

Hogrefe Code of Conduct

Table of Contents

| Code of Conduct | |
|---------------------------------------|---|
| Scope of application | 3 |
| 1. Corporate values and obligations | 3 |
| 1.1 Corporate values | 3 |
| 1.2 Management commitment | 3 |
| 1.3 Human rights | 4 |
| 1.4 Business partners | 4 |
| 1.5 Suppliers | 4 |
| 1.6 Dealing with trade secrets | 4 |
| 1.7 Sustainability | 5 |
| 2. Regulations for employees | 5 |
| 2.1 Equal opportunities | 5 |
| 2.2 Compliance with applicable law | 6 |
| 2.3 Intellectual property | 6 |
| 2.4 Product safety | 6 |
| 2.5 Fair competition | 6 |
| 2.6 Bribery / Corruption | 7 |
| 2.7 Data protection | 7 |
| 2.8 IT security | 8 |
| 2.9 Workplace safety | 8 |
| 2.10 Internal reporting of violations | 8 |

Code of Conduct

This Code of Conduct for the Hogrefe Publishing Group serves as a guideline for ethical and lawful behavior within our company. It reflects our commitment to uphold the highest standards of integrity, fairness and responsibility. This Code covers key topics such as equal opportunities, compliance with applicable laws, protection of intellectual property, product safety, fair competition, data protection, and IT security and sustainability. It is aimed at all employees, business partners and suppliers, and is intended to ensure that our corporate values are practiced in all aspects of our business activities. By complying with this Code, we help to strengthen the trust of our customers and partners and ensure the long-term sustainability of our company.

Scope of application

Our Code of Conduct applies to all companies of the Hogrefe Publishing Group.

1. Corporate values and obligations

1.1 Corporate values

At Hogrefe, we are committed to living and promoting the core values of our company in all our activities and interactions. The core values include:

- Compliance with the highest scientific standards.
- Importance placed on building and maintaining strong and respectful relationships with our partners and customers. We strive to be professional, fair, polite and helpful in every interaction.
- Encouragement for all colleagues to think creatively and contribute new ideas when solving problems.
- Promotion of a creative approach to develop effective and sustainable solutions, and to constantly develop and implement new processes to better meet the changing needs of our customers and markets.

1.2 Management commitment

The management level of the Hogrefe Publishing Group bears a special responsibility for compliance with and implementation of the Code of Conduct. Managers undertake to actively exemplify and promote the values and principles of this Code by:

- Consistently integrate the Code of Conduct into our decision-making processes and corporate strategy.
- Ensuring that all employees are informed about the content and significance of the Code.
- Acting consistently and transparently in the event of violations of the Code.
- Working continuously to further improve compliance with the principles set out in the Code of Conduct.

1.3 Human rights

It is our firm belief that respect for human rights is fundamental to the integrity of our organization. We are committed to respecting and protecting the human rights, in the form of the United Nations Universal Declaration of Human Rights, of all individuals with whom we interact – including our employees, suppliers, customers and the members of the community in which we operate.

- We reject all forms of child labor and forced labor. We respect the right to childhood and education
- We believe that forced labor, whether through physical, psychological or financial pressure, is unacceptable. We respect the right of all employees to work voluntarily and the right to carry out their work under fair and safe conditions.
- We do not support nor tolerate actions that violate human rights. We are committed to the elimination of discrimination in employment and occupation and promote and respect diversity in all aspects of our business.
- We expect all those who act for us or on our behalf to share this commitment and abide by this Code.

1.4 Business partners

Communication with our business partners is always professional and respectful. All interactions should be based on integrity and mutual respect. We expect our business partners to behave in a legally compliant manner in all aspects of their business practices. This includes compliance with all relevant laws and regulations in the countries in which they operate.

In the event of conflicts or differences of opinion with business partners, we endeavor to find a constructive and fair solution. We are open to dialogue and compromise, and are committed to responsible procurement and expect our business partners to follow similar practices. This includes compliance with environmental standards, fair working conditions and the rejection of forced and child labor.

1.5 Suppliers

We expect all our suppliers to adhere to ethical standards comparable to this Code of Conduct. This includes, but is not limited to, the following principles:

- Suppliers must comply with the applicable laws and regulations in the countries in which they operate and credibly speak out against corruption, bribery and unfair business practices.
- Suppliers must respect human rights and to be committed to fair working conditions. This includes the prohibition of child labor, forced labor and discrimination in any form.
- Suppliers should be committed to protecting the environment and promoting sustainable practices.

1.6 Dealing with trade secrets

We understand trade secrets to be all non-public, financial, business, scientific, technical, economic or technical information or samples that have an actual or potential economic value because they are not generally known or easily accessible.

Organizational, legal and technical measures are taken to protect trade secrets. Business secrets are passed on according to the need-to-know principle. This means that confidential information is only made accessible to employees if they need it for their work.

Every employee who encounters this information is obliged to protect the company's business secrets. To protect our own business secrets, but also to ensure the protection of business secrets of business partners, we use non-disclosure agreements when dealing with third parties.

Employees may only use trade secrets for legitimate company business purposes. Any other use is strictly prohibited.

1.7 Sustainability

The Hogrefe Publishing Group is aware of our responsibility for a more sustainable world and want to make the best possible contribution to this effort – therefore we align our corporate activities accordingly.

Sustainability covers a wide range of essential topics - from the use of clean energy, the fight against climate change, responsible consumption and conscientious production — to reducing inequalities, improving well-being, supporting education, and promoting gender equality.

We have signed and endorse the SDG Publishers Compact to actively support and accelerate the achievement of the 17 Sustainable Development Goals (SDGs) adopted by the UN by 2030.

2. Regulations for employees

2.1 Equal opportunities

The Hogrefe Group is committed to promoting equal opportunities and diversity. We strive for an inclusive environment that is free from discrimination, regardless of skin color, ethnic origin, religion, gender, family status, ideology, sexual orientation, age, disabilities and trade union orientation.

Every single employee has unique skills and perspectives that can contribute to achieving our common goals. We therefore strive to offer each individual the same opportunities to develop their skills and realize their full potential.

We expect all members of our organization to support and promote this commitment to equal opportunities and to actively work against discrimination and unequal treatment. Any form of bullying or harassment is prohibited.

Treating each other with respect and appreciation is the basis of our collaboration. This includes respecting the opinions and perspectives of others, resolving conflicts constructively and creating a working environment in which everyone feels safe and recognized. Managers have a special responsibility in this regard by modelling and promoting an open and inclusive culture.

2.2 Compliance with applicable law

All members of Hogrefe are obliged to comply with all applicable local, national and international laws and regulations as well as all internal instructions and guidelines. Any behavior that violates applicable laws, regulations or our internal instructions and codes of conduct and ethics will not be tolerated.

2.3 Intellectual property

As a specialized scientific publisher, the protection of intellectual property rights is of particular concern to us. This applies to both our own intellectual property rights and those of third parties. Respect for intellectual property is fundamental to the continued existence of our industry.

The infringement of intellectual property rights is therefore a serious offence and will be consistently pursued by us with all available legal means to protect our authors.

All employees concerned regularly strengthen their skills in dealing with their own and third-party property rights to ensure the protection of intellectual property

All employees are obliged to respect the copyrights, trademark rights and other forms of intellectual property of third parties. The unauthorized use or distribution of copyrighted material is strictly prohibited.

2.4 Product safety

The Hogrefe Group complies with all legal regulations relating to the production and marketing of our products with respect to product safety. Our company is committed to developing, manufacturing and distributing products that are safe for their intended use.

All products must comply with the applicable safety standards and regulations. This includes internal guidelines as well as external legal and regulatory requirements. Risks associated with our products must be regularly assessed and minimized. This includes identifying potential hazards, assessing the probability of their occurrence and implementing suitable control measures.

Employees who become aware of potential safety issues with our products are obliged to report them immediately. The company will take all reported safety issues seriously and respond appropriately. All employees involved in the development of products regularly deepen their expertise in product safety to ensure that their knowledge is always current.

2.5 Fair competition

Honesty, integrity and fairness should be reflected in all our business practices. We avoid practices that unreasonably restrict or manipulate competition, such as price fixing.

We comply with all applicable competition and antitrust laws and regulations and expect the same from all those who participate in our activities.

We are transparent in our business practices and avoid misleading or unfair practices. We expect the same from our business partners.

2.6 Bribery / Corruption

At the Hogrefe Group, we are aware of the negative effects of corruption on society and the economy and are therefore committed to strictly rejecting all forms of corruption and bribery. Compliance with global legal requirements is a matter of course for us.

These requirements apply to all employees:

- Employees may not offer, promise, give, demand or accept bribes, or exchange monetary gifts/benefits for illegal or immoral behavior. This applies regardless of whether the other party is a public official or a private individual.
- Gifts, invitations or other benefits may only be offered or accepted if they are appropriate and do not give the impression nor mean that they are intended to improperly influence a decision.
- Employees must disclose potential conflicts of interest and must not abuse their position or influence in the company to gain personal advantages.
- All financial transactions and business relationships must be documented correctly and transparently.
- Employees are encouraged to report any suspicions of corruption immediately. It is ensured that no retaliatory measures are taken against those who raise such concerns.
- In general, any active or passive participation in illegal activities is prohibited. In addition to bribery, this also includes violations of antitrust law, tax fraud and aiding and abetting tax evasion.

2.7 Data protection

The topic of data protection is becoming increasingly important for companies. Increasing technological change in conjunction with growing awareness among the population means that data protection plays an important role in almost all business activities.

We are committed to handling personal data with the utmost care and to establishing data protection as an integral part of our business processes. This includes the legally compliant handling of personal and sensitive data in accordance with the General Data Protection Regulation (GDPR) and other relevant regulations in our companies.

Our processes include:

- We inform data subjects clearly and comprehensibly about the collection, processing and use of their data.
- We only collect and store the data that is absolutely necessary for the respective purpose.
- All employees regularly develop their knowledge with respect to data protection to promote a high level of data protection awareness within the company.
- To meet our own high standards, we seek support and advice from external experts. This ensures that our data protection measures are continuously adapted to legal and technical developments.

2.8 IT security

Compliance with IT security standards is an immensely important building block for our company in all our business activities. We counter the risk that can arise in today's world due to a breach in IT security by having clear rules for the use of the IT infrastructure, regular training for our employees, regular testing of our security systems and support from external expertise.

Specific safety measures include:

- Keeping our technology current, conducting regular backups for data protection, installing the latest versions of firewalls and anti-virus programs, and drawing up a contingency plan in the event of a malfunction.
- Every employee is responsible for the security of the IT resources they use at the Hogrefe Group. This includes regularly updating passwords, using secure connections, and complying with all security policies and procedures.
- The secure handling of IT systems is promoted through continuous skills development so that all employees always have up-to-date knowledge and relevant skills around IT security.

2.9 Workplace safety

We are committed to ensuring a safe working environment and minimizing risks of injury. All employees are required to observe safety regulations, use work equipment responsibly, and report potential hazards immediately. Managers have a particular responsibility to monitor and continuously improve safety standards.

2.10 Internal reporting of violations

Employees can report grievances at any time without fear of negative consequences. Retaliation for a report made in good faith is prohibited. Dealing openly with concerns strengthens our corporate culture and enables us to learn from mistakes and continuously improve.