

# Code of Conduct

## Applicable to All Companies and Locations of the zooplus Group

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All texts always refer to women and men equally regardless of the form used.

The following provisions apply to all companies and locations of the zooplus Group ("zooplus"), as well as to all employees, managing directors and members of the Management Board ("employees").

## Preamble

The trust of our business partners, customers, shareholders, authorities and the public in the responsible and lawful conduct of our employees is of great importance to our company's reputation and success. All employees are expected to possess a high level of social and ethical competency. This expectation also applies when we select of our business partners. Through the company's managers, zooplus will keep employees informed and actively support them in meeting these expectations.

Responsible and lawful action is common practice at zooplus. As such, this Code of Conduct does not contain any new rules, but rather illustrates the requirements concerning our behavior when performing our duties, both externally and internally. In doing so, employees have a duty only to the company and not to individuals such as a supervisor. Compliance with the laws and regulations of all countries in which we operate is our highest priority. We do not do or refrain from doing anything that would lead to a violation of the law. Exceptions to this are not permitted, not even based on customary business practices or regional customs.

The Code of Conduct is not intended to replace detailed rules or procedures and is therefore broad and inherently generic. Instead, by naming the core elements of individual and corporate responsibility, it should serve to give all employees a clear understanding of the principles and ethical values that apply at zooplus.

## General Behavior Requirements

### I. Equal opportunity and prohibition of discrimination

It is a fundamental zooplus principle that all employees, business partners, customers of the company or other persons are treated with respect and dignity at all times. No one may be discriminated against, because of race, color, nationality, origin, gender, religion or beliefs, political attitude, age, physical constitution, sexual orientation, appearance or other personal qualities or disadvantaged for no objective reason.

Behavior in which employees are systematically disparaged, marginalized or unreasonably placed under pressure by colleagues or supervisors ("mobbing") is not tolerated at zooplus and leads to disciplinary consequences under labor law.

### II. Social responsibility

The observance of human rights and fundamental social standards is the basic principle of all human coexistence. Working conditions that violate such rights and standards are contrary to this principle. This applies within the company as well as in cooperation with business partners. All employees are responsible for ensuring that human rights and fundamental social standards are not violated in their area of authority and influence.

### III. SAFETY, HEALTH AND ENVIRONMENTAL PROTECTION

In its business activities, zooplus adheres to the applicable health, safety and environmental laws as well as to recognized corporate standards and best practices. zooplus takes all reasonable and practicable steps to ensure a safe, healthy and clean working environment.

It is also up to the employees of zooplus to ensure a safe and healthy working environment. Strict compliance with health, safety and environmental regulations and practices is an essential requirement.

### IV. USE OF THE TELEPHONE, EMAIL AND INTERNET

Internet, intranet, and e-mail communication, as well as computer systems, are essential tools for the business of zooplus. Inappropriate use can lead to serious consequences for zooplus and each individual employee and is therefore not permitted.

When using the Internet, any access to content that is criminally relevant; infringes on ethical principles; has racist, sexist or pornographic content, insults or otherwise runs counter to the reputation and interests of zooplus must therefore be avoided. Access to data that could jeopardize the security of the zooplus IT system is also specifically prohibited.

### V. HANDLING OF INTELLECTUAL AND COMPANY PROPERTY

Intellectual property laws protect valuable zooplus assets, including trademarks, designs, regulatory data, copyrights, trade secrets, domain names and other related rights. zooplus respects the intellectual property rights of third parties and expects all employees to do the same.

The property of zooplus may only be used for business purposes. Each employee is obliged to protect the property of zooplus against loss, damage or theft. Office and work materials, samples and zooplus products are also company property. The private use of company property is only allowed if individual legal or company regulations or operational practices provide for this.

### VI. WORK SAFETY & HEALTH AND FIRE PROTECTION

In the working environment, zooplus assumes responsibility for the health and safety of its employees from the point of view of occupational safety as well as health and fire protection. zooplus AG takes the best known precautionary measures to contain risks and avoid or prevent accidents and work-related illnesses.

zooplus AG regularly conducts training courses for employees on various occupational safety and first aid topics.

### VII. Product safety

With more than 8,000 products, zooplus offers its customers a wide assortment. The vast majority of the product range consists of internationally known brands. Under the umbrella of a private label company, zooplus also manufactures its own branded products and cooperates directly with suppliers from different countries. Pet food production and retailing require the utmost in responsibility towards our customers, employees and the environment. zooplus has committed itself to high standards and strict control mechanisms in order to guarantee the quality and product safety of its own brands in particular. zooplus expects the same level of responsibility from its brand suppliers.

## Dealing with Business Partners and Third Parties

### I. CODE OF CONDUCT FOR SUPPLIERS

zooplus is committed to ensuring that goods and services are sourced only from those suppliers who are committed to upholding and respecting ethical codes of conduct.

The zooplus Supplier Code of Conduct sets out the requirements and expectations that must be met by all suppliers and their affiliated companies – including suppliers, factories and approved subcontractors – to have business relationships with zooplus and its related businesses.

The ethical principles described in this Code of Conduct are based on the principles of the United Nations Global Compact, the International Labor Standards drawn up by the ILO, the United Nations Universal Declaration of Human Rights and the UN Convention against Corruption. Our suppliers and their affiliates must abide by the stated principles and commit to making every effort to continually promote compliance with these principles.

### II. COMPETITION & ANTITRUST LAW

zooplus is committed to fair and open competition in markets within and outside Europe. zooplus therefore complies with the applicable laws protecting and promoting competition, specifically the applicable antitrust laws and other laws regulating competition.

Our companies and employees must not engage in any unlawful and / or criminally relevant practices, such as unlawful bid rigging, that excludes, restricts or distorts competition.

As the lines separating unlawful cartels and permissible cooperation can be problematic, zooplus' Legal Department is available as a contact for any queries.

In addition, antitrust training is held regularly, and training materials are provided.

### III. PREVENTING AND COMBATTING CORRUPTION

Receiving or granting benefits in order to gain a material or immaterial advantage for you or a third party is a criminal offense worldwide. Therefore, no employee may obtain improper benefits for themselves, business partners, their employees or other third parties in connection with business activities of any kind. Actions and (purchase) decisions must be made free of extraneous considerations and personal interests.

An inadmissible advantage can be assumed especially in cases where the nature and extent of this advantage are such as to unduly influence the actions and decisions of the recipient. Third parties (e.g., consultants, service providers and other intermediaries) may not be used to circumvent this rule.

So-called "cultural expectations," such as the alleged tendency in certain countries or regions to accept gifts or personal benefits in return for doing business, or to practice another type of bribery or pay bribes, are no excuse for violating this Code of Conduct and the applicable legal regulations.

Individual violations can also jeopardize zooplus's existence (share price loss, loss of confidence, etc.). Violators will therefore incur disciplinary consequences under labor law and, where applicable, criminal consequences.

#### IV. GIFTS AND OTHER BENEFITS

No employee may, directly or indirectly, accept or grant gifts and other benefits that may reasonably be expected to influence business decisions. Invitations and gifts must be within the bounds of customary hospitality. The supervisor in each case must be informed if invitations and / or gifts are offered that do not meet the criteria mentioned. The granting or accepting of cash or cash assets is prohibited regardless of their amount.

#### V. DONATIONS AND SPONSORING

zooplus makes no direct or indirect donations to political organizations, political parties or individual politicians. Any exception to this rule must first be clarified with the Management Board. Sponsorship and donations to other non-political recipients should not be used to circumvent the provisions of this Code of Conduct. The use of the charity brand "zoolove by zooplus" as well as donations to charitable organizations are allowed and explicitly requested.

#### VI. TRADE CONTROLS

zooplus also maintains international trade relations and is actively involved in the cross-border exchange of goods. zooplus complies with relevant trade controls and the current regulations on import and export control.

#### VII. AVOIDING CONFLICTS OF INTEREST

zooplus expects loyalty to the company from its employees. All employees must avoid situations in which their personal or financial interests conflict with those of zooplus. Therefore, it is especially prohibited to take a stake in competitors, suppliers or customers or to enter into business relationships with them in the private sphere, as far as this may lead to a conflict of interest.

Conflict situations should not affect the interests of zooplus. For example, no employee may accept any benefits whatsoever that may reasonably be expected to affect business decisions or transactions of zooplus. Invitations must be within the bounds of customary hospitality. Because of their position at zooplus, employees should not gain personal benefits directly and / or indirectly through access to confidential information.

All employees have a duty to promote the legitimate interests of zooplus as much as possible. Any competition with the company should be avoided. Any actual or potential conflict of interest must be reported and discussed with the relevant supervisor.

## Handling Information

### I. CONCLUSION OF CONTRACTS AND DOCUMENTATION OF BUSINESS TRANSACTIONS

All business transactions must be documented in a timely, complete and proper manner in accordance with the statutory guidelines as well as zooplus' own internal guidelines. Each employee shall be committed to this goal.

Furthermore, employees are only entitled to make binding declarations for zooplus or to sign contracts within the framework of the internal representation, signature and approval guidelines.

Proper accounting is essential for guiding company decisions, ensuring correct financial statements and to fulfill the requirement of public information about the financial position of public companies. Insofar as accounting duties are the responsibility of employees, they are therefore expected to know and comply with all financial and accounting principles in their current version.

### II. DATA PROTECTION & INFORMATION SECURITY

Personal data may only be collected, processed and passed on within the framework of data protection regulations.

Demands are high when it comes to the handling data, especially when dealing with sensitive data. Violations may also have criminal consequences. A transfer of data to third parties is only possible under strict conditions. In any case, the data may only be used for the purposes for which it is collected, and not beyond. In case of doubt, contact the data protection officer or the legal department.

The business and trade secrets of zooplus are an essential asset. They must be treated confidentially. This includes all information whose confidentiality zooplus, its contractual partners, customers and employees have an interest in. Such information may not be disclosed to unauthorized persons without permission. This obligation continues after termination of the employment relationship.

Passwords must be kept secret, and confidential information must be kept secure.

### III. INSIDER RULES

In order to protect investors' confidence in the functioning of the capital market, zooplus is committed to complying with all laws and regulations regarding the handling of insider information, particularly the prohibition of insider trading.

## Implementation and Monitoring of the Code of Conduct and Whistleblower Hotline

The rules contained in this Code of Conduct form a core element of zooplus' corporate culture. Compliance with these principles is indispensable. Every employee is responsible for their compliance.

If an employee has concerns or complaints about the points raised in this Code of Conduct or any knowledge of any breaches of the Code of Conduct contained herein, the employee should submit this complaint to his supervisor for clarification.

zooplus offers the opportunity to anonymously report any evidence of serious personal misconduct on the part of employees. Tips are followed up consistently. Confidentiality and discretion are a top priority. All matters resulting from the use of the whistleblowing system are investigated and dealt with by the Whistleblower Compliance Team. In addition, zooplus has set up an external reporting office, which is staffed by an external trusted attorney.

All information in cases of suspicion will be followed up. If there are specific indications, internal compliance investigations will be carried out. If employee misconduct is detected, zooplus may take disciplinary action under labor law.

zooplus does not permit reprisals for complaints raised in good faith under this Code of Conduct.