

DIE ZUKUNFT IM BLICK

Code of Conduct



PREAMBLE

Carl Götz GmbH looks back on a long tradition in the timber trade and is proud to be an important player in the industry. We have always endeavoured not only to offer high-quality products, but also to create a corporate culture based on integrity, respect, fairness and sustainability.

The Carl Goetz Group, i.e. Carl Goetz GmbH together with its affiliated companies ("Goetz"), bears a special responsibility with regard to responsible, ethical and lawful conduct. As a family-owned company, ecologically and socially responsible corporate governance is not a legal requirement for us, but a matter of course anchored in our corporate culture.

This Code of Conduct serves as a guide for all employees, suppliers, partners and stakeholders to define the fundamental values and principles by which we act and work at Carl Götz GmbH. It reflects our commitment to ethical behavior, social responsibility and sustainable business practices.

This is not just a document that disappears into drawers, but a vital concept that accompanies and guides us every day. We encourage each of you to understand and adopt the guidelines contained therein and to take them into account in your daily actions. It is only through joint efforts and adherence to these principles that we can strengthen the trust of our customers and business partners and be successful in the long term.

We firmly believe that the success of a company should be measured not only by financial metrics, but also by its contribution to society and its ability to create long-term value and promote sustainable business practices.

This code commits us to incorporating these values in all our business activities and ensuring that all employees, suppliers, partners and stakeholders are aware of their importance and act accordingly. Our commitment to integrity, fairness and sustainability is at the centre of everything we do and forms the foundation of our success.



THIS CODE OF CONDUCT APPLIES TO

Carl Götz GmbH (Head Office)
Otto-Renner-Str. 15
89231 Neu-Ulm

and our other locations

1. Carl Götz GmbH, Hagenring 7, D-72119 Ammerbuch-Altingen, Germany
2. Carl Götz GmbH, Benzstrasse 1, D-96052 Bamberg, Germany
3. Carl Götz GmbH, Am Werbering 2, D-85551 Kirchheim-Heimstetten, Germany
4. Carl Götz GmbH, Graf-Stauffenberg-Strasse 16, D-06618 Naumburg, Germany
5. Carl Götz GmbH, Bahnhofstrasse 12, D-97855 Triefenstein-Trennfeld, Germany
6. Carl Götz GmbH, Hombergstrasse 181, D-32049 Herford-Falkendiek, Germany
7. Carl Götz GmbH, Eichenstrasse 9, D-78256 Steisslingen, Germany
8. Andreas Popp, Carl Götz GmbH, Am Jahnsbacher Berg 7, D-09392 Auerbach, Germany
9. Andreas Popp, Carl Götz GmbH, Gummistrasse 15, D-95326 Kulmbach, Germany
10. Stadelbauer Holzhandels GmbH, Industriegebiet West 4, In der Spöck 3, D-77656 Offenburg, Germany
11. Holz Sturm, Carl Götz GmbH, Julius-Probst-Strasse 10, D-87600 Kaufbeuren, Germany
12. Steinhauser Holzhandls GmbH, Stolzenseeweg1 18, D-88353 Kisslegg, Germany



INTEGRITY AND HONESTY

THE CORNERSTONES OF OUR SUCCESS AT CARL GÖTZ

We are committed to conducting our business with the utmost integrity and honesty at all times. This means that we adhere to moral and ethical principles and comply with the laws and regulations relevant to our business in all our actions. We expect all employees to behave honestly and with integrity towards customers, suppliers and colleagues.

In the Götz family, integrity and honesty are always at the centre of our actions. As a company, we know that these values are not only the foundations of our corporate culture, but also the core of our success.

For us, integrity means always acting in accordance with the highest ethical standards, regardless of external influences or temptations. It is about being transparent and honest, both with our customers and with our employees and business partners. We keep our promises and treat each other fairly and respectfully.

Honesty is another indispensable value in our company philosophy. We communicate clearly as well as openly and do not turn a blind eye to challenges or mistakes. When we make mistakes, we own up to them, learn from them and do everything we can to do better next time.

This openness creates trust and strengthens our relationships with customers and suppliers. Our customers rely on the fact that they not only receive high-quality products from Götz, but also honest advice and reliable service. We take our responsibility seriously to fulfil the expectations and support them in the best possible way - and we do this with integrity and honesty.

These values are also important to us when dealing with our employees. We strive to create a working environment in which everyone is free to express their opinions and in which fairness and respect are emphasised. We believe that satisfied and motivated employees are the basis for the long-term success of a company.

Integrity and honesty are not just promises at Goetz, but values that we live by and that drive us every day. They are the foundations of our success and the guarantee for long-term and trusting co-operation with our customers and partners.



RESPECT FOR CUSTOMERS AND EMPLOYEES

WE ARE COMMITTED TO RESPECTFUL INTERACTION
WITH ONE ANOTHER

Our employees are the bedrock of the success of the Goetz Group. For their strengths to unfold, we create a working environment that fosters this appreciation and promotes integrity.

We do not tolerate discrimination or harassment. Regardless of age, origin, gender or race, what counts for us is performance and cooperative behaviour. Regardless of political or trade union involvement, religion, physical constitution or sexual identity, we assess work results objectively. For this reason, slander, intimidation, threats and accusations are not tolerated. Fairness, respect, team spirit and openness characterise cooperation with superiors, colleagues and employees.

These principles also apply to our behaviour towards external partners. We respect and promote employee rights and pursue a partnership-based and solution-orientated approach with employee representatives. Working at Götz means having confidence in the power of one's own performance, treating others with respect and being a role model through excellent work results.



QUALITY AND SUSTAINABILITY

WE ARE COMMITTED TO SUSTAINABLE
ENTREPRENEURSHIP

The quality of our products is at the very centre of our approach to business. We are committed to promoting sustainable forestry practices and ensure that the wood products we purchase come from legal and ethical sources. We strive to minimise the environmental impact of our activities and use our resources efficiently.

Götz is committed to the common good and the idea of sustainability. These fundamental principles characterise our actions from an ecological, social and economic point of view. Our more than 75-year history shows that Götz does not rely on short-term success. Natural resources should be protected, materials saved and waste reduced. In order to reduce the consumption of raw materials as well as energy and to limit emissions, sensible options for process optimisation are being exploited. Our infrastructure is established and operated exclusively within the framework of the respective legal authorisation requirements.

Goetz has also set itself the goal of not only preventing human rights and environmental risks in its own business area, but also ensuring this with business partners through strict selection procedures as well as control mechanisms and preventive measures.

For this reason, ecological and social criteria alongside economic aspects are also taken into account when selecting business partners. Anyone who violates environmental regulations and human rights, does not provide employees with fair and healthy working conditions, e.g. exploits employees, permits child or forced labor, disregards the freedom of association of employees and their right to collective bargaining, does not ensure appropriate wages and fair working conditions, or moves in legal gray areas in this regard or deliberately violates legal requirements, will not be accepted by us as a business partner. Likewise, we will not accept such violations in our own business area and will remedy them immediately.

Götz complies with health and safety legislation and works together with its employees to ensure a healthy and safe working environment. The health of our employees is in the best interests of each individual as well as the company. Occupational health and safety specialists support management in the prevention of illnesses and accidents. The relevant occupational safety regulations must be complied with. Every employee shares responsibility for safety in their area and the safety of their colleagues.



TRANSPARENCY AND OPENNESS

WE ARE COMMITTED TO TRANSPARENT REPORTING

We are transparent in our business practices and communications. Customers and employees have the right to clear and complete information about our products, prices, delivery conditions and terms and conditions. We strive for open and honest communication and are prepared to answer questions and concerns of our customers and employees appropriately.

Our partners trust that we will only provide them with truthful information about the business performance, results and prospects of the company. Among these are customers, business partners, banks, rating agencies, employees and financial authorities. The correctness of our accounting, records and financial reporting are the benchmark of our credibility. Internal control systems appropriately document key business processes and ensure that accounting-relevant information on business transactions is recorded completely and correctly.

Complete, clear and comprehensible document and file management is therefore a matter of course for us. Records and files must be kept in such a way that auditors and tax authorities can trace their system and contents at any time. Our processes are so transparent and structured that other employees can always continue them. Legal or internal retention obligations must be complied with. Documents relating to official or legal proceedings must not be destroyed. All documentation must be formally correct and consistent in terms of content so that it can be presented to third parties if necessary.



RESPONSIBLE PROCUREMENT

WE ARE COMMITTED TO THE OBSERVANCE OF FOREIGN TRADE LAW

We attach great importance to ensuring that the wood products we purchase come from legal and ethically irreproachable sources. We only work with suppliers who are also committed to sustainable and responsible practices. We strictly reject the purchase of wood products from illegal or unethical sources and are committed to ensuring that the entire supply chain meets the highest standards.

Götz respects all national and international customs laws as well as foreign trade, anti-terror and embargo regulations. We support the efforts of the international community to combat international terrorism and to prevent the production and proliferation of chemical, biological and nuclear weapons. All employees are obligated to comply with the restrictions and bans on foreign and domestic trade of certain goods, technologies or services.

Trade bans and restrictions under international embargoes and the international fight against terrorism, which may also affect capital and payment transactions, must be observed. If doubts about the permitted use or transfer of our products cannot be resolved, the transaction must be waived.



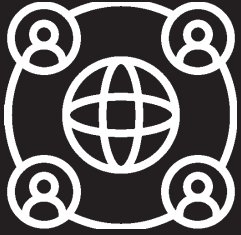
CONFIDENTIAL INFORMATION

Protecting the privacy of our customers, employees and other affected parties is our top priority. We undertake to treat personal data confidentially and to use it only for legitimate business purposes. We comply with all applicable data protection laws and implement appropriate security measures to ensure the integrity and confidentiality of the data.

We safeguard confidential information of our company and respect the confidential information of others. Confidential information constitutes information that is not or not yet published. Such information includes business secrets, research and development work, technical specifications, patents and personal data as well as all information that is expressly designated as confidential.

The continued success of Götz relies on the use of confidential information and keeping it secret from third parties. Unless required by law or authorised by management, employees must not disclose or permit the disclosure of confidential information. This obligation shall also apply after the termination of the employment relationship with Götz.

Götz respects the efforts of third parties to protect their confidential information. In the same way, employees protect confidential information that they have gained knowledge of during previous employment.



FAIR WORKING CONDITIONS

We do not tolerate child labour.

We do not employ any staff under the age of 15. No person under the age of 18 will be assigned to dangerous or heavy work, unless training is provided under approved national laws and regulations. [If applicable] Persons between the ages of 13 and 15 shall only be permitted to do light work and the employment shall not interfere with schooling or be detrimental to the health or development of the children. Particularly where children are subject to compulsory schooling, they shall only work outside school hours during normal working time.

The certificate holder prohibits the worst forms of child labour.

We do not accept any form of forced or compulsory labour, in particular:

physical and sexual violence

debt bondage

withholding of wages/including the payment of labour fees and/or

the payment of a deposit to obtain employment

restriction of the freedom of movement / mobility of the employee

retention of passport and/or identity documents threat of denuncia-

tion to the authorities Employment relationships are voluntary and

based on mutual consent, without threat of punishment.

We ensure that employment and professional practices are not discriminatory.

We respect the freedom of association and the effective right to collective bargaining

Employees can organise or join workers' organisations of their own choice.

The certificate holder (as well as any affiliated sites in Germany) respects the full freedom of workers' organisations to draw up their own statutes and rules.

Collective agreements are applied where they exist.



ZERO TOLERANCE TOWARDS CORRUPTION

WE ARE COMMITTED TO INTEGRITY IN OUR BUSINESS
AND SOCIAL ACTIVITIES

We do not tolerate any form of corruption, bribery or unfair business practices. We are committed to conducting all our activities transparently as well as ethically and to consistently combating any form of misconduct. We promote a culture of integrity and encourage our employees to report possible offences.

We achieve business transactions exclusively through the quality and performance of our products or services. Sales are not promoted through gifts, donations, bribery or corruption. The principles of honesty and integrity must be observed in all business and social activities. Relationship management is part of business success. It does not operate in legal gray areas, nor is it carried out by improper means. Götz employees neither directly or indirectly accept bribes nor make an offer themselves. Bribery is a criminal offense in business dealings as well as with public officials. In dealings with government bodies or authorities, no payments or benefits are promised or granted in order to influence the decisions of officials or other public officials in favor of Götz. We do not make gifts in order to unduly influence our position in the market.

We do not accept gifts that are intended to stimulate the awarding of contracts. Gifts and benefits that could influence business decisions must be avoided and may not be offered, granted, demanded or accepted.



CLOSING STATEMENTS

CONTINUOUS IMPROVEMENT

We continuously strive for improvement in all areas of our business. We regularly analyze our business practices and performance results to identify areas for improvement and take appropriate action. We are open to feedback and suggestions for optimizing our processes and services and are committed to providing our customers with the best possible service at all times.

By adhering to this Code of Conduct, we are committed to ethical, sustainable and responsible business practices and strengthen the trust of our customers, employees and business partners in our company.