CODE OF CONDUCT OF INTERSHOP Holding LTD

for business partners
(including suppliers, service providers, contractors, subcontractors, etc.)

Edition 2024

I. INTRODUCTION

Intershop Holding Ltd, including all subsidiaries (hereinafter referred to as «Intershop»), is committed to the consistent implementation of responsible, sustainable, and customer-oriented procurement principles. We are dedicated to our economic, ecological, and social responsibilities beyond our own value chain. Our direct and indirect business partners are important and valued stakeholders who share this comprehensive responsibility with us. As a company committed to the values of excellence, ownership, integrity, customer focus, and teamwork, we expect our business partners to share these principles, require the same adherence from their own partners, and act in accordance with their responsibilities.

Excellence is not only a goal for us, but a continuous commitment to the quality of our work and that of our business partners. We expect our business partners to strive to meet or exceed the highest quality and standards.

Ownership means taking responsibility for our work, our decisions, and the impact they have on society and the environment. Our business partners are encouraged to share this mindset and to embrace their role as responsible stakeholders.

Integrity is the foundation of our actions. We rely on honest, transparent, and legally compliant behaviour and expect the same from our business partners.

Customer focus shapes our work, and we expect our business partners to work with the same commitment to delivering solutions that meet the needs of our customers.

Team orientation is the key to sustainable success for us and shapes our understanding of collaborative partnerships. We strive to overcome challenges and celebrate successes together with our business partners.

This Code of Conduct serves as the foundation for a sustainable and responsible business partnership and defines, subject to stricter country-specific regulations, the minimum standards for cooperation. It applies to all business partners of Intershop who are in a direct or indirect contractual relationship with Intershop. By taking responsibility together, we create the foundation for a mutually beneficial collaboration that enables us to exceed the high expectations of our customers while also making a valuable contribution to society.

II. REQUIREMENTS FOR BUSINESS PARTNERS

a. Laws and Standards

Intershop expects its business partners to comply with all applicable laws, regulations, rules, and standards, possess the necessary permits, licenses, or concessions for their business activities, and to actively ensure that their own business partners, such as suppliers, service providers, and subcontractors, also diligently adhere to these requirements.

b. Partnership and Integrity

Intershop expects all business partners to work together in a spirit of partnership and trust, to be reliable and to have a strong customer focus. Furthermore, we require a willingness to be agile and flexible with the goal of finding joint solutions to any potential issues. These qualities are essential prerequisites for mutual economic success and the preservation of Intershop's excellent reputation.

Corruption and bribery in any form are strictly prohibited. This includes all types of unauthorized granting and acceptance of advantages. Likewise, unfair competition, anti-competitive agreements, and abusive practices that unlawfully impair fair competition are expressly forbidden. This prohibition also applies to any actions that violate applicable sanctions or embargoes. Intershop may require the business partner to provide a confirmation that neither they nor their own business partners are listed on national or international sanctions lists.

The business partners of Intershop are required to avoid conflicts of interest whenever possible and ensure that their employees are not unduly influenced by personal interests and relationships. Any business and personal connections that could potentially result in a conflict of interest or give rise to allegations of favouritism must be disclosed prior to entering into, and throughout the duration of, the business relationship. The misuse or disclosure of insider information is strictly prohibited.

c. Confidentiality and Information Security

The business secrets and confidential information made accessible by Intershop within the scope of the contractual agreement are only to be used for their intended purpose and not to the detriment of Intershop and are to be protected from unauthorised access by appropriate measures. Applicable data protection laws must be strictly adhered to. The processing of third-party data is also permitted solely within the scope of the business activities and in compliance with the applicable data protection regulations.

All business partners are required to obtain Intershop’s explicit consent prior to the publication of any external communication regarding Intershop or joint projects with Intershop. This provision also includes communication on social media.

d. Human Rights and Social Responsibility

Intershop respects, protects, and promotes human rights and demands the same from its business partners. Applicable laws on working hours, rest periods, and minimum wages must be adhered to. Fundamental rights, such as the right to freedom of association, must be respected and protected.

Child labour, illegal employment, and forced labour are strictly prohibited and must be eliminated throughout the entire value chain. No individuals may be employed who have not reached the statutory minimum age for employment. In the absence of, or in case of any other country-specific regulations that are not in line with ILO Convention No. 138 on the Minimum Age for Admission to Employment (SR 0.822.723.8), business partners must ensure that the minimum age of 15 years is adhered to both within their own operations and throughout their supply chain. Intershop may request a corresponding written confirmation from the respective business partner.

To promote transparency throughout the entire supply chain, cooperation with local suppliers, service providers, companies, and subcontractors is encouraged wherever feasible. Risks in the supply chain related to minerals and metals from conflict zones with harmful impacts, as well as with relation to potential cases of child labour in accordance with Articles 964j – 964l of the Swiss Code of Obligations («**OR**»; SR 220) in connection with the Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labor («**DDTrO**»; SR 221.433), must be eliminated or if not feasible at least minimized. The business partners must promptly inform Intershop if there is any suspicion of such risks and, upon request, provide all relevant information and documentation regarding the supply chain and the products used. Intershop has the right to prohibit and require the replacement of problematic products, without any cost to Intershop.

e. Working Conditions, Equal Opportunities, and Integration

Intershop requires its business partners to ensure fair and safe working conditions, wages that meet basic living standards, and to treat their employees with dignity and respect. Harassment, bullying, or intimidation will not be tolerated. Equal opportunities and non-discrimination are regarded as fundamental principles. Discrimination based on age, religion, gender, origin, ethnicity, skin colour, sexual orientation, belief, disability, political affiliation, or any other identity-related characteristic is strictly prohibited and may result in sanctions.

Intershop’s business partners must comply with the applicable health and safety regulations at all times. The health of all employees and the prevention of accidents must be proactively promoted through appropriate training, in addition to preventive measures and policies. Accidents occurring during work on behalf of Intershop must be reported immediately.

f. Environmental Protection and Resource-Efficient Sourcing

Environmental sustainability and eco-conscious practices are essential components of Intershop's corporate philosophy. T Intershop’s stated objective is to continuously reduce direct and indirect CO2 emissions and achieve net-zero by 2050. Business partners are required to conserve valuable natural resources and continually strive for environmental improvements within the scope of their business activities, and make contributions throughout the value chain to prevent negative environmental impacts.

The business partners of Intershop must pay particular attention to sourcing resource-efficient and environmentally friendly materials, and, where possible, incorporate recycled and especially sustainable components. In addition, the proper and professional disposal of construction debris and other waste must be strictly adhered to.

Furthermore, Intershop expects its business partners to take all reasonable measures to continuously mitigate the negative impact of their actions on the environment.

III. Implementation and Reporting

The business partners of Intershop are responsible for complying with this Code of Conduct within the scope of the relevant contractual agreement. They undertake to regularly train their own employees and, where feasible, their own business partners to ensure compliance with the Code of Conduct. Upon request, they shall provide Intershop with all relevant information, such as training records. Intershop is entitled, at its discretion and at its own cost, to conduct audits of its business partners, either directly or through third parties, to verify compliance with the Code of Conduct. In the event of any indications of potential violations, Intershop reserves the right to undertake additional investigations.

In the case of minor violations of the Code of Conduct, Intershop will initially make efforts to assist its business partners in taking appropriate measures to promptly rectify the issue. However, in the case of serious violations or if, following a complaint, the business partner fails to take appropriate corrective measures within the deadline set by Intershop, Intershop reserves the right, to terminate the collaboration with immediate effect, without liability for damages, and to assert any claims it may have against the non-compliant business partner.

Business partners are required to notify Intershop immediately upon becoming aware of any misconduct towards Intershop by themselves, their own suppliers, service providers, contractors, subcontractors, or affiliated parties. Any observations or suspicions can be reported anonymously to https://X.integrityline.io/ at any time. Intershop guarantees the confidentiality of all reports.

IV. Entry into force

The Code of Conduct shall enter into force on December 12, 2024. The most current version of the Code of Conduct for business partners is available on Intershop's website (www.intershop.ch).

Zurich, 12 December 2024

Intershop Holding AG

For the Board of Directors





Ernst Schaufelberger

Chairman of Board of Directors

Dr. Christoph Nater

Member of Board of Directors