

Code of Conduct



Code of Conduct of PBS Holding AG Group

Foreword of the Board of Directors



Dr. Richard Scharmann, MBA
Chairman of the Executive Board



Mag. Andreas Schachtner
CIO / CTO



Mag. Christian Müller
CFO / Law / HR

Dear Colleagues,

As a strong partner for retailers and end consumers in the paper, office supplies and stationery sector in Central Europe, we have a special responsibility. We live from the trust of our business partners and the public, but also from trust among our employees. Responsible and ethical behavior and respectful interaction with one another are therefore an integral part of our corporate culture.

The integrity of each individual employee is indispensable and key to the success of our company. Lawful and correct conduct protects against significant legal and economic risks and strengthens the good reputation of our company.

This Code of Conduct conveys our principles, values and principles, which are substantiated by guidelines based on them.

This Code applies to all employees of the PBS Holding AG group of companies.

If you have any doubts about how to behave in a particular situation or need advice, please contact the Compliance Department, which will be happy to help you.

Let us work together to ensure the lasting and sustainable economic success and reputation of our company through rule-compliant and value-oriented behavior in everyday business.



Dr. Richard Scharmann
Chairman of the Management Board

General
Principles
of our
Action



We comply with applicable law

Compliance with existing laws, official regulations and internal company guidelines is a matter of course for us. Any violation of applicable laws or existing regulations can have significant consequences for the company. Examples include criminal penalties, possible claims for damages and damage to the good reputation of the PBS Holding AG Group.

It is the task of the respective manager to know the laws, regulations and internal company provisions applicable to his or her own area of responsibility and to ensure that these regulations are implemented appropriately. For persons in executive functions (management and authorized signatories) are subject to an increased duty of care, as these persons bear a special responsibility for the company both as role models for colleagues and as external representatives of the PBS Holding AG Group.

We promote respectful and trusting dealings with each other and ensure a discrimination-free environment

We attach great importance to a working environment characterized by mutual respect, tolerance and courtesy. Any form of harassment, discrimination and bullying is strictly prohibited. We share a common goal and work together to achieve it.

Ethical conduct
and conduct
with integrity
are a matter
of course for us



We take our responsibility with regard to health and occupational safety

A healthy and hazard-free working environment for all our employees is an important concern, which we ensure by complying with all laws on health and safety in the workplace.

We strictly separate the interests of the company and our private interests strictly

Our business activities are always guided by the interests of the company. Every colleague is required to avoid situations in which a personal or financial interest conflicts or could conflict with the interests of our company. Situations that could give the impression that our business decisions are influenced by personal interests are to be avoided.

Nevertheless, such conflicts of interest cannot always be ruled out. We disclose potential conflicts of interest to our superiors without being asked to do so, immediately and in full.

We live from
the trust
of our
business partners



We respect company property as well as the property of third parties and handle company assets responsibly

Company assets are used to provide the business purposes for which they are intended. Any improper use, especially if it serves illegal or inappropriate personal purposes, must be refrained from.

We respect the assets of the company and third parties. Any unlawful act leading to damage to these assets shall be prevented by appropriate management control measures.

We protect data and confidential information

Information is a valuable asset. We ensure that personal data is used exclusively within the legally permissible scope and that the confidentiality interests of the persons concerned, which are worthy of protection, are not violated.

The disclosure of confidential customer-specific or other information to third parties or its use for purposes that are not in line with the company's interests is prohibited without exception. Confidential information will be handled with the utmost care and in compliance with all legal framework conditions.

The integrity
of each individual
employee is
indispensable



We have no understanding for bribery and corruption

Bribery and corruption have no place in the corporate culture of the PBS Holding AG Group.

We therefore avoid all circumstances that could influence our impartiality or even create the appearance of influence.

This means that we do not grant, promise or accept any direct or indirect benefits that are likely to influence decision-making processes or business activities in an improper manner or even give the appearance of such influence. It also goes without saying that we strictly separate corporate interests from private interests.

Questions of doubt, both with regard to benefits received and those given, must be clarified in advance with the supervisor or the Compliance Department in a documented manner.

Our principle must be clear: We strictly reject corruption and bribery!

We also say „Fair play!“ in competition.


Fair play
also in
competition



We are committed to fair competition as the basis of our business activities and a prerequisite for our long-term corporate success. We expect our employees and business partners alike to comply with the applicable competition and antitrust laws.

We do not engage in any activities that restrict fair competition. In particular, we do not collude with competitors or disclose confidential information that could restrict or distort fair competition.

A violation of the applicable regulations could result in significant damage to us personally and to our company.



Always an
open door



pbs
holding ag

We have an open door to answer questions and address concerns

In many decision-making situations, there may also be uncertainty. Opportunities are provided to seek advice and support in cases of doubt from:

- the compliance officer
- the respective supervisor
- the respective company management

Compliance with the Code of Conduct must be ensured. If violations of the provisions of our Code of Conduct are identified, they must be reported to one of the above-mentioned bodies. We assure careful investigation and, in justified situations, absolute confidentiality about the identity. We support an open dialogue and have an open door for every colleague.

Questions and comments

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The image features a minimalist landscape. The bottom portion is a dark, textured foreground, possibly water or a field, with a dark brown to black color palette. The top portion is a light, gradient sky, transitioning from a pale grey at the top to a slightly darker grey near the horizon line. The overall composition is clean and modern.

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