. Environment & Sustainability

We handle natural resources responsibly and invest in measures that reduce our environmental impact. This includes reducing emissions, efficient use of energy, the use of sustainable materials where possible, as well as optimizing our waste and recycling processes.

11. Quality Management & Product Safety

We apply the highest standards to our products and services. Compliance with all relevant norms and standards is a matter of course for us. We document our work steps in a transparent manner and carry out regular quality checks. Deviations or errors are reported immediately in order to initiate corrective measures as quickly as possible.

12. Information Security, Data Protection & Cybersecurity

The security of data and information is a central component of our business activities. We protect personal data as well as confidential company information. We expect secure passwords, regular updating of access credentials and responsible use of digital systems. Cyber risks must be identified, reported and actively defended against. Data protection breaches must be reported immediately and are consistently investigated.

Hardware must always be stored appropriately and protected by password security within the scope of technical possibilities. Only the data immediately required may be carried on business trips. Personal passwords must not be passed on to other employees or third parties. Clear and demonstrable arrangements must be made for replacements. If company-related data is stolen or cannot be located, immediate notification must be made to the respective supervisor.

If electronic data is affected, passwords must be blocked or other suitable measures taken immediately in coordination with the responsible IT department.

13. Use of Company Assets & Trade Secrets

All employees are responsible for careful handling of the resources entrusted to us. These include machinery, IT systems, materials, financial resources as well as intangible assets such as brands, know-how or intellectual property. Any form of misuse, waste or theft is strictly pursued. Trade secrets, in particular research and development processes, acquisition strategies or acquisition targets, as well as key figures subject to confidentiality, regardless of the source of information, must be treated confidentially and must not be disclosed without authorization.

Confidential information of any kind obtained in the course of professional activity – including information outside one's own area of responsibility – may neither be used for the pursuit of one's own interests nor made available for the interests of third parties.

Company information of any kind must always be stored securely and protected against inspection or access by third parties.

This obligation also applies to information in which contractual partners of the Constantia Industries Group have a confidentiality interest, in particular if a corresponding confidentiality agreement has been concluded.

14. Business Relationships, Suppliers & Third-Party Risk Management

We select our business partners carefully. We expect them to adhere to the same ethical, social and environmental standards that we apply ourselves. Regular audits, compliance inquiries and risk analyses form an important basis for our cooperation. We reserve the right to terminate business relationships if fundamental values are violated.

15. Fair Competition

We are committed to fair and transparent behaviour in the market. Any restriction of free competition and violations of competition and antitrust law are not compatible with the corporate philosophy and culture, as well as with the corporate vision of our company.

We are aware that violations of national or international antitrust regulations can have serious consequences for the Constantia Industries Group and the employees concerned.

In particular, they may result in high fines and claims for damages and, in some countries, even imprisonment. Oral agreements and coordinated conduct are punished in the same way as written agreements.

In the course of business activities, employees must in particular comply with the following rules of conduct:

- Agreements of any kind with competitors on business matters are prohibited, especially agreements aimed at or resulting in the fixing of prices or production capacities, the allocation of markets or customers or the boycott of a customer or other market participants;
- unfair business practices or immoral pressure on intermediaries in order to distribute products at a certain price are prohibited;
- Agreements or understandings to submit sham offers are prohibited;
- Employees of the Constantia Industries Group are prohibited from discussing confidential matters such as prices and sales conditions, costs, production capacities, inventory levels or similarly confidential information relating to the shared competitive market during discussions and contacts with competitors;
- Activities in associations and participation in association meetings constitute an important basis for representing the interests of industry and business groups within the scope of national and international legislation. However, when working in associations, employees of the Constantia Industries Group must also observe the principles and rules of conduct described above and act in compliance with antitrust law. If they become aware of antitrust violations by other participants in such bodies or at the margins of such association events, they must immediately withdraw from these bodies and associations and inform their supervisor.

16. Anti-Corruption, Anti-Bribery & Anti-Money Laundering

Any form of corruption or bribery is strictly prohibited in our company. We do not accept any impermissible gifts or invitations and do not offer any benefits that could influence business decisions. Financial transactions must be transparent and verifiable. Unclear or suspicious payments must be reported immediately.

Employees are therefore strictly prohibited from directly or indirectly offering or accepting advantages if this is intended to improperly influence business transactions or could even create such an impression. Advantages may include gifts, invitations, purchasing opportunities on non-market terms, interest-free loans, etc. Gifts to public officials that exceed the applicable country-specific thresholds (where defined) are in any case impermissible. Acceptance of gifts by employees of the Constantia Industries Group is prohibited. The only exceptions are occasional gifts of low value and hospitality within the scope of customary business practices. All other gifts must be rejected or returned and the supervisor must be informed.

Offering or accepting money or monetary benefits is under no circumstances permitted.

17. International Business Activities, Sanctions & Export Controls

In international business activities, we ensure compliance with all export control and sanctions regulations. Before entering new markets or exporting products, we ensure that no legal restrictions exist and that all necessary approvals have been obtained.

18. Financial Integrity, Accounting & Documentation

Correct, transparent and complete accounting is indispensable for us. Financial reports must reflect the truth and must not be manipulated or falsified. Off-book accounts or other intransparent financial structures contradict our principles and are prohibited.

19. Communication, Media, Social Media & Reputation Protection

We communicate clearly, respectfully and professionally – internally and externally. Official statements to the media are made exclusively by authorized persons. All oral and written statements and press releases that affect the interests of the Constantia Industries Group or

individual affiliated companies are issued exclusively via the respective Management Boards, Managing Directors or communication managers.

On social media, we ensure that no confidential information is disclosed and always behave in a manner that corresponds to the values of the company.

20. Digital Responsibility & Use of AI

We use digital technologies responsibly. The use of automated systems or artificial intelligence takes place transparently and comprehensibly. Discriminatory or unethical algorithmic decisions are prevented through appropriate control mechanisms. Critical human decisions must never be completely replaced by AI processes.

21. Conflicts of Interest & Incompatibilities

Employees must avoid situations in which personal economic interests could influence their business decisions. Secondary activities, relationships with business partners or private investments related to the company must be fully disclosed and may be subject to review.

The Constantia Industries Group obliges its employees to deal transparently with such matters. Every employee is required to fully and unsolicitedly disclose existing or potential conflicts of interest before commencing employment with the Constantia Industries Group or, if such conflicts of interest arise or become evident during the employment relationship, immediately to the respective supervisor and the HR department and, if necessary, to apply for a specific approval.

Conflicts of interest may arise in particular in connection with the following aspects:

- secondary activities may conflict with duties in the Constantia Industries Group or lead to a conflict of interest and therefore require prior written approval in all cases; this also applies to participation in supervisory or advisory boards of non-company or non-group companies;
- economic involvement in competitors or business partners of the Constantia Industries Group, in particular customers or suppliers – with the exception of minor shareholdings in listed companies within the scope of normal asset management – requires prior

written approval in all cases; shareholdings held by close relatives in the aforementioned companies must be demonstrably disclosed to the respective supervisor;

- close relatives include the spouse or partner of the employee, their parents, siblings and children as well as other persons who have lived in the same household as the employee for at least one year;
- transactions with business partners of the Constantia Industries Group in which persons involved in the business decisions on the side of the business partners or the direct negotiating partners are close relatives must likewise be reported in a timely manner before conclusion of a contract;
- conflicts of interest may also arise from family relationships between employees who work in the same department and must therefore be disclosed to the supervisor.

22. Whistleblowing, Reporting Systems & Protection against Retaliation

We promote a culture in which misconduct can be addressed openly and safely. Employees have the opportunity to report violations anonymously, confidentially and without fear of consequences. All reports are carefully examined, documented and handled according to transparent standards.

If employees become aware of violations of the Code, other internal policies or legal provisions, they are free to report them. The following options are available:

- first, notification to the direct supervisor; or
- notification to the responsible Legal or HR department; or
- notification to the management of the respective Group company; or
- notification to the Group Management Board; or
- reporting via the whistleblower system, which is currently available via the intranet in all European Group companies.

To facilitate clarification, it is helpful for employees to identify themselves when making a report, whereby confidentiality regarding their person is guaranteed upon request in any case. The whistleblower system also allows anonymous reporting upon request. To promote open and trusting communication, it is expressly stated that employees who report identified

violations of laws, this Code or other internal policies or regulations will not suffer any negative consequences of any kind. This also applies to other persons who contribute important information to the investigation of such misconduct.

However, the Constantia Industries Group expressly reserves the right to take disciplinary action against employees who deliberately or through gross negligence make false accusations.

23. Investigations, Sanctions & Disciplinary Measures

Violations of the Code may, depending on their severity, result in disciplinary measures, employment law consequences or criminal proceedings. Investigations are conducted objectively and confidentially. The company is committed to a fair procedure that takes into account both the rights of the persons concerned and the protection of the reporting parties.

24. Compliance Organization & Responsibilities

Responsibility for the implementation of this Code does not lie solely with company management, but with all employees. Managers have a special role model function and support their teams in understanding and implementing the requirements. Compliance officers, data protection officers (where required by law) and internal audit bodies ensure that monitoring and control mechanisms function effectively.

25. Training, Education & Continuous Improvement

Regular training sensitizes employees to ethical, legal and safety-related topics. Our training concepts are continuously developed in order to meet new legal requirements and technological developments. The Code itself is reviewed at regular intervals and updated if necessary.

26. Final Provisions

The Code of Conduct is a central component of our corporate culture. It describes how we work and what we stand for. Compliance creates trust – among employees, partners, customers and society. By adhering to this Code, we secure not only economic success but also the sustainable and responsible future of our company.

This document may also be used in external communication with customers and suppliers.