

A photograph of a meeting room with several people seated around a table. In the foreground, a woman with long dark hair is seen from the side, looking down at a notebook. Other people are visible in the background, some looking at laptops. A whiteboard is mounted on the wall. The image has a blue tint and a semi-transparent dark overlay. The text 'casadevall group' is written in white, lowercase letters across the middle of the image.

casadevall group

Code of Business Conduct
for Employees and
Contractors

Casadevall Group

Code of Business Conduct for Employees and Contractors

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Introduction

Casadevall Group is committed to operating with the highest ethical standards, fostering a culture of integrity, respect and trust. This Code of Business Conduct (our “Code”) is our shared commitment to operating with unwavering professionalism and earning the trust of our colleagues, customers and partners every day. It serves as our moral and ethical compass, outlining the principles that guide our behavior and ensuring a culture of accountability, and professionalism across all aspects of our business.

Scope

This Code applies to all employees, contractors, and representatives of Casadevall Group worldwide. This code sets out mandatory standards of conduct in compliance with applicable laws, regulations, and best practices, serving as a foundation for ethical business practices throughout the organization.

Key principles

Integrity and compliance

We conduct our business honestly, fairly, and in full compliance with all applicable legal and regulatory requirements. If you are unsure about a legal or ethical issue, it is your responsibility to seek guidance before acting.

Employees must complete mandatory compliance training annually.

Conflicts of interest

Please refer to our Casadevall Group Anti-Corruption and Bribery Policy for details on conflict of interest.

Respect and inclusion

We value diversity and foster an inclusive work environment where everyone is treated with dignity and respect. We believe that diverse teams drive better results.

Collaboration and open communication are encouraged to promote a positive workplace culture.

We have a zero-tolerance policy for harassment, discrimination, or bullying of any kind.

Confidentiality and data privacy

We protect all confidential and proprietary information entrusted to us and use it solely for legitimate business purposes, adhering to applicable data privacy regulations.

Employees must follow company-approved tools and processes for handling sensitive data.

Casadevall Group is committed to protecting the privacy and security of employee personal data in accordance with applicable data protection laws and regulations such as the GDPR. Personal information will be collected, processed, and stored only for legitimate business purposes and handled with confidentiality.

Anti-bribery and fair competition

Bribery, corruption, or any unethical influence is strictly prohibited. We compete fairly and responsibly, respecting all relevant laws and ethical standards.

Any form of bribe, whether offered or received, must be rejected and immediately reported to Raul Casadevall, CEO. Please refer to our Anti-Corruption and Anti-Bribery Policy.

Adequate wage

Casadevall Group believes that fair compensation is fundamental to human dignity and to the long-term resilience of our business and supply chain. We define wages as the total compensation, comprising base pay and any legally mandated or contractually agreed benefits and allowances, paid by an employer in exchange for work performed during standard working hours.

We are committed to ensuring that all employees and contractors are paid at least the applicable statutory minimum wage, and we work toward wages that meet an adequate, or living, standard; a level of compensation sufficient to cover the basic needs of workers and their families, including food, housing, healthcare, education, and a discretionary margin for unforeseen circumstances.

Where a gap is identified between the statutory minimum wage and a recognized adequate wage benchmark for the country or region in which we operate, we assess the gap and work with relevant stakeholders, including suppliers and contractors, toward closing it over time.

This commitment extends across our own workforce and our wider supply chain. We expect suppliers and contractors engaged by Casadevall Group to pay their workers' wages that meet or exceed applicable legal requirements and to support the objective of an adequate wage throughout their own operations.

All wages must be paid regularly, in full, and on time, with pay slips or equivalent documentation that clearly set out the basis for calculation. Deductions from wages will only be made in accordance with applicable law or with the informed consent of the employee, and never as a disciplinary sanction. We recognize employees' and workers' rights to freedom of association and collective bargaining as an important complement to our wage commitments.

Please refer to our Material Standard and Responsible Sourcing Policy for further detail on how adequate wage expectations are assessed and monitored across our supply chain, and to our Employee Handbook for information on equal pay and benefits applicable to Casadevall Group employees.

Sustainability and responsibility

We are committed to responsible sourcing, minimizing environmental and climate impact, and promoting social responsibility throughout our operations.

This includes upholding human rights within our supply chain and engaging positively with the communities in which we operate.

Please refer to our material standard and responsible sourcing policy for further detail on how we assess, select and monitor the materials and suppliers we work with, and to our Climate Policy and Resource and Waste management Policy for our environmental commitments.

Anti-trafficking and modern slavery policy

Our commitment to operational excellence is inseparable from our dedication to high ethical standards. In accordance with ILO standards and all relevant local and international laws, Casadevall Group maintains a zero-tolerance mandate regarding human trafficking and modern slavery in all forms. This policy applies to all employees, contractors, suppliers, and business partners.

We are committed to regular training, audits, and transparent reporting to uphold this policy and address any violations promptly. We encourage all stakeholders to report concerns without fear of retaliation, and we guarantee protection for whistleblowers.

Health, safety, and well-being

The health and safety of our employees, contractors, and visitors are our highest priorities. We strive to maintain safe working conditions and support overall well-being. We recognize the importance of mental health and are committed to fostering a work environment that supports our employees' holistic well-being.

Compliance with the Health and Safety Policy is mandatory for all employees, contractors, visitors and other individuals present at our sites or involved with our operations

Reporting and accountability

All employees are encouraged and expected to report any concerns or violations of this Code without fear of retaliation. Any act of retaliation against an individual who makes a report in good faith is a serious violation of this code and will not be tolerated.

Casadevall Group is committed to addressing reports promptly and fairly, ensuring accountability at all levels. Reports can be made to your manager or the respective department in the local company or through the global whistleblower channels accessible in local languages, at our global **Casadevall Group Whistle blower channel**.

By adhering to this Code of Conduct, Casadevall Group reinforces its dedication to ethical excellence and sustainable business practices that benefit all stakeholders.

Consequences for violations

Violating this code can have serious consequences. Depending on the nature of the violation, disciplinary action may range from a verbal or written warning up to and including termination of employment. Furthermore, certain violations may result in civil or criminal legal proceedings.

Policy revisions and governance

The Code of Conduct may be reviewed and updated periodically to remain aligned with evolving knowledge on good business conduct and regulatory frameworks. Questions or requests for clarification can be directed to the owner of this policy.

Public policies

For more details on Casadevall Group's publicly accessible policies, including our approaches to greenhouse gas emissions reduction, stakeholder health and safety, and anti-corruption and bribery, please visit:

- Casadevall Group Climate Policy
- Casadevall Group Resource and Waste Management Policy
- Casadevall Group Material Standard and Responsible Sourcing Policy
- Casadevall Group Health and Safety Policy
- Casadevall Group Code of Business Conduct for Employees and Contractors
- Casadevall Group Anti-Corruption and Bribery Policy
- Casadevall Group Global Inclusion and Belonging Policy
- Casadevall Group Responsible Marketing Standard
- Casadevall Group Whistleblower Policy

Policy owner

This policy is owned by Helene Liebst von Obelitz, Head of Sustainability and Creative Transformation and approved by Raul Casadevall, CEO.

Inquiries pertaining to our policies, actions and targets for the group should be send to Helene Liebst von Obelitz, Head of Sustainability and Creative Transformation, helene@casadevallgroup.com

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Approved by: Helene Liebst von Obelitz, Head of Sustainability and Creative Transformation and Raul Casadevall, CEO