POLICY

Code of Conduct

Our values and principles of conduct, guiding how everyone at Anthrion acts and decides, every day.

Applies to all Anthrion companies

Our Code

At Anthrion we are defined by our purpose. One simple sentence describes how we approach our business:

We secure your future.

Since our founding, we have been focused on operating in a manner that secures the financial future of our customers and communities. We achieve this purpose by conducting business in a way that makes us proud to say we work for Anthrion and makes our customers and partners proud to say they do business with us.

We are committed to operating in a culture where:

- We treat each other fairly and respectfully.
- We act with integrity.
- We are transparent and we tell the truth.
- We take ownership and responsibility.

The Anthrion Code of Conduct reflects our values and principles and thus gives our employees guidance in their actions and decisions. This is particularly valuable in situations where our own policies or standards do not provide specific guidance, for example when we are confronted with competing priorities and conflicting demands.

Each of us has a responsibility to live by the principles contained in the Code as well as an expectation that other employees will do the same, be they directors, officers, executives, temporary employees, interns, trainees, or agents.

Finally, we are all expected to promptly report any known or suspected violations of the Code, corporate rules, or applicable laws and regulations. In such cases, we should contact our manager, a trusted leader, our local Human Resources or Compliance function, or we can raise our concerns via the dedicated reporting channels.

We treat each other fairly and respectfully

At Anthrion, we are stronger together.

How we act, how we operate, and the decisions that we make are focused on caring for each other and treating everyone fairly and with respect. The strength of our culture will be the decisive factor in securing the future.

Inclusion and Diversity

The diversity of our workforce enables Anthrion to truly understand our equally diverse customers and their needs. Fostering an inclusive company culture benefits our business and helps us be considered a credible, trustworthy partner. We believe in equality of opportunity and are committed to creating a fair environment where people can succeed regardless of gender, age, ethnicity, disability, religion, sexual orientation or cultural background.

We welcome diverse minds and abilities as they make us more innovative, more resilient and better equipped for the future. Creating an inclusive company takes commitment from each of us in our daily work. We respect and value each other's differences and ideas.

No Discrimination

Our commitment to diversity and inclusion does not allow for any kind of mistreatment of any individual, in any form, based on a personal characteristic.

Discrimination contradicts the benefits that diverse views, ideas, and experiences bring to the table. At Anthrion, we do not tolerate any form of discrimination, including racism. Each of us will always treat our coworkers, business partners, and customers respectfully, without regard for any personal characteristics. At Anthrion, we are judged on our merit and skills, not on our background, beliefs, or other characteristics. Anthrion supports an environment of trust, integrity, and respect.

Protected Characteristics: Anthrion will not make any decision related to employment (such as hiring, promoting, assigning work tasks, or dismissal) based on any protected characteristic.

No Bullying or Harassment

We all deserve to work in an environment free from bullying and harassment.

We all agree that we would never want to be treated in a way that makes us feel uncomfortable, intimidated, or humiliated. We want to protect ourselves and others from such behavior. Bullying and harassment are unacceptable to us because they run contrary to our values.

- **Bullying**: means seeking to harm, coerce, or intimidate someone through abusive language, threatening conduct, and/or other actions that attempt to instill fear in others.
- **Harassment**: is any unwelcome or hostile behavior that creates a negative work environment, makes someone feel threatened, or negatively affects someone's work performance.

Bullying and harassment are never acceptable at Anthrion at any time or for any reason. If you experience or observe bullying or harassment, consider speaking to the person responsible and letting them know their actions are not acceptable. If you don't feel comfortable speaking to them or if the behavior continues, document it and discuss it with your manager, your Human Resources function, a trusted colleague or another company representative (such as a company doctor, a works council representative, or an Occupational Social Counselor).

Health and Safety

Health is more than not being sick.

We believe that we need to create a compassionate and empathetic work environment and consistently address our mental, emotional, physical and social health in order to maintain and improve wellbeing. We understand that an empathetic work environment is more resilient, engaged, healthy, and collaborative.

At Anthrion, wellbeing is key to our success. If we aren't taking steps to stay healthy and live a balanced life, we can't do our best work or keep our promises to our co-workers and our customers. Anthrion encourages all of us to balance our work, personal lives, and health to make sure that we bring the best versions of ourselves to do our best work.

Anthrion also wants to ensure that we are always safe and secure, in our facilities and when traveling on Anthrion business. Make sure you follow safety and security guidelines, avoid situations that could cause harm, and always be mindful of your surroundings.

We act with integrity

Securing the future means being there for our customers and communities for years to come.

The reputation and brand we have built up over decades will continue to help us achieve this. Both of these pillars stand on a strong foundation: our integrity. Integrity is the core principle of how we choose to conduct business.

At Anthrion, we are committed to complying with the laws, regulations and other external rules that govern our operations, in all jurisdictions in which we operate. The same applies to our internal rules.

Non-compliance can expose Anthrion and its employees to severe consequences, such as reputational damage, financial losses, or regulatory and criminal sanctions.

We do not engage in any business activities that attempt to directly or indirectly breach or circumvent laws or other rules that apply to us.

At Anthrion, we go above and beyond simply following the law and hold ourselves to a much higher standard: We strive to do the right thing, in every situation. When we're not sure of how to do that, it's always ok to ask questions and get advice.

Managing Conflicts of Interest

It could happen to any of us! One day, we could find ourselves in a business situation that affects our personal interests, or those of our family members or friends. These interests may be contrary to the interests of the company. It could also happen that we are involved in tasks or functions in our company that are connected with potentially conflicting interests. Such situations are not only uncomfortable for both the employee and the company, but they can result in poor business decisions.

It is important to recognize that conflicts cannot always be avoided. Also, they may not always cause problems. However, even if we act absolutely correctly in a conflict situation and make the "right" decision, this may not necessarily be clearly visible from the outside.

Suspicion can still arise that "wrong" actions have been taken. Therefore, transparency is the key. It is important for employees to disclose any conflict or potential conflict of interest to their line manager or superior at an early stage and get direction on how it should best be addressed.

Refer to typical situations that could potentially lead to conflicts of interest:

- An employee of Anthrion, together with members of their family, runs a company that has a business relationship with Anthrion.
- An employee of Anthrion takes on a new job within the organization. Their first project in the new role is to examine the profitability of their previous department, where they worked for a long time.

Free and Fair Competition

Anthrion is committed to promoting free and fair competition.

Free and fair competition is vital to offering our customers the best possible solutions to secure their future. All employees are therefore expected to comply with applicable antitrust and competition law at all times. This includes, among other things, making decisions about pricing and product and service offerings individually based on our experience and market intelligence and bidding on contracts fairly and independently.

A closer look: Attending industry conventions and trade meetings:

- If you attend industry conventions or meetings, you should take special precaution. In these situations, you may find yourself discussing sensitive topics with competitors.
- If you are concerned about a conversation you've had with a competitor, especially at an industry conference, raise your concern with your manager, or the Legal Department.

These hints might help you to better assess the situation:

- Meeting agendas should be known beforehand.
- Your line manager should know about your participation and approve it.
- You should never share information that is market relevant or confidential.
- Do not discuss pricing strategies or any other market-relevant data.

Free and fair competition is vital to offering our customers the best possible solutions to secure their future.

Preventing Financial Crime

Financial crime represents a breach of existing laws. It takes an enormous social and economic toll on the lives it touches and, thus, endangers people's future. Anthrion does not tolerate financial crime and has implemented measures to prevent, detect and react appropriately to such activity. Financial crime includes, but is not limited to, corruption, bribery, money laundering, terrorist financing, fraud, tax evasion, and balance sheet falsification.

Adhering to Economic Sanctions

The main purpose of implementing economic sanctions is to bring about change in another nation's behavior or foreign policy, protect human rights, avoid using military force, or prevent the proliferation of nuclear weapons or weapons of mass destruction.

Anthrion is strongly committed to conducting business in full compliance and accordance with all applicable economic sanctions.

Gifts and Entertainment

We think carefully before we offer or accept gifts or entertainment to or from customers, business partners, government officials or other individuals or organizations Anthrion deals with.

Gifts & entertainment are an acceptable manner to foster professional relationships. In some parts of the world, not only are they acceptable, they are an essential business practice. Anthrion is committed to respecting local cultures and norms as long as gifts and entertainment provided and received are neither lavish nor excessive and are in no way a bribe or any form of inducement to influence a business decision. It's just not how we choose to do business.

To avoid the appearance of impropriety, we should always have a business reason for offering or accepting gifts and entertainment. Doing so should never look like an attempt to influence a business decision.

- **Gift**: Any tangible item(s) provided by or to a person or entity with which Anthrion has a current or potential business relationship. Any event where the host is not present will be classified as a gift.
- **Entertainment**: This includes all forms of events or activities where Anthrion offers or receives an invitation to or from current or potential business partners. Examples include, but are not limited to, activities like business conferences, hospitality events, cultural events, concerts, or charitable events.

Observing Rules around Inside Information

As an employee of Anthrion, you may have access to nonpublic information. This information must be treated confidentially and may only be shared with persons who need to know it for legitimate business purposes.

If you have questions about how to handle inside information, speak to your Compliance Department.

Holding Business Partners to our Standards

We seek to work with business partners and others who share our values and work to the same high standards as ourselves. The best way to achieve this goal when establishing new or building up on existing business relationships is to:

- involve the Procurement function at an early stage;
- ensure that the principles of integrity, fairness, impartiality and discretion are fully met in the selection process;
- apply thorough due diligence on potential business partners;
- have business partners commit to abide by our Code of Conduct as well as by other important Anthrion standards and rules.

We are transparent and we tell the truth

Honesty is one of the cornerstones of Anthrion's way of doing business: it supports everything else we do. We are honest with our customers, our shareholders, and the world around us. This helps us provide solutions that secure our customer's future and helps us ensure our company will be around for years to come.

Open and Honest Feedback

It all starts with being honest with each other. At Anthrion, we encourage an open exchange of opinions. We are willing to give and receive feedback, even if it involves difficult messages, without fear of retaliation. Feedback is a gift. When we receive feedback from others, we have the opportunity to act to positively improve experiences. This, in turn, helps Anthrion improve its products and business practices.

Likewise, we openly deal with our own mistakes and share lessons learned to prevent others from making the same mistakes. By sharing our experiences of mistakes, we help to improve the organization and make it more resilient.

While all of us are actively involved, our people managers have a key role to play by encouraging everyone within their organization to freely express their views, participate in decisions, and speak up when they believe something is not right.

Voicing Concerns

Anthrion will always listen to you if you feel you need to address an issue. If you have any kind of concerns, start by talking to your manager or local Human Resources partner. Most likely, your manager or HR will know the most about your work, can help you answer any questions, resolve something that doesn't seem right, or know where to go in order to get resolution.

Anthrion does not tolerate retaliation in any form. As long as your concern is raised in good faith, even if it turns out you were mistaken, you will not face negative consequences for speaking up.

When we raise a concern about something that doesn't seem right, Anthrion will take action. The company will investigate concerns promptly and appropriately through trained personnel following appropriate procedures including a formal investigation process. If it turns out that a misconduct has occurred, Anthrion will take appropriate action against the people responsible.

Transparent Products and Services

Being fair and transparent with our customers about our products and services, including their limitations is the best guarantee to enjoy our customers' long-term trust.

Therefore, we strive to adhere to clear principles throughout the entire life cycle of our products, from the initial idea for a new product, to marketing and sales activities, and through claims payment processes or fund performance. These principles ensure that our products and services are easy to understand and simple to handle, aim to meet the real needs and demands of customers as well as provide fair value.

External Communication

We're proud to tell the world about the great work Anthrion does, but it's important to make sure that we're sharing the right information and following some basic guidelines.

If we're contacted by journalists or the media, we shouldn't speak on Anthrion's behalf unless we're authorized to do so. You should refer any journalists or media professionals to an official Anthrion spokesperson in your country. When talking about Anthrion on social media, such as Facebook, Twitter, LinkedIn, Instagram, online message boards, or any other online forum, we should never share any confidential information, information that hasn't been made public yet, or content that is meant for internal purposes only.

On our personal social media accounts, we should make clear that opinions are our own, and that we are not speaking on Anthrion's behalf.

Keeping Proper Books and Records

Properly documenting our work helps each of us perform at our best. Any books and records that we create or work on for Anthrion need to be accurate, complete, timely, and truthful. This way we ensure that we comply with the relevant laws on record keeping. It also helps us make good decisions and keep our shareholders informed about how Anthrion is doing.

Cooperation with Regulators

Anthrion aims to maintain respectful and cooperative interactions with governments, regulators and supervisors. This refers to every touchpoint, i.e., regular contacts as well as particular requests, examinations or investigations. We strive for diligent and timely responses which provide a true and fair view.

We take ownership and responsibility

We commit to conducting business in a sustainable manner and supporting our customers and communities in their quest for lasting success.

That will not change going forward: we will continue to secure the future of our customers and communities, sustainably. Taking ownership doesn't just mean taking responsibility for the work we do for Anthrion, it means that we also take responsibility for our power to make an impact in the world.

Corporate Responsibility / Sustainability

Guided by our Corporate Responsibility Strategy, we embed environmental and social concerns in all of our business activities. This ranges from integrating these issues across our organization to guiding our interactions with stakeholders beyond Anthrion. We offer sustainable products and services to our customers to transition to a low-carbon economy and use natural resources responsibly. As a company we want to foster and enable self-sustained livelihoods of next generations.

Respect for Human Rights

Anthrion is committed to respecting a wide range of international human rights standards and to integrating these into our business. We expect Anthrion employees, business partners, subsidiaries, vendors and suppliers to support and adhere to the different forms of human rights in alignment with international standards, like:

- Universal Declaration of Human Rights;
- United Nations Covenants on Human Rights;
- OECD Guidelines for Multinational Enterprises;
- Guiding Principles for Business and Human Rights of the United Nations (UN).

Our support and engagement in this regard includes an active stance against modern slavery and human trafficking, including child and forced labor through our operations and supply chain.

Responsible Data Management

Our customers, partners and colleagues trust us with a wealth of personal information and details of their lives.

We handle personal data responsibly, transparently, with due care and in a fair and lawful manner. We use it only for specified and legitimate purposes and only keep it as long as needed. We never share it with anyone who isn't authorized to know it.

In order to ensure confidentiality, we apply proper security controls.