

CODE OF CONDUCT

OF THE CLASSEN GROUP

09/10/2025

DEAR EMPLOYEES,

The CLASSEN Group has grown considerably in recent years. The founder of the CLASSEN Group, Dr. Hans-Jürgen Hannig, started his first company in the building materials trade in 1962. In the years that followed, he bought up companies in similar sectors, which he finally merged into the CLASSEN Group in 1994. Today, the entire group of companies has around 2,000 employees.

Starting out as a timber trading company, the CLASSEN Group has steadily expanded into other business areas, making it one of the strongest flooring producers in the world. The CLASSEN Group can therefore look back on more than 60 years of company history, which is characterized above all by continuous growth. This success is also based on long-term cooperation with existing suppliers and the long service of many employees.

As a family-run company, we benefit from consistency. Sustainable action is an integral part of our corporate responsibility. In our business decisions, we think first and foremost in the long term and with an eye to the future. As a company, we benefit from the resulting high level of innovation. This approach safeguards our future viability and enables us to secure the existence and success of our group of companies in the long term.

The CLASSEN Group is committed to clear values in its actions. We are committed to treating our employees, our partners, third parties and the public with respect and fairness. Compliance with national and international law is essential for us.

This Code of Conduct is based on the corporate values and objectives of the entire CLASSEN Group and must be observed by all employees. It is important that each individual employee takes responsibility: For fair cooperation and the external impact of their actions. This Code sets out binding guidelines for this and creates a common basis. At the same time, we want to meet the increasing legal and social requirements placed on our company. All employees are called upon to further develop the Code.

We therefore ask you to observe the Code of Conduct – let it guide you in your daily business life. If in doubt, seek advice from your manager, our management or the HR department. We ask you to inform a manager, the management or our internal complaints office if you become aware of any violations of this Code of Conduct. Of course, you can also make such a report anonymously.

We are counting on your support!

Kaisersesch, 9 September 2025

Dr. Hans-Jürgen Hannig

Stefanie Quervel

Maciej Gorecki

Celine Quervel

GLOBAL ORIENTATION AND SUPPORT OF THE UNGC

The following code of conduct is based, among other things, on the ten principles of the United Nations Global Compact. The CLASSEN Group endorses and supports the UNGC and its principles.

At CLASSEN Group, we are committed to respecting and upholding human rights throughout our operations, including our entire value chain, and in our relationships with stakeholders. This policy is guided by the fundamental conventions of the International Labor Organizations and the United Nations Guiding Principles on Business and Human Rights as well as the International Bill of Human Rights. This policy applies to all employees, contractors, suppliers, business partners, and other stakeholders involved with the company.

Where national law and these international human rights standards differ, the CLASSEN Group must follow the higher standard; where they are in conflict, the CLASSEN Group must seek to respect internationally recognized human rights to the greatest extent possible.

SOCIAL RESPONSIBILITY

We are committed to creating a safe and attractive working environment in which trust, teamwork, diversity, acceptance of responsibility and fair and respectful treatment of one another are valued and practiced. We support and respect the protection of international human rights in accordance with the United Nations Universal Declaration of Human Rights and ensure compliance with them, regardless of whether we are dealing with our employees, suppliers, customers or other stakeholders in our network.

We are committed to ensuring a workplace free from discrimination based on ethnicity, race, gender, religion, disability, age, sexual orientation, or any other characteristic protected by law. We strive to provide equal opportunities in employment and occupation, fostering a culture of inclusion and diversity.

DISCRIMINATION, EQUAL TREATMENT, ABUSE AND HARASSMENT

The CLASSEN Group operates worldwide. We deal with a wide variety of customers, suppliers and other partners on a daily basis. Diversity is an indispensable added value for us as a company. The principle of equal treatment of all employees applies to the entire Group – regardless of age, gender, sexual orientation, nationality and religion.

Classten has a zero-tolerance policy towards any form of harassment or abuse in the workplace, including verbal, physical, sexual, and psychological abuse. We are committed to creating a safe and respectful work environment for all employees, where dignity and mutual respect are upheld at all times.

EXCLUSION OF FORCED AND CHILD LABOR

Our company rejects all forms of forced and child labor in accordance with Conventions No. 138 and No. 182 of the International Labor Organization (ILO). It is a matter of course for us to comply with the legal requirements of the Law for the Protection of Working Youth (JArbschG) and to protect the health and social development of every child. No person may be employed below the national minimum age limit. We also do not tolerate the use of forced or child labor by our suppliers and business partners.

We are committed to eliminating all forms of forced, compulsory, and trafficked labor within our operations and throughout our supply chain. This includes activities that may lead to forced labor, such as human trafficking. All employees shall be hired voluntarily, and we will not tolerate any form of coercion in our hiring processes.

We prohibit the use of child labor in all our operations and require that all employees meet the legal working age requirements. We also commit to protecting young workers (those under the age of 18) and ensuring that they are not engaged in hazardous work. Furthermore, we ensure that workers above the legal minimum age are provided with appropriate protections.

FAIR REMUNERATION AND WORKING HOURS

We comply with the applicable laws and regulations on remuneration and ensure that our employees receive appropriate remuneration that ensures their livelihood. We also comply with the applicable protective regulations and rules on working hours.

We are committed to providing at least the legal minimum wage and all legally mandated benefits to our employees, including employer contributions for social security and other required services.

We are committed to preventing excessive working hours and ensuring compliance with national and international labor laws. We will provide fair working hours and rest periods, and will ensure that overtime is voluntary, paid in accordance with legal requirements, and not excessive.

In addition to meeting legal requirements, we aspire to provide a living wage that meets the basic needs of workers and their families, taking into account local contexts such as food, water, housing, healthcare, education, transportation, childcare, and discretionary income.

SOCIAL DIALOG

We are committed to honest and fair dialogue with our employee representatives and uphold the freedom of association of our employees at all CLASSEN Group locations. Decisions that directly affect the workforce are made with the involvement of the respective employee representatives.

We respect the rights of all employees to freely associate, form or join trade unions, and engage in collective bargaining without fear of retaliation or discrimination. We are committed to creating an open and supportive environment for workers to voice their concerns and negotiate working conditions.

HEALTH AND SAFETY IN THE WORKPLACE

The CLASSEN Group is committed to safe and healthy working conditions and aims to continuously develop these further.

Classen commits to the following actions to ensure the well-being of our employees:

- Access to Water, Sanitation, and Hygiene (WASH):
We will provide access to clean water, sanitation facilities, and hygiene standards across all workplaces.
- Emergency Preparation and Response:
We will implement emergency preparedness measures and ensure that employees are trained in safety protocols.
- Hazardous Materials Handling:
We will have appropriate systems in place for the safe handling of hazardous materials, in compliance with relevant safety standards.
- Health and Safety Management Systems:
We will implement and maintain management systems to monitor and address health and safety risks.
- Building and Fire Safety:
We will ensure that our facilities are constructed and maintained in compliance with all relevant safety regulations, including building codes and fire safety standards.

The compliance with our occupational safety standards is regularly reviewed. Safety instructions are also imparted in safety briefings, which must be repeated at regular intervals by every employee.

Every employee is able to contribute to making CLASSEN a safe place to work. We therefore ask all of our employees to consider the following rules of conduct to be compulsory at all times:

- Compliance with the health and safety requirements in the workplace.
- Acting with care at all times to ensure that no one is put in danger.
- Thinking your actions through and being careful to prevent situations that could jeopardise safety. If a hazardous situation arises, you must notify your colleagues, your line manager and our safety officer immediately and ensure that the problem is rectified.
- Reporting of all incidents that jeopardise safety to the relevant manager and the safety officer.

COMPLAINT MECHANISMS

If you have any doubts about the appropriateness of your own personal conduct, we expect you to seek advice from a contact person immediately. Your line manager, the executive team or the HR department are available to assist you. If you become aware of an offence by others or suspect such an offence, please do not hesitate to contact the internal complaints office. The relevant contact details are provided on the notice board and the CLASSEN website.

ECOLOGICAL RESPONSIBILITY

As a manufacturing company, we are very aware of our ecological responsibility. We want to play an active role in shaping the future. That is why we have long been committed to environmental protection, energy efficiency, resource conservation and the circular economy. We are committed to complying with the legal framework and take measures to reduce or prevent adverse environmental impacts. Environmental protection and quality are very important to us. We therefore see continuous improvement in both areas as a mandatory task for us.

ENVIRONMENTAL PROTECTION

The CLASSEN Group's declarations of commitment are an expression of our own aspiration to take into account the sustainable use of raw materials, the conservation of resources and the protection of the environment and climate in the manufacture of CLASSEN products.

We are actively involved in the implementation of European and national climate targets. We achieve this through energy efficiency, recycling management and responsible use of raw materials. For us, this includes above all the expansion of renewable energies, the reuse of waste generated during production, the use of recycled materials and wood from sustainable forestry and the resource-conserving use of water.

USE OF ENERGY

Responsible and efficient energy consumption is important to us. We therefore rely on very modern facilities that produce energy efficiently. We are also expanding the generation of renewable energy at our locations by investing in our own photovoltaic plant parks and biomass power plants. Our aim is to produce as energy-efficiently as possible, significantly increase the proportion of energy from renewable sources and gradually reduce emissions.

Our energy policy is reviewed annually with the help of internal and external audits and the management review and updated if necessary – also with regard to the appropriateness of the type and scope of the organization's energy use and consumption. We ensure that the energy policy is communicated and documented across all levels. We promote energy-conscious behaviour among our employees within the company through information and training.

DEALING WITH RAW MATERIALS

When designing and manufacturing our products, we strictly ensure that we do not use any harmful substances that are harmful to health or the environment.

Whether laminate flooring or CERAMIN: for us, sustainable products from ecologically sound production and carefully extracted raw materials are part of our corporate vision. We confirm this claim with this declaration of commitment and numerous independent certifications.

WATER MANAGEMENT

Water is an important resource for us. We are committed to responsible water consumption at our sites. We dispose of waste water via our own evaporation plant and local sewage treatment plants. We strictly adhere to all legal regulations and provisions relating to water and wastewater management and take all necessary measures to ensure compliance.

DEALING WITH WASTE AND HAZARDOUS SUBSTANCES

The waste generated during production can be fed back into the production cycle so that our production waste is recycled. All other waste is separated by type and clustered into hazardous and non-hazardous waste and disposed of professionally if necessary.

ECONOMIC RESPONSIBILITY

Our corporate responsibility is to be economically successful in order to create long-term value. This includes adherence to ethical business practices, fair competition, job creation and economic prosperity. We are committed to complying with all legal frameworks. Every day, we work closely with suppliers, customers and other partners to achieve these goals. These partnerships are geared towards the long term. We do not tolerate any form of corruption. Fair and open competition is a matter of course for us.

COMPLIANCE WITH THE LAW

For us, compliance with laws and regulations is a self-evident basic principle of economically responsible action and decision-making. Every employee of the CLASSEN Group undertakes to comply with the applicable laws and other relevant regulations of the countries in which we operate in all business decisions and actions. Our managers act as role models and should encourage their employees to act in accordance with the law at all times.

PRODUCT QUALITY AND PRODUCT SAFETY

We are committed to continuously improving the quality of the products we manufacture. To this end, we provide the necessary resources (personnel, time, finances) and all relevant information. Regular assessments of our procedures and processes are carried out to identify potential for improvement.

We are committed to complying with all requirements that we have agreed with our customers. If we discover any deviations from such agreements, we inform our customers immediately. We regard our suppliers as partners and therefore involve them in quality-related processes. All decisions taken to improve the quality of products are recorded. Their implementation is continuously monitored. Every employee is responsible for acting in a quality-conscious manner.

ANTI-CORRUPTION

The CLASSEN Group is committed to maintaining the highest standards in our global business activities. We do not tolerate corruption, regardless of the form it takes. Any benefits in the form of favors, incentives, preferential treatment or other advantages are strictly prohibited. We convince with our quality and our prices in a fair manner. All employees, managers and business partners must ensure that they are in no way involved in corrupt activities or tolerate such activities. Gifts or invitations may only be granted or accepted as part of normal business practices and in compliance with the applicable legal and internal regulations. If you become aware of any cases of corruption or bribery or if you have any doubts about your own or a colleague's conduct, please report your suspicions immediately via the channels known to you.

For the complete anti-corruption policy, please scan the QR code:



INTELLECTUAL PROPERTY, CONFIDENTIALITY AND TRADE SECRETS

As the owner of numerous patents, intellectual property plays a central role in our culture of innovation. Respect for intellectual property, whether our own or that of others, is of fundamental importance to us.

Maintaining confidentiality and business secrets is of the utmost relevance to us.

CONFIDENTIALITY AND DATA PROTECTION

Confidentiality and data protection are a top priority for our company. We are committed to handling the data of our customers, employees and partners with the utmost care at all times and to safeguarding the integrity of our company. This includes protection against unauthorized access, misuse or disclosure of confidential information.

We only use secure IT systems. Our colleagues in the IT department carry out strict investigations on an ongoing basis

IMPLEMENTATION AND REPORTING

In line with our ongoing commitment to human rights, we will continuously assess and monitor potential risks to human rights within our operations and supply chain. Where risks are identified, we will take appropriate steps to mitigate or address these concerns, including engaging with stakeholders, implementing corrective actions, and ensuring compliance with this policy.

The Code has been communicated to all employees and can be accessed at any time on the CLASSEN homepage. Regular training ensures that the Code is followed. In addition, internal controls have been established to monitor compliance with the Code.

In the common interest, we want to ensure that the above principles are observed and implemented. If violations – whether by employees, suppliers or other business partners – are detected against these provisions, please contact your supervisor, the HR department, the internal whistleblowing channel or the works council. Of course, all reports are treated confidentially and examined carefully.

CONCLUSION

At Classen we believe that respecting human rights is fundamental to our success and long-term sustainability. We strive to create a positive and inclusive work environment and conduct business in a manner that respects the dignity of all individuals.

The Group Management Board is responsible for the systematic identification and assessment of sustainability-related impacts, risks and opportunities. This responsibility has been delegated to the head of Sustainability and his department, which is part of the Chief Financial Officer's remit.