

# **Code of Conduct**

High View

HV Fernsehbetriebs GmbH, Adelmannstraße 2, 84036 Landshut  
Just Music Fernsehbetriebs GmbH, Adelmannstraße 2, 84036 Landshut  
High View Media GmbH, Schenkenstraße 2, 1010 Wien  
High View Holding GmbH, Schenkenstraße 2, 1010 Wien

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## **I. FOREWORD BY THE MANAGING DIRECTOR**

The success of High View depends on the confidence that our customers and partners have in our independence and integrity. Therefore, our reputation in the public and among our customers and business partners is a valuable asset. We would rather pass on a deal than allow doubts concerning our integrity to arise.

Therefore, it is crucially important that we all observe, without exception, all laws applicable to our areas of business and our own corporate values. Adherence to high journalistic and ethical standards and social responsibility are critically important for our business success. No matter where we conduct business and what roles we perform, all of us – including senior managers, and all employees – are responsible for living up to these principles.

The Code of Conduct is meant to help all employees of High View make the right decisions. We also expect our customers and suppliers to conduct themselves in accordance with the principles described herein. Please read this Code of Conduct carefully and follow it. Every one of us is personally responsible for practicing the principles of the Code of Conduct in our day-to-day work. Senior managers are required to exercise a special role model function. They must credibly embody our values and consistently oppose any behavior that is not compatible with laws and regulations or the basic values of our company.

High View takes violations of applicable law and this Code of Conduct very seriously. Violations of the principles described herein may result in criminal prosecution and lead to consequences under employment law and civil law. We can only succeed in this respect when the company and its senior managers create a climate in which critical issues can be addressed without fear of retaliation.

This applies particularly to violations of the Code of Conduct. Anyone who learns of or suspects such violations should first be able to raise the issue with his or her direct supervisor. If this is not possible or advisable in a certain situation, employees may contact several different people within the company, particularly including the colleagues in the Compliance Department.

Create transparency! If you are not sure if your actions are lawful or conformant with the Code of Conduct, please ask your supervisor, the Compliance Officer or Legal Affairs before you continue such actions. You will find contact persons at the end of this Code of Conduct.

Please note that applicable laws and regulations may be even stricter than the present Code of Conduct and always take precedence over the Code of Conduct. Also keep in mind that the Code of Conduct only outlines our principles and cannot cover all conceivable situations or serve as a substitute for legal advice in specific situations.

The managing director wishes to thank you already now for your responsible and active cooperation in the implementation of our principles and values in your day-to-day work.

## **II. TO WHOM DOES THE CODE OF CONDUCT APPLY?**

The Code of Conduct is binding on all High View employees, possibly in a version adapted to local laws and regulations. It is an integral part of all employment contracts and is also available in the intranet. All senior managers must ensure strict compliance with the Code of Conduct and to set an example in an exemplary and active manner.

## **III. INDEPENDENT JOURNALISM**

As a media company, High View has a special responsibility for forming public opinion. Therefore, our editorial independence represents the indispensable basis of our work. All persons bearing editorial responsibility must observe the relevant laws and press guidelines.

Journalists and editors working for High View must follow the Principles on the Conduct of Journalists of the International Federation of Journalists. If you gather, transmit,

disseminate, or comment on news and information in describing events as a journalist or editor of High View, you must observe the following principles:

- Respect for truth and for the right of the public to truth is your highest duty. In pursuance of this duty, you shall at all times defend the principles of freedom in the honest collection and publication of news, and of the right of fair comment and criticism.
- You shall report only in accordance with facts of which you know the origin. You shall not suppress essential information or falsify documents.
- You shall use only fair and lawful methods to obtain news, photographs and documents.
- You shall do the utmost to rectify any published information which is found to be harmfully inaccurate.
- You shall observe professional secrecy regarding the source of information obtained in confidence.
- You shall be aware of the danger of discrimination being furthered by the media and shall do your utmost to avoid facilitating such discrimination based on, among other things, race, sex, sexual orientation, language, religion, political or other opinions, and national or social origins.
- As a general rule, you shall not report on persons related to you, particularly including family members, in text or pictures, unless there is an objective reason to do so which has been approved by the responsible supervisor;
- You shall not use your reporting to gain benefits for yourself or others;
- You shall regard as grave professional offenses the following: plagiarism, calumny, libel, slander and unfounded accusations, acceptance of a bribe in any form in consideration of either the publication or suppression of information.

In addition, journalists and editors who work for High View are particularly obligated to observe all regulations applicable to insider trading.

#### **IV. ADVERTISING**

##### **Separation of programming and advertising**

Make sure that advertising and editorial contents are kept separate from each other. We do not allow advertisers or other interested parties to influence our editorial content, and we do not enter into agreements that could compromise our journalistic independence.

##### **Misleading advertising**

False statements and misleading information about products and services constitute deception and/or injury of the customer, supplier etc. Therefore, we do not make any intentionally misleading or untrue statements in our marketing or advertising activities. Employees working in the areas of marketing, advertising and sales must take special care to ensure that statements made in the company's marketing and advertising activities are not misleading.

##### **Sponsoring**

Sponsoring and the acceptance of production aids may not be allowed to influence program planning or jeopardize our journalistic and artistic freedom of presentation. We refer to this policy with respect to sponsoring and production aids in the affected programs.

##### **Surreptitious advertising, product placements**

Surreptitious advertising and product placements for third parties in our programs or on our websites are prohibited. Tie-ins such as media purchases in return for a promise to publish certain editorial stories are not permitted. We do not place any content offered to us free of charge by companies or associations, etc. All content is reviewed prior to broadcast or publication. We expressly designate merchandising campaigns and media partnerships as such.

## **Personal interests**

Personal interests may not be allowed to influence our editorial stories and publications under any circumstances.

## **V. DATA PROTECTION, CONFIDENTIALITY**

### **Data protection**

The purpose of data protection is to protect the right to privacy and informational self-determination, i.e. the right of every person to determine how his or her personal data (e.g. name, addresses, telephone numbers, location data, financial situation, etc.) is disclosed and used.

We take great care in the handling of personal data and protect it against misuse. We collect, process (i.e. enter, store, modify, transmit, etc.) and use personal data only when total compliance with applicable laws is assured and the data is needed for objectively justifiable business purposes. We take great care in collecting, processing and using personal data and in keeping it strictly confidential.

Our use of personal data must be transparent for the affected persons. We guarantee the right of every individual to object to the use of personal data and/or demand the deletion or blocking of personal data. We only disclose personal data to third parties, in accordance with legal regulations. We take appropriate precautions to protect personal data against loss, destruction, unauthorized access and use, manipulation and publication.

### **Confidential information of High View**

The disclosure and divulgance of business secrets (e.g. contracts, financial data, intellectual property rights, personal information, strategy papers) could cause considerable harm to High View and may even be subject to **criminal prosecution** in certain cases.

Therefore, we treat as confidential all information that is designated confidential or is recognizable as such. We do not divulge confidential information within or outside the company (not even to other colleagues or family members) unless such divulgance is necessary for performing the work of High View and is protected by a confidentiality agreement.

We take care to ensure that confidential information is not disclosed to others by accident, either in a telephone call, conversations in the employee cafeteria, or in public. We do not leave documents out in the open. When we are not in the office, we lock the door or lock our computer screens. We do not leave external visitors alone, as a general rule.

### **Confidential information of third parties**

The law protects not only our own business secrets, but also those of other companies, particularly those of our competitors or information about our earlier employers. When we gain access to the business secrets of third parties (e.g. as part of a due diligence investigation), we treat this information with the same care we apply in handling our own business secrets.

We do not attempt to gain access to the business secrets of others without authorization. We do not derive any advantages from the confidential information of others that is made available to us without authorization; instead, we reject such information. We do not disclose the confidential information of our earlier employers to High View, and we also do not urge our colleagues to disclose such information.

## **VI. IT SECURITY**

The communications systems of High View (including both the network and necessary hardware such as computers and mobile devices) are a very important element of the company's assets, both as technical equipment and as intellectual property.

We take IT security seriously as a means of preventing unauthorized access to these systems. We are especially cautious outside the office (e.g. while teleworking, in Internet cafés, when using smartphones, USB sticks) to protect our equipment from theft and to prevent the exposure of access data and attacks from malicious software.

We do not leave our devices in public without being able to observe them and we do not give them to third parties. We protect our devices with suitable passwords that we do not share with anyone, and we encrypt our data whenever possible.

We report the loss of access data, mobile data carriers and mobile devices immediately to the Service Center, Gerhard Weiß, [gw@highview.com](mailto:gw@highview.com) +43 660 4421484.

We observe the rules of IT security guidelines for IT usage by users and administrators and also for projects and processes, for mobile devices and for the organization of log files.

## **VII. COMMUNICATION**

### **Communication with the media and in social networks**

As a media company, High View is the focus of public attention. Therefore, it is especially important to present a uniform image to the public and to make true statements regarding our products and services.

We refer all queries from the press or other media representatives to the Corporate Communication Department and do not answer them without prior consultation. Because even the private posts of employees in social networks in which the products or services of our company or its subsidiaries are promoted can be attributed to High View, we coordinate all media releases, including company-related postings in social networks, with Corporate Communication.

Although the subsidiaries design their own communication measures, strategically relevant communication issues (financial, corporate, crisis communication, brand management and the like) must always be coordinated with management of High View.

Any and all communication regarding legal matters, litigation or other proceedings requires the prior approval of Legal Affairs.

## **VIII. INTELLECTUAL PROPERTY**

We protect the intellectual property of High View and respect the intellectual property of others. Intellectual property includes, but is not limited to patents, trademarks and service marks, domain names, copyrights (including copyrights to software), rights to designs, databases, know-how and business secrets.

### **Protection of the intellectual property of High View**

The ingenuity of employees and creative partners is among the most valuable property of High View. High View disposes of important rights and licenses to intellectual property, such as (for example) copyrights and trademark rights. In handling these rights to intellectual property, appropriate steps must always be taken to protect the interests of High View. Unauthorized use could lead to the loss of such rights or a great loss of value.

### **Handling of the intellectual property of others**

When we use the intellectual property rights of third parties, we take care to ensure that we have a valid agreement with the rights holder. High View does not tolerate the unauthorized use of the intellectual property of third parties. Above all, the reproduction,

performance, divulgence, licensing or presentation of copyright-protected works without the prior consent of the copyright holder are prohibited. The consent of the copyright holder is also required for the production of derived works. We proactively consult Legal Affairs to clarify any doubts.

## **IX. CONFLICTS OF INTEREST**

The managing director, senior management teams and employees must always act in the best interest of High View. Conflicts of interest arise when the impression is created that your actions could be motivated by personal interests.

When a conflict of interest arises, it does not necessarily mean that you have done something wrong or acted unlawfully. However, even the mere appearance of a conflict of interest could harm our good reputation and therefore our business. Therefore, our conduct should never give rise to any doubts. For this reason, you are obligated to *immediately* inform your supervisor of *all* potential or actual conflicts of interest and bring about a clarification of the conflict. In most cases, this means that you will not be permitted to play a role in the affected decision.

If you are not certain of the existence of a conflict of interest, please ask your supervisor, the Chief Compliance Officer or Legal Affairs. The supervisor will determine whether a conflict of interest actually exists. If yes, he or she must notify the conflict to the Chief Compliance Officer, who will clarify the matter.

The failure to duly disclose conflicts of interest is a violation of the Code of Conduct, which can lead to sanctions under employment law.

### **Investments in other companies**

Equity interests or financial investments in other companies can lead to conflicts of interest, particularly when the company in question conducts or would like to conduct business with High View or is a competitor. The existence of a conflict of interest must be determined on a case-by-case basis. The following factors are decisive:

- What position do you hold?
- How high is your investment and what is it worth?
- Can you influence the management or the strategic decisions of the company in question?

Investments in funds or venture capital firms that invest in a wider range of different companies usually do not give rise to conflicts of interest. If, however, you can influence the investment decisions of the fund or the business dealings of a private equity firm with High View, the investment must be disclosed and approved by the supervisor and the responsible Compliance Officer.

### **External management teams, sideline activities**

We protect the interests of High View also in our external activities and commitments. No activities may be performed outside of High View that run counter to the employee's responsibilities for High View, when they could harm the good reputation of High View or otherwise run counter to the justified interests of High View.

Activities in the following positions outside of High View must be approved in advance by at least the supervisor and Human Resources:

- Managing Director, management team, partnership
- Permanent position, partnership
- Consultant

Senior managers must have such sideline activities approved by of the managing director High View.

### **Business opportunities, non-competition**

We are committed to promoting the business of High View. You may therefore not compete with High View. Furthermore, you may not exploit business opportunities arising from or in connection with your employment to your own advantage or the advantage of others unless the company has first expressly denied any interest in such opportunities.

If you wish to exploit business opportunities in which High View could have an interest, you must first inform your direct supervisor, who will bring about a decision by the Management as to whether the company would like to exploit the opportunity.

Even when High View does not exploit an opportunity, you may pursue it in your own interest only when it is clearly established that such activity will not compete with High View.

### **Dealings with related persons**

We do not participate in High View's dealings with persons related to us, in order to avoid the "negative appearance" of favoritism. Please inform your supervisors when you or a person related to you works in the management or otherwise holds a senior managerial position with a competitor or key customer, supplier or licensor.

Close family members and life partners of employees may be hired as employees or consultants only when the decision is based on qualifications, performance, abilities and experience. The affected employees do not participate in the hiring decision or contract negotiations.

These principles apply to all aspects of employment, including compensation, promotion and transfers. The same rule applies when the relationship status involving a direct or indirect reporting line develops only after the affected employee has started to work for the company.

Subject to the condition that they are just as qualified as other candidates, the children of High View employees may be given preference for internships, vocational training programs, summer jobs and similar short-term positions.

## **X. COMBATING CORRUPTION**

We do not tolerate bribery and corruption.

- We do not pay money or give gifts either to politicians, civil servants, or other public officials, or to our business partners as an inducement to conduct business or issue permits. We do not pay bribes as a means of obtaining permits more quickly.
- We do not accept gifts, hospitality or other contributions that influence our objectivity, say in a procurement decision, or that could create even the appearance of undue influence. We do not allow such gifts or hospitality to be given to persons related to us.
- We make sure that persons working on our behalf and persons related to us also observe these principles.

If you have any questions, please inquire of the Chief Compliance Officer or the Compliance Officer responsible for your unit.

### **Monetary gifts, commissions, kickbacks**

Monetary gifts are always prohibited, regardless of the amount. The same applies to other items of monetary value such as shares or stock options. We also do not accept any loans, commissions or kickbacks from our business partners.

### **Public officials: civil servants, politicians, judges**

**A complete prohibition of gifts and hospitality** applies with respect to public officials, i.e. politicians, civil servants and judges, both at home and abroad, regardless of the value

of the contribution. Please note that payments or contributions that are made indirectly, say by a third party or to family members or acquaintances of the civil servant, are likewise prohibited.

### **Political involvement and contributions**

As a media company, political independence is of the utmost importance for High View. Monetary and in-kind contributions to political parties are prohibited unless the contribution is approved in advance by the managing director of High View. The same prohibition applies to political events on company premises and all other forms of support of political parties or foundations related to political parties, and to the support of party functionaries or candidates for office. Even contributions for other purposes require the prior consent of the managing director of High View. No contributions may be given as consideration for a permit, a contract or the like, even if the recipient enjoys an impeccable reputation or is in need of such contributions.

If you make contributions to political parties or for other purposes or participate in the political process as a private individual, you must do this in your free time and at your own expense. You must make it clear that you do not represent our company.

### **Gifts, hospitality, etc.**

Accepting or giving gifts and hospitality can easily create the impression of a conflict of interest and could even lead to criminal prosecution in certain cases. Therefore, you may not accept or give any gifts and hospitality or other "contributions" and "benefits" (e.g. discounts, non-monetary gifts, travel, meals or hotel accommodations, tickets to cruises, concerts, galas, sports events, the use of automobiles, etc.).

We allow exceptions only in the case of occasional smaller contributions that are often given as a generally accepted gesture of courtesy and clearly do not compromise any persons involved. In this respect, the following rules must be observed:

- **Avoid the "negative appearance" of impropriety:** Regardless of their value, gifts and hospitality may not be given or accepted as consideration for an act or omission. It is not permitted to ask for gifts or hospitality. As soon as an impression of corruptibility or partiality could be created, no contribution may be accepted or given.
- **Transparency and auditability:** Benefits may never be given or received in secret. Benefits such as paid business meals may be given or accepted only for a reason that is comprehensible and acceptable to outsiders.
- **Appropriateness:** The frequency and value of contributions must be kept within reasonable and socially accepted limits. The contribution must be appropriate for the position of the recipient and the circumstances and should have a business reason. Please note that even many small gifts or frequent hospitality may be inappropriate in their totality or create the impression of corruptibility ("groundbait").
- **Keep a critical distance:** Do not take gifts and hospitality for granted and always keep a critical distance.

If these principles are not observed, you must decline gifts or hospitality politely, but firmly and refrain from offering gifts and hospitality. If you have already received the gift, you must return it. If that is not possible in exceptional cases, as in the case when the gift is offered during an official event and refusing it could be perceived as an insult, immediately report the gift to your supervisor. It will then be donated to a charitable organization or auctioned off internally for the benefit of a charitable cause. Tell the gift giver politely what you did with the gift and why, otherwise you may be confronted with the same situation at your next meeting.

## **XI. BUSINESS PARTNERS, AGENTS AND INTERMEDIARIES**

Our business partners (e.g. customers, suppliers, agents and consultants) can always count on the lawful conduct and integrity of High View. We comply with all applicable laws and regulations and expect the same of our business partners.

### **Careful selection (due diligence)**

We select our business partners carefully. If something seems “fishy” to us, we take a close look and ask questions before entering into a business relationship. We also do not allow ourselves to be placed under time pressure. The following factors serve as warnings:

- The business partner is domiciled in a country in which bribes are frequently paid. The business partner has been linked to dubious payments or political contributions in the past. The business partner has a personal relationship with civil servants or politicians or other persons who influence the planned business deal. The business partner is named or recommended by a public official.
- The business partner makes misleading or contradictory statements that make it seem doubtful that he is truly in a position to render the promised services.
- The business partner demands cash in advance, advances, cash payments or transfers to a foreign bank account. The business partner demands that the money be paid not to him, but to someone else, e.g. a company in a tax-haven country. The business partner makes inconsistent payment requests without a discernible reason, including payment to different accounts, without there being an obvious reason for proceeding in that way.
- The business partner demands excessive commissions. The demanded compensation is greater than the value of products or services. The business partner demands reimbursement of unusually high or insufficiently substantiated expenses.
- The business partner insists on anonymity or refuses to provide books or other financial data or to commit to not taking any steps to make unlawful offers, promises or payments to a public official or another person. The business partner intends to circumvent reporting obligations, for instance by splitting a unitary transaction into different individual transactions.

None of these factors automatically means that the contemplated business deal would be illegal. However, such indications must be investigated in order to avoid risks that could otherwise arise. In such cases, a business deal should only be concluded after a detailed review of the business partner and the circumstances of the deal by the responsible Compliance Officer. No business deal may be concluded if doubts concerning the integrity of the business partner cannot be dispelled.

### **Obligation of lawful conduct**

Sub-contractors, commercial agents, brokers, agents and intermediaries must be placed under the obligation to follow anti-corruption, anti-trust and anti-money laundering laws. No cash payments may be agreed or made with them. In addition, the contracts must provide for appropriate internal controls, performance records and the keeping of truthful books and records. Contracts must also stipulate that the contract or order can be terminated for cause if the business partner violates anti-corruption, anti-trust or anti-money laundering regulations.

## **XII. FREE COMPETITION**

Free competition is an essential pillar of our economic system and is particularly protected by anti-trust laws. Violations of fair competition law may lead to substantial fines and claims for damages, which could affect not only the company, but employees personally. Anti-competitive agreements are invalid and cannot be enforced. Anti-trust law is complex and also covers behaviors that may not appear critical at first glance. However, the following basic rules can help you prevent the occurrence of major risks:

- We adopt our business policies independently, and not in coordination with outside parties. We do not discuss our business decisions with competitors. We make no announcements, commitments or promises in relation to our behavior in competition.
- Do not make price or quantity agreements with competitors. Do not divide markets, territories or customers between High View and competitors, and otherwise, make no agreements pertaining to your behavior in competition. Do not participate in boycotts

or calls for boycotts. Do not compare our bids with those of competitors when participating in tenders. Immediately and unmistakably refuse any offers or demands to enter into anti-competitive agreements.

- If you intend to enter into agreements, contracts and cooperation ventures with competitors, this can only be done after review and approval by Legal Affairs.
- Always enter into written agreements only. So-called “gentlemen’s agreements,” informal or oral agreements, side agreements, side letters and commitments to engage in a certain behavior with competitors are prohibited without exception.
- Every contact with competitors harbors anti-trust risks. This applies particularly to informal or personal contacts because an overly familiar atmosphere is conducive to anti-competitive agreements. Therefore, be risk-conscious and cautious. Limit all contacts with competitors to the absolutely necessary minimum. Before holding any conversation with a competitor, consult Legal Affairs about the legal ramifications.
- Do not talk with competitors about business secrets and internal affairs of the company, and particularly not about prices, strategies, costs, etc.
- Treat our customers and suppliers fairly. Clauses related to resale prices or the handling of commissions, exclusivity clauses, most-favored clauses, selective distribution clauses, non-competition clauses, customer and territory protection clauses and non-challenge clauses may be requested or agreed only in consultation with Legal Affairs.

### **XIII. CONTRACTS**

Do not sign any contracts unless the following requirements are met.

#### **Signature authorization**

The “4-eye principle” must be practiced at all times, meaning that a contract must always be approved by at least two authorized signatories.

The fact that you are authorized to approve a transaction does not automatically mean that you are also permitted to sign the related contracts or documents that establish an obligation for the company.

#### **Approval by Legal Affairs**

Contracts may not be signed without the prior approval of Legal Affairs. Exceptions are strictly forbidden.

Even with the approval of Legal Affairs, authorized signatories are still obviously obligated to read and understand a contract and clarify any remaining questions with Legal Affairs.

#### **Written form**

All contracts must be concluded in writing or at least in text form. The performance to be rendered by both parties must be described clearly, comprehensibly and completely in the contracts. Informal agreements as well as oral commitments are not permitted even when there is no legal form requirement.

### **XIV. ACCOUNTING AND DOCUMENTATION**

All our documentation, i.e. all financial books, records, accounts, financial reports and other documents that are relevant for accounting purposes must always meet the highest standards of precision and reliability. High View documents all business dealings and transactions with the highest precision and completeness, so as to make it possible to prepare financial statements in compliance with applicable laws and regulations and generally accepted accounting principles.

## **Assurance of correct accounts, records and disclosures**

We document all transactions, assets and liabilities in accordance with the legal requirements for financial reporting.

- Do not make incorrect or misleading entries to financial accounting-relevant documents. Every form of balance sheet manipulation is prohibited. It is forbidden to produce misleading documents or assist in the production of misleading documents.
- All cash, bank accounts and other assets must be posted promptly and with the greatest precision. No invoices may be issued or paid in respect of illusory or unprovided goods and services. The same rule applies to invoices issued to non-existent persons and companies. The contractual partner must be the invoice recipient or issuer; exceptions are only allowed with the prior approval of Legal and Tax Affairs.
- Payments may not be made or approved if they are not used for the purpose described in the corresponding documents or when approval exceeds your signature authority.
- So-called “black accounts”, meaning secret or undocumented accounts, financial resources or other assets are strictly prohibited. They are punishable under employment law and may also result in criminal prosecution.
- A signed receipt or other suitable document must be presented for every cash payment; proof of identity, a declaration of purpose and a corresponding order must be presented for every check payment;
- Payments must be made by wire transfer to an existing verified account or by means of a check issued to the payment recipient. Payments to foreign accounts for goods and services delivered within the country are only permitted with the prior approval of the Management and the responsible Compliance Officer.
- No payments may be made to bank accounts with unknown account holders. Payments to numbered accounts are likewise impermissible.

The company's financial reports must always be recorded and administered correctly. For example, it is not permitted to enter income or expenses under the wrong period, to capitalize items that should be posted as expenses or enter personal expenditures as business expenses.

If you believe that these standards are not being met, please report your suspicion immediately to the compliance officer.

## **Auditing**

All employees are obligated to cooperate with internal and external auditors and answer their questions promptly, truthfully and extensively. No one is permitted to influence our company's auditors or the audits of our financial reports.

No information that could contribute to a complete and truthful answer may be withheld or falsified. This rule also applies when only confirmation of individual aspects of a more extensive business relationship is requested.

## **Retention and archiving of data and documents**

High View is bound to observe a number of statutory regulations on the retention of documents and required retention periods. Please note that all documents, regardless of their storage medium or physical place of retention, may be important for tax audits or legal disputes with customers or suppliers and may need to be presented as evidence in court proceedings.

Therefore, all documents must be retained in such a way that they can be viewed at all times. These documents may not be destroyed or falsified because that could obstruct or prevent trials, investigations, audits or examinations.

## **XV. TAXES**

High View is expressly committed to fulfilling its tax obligations in all countries in which High View operates. We comply with national and international tax laws and reject any form of misrepresentation. We conduct tax planning responsibly and lawfully and in accordance with our obligations under the law of stock corporations. We avoid aggressive tax optimization.

## **I. COOPERATION WITH GOVERNMENT AUTHORITIES AND COURTS**

We cooperate honestly and trustfully with government authorities and courts on the basis of applicable law. We follow all lawful orders of government authorities and courts immediately and completely, even as we also actively assert our legally guaranteed rights. We make no statements without first consulting Legal Affairs.

## **XVIII. WORK ENVIRONMENT**

### **Discrimination and harassment**

We respect each other and treat each other fairly. Everyone is entitled to protection of his or her private space and personal dignity. We do not tolerate any discrimination on the basis of sex, race or ethnic background, age, religion or world view, sexual orientation, disability or other criteria prohibited by law. We do not tolerate hostilities, insults or harassment.

### **Health, environmental protection and occupational safety**

The health and safety of our employees, contractors, suppliers and the public are of the utmost importance for our company. We observe all applicable laws and regulations pertaining to health, safety and environmental protection. We use all devices and equipment responsibly and in an appropriate and safe manner. We do everything we can to avoid environmental damage.

Our company and its employees can be held liable for the costs of cleaning up contaminations and may be subject to civil lawsuits or criminal prosecution when environmental regulations are violated. To ensure that we can respond immediately to accidents or incidents that occur despite our best efforts, you must immediately inform your supervisor of any concerns regarding matters of health, safety and environmental protection.

### **Handling of company property**

High View provides its employees with the devices and operating resources that are needed for the efficient performance of their tasks, and expects its employees to handle the resources provided to them responsibly and not wastefully. The company's capital stock, equipment and other assets may not be used for private purposes. Appropriate use of certain operating resources (e.g. telephones, computers, etc.) also for private purposes is permitted to the extent that it conforms to accepted business customs or is expressly permitted by way of exception in individual cases.

### **Internet, intranet, e-mail, computer systems**

Inappropriate use of the Internet, intranet, e-mail or computer systems is not permitted. Inappropriate use particularly includes unauthorized access to the e-mail account of another user, the unauthorized transmission of secret or confidential information, the transmission of offensive materials or messages, the transmission of materials that infringe the copyrights of third parties and other unlawful or unethical activities. Employees must take care to ensure that they follow all internal regulations on the use of information and communication technologies.

## **XIX. VIOLATIONS OF THE CODE OF CONDUCT**

### **Enforcement and penalties**

Violations of applicable laws, this Code of Conduct or company guidelines are not tolerated. Failure to read or acknowledge this Code of Conduct does not release employees from their responsibility of compliance with it. Depending on the severity, violations may lead to consequences under employment law and civil law, up to and including termination for cause. Violations of law may lead to claims for damages, fines or even criminal prosecution.

### **Reports of violations**

We encourage our employees to address critical issues openly and without fear of retaliation. If you become aware of a violation of applicable law, this Code of Conduct or company guidelines or if you suspect a violation, you are bound to report it immediately. Please first inform your direct supervisor and discuss the issue with him or her. Supervisors encourage their employees to speak openly, support them and investigate suspected cases and concerns fairly and without prejudice.

If it is not possible for you to inform your direct supervisor of a concern or discuss it with him or her (for instance because you suspect that your supervisor in particular may have broken the rules), you may turn to the Compliance Officer at any time. However, the option of involving the Compliance Officer should only supplement the existing internal reporting and communication channels, and not supersede them under any circumstances.

Reports will be treated as confidential to the extent this is possible in the process of investigating the matter and when taking appropriate measures is in the best interest of our company. Employees are also bound to treat information regarding such matters as confidential. They must also understand that they are obligated to provide full cooperation to the employer in such investigations.

### **No retaliatory measures**

Employees who express concerns about happenings within the company or report suspected cases in good faith will not be disadvantaged for this reason. The same applies expressly when the concern or suspicion proves to be unfounded. "In good faith" means that the employee is convinced that his or her account is truthful. We do not tolerate intimidation attempts or retaliatory measures against employees who seek advice or report otherwise unlawful or unethical behaviors in good faith.

Intentionally false reports that serve the purpose of harming the other person will result in disciplinary action.

### **Improvement suggestions**

Compliance depends on the cooperation of everyone. Please let us know if you have any improvement suggestions regarding this Code of Conduct or our guidelines and processes.

Thank you very much!

## **XX. ADDITIONAL INFORMATION**

This Code of Conduct cannot provide detailed instructions on how to act in every conceivable case. The additional business conduct guidelines provide further assistance. The application and implementation of the standards set out in this Code of Conduct and other internal conduct guidelines in day-to-day business activities may require further clarification in some cases.

Managing Director: Alexander Trauttmansdorff, [at@highview.com](mailto:at@highview.com), +43 676 4456757

Compliance Officer: Ruth Ilmberger, [ri@highview.com](mailto:ri@highview.com), +49 176 2286 7086

Data Protection Officer: Klaus Fendt, [kf@highview.com](mailto:kf@highview.com), +49 171 937 0 437