

Code of Conduct

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1 Preamble

This Code of Conduct summarizes the main principles and rules governing all actions and standards which are set for elderbrook . All employees & associates of elderbrook are bound to this agreement. The Management’s aim is to comply with ethical rules and to create working conditions which foster integrity, respect, and fair behavior. In combination with compliance to legislative rules and regulations we will ensure the long-term corporate development.

This Code of Conduct was approved by the elderbrook Management.

2 Compliance with Laws and Guidelines

elderbrook is committed to adhere, at all times, to local and international legislation and guidelines. The national laws take precedence over rules applying at elderbrook whenever local legislation is stricter.

3 Responsibility

Trust and a good relationship between employees, associates and the Management will be reflected in an open communication and mutual support. All employees, associates, and the Management of elderbrook are committed to the rules of the Code of Conduct. The Management of elderbrook is responsible in ensuring that all employees & associates understand and act according to the Code of Conduct. Unacceptable conduct should be avoided, and suitable measures will be taken if misconduct is discovered. Information about potential misconduct shall be forwarded to the Management and will be treated as strictly confidential.

4 Conflict of Interests

elderbrook expects loyalty from all employees & associates towards the company. All employees & associates shall avoid situations where personal or financial interests are in conflict with the company's business interests. Any business, private or stakeholder relationships to competitive concurrent companies, suppliers, or customers in a private environment should be avoided, especially if this leads to a conflict of interest for elderbrook. Shall such situations occur they must be transparently reported to the Management and resolved in compliance with law.

5 Anti-Corruption

elderbrook stands for customer orientation with motivated and responsible employees & associates. The company is against corruption and bribery in any shape or form. We will not tolerate behavior nor business activities by unfair means. All employees & associates will never provide nor accept privileges, the doing of such will preclude objective or fair business. For elderbrook bribery or unfair agreements are unacceptable and will not be tolerated.

6 Confidential Inside Information

All employees & associates shall be obligated to adhere to the insider rules of the Security Trading Act, especially in case of access to confidential internal information relating to any of elderbrook's customers or business partners. An employee or associate who has insight to verifiable information or circumstances, which are unknown to the public, shall not buy, sell shares or other financial types of investments nor pass this information to other persons unless this information is made public.

7 Data Protection and Information Security

The protection of personal and sensitive data of employees, associates, customers and suppliers is of utmost importance to elderbrook. We only collect or process personal and/or sensitive data with the informed consent of the respective persons for the fulfilment of a contract or legal obligations. We adhere to national and international data protection rules.

8 Handling of Internal Information

All employees & associates of elderbrook are committed to the smooth exchange of information within the company. All information shall be correctly forwarded to the respective department(s) except where such information is restricted by a prior specific secrecy agreement(s). Specific knowledge shall not be deliberately withheld, changed or selectively forwarded.

Dishonest reporting within elderbrook or to external companies or persons is strictly forbidden. All financial reports of elderbrook shall adhere to the legal requirements in force.

9 Fair Working Conditions

elderbrook takes on the responsibility for conserving natural resources and for the protection of the environment and climate. All employees & associates shall foster a safe and healthy environment. Security rules will be strictly followed. All employees & associates shall ensure that environmental and climate impacts are kept to a minimum.

elderbrook considers all employees & associates as of great value. Open discussions, constructive criticism and ideas are welcome. We ask for engaged contribution to the company and in return we share our commercial success with the employees & associates in compliance with national legal standards.

10 Equal Treatment and Non-Discrimination

elderbrook promotes professional and personal development of all employees & associates. We respect free speech and protect personal rights and privacy. We have no interest in discrimination in any form, especially in the areas of recruitment, training, or development. We treat all employees & associates equally regardless of their gender identity, skin color, ethnic origin, religion, disability, age, sexual orientation or ideology.

11 Protection of Company Property

All employees & associates are responsible for the correct handling of company property. Every employee & associate is committed to prevent loss, damage, misuse, theft, fraud, or destruction of company property. Every employee & associate shall immediately report any of the above.