



# CODE OF CONDUCT

The OHB Group Code of Conduct

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1.

PORTRAIT

## COMPANY PROFILE

OHB SE is a European space flight and technology group and one of the most important independent forces in European aviation/aerospace. With more than 40 years of experience in developing and executing innovative space technology systems and structures and its range of specific aviation/aerospace and telematics products, the OHB Group is superbly positioned to face international competition. "Structure follows strategy" - it is in line with this principle that OHB SE has structured its business units. Segmentation reflects the strategy of integrating the individual subsidiaries more effectively in order to harness synergistic benefits and to pool related areas more efficiently. Reflecting this, the Group's skills, strategies and solutions are pooled in three core segments:

## BUSINESS UNITS

The **"SPACE SYSTEMS" business** unit focuses on developing and executing space projects. In particular, it is responsible for developing and fabricating low-orbiting and geostationary small satellites for navigation, research, communications and earth observation including scientific payloads. Its human space flight activities chiefly entail the assembly and operation of the International Space Station ISS, Columbus and ATV. Specialists in the exploration segment work on studies and models for exploring our solar system, primarily the moon and Mars. In addition, efficient reconnaissance satellites and broadband wireless transmission of image data form core technologies for security and reconnaissance.

The **"AEROSPACE" business** unit is responsible for fabricating aviation and space products as well as for other industries. In this area, the OHB Group has positioned itself as a significant supplier of aerospace structures for the aviation and space industry; among other things, it is the largest German supplier of components for the Ariane-5 and Ariane-6 programs and an established producer of critical components for aircraft engines. In addition, OHB telematics systems serve the logistics industry around the world by offering efficient transport management and consignment tracking facilities.

The **"DIGITAL" business** unit ensures the reliable operation of satellites and satellite ground systems as well as airport security applications. Another focus is on the provision of digital systems (for example, for cybersecurity) for German railway company Deutsche Bahn. As well as this, the OHB Group is an experienced vendor of mechatronic systems for antennas and telescopes and is involved in several major radio telescope projects.



## FOREWORD BY THE MANAGEMENT BOARD

### ON THE IMPORTANCE OF THE CODE OF CONDUCT

Dear colleagues,

our Company's reputation and the trust of our customers, investors, employees and the general public hinge crucially on the specific conduct of each and every individual working for the OHB Group. Responsible and ethical conduct towards other employees, business partners, society and the environment forms an integral part of OHB's system of values. Every member of our organization must contribute to ensuring that our Company does justice to the responsibilities and values described.

This Code of Conduct sets out minimum standards that are binding on all employees and every unit within the OHB Group worldwide. Its purpose is to help address legal and ethical challenges in our daily work, to provide a guide and thus to further strengthen confidence in the OHB Group's capabilities and integrity.

We would particularly like to emphasize three points in this connection:

- There is no substitute for personal integrity and sound judgment on the part of every individual in our Company. In order to do justice to our social responsibility, it is essential for all of us to be familiar with the laws and regulations that are relevant for our work and to assume personal responsibility for complying with them in our own working environment.
- Managers have a particular function as a role model in this regard. Credibly putting our values into practice, ensuring that our corporate culture is the way it should be and resolutely combating any conduct that is not in line with the applicable rules and regulations or the Company's fundamental values – all these tasks are the responsibility of every manager at OHB.
- It is also up to the Company and its managers to create a climate in which all matters can be addressed openly and without any fear of recrimination. This applies in particular to violations of the Code of Conduct: Anyone who learns of such violations should initially be able to contact a person of trust in their immediate working environment. If this is not possible or advisable in a given situation, OHB employees can turn to several contact persons, particularly the members of the Compliance Department, as well as using the **We.Create.Integrity** whistleblower system. The specific contact persons are described in greater detail in this Code.

This Code of Conduct is binding on OHB SE and all companies that are directly or indirectly controlled by OHB SE.

In the interests of gender-sensitive language, we have endeavored to use gender-neutral personal pronouns and job descriptions. Where this has not been possible for linguistic reasons, we use only the female form for the sake of simplification and better readability of the text. The sole use of the female form applies to all genders and does not constitute any form of discrimination.

Our Company's continuity and ongoing development depend to a large extent on our commitment to social responsibility and our reputation as a trustworthy business partner. We thank you for making a contribution to this through your own personal integrity.

Bremen, December 2021

The Management Board



**Marco R. Fuchs**  
Chairman of the Management Board



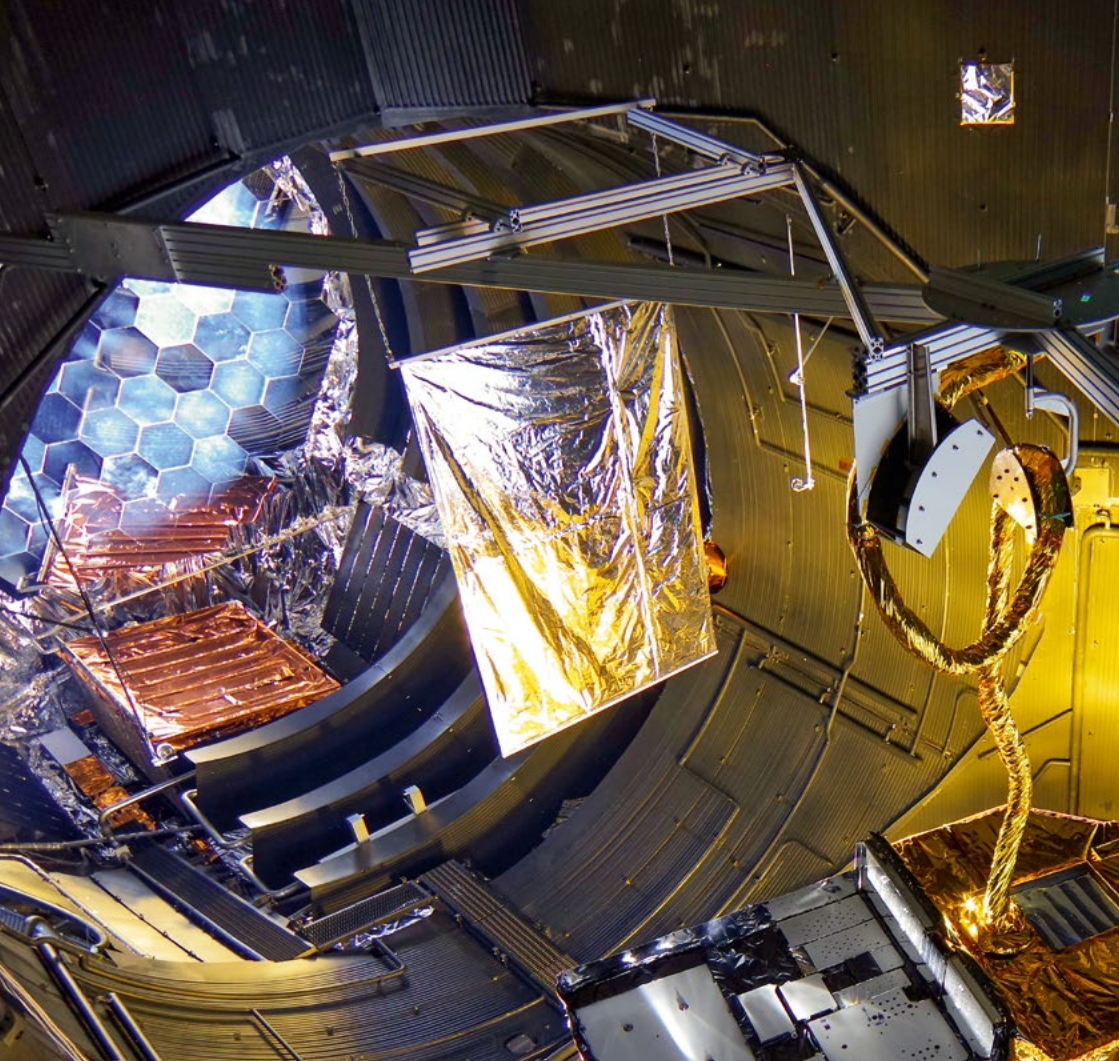
**Dr. Lutz Bertling**  
Member of the Management Board



**Kurt Melching**  
Member of the Management Board



**Klaus Hofmann**  
Member of the Management Board



# 2.

## PRINCIPLES





## **2.1 OUR GUIDING PRINCIPLES**

### **WE ARE AWARE OF THE UNDERLYING REQUIREMENTS FOR LONG-TERM AND SUSTAINABLE BUSINESS SUCCESS.**

#### **2.1.1 Social acceptance**

The social acceptance of our activities forms the basis for our long-term and sustainable business success. We are mindful of the fact that our reputation is shaped by the conduct, actions and behavior of each and every individual in our Group. All employees respect the OHB Group's reputation within the Company and are guided by this principle in performing the tasks that have been assigned to them.

## **WE COMPLY WITH LOCAL, NATIONAL AND INTERNATIONAL LAW.**

### **2.1.2 Observing applicable law**

Complying with all applicable laws and regulations at a local, national and international level is a matter of course for us. Any violation of the applicable laws or regulations may have serious ramifications, such as criminal penalties, liability for compensation and damage to our reputation. All employees and each member of the Company's governance bodies are under a duty to comply with the applicable law.

All managers are required to know the basic laws, regulations and internal company rules that are relevant to their area of responsibility. Comprehensive knowledge is particularly necessary for managers who have a special responsibility for ensuring compliance due to their function or position in a governance body (e.g. members of the Management Board, managing directors, managers in the areas of compliance, legal, human resources, auditing and risk management).

Stricter rules than those described in this Code of Conduct may apply in individual countries, business segments or markets or in relations with business partners. In such cases, the stricter rules must always be applied.

If there are any doubts regarding the legal appropriateness of a decision, a (legal) expert from within the Company must be consulted (see also Section 4: Contact persons for the Code of Conduct).

## **WE ENSURE RESPONSIBLE CORPORATE GOVERNANCE.**

### **2.1.3 Responsible corporate governance**

In addition to the interests of our customers, we take account of those of our shareholders, employees, suppliers, lenders and other stakeholders with the aim of sustainably enhancing the Company's enterprise value, as reflected in a dividend that is oriented to the Company's success, and of preserving jobs.

The basic structure of responsible, transparent and value-oriented corporate governance is derived from the applicable laws, the Company's articles of association and the internationally recognized standards set out in the German Corporate Governance Code. The ongoing review of and, where necessary, adjustments to the main functions of our management and control system ensure that our economic goals can be achieved and all legitimate claims duly settled.

In addition to the laws and regulations of the individual countries, there are a number of conventions and recommendations issued by supranational organizations. They are primarily targeted at the signatory states rather than directly at individual companies. However, they provide an important guide to the responsible conduct of internationally active companies and their employees. The OHB Group therefore attaches great importance to compliance with these guidelines in its business conduct worldwide.

Here are the main conventions of this type:

- Universal Declaration of Human Rights of 1948 (UN) and European Convention for the Protection of Human Rights and Fundamental Freedoms, 1950.
- ILO (International Labor Organization) Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, 1977, and ILO Declaration on Fundamental Principles and Rights at Work, 1998 (mainly covering the prohibition of child labor, the abolition of forced labor, the prohibition of discrimination, freedom of association and the right to collective bargaining).
- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, 1997.
- "Agenda 21" on sustainable development (final document of the fundamental UN Conference on Environment and Development, Rio de Janeiro 1992).

**WE ENCOURAGE OUR EMPLOYEES TO ADDRESS ALL MATTERS OPENLY AND WITHOUT ANY FEARS OF RECRIMINATION. EMPLOYEES WHO RAISE CONCERNS IN GOOD FAITH WITH RESPECT TO MATTERS WITHIN THE COMPANY MUST THEREFORE NOT EXPERIENCE ANY REPRISALS AS A RESULT.**

#### **2.1.4 Voicing concerns openly**

The ability to openly voice concerns materially helps to reduce the incidence of misconduct and ensures that it is detected and eliminated as quickly as possible. For this reason, we attach importance to a climate of openness in which employees can approach their superiors or the management without hesitation and in confidence, even in critical situations. Managers encourage their staff to openly voice their concerns, stand by their employees and address any matters brought to their attention fairly and free of any preconceptions.

Attempts to intimidate employees who report actual or suspected misconduct in good faith and to threaten them with reprisals cannot be tolerated. "In good faith" means that the employee is convinced of the truth of their report, regardless of whether a subsequent investigation confirms it or not.

If employees nevertheless have any reservations about discussing their concerns with a person of trust in their immediate working environment, or if this does not have any effect, they can approach any of the contact persons for the Code of Conduct referred to in Section 4 at any time. In addition, employees are also free to use the **We.Create.Integrity**. whistleblower system anonymously if they wish to.

<https://www.bkms-system.com/wecreateintegrity>

## **WE TREAT EACH OTHER WITH RESPECT AND TRUST. WE CREATE A WORKING ENVIRONMENT THAT IS FREE OF DISCRIMINATION.**

### **2.1.5 Trust and respect**

We respect all employees equally – regardless of their nationality, culture, religion, ethnic origin, gender, sexual orientation, age, pregnancy or parenthood, marital status, disability or confession, or any other factors subject to the prohibition of discrimination. As a Group active worldwide, we treat our employees fairly and openly as well as with understanding and tolerance. Personnel-related decisions, e.g. recruitment, promotions or disciplinary measures, must be made free of any discrimination. We do not tolerate any discriminatory conduct towards other employees or job applicants. This means that the Company also expects every employee to treat their colleagues, coworkers and third parties in the same way.

Every single person has the right to fair, dignified and respectful treatment. We are committed to equal opportunities and to promoting a working environment that is characterized by respect and tolerance, in which the value and dignity of each individual are acknowledged and all employees treat each other with mutual courtesy, honesty and dignity. Harassment, bullying and intimidation are prohibited and will not be tolerated.

Each manager bears responsibility for their employees. They must earn recognition through their own exemplary personal conduct, performance, openness and social skills. Managers place their trust in their employees and agree on clear, ambitious and realistic goals, while giving their employees as much personal responsibility and freedom as possible.

Creating a positive working environment requires the recognition of employees' rights. Observance of acknowledged health and safety standards in the workplace is a fundamental principle. Providing working conditions that are conducive to good health forms part of managers' duty of care towards their employees. Comprehensive social dialog is also one of the OHB Group's ongoing commitments. The Group also feels obliged to ensure equal opportunities for its employees and to give them scope for personal development.

**WE ENCOURAGE TRAINING AND UPSKILLING AS WELL AS THE COMMITMENT AND PERFORMANCE OF ALL EMPLOYEES.**

**2.1.6 Targeted development**

We owe the OHB Group's success to the knowledge, experience and commitment of each individual employee. The OHB Group invests in the training and upskilling of its employees; commitment and performance are particularly encouraged. In this way, we ensure the OHB Group's future viability.

## **EVERY PERSON HAS THE RIGHT TO FREELY EXPRESS THEIR OPINION ON ANY MATTERS RELATING TO THE COMPANY.**

### **2.1.7 Freedom of expression**

The OHB Group fundamentally supports the involvement of its employees in public functions at a municipal or supra-regional level. If these activities are related to the OHB Group's business, the prior approval of the responsible manager is required.

Statements made by employees of the OHB Group in public are fundamentally protected by the right to freedom of expression. In particular, all employees must ensure that any official appearance in the public domain is not detrimental to the OHB Group's reputation. When expressing their own personal opinions, employees should not make any reference to their own role or activities within the Company.

**WE DISCLOSE POTENTIAL OR ACTUAL CONFLICTS OF INTEREST AND RESOLVE THEM AS QUICKLY AS POSSIBLE.****2.1.8 Conflicts of interest**

The OHB Group attaches importance to ensuring that its employees do not experience any conflicts of interest or conflicting loyalties in the performance of their duties. Such conflicts may arise if employees work for or hold a share in another company. For this reason, it is not permitted to engage in any business or hold a substantial direct or indirect stake in an entity that is competing with or maintains a business relationship with any of the OHB Group companies in whole or in part. This does not apply to secondary employment and investments that can be demonstrated to be free of any influence on the OHB Group's activities and/or have been approved by OHB. This does not have any effect on the rules applicable in the individual companies concerning the duty to disclose secondary employment.

The OHB Group's governance bodies and employees must avoid any situation in which a conflict may arise between their personal interests and those of the OHB Group or which gives the impression of causing such a conflict. A conflict of interest may arise if a member of a governance body or an employee takes any action or pursues any interests that may make it more difficult for them to fulfil their duties objectively and effectively and to exercise their responsibility towards the OHB Group.

All of the OHB Group's business activities and relationships are consistent with its business and technical goals and are based on regular, legally solid business relationships with partners and suppliers.

When recruiting staff who are working or have previously worked for government agencies, the OHB Group observes the laws and regulations governing the conflicts of interest. These rules may limit the OHB Group's ability to recruit certain persons from this group of people and the extent to which their services may be used. This also applies to contacts or negotiations with government employees regarding employment opportunities within the OHB Group or their use as consultants or subcontractors.



Relationships between OHB Group companies and their business partners – both suppliers and government agencies and their employees – must be transparent, especially with regard to purchasing and sales. This applies equally to relationships with former OHB Group employees who now directly or indirectly supply the Group with goods or services.

Employees and members of the governance bodies exposed to a potential or actual conflict of interest are required to promptly notify their line manager, management or the corresponding governance body in order to ensure swift resolution of the matter.

## **WE TREAT THE COMPANY'S PROPERTY AND ASSETS RESPONSIBLY.**

### **2.1.9 Protection of Company assets and anti-fraud efforts**

We attach importance to handling Company property of all kinds, e.g. products, work equipment or intellectual property, responsibly.

Assets owned by the OHB Group companies (including documents and information) may not be viewed, used, disclosed or modified without appropriate authorization. In no case may they be stolen, damaged or destroyed unless the destruction is necessary for operational reasons.

Through their conduct, employees help to strengthen and protect the Group and its image. The OHB Group expects all employees and business partners to protect the Group's tangible and intangible assets and its reputation. These assets particularly include real estate, consumables and inventories; securities and cash; office equipment and supplies; information systems including software; patents, trademarks and copy-rights; and proprietary information and expertise.

As a general rule, Group property may only be used in the pursuance of the OHB Group's business activities. Instruments, tools and other equipment made available to employees must be handled with the utmost care.

Employees must treat third-party property and rights with the same care and in the same way as the assets owned by the OHB Group. Any form of fraud is prohibited, regardless of whether it damages the Company's assets or those of third parties.

## **WE OBSERVE THE NATIONAL AND INTERNATIONAL RULES FOR THE IMPORT AND EXPORT OF GOODS AND SERVICES.**

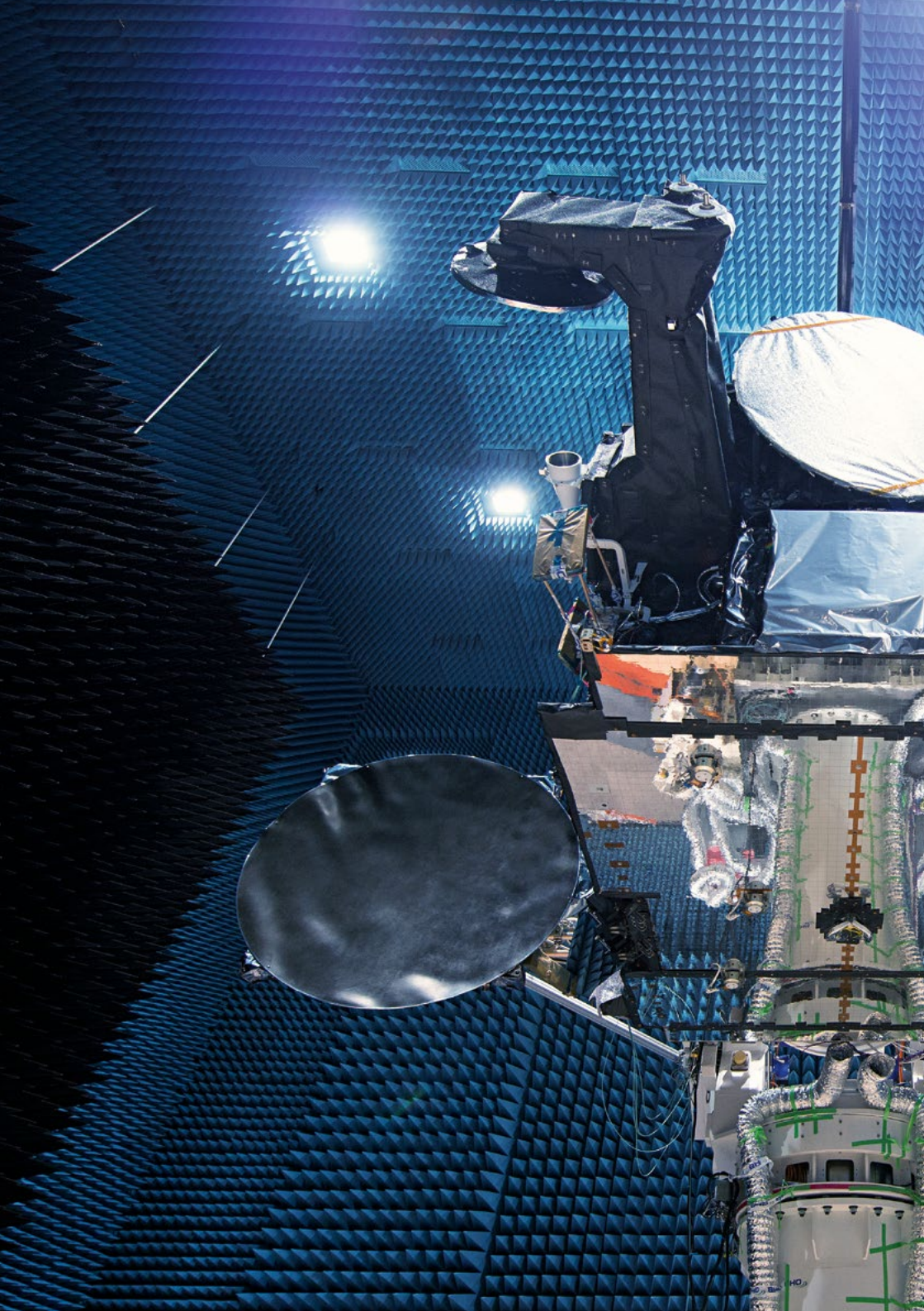
### **2.1.10 Import and export controls**

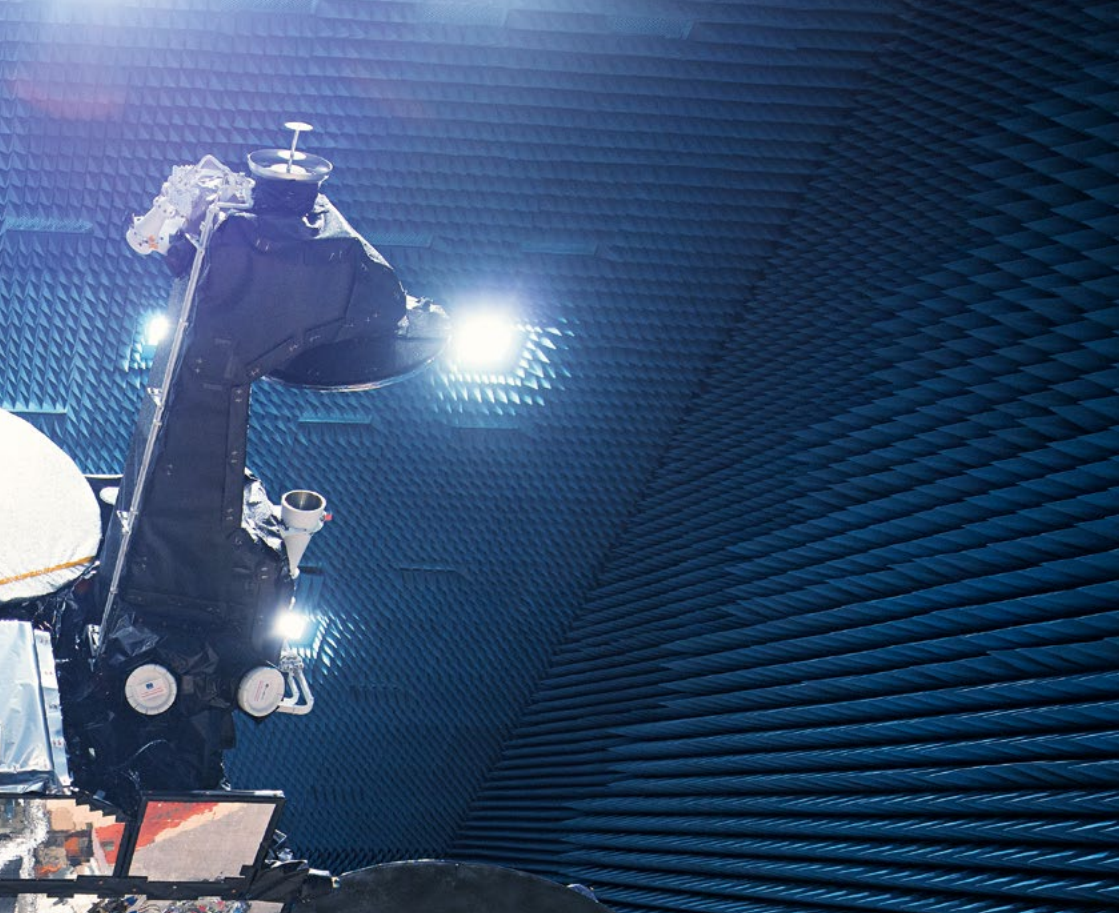
All employees involved in the import or export of goods, services or technical information must be aware of and comply with the relevant rules and regulations. In addition, they must ensure that import and export documents are complete and free of any errors.

All OHB Group employees must comply with export and import control legislation for goods and technical information. Applicable approval requirements within the companies must be observed.

If exports of products and technical data are subject to any restrictions in the country concerned, employees must obtain appropriate licenses and other governmental approvals beforehand.

All employees must provide truthful and accurate information on all export transactions, including information on technical data and the economic value.





# 2.2

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DEALING WITH  
BUSINESS PARTNERS  
AND THIRD PARTIES

## **WE ACT WITH INTEGRITY IN OUR BUSINESS RELATIONSHIPS WITH OTHERS AND ALSO EXPECT OUR BUSINESS PARTNERS TO COMPLY WITH THE LAW.**

### **2.2.1 Relations with business partners**

Our business partners (e.g. customers, suppliers, representatives and consultants) expect to be able to rely on OHB as a business partner that complies with all laws. We are aware of our contractual obligations towards our business partners, comply with them and, if necessary, exercise our rights under them.

Market participants can only unleash their full potential in fair competition with each other. For this reason, competition for market shares is subject to the principle of integrity. All employees are obliged to respect and comply with the rules of fair competition. In particular, employees may not hold any discussions with competitors dealing with any commercial and technological aspects. Agreements with competitors to waive competition, to submit bogus offers in tender processes or to divide up customers, territories or production programmes between each other are not permitted. This also includes informal discussions and agreements as well as concerted actions aimed at restricting competition in one of the ways mentioned above or having such an effect.

We ensure that in their business practices our business partners also comply with the law.

## **WE MAINTAIN A CORRECT AND LEGALLY CORRECT RELATIONSHIP WITH ALL GOVERNMENT AND REGULATORY AUTHORITIES.**

### **2.2.2 Dealing with political institutions and government agencies**

Business relations with government agencies are often subject to particularly strict requirements. In dealing with governments and public-sector agencies, we always act in a sincere and transparent manner and in accordance with the applicable law. This applies, for example, to contacts with government agencies in day-to-day business (for necessary licenses, permits or contracts), in the case of political lobbying or in the case of inquiries received from government agencies (requests for information, official investigations, court proceedings).

Employees who are involved in contract negotiations with government agencies should be aware of the guidelines applicable to the respective country for the tendering process and must not violate them or create the appearance of doing so.

It is in the nature of the OHB Group's products and services that the Company often submits tenders to government agencies, participates in government tenders or enters into contract negotiations with government agencies. It is the basic principle of the Group to seek contracts via fair and legal means and to conduct contract negotiations in compliance with all applicable customer requirements and legal rules and regulations.

In the case of government inquiries of any kind, all employees are advised to immediately consult with management and/or the legal department before taking any further steps. Steps must be taken to ensure that all legal requirements are met.

## **WE CONDEMN ALL FORMS OF CORRUPTION AND BRIBERY.**

### **2.2.3 Anti-corruption and anti-bribery**

At OHB, all forms of bribery and corruption are prohibited, whether on the part of public officials or in business dealings.

When competing for orders, we rely on the quality and benefits of our products and services for our customers/contract partners as well as on reasonable prices. We support national and international efforts to avoid any influence on or distortion of competition through bribery.

Incentives of all kinds given by employees of the OHB Group to public officials or employees of other companies with the aim of obtaining orders or unfair advantages for the OHB Group or other persons are not permitted subject to the following provisions.

OHB Group employees are obliged not to give public officials or other business partners any gratuities, either in the form of gifts or hospitality, if this could be interpreted as constituting a business incentive. Where justified, business gratuities should conform to standard market practice.

Courtesy gifts that correspond to generally accepted business practices up to a certain extent must be handled in accordance with the applicable law. In any case, they must be such that the recipients do not feel any compulsion to conceal them and they do not give rise to any forced dependence.



Gifts and hospitality among business partners are within limits a generally accepted business practice. However, accepting them may lead to conflicts of interest and jeopardize our Company's good reputation.

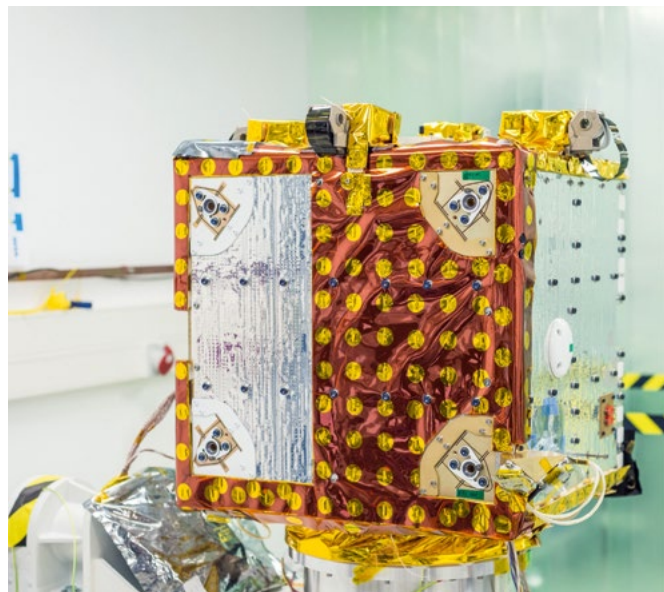
No employees may use their position or function within the Company to seek, accept or obtain any personal benefits. Acceptance of occasional low-value gifts is permitted under applicable corporate policies (e.g. the anti-corruption policy). Any gifts and other benefits beyond this for the employee concerned or related persons must always be rejected. In such cases, employees must inform their line manager, the responsible compliance officer or the chief compliance officer that they have been offered gifts or other personal benefits.

The OHB Group grants cash and non-cash donations for education and science, art and culture and social concerns as well as sport. Donations must always be granted transparently and approved by the responsible management. The identity of the recipient of the donation and the specific use of the donation by the recipient must be known and traceable. It must be possible to publicly account for all donations at all times.

**WE ARE REQUIRED TO COMPLY WITH THE APPLICABLE ANTITRUST AND COMPETITION LAW AND SEEK ADVICE FROM APPROPRIATE EXPERTS ON ANTITRUST AND COMPETITION LAW MATTERS.**

**2.2.4 Fair competition**

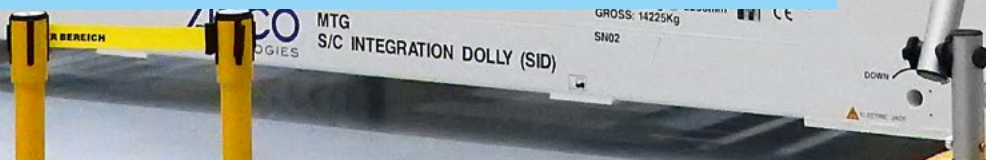
In almost all countries, relationships and agreements with competitors, suppliers, distributors and dealers that affect fair competition are prohibited by law. This includes, for example, price agreements, dividing up customers or sales territories among competitors, anti-competitive boycotts and other unfair trading practices. We are committed to fair competition and strictly abide by the relevant laws and rules.





# 2.3

## DEALING WITH INFORMATION



**WE OBSERVE THE APPLICABLE LAWS AND RULES WHEN WE COLLECT, STORE, PROCESS OR TRANSFER PERSONAL DATA AND INFORMATION.****2.3.1 Data privacy**

When collecting, storing, processing and transferring the personal data of employees, job applicants, customers, business partners or other third parties, we apply utmost care and ensure strict confidentiality as well as compliance with the applicable rules and laws.

Personal data may only be collected, processed or used as far as this is necessary for specified, unambiguous and lawful purposes. High standards must be maintained with respect to data quality and the technical facilities for preventing unauthorized access. The use of data must be transparent for the data subjects, and their rights of access and rectification and, where appropriate, their rights of objection, blocking and deletion must be safeguarded.

Employees who handle personal data receive advice and support from the responsible legal department and the Company data protection officer.

## **WE RESPECT AND PROTECT INTELLECTUAL PROPERTY OF ALL KINDS.**

### **2.3.2 Protection of intellectual property**

The protection of intellectual property forms an essential part of the business policy of OHB as an innovative technology group.

Patents, inventions and other intellectual property rights are of particular importance for the OHB Group's success and future. Accordingly, no employees may disclose any new findings or trade secrets to third parties in any form; official documents and data carriers must always be shielded from unauthorized access.

Our employees and the members of the governance bodies must respect third parties' legally effective property rights; unauthorized use of these must be avoided. No one may obtain or use a third party's secrets in the pursuance of an activity for the OHB Group without authorization; this particularly applies to employees and members of the governance bodies.

## **WE SHIELD CONFIDENTIAL INFORMATION FROM UNAUTHORIZED DISCLOSURE AND USE AND PROTECT OUR COMPANY'S REPUTATION IN OUR PUBLIC STATEMENTS.**

### **2.3.3 Confidentiality and public relations**

Confidential information is intended only for the designated group of recipients and not for internal distribution or external publication. This includes, but is not limited to, documents, reports, contracts, financial data, personnel information, investigations and the results of these, court files, creative works, intellectual property and new business or product plans. Confidential information may take many different forms (digital, paper, etc.).

Discussing confidential information in the public domain or disclosing information about the Company or its customers to third parties, such as the media or competitors, without the requisite authorization constitutes a breach of confidentiality and may have ramifications under antitrust law among other things.

In particular, employees who have access to particularly confidential information (e.g. information on financial, personnel or legal matters, the Company's development or inside information about other companies) must observe strict confidentiality – also when dealing with other employees. Such employees should seek legal advice from the Legal Department before disclosing any confidential information to third parties.

In this respect, it is necessary to determine whether a non-disclosure agreement is required. When using social media, we are aware of our responsibility for the Company's reputation, do not disclose any confidential or sensitive information pertaining to the Company and respect the privacy of employees and business partners.

Media inquiries are answered exclusively by the Corporate Communications department, management or the responsible spokesperson.

**WE CONDUCT OUR BUSINESS, ARCHIVE RECORDS AND ENGAGE IN FINANCIAL REPORTING IN A PROPER AND TRANSPARENT MANNER.**

**2.3.4 Financial integrity**

The Company's business transactions and records must be correct and proper. We record and document all transactions, assets and liabilities in accordance with OHB SE's financial reporting rules and legal requirements.

The greatest possible accuracy and completeness as well as a sense of responsibility are indispensable in all business processes in order to ensure the due and proper documentation and storage of documents.

Documents relevant for financial accounting must be free of any deliberately false or misleading entries. All forms of balance sheet grooming are prohibited.

All records and reports prepared internally or externally must be correct and truthful. Data entries and other records must always be complete, correct, timely and system-compliant.



## **WE OBSERVE THE PROVISIONS OF THE EU MARKET ABUSE REGULATION AND COMPLY WITH THE LAWS ON INSIDER TRADING.**

### **2.3.5 Insider trading**

As a general principle, all employees of the OHB Group are permitted without restriction to trade in shares or other securities issued by the OHB Group.

However, all employees of the OHB Group are without exception prohibited by law

- from acquiring or selling shares or other securities issued by OHB SE, another OHB Group company or a listed business partner of the OHB Group, or any securities or derivatives linked to them, which are publicly traded (insider securities issued by the OHB Group), for their own account or for the account of another person, using inside information, irrespective of whether this information was acquired for the purpose for which it was intended within the scope of such employee's functional responsibility or from a third party,
- from disclosing or divulging inside information to another person without authorization,
- from advising or otherwise inducing another person to acquire or sell insider securities on the basis of inside information.

Inside information is defined as information of a precise nature, which has not been made public, relating to the issuer or to a financial instrument, and which, if it were made public, would be likely to have a significant effect on the price of that financial instrument or on the price of a related derivative financial instrument.

The OHB Group informs all capital market participants in a timely manner about its current financial and earnings situation as well as the Company's business performance. Inside information is published immediately in ad hoc notices in accordance with the applicable legal requirements and made available on our website.

**WE DO NOT MAKE ANY INTENTIONALLY MISLEADING OR UNTRUE STATEMENTS ABOUT OUR PRODUCTS AND SERVICES IN OUR MARKETING AND ADVERTISING ACTIVITIES.**

### **2.3.6 Disclosures on products and services**

We always make truthful statements about our products and services.

Misrepresentations and misleading information on our products and services can be detrimental to our customers and harm our reputation. This contradicts our principles and is inadmissible.

Marketing, advertising and sales employees must be particularly mindful of this.

**WE USE THE IT SYSTEMS MADE AVAILABLE TO US BY OUR COMPANY TO FULFIL OUR TASKS AND TO FACILITATE THE PROTECTION OF THESE SYSTEMS AND DEVICES FROM INTERNAL AND EXTERNAL MISUSE.**

**2.3.7 Use and security of IT systems**

IT systems are regularly used and data processed in day-to-day business activities. For this purpose, appropriate security measures (passwords, approved technologies and licensed software) are required to protect intellectual property and personal data. Failure to comply with necessary security measures may have serious repercussions, such as loss of data, theft of (personal) data or copyright infringements.

Since digital information can be distributed quickly and reproduced easily and is practically indestructible, we pay great attention to the content of e-mails, attachments, downloaded files and stored voice messages.

We undertake to utilize the IT systems provided by the Company to perform business tasks and to refrain from using them for personal purposes that are inappropriate or inadmissible, or for unethical or illegal activities.

All employees must be mindful of the fact that the IT resources available at the workplace do not belong to them but are Company property.

All employees are obliged to take the necessary measures to protect the security of IT systems from internal and external misuse and threats (e.g. unauthorized use of assigned passwords or downloading inappropriate material from the Internet). If you have any questions or problems, you can contact the IT department at any time.



# 2.4

## PEOPLE AND THE ENVIRONMENT

**RESPECT FOR HUMAN RIGHTS AND THE PROTECTION OF HEALTH AND THE ENVIRONMENT ARE AN ESSENTIAL PART OF OUR SOCIAL RESPONSIBILITY.**

**Human rights, health, the environment**

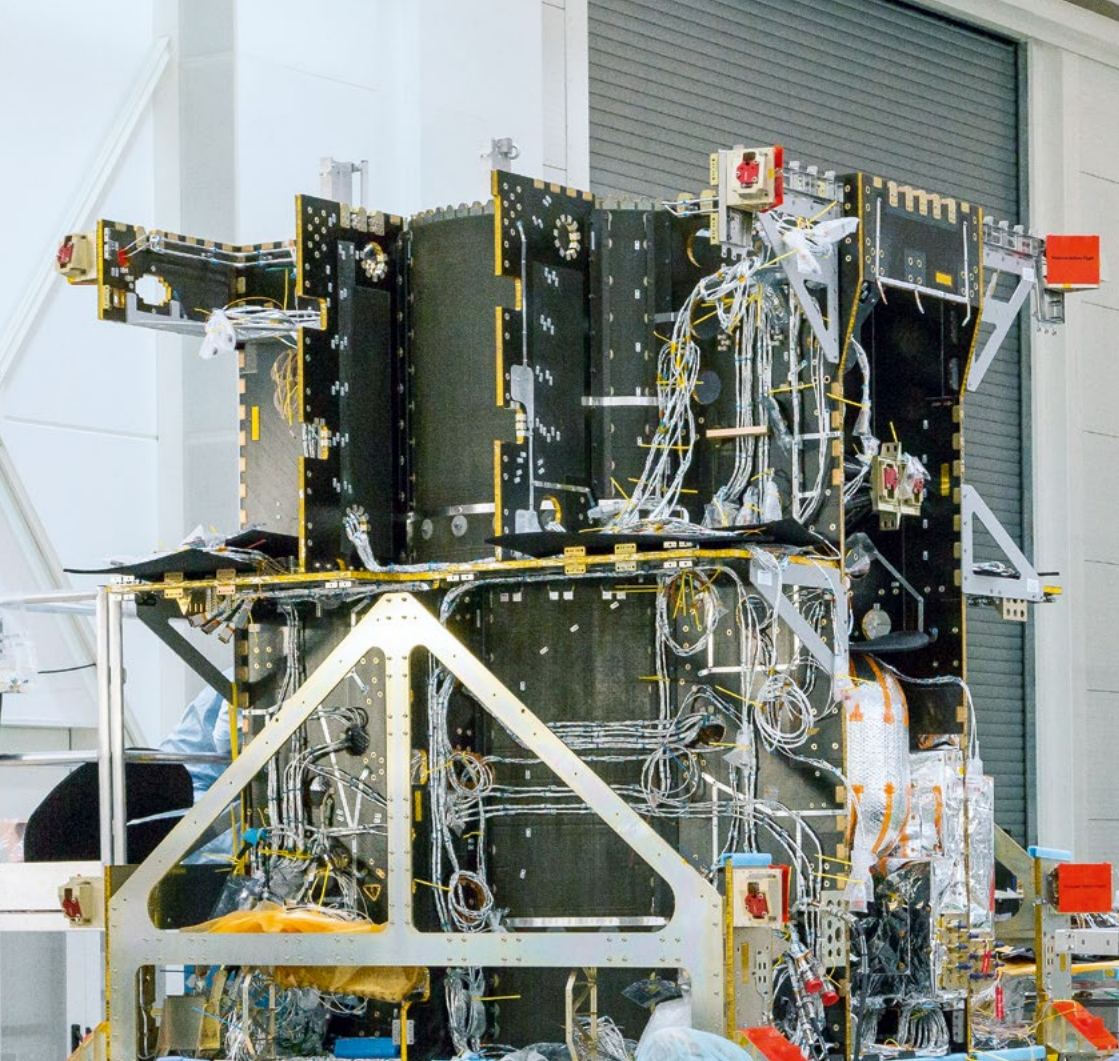
We respect the dignity and personal rights of our employees and third parties with whom we maintain business relations.

We respect the rights to freedom of association and collective bargaining in accordance with the applicable rules and regulations. We reject forced and child labor and all forms of exploitation or discrimination and ensure strict compliance with the relevant laws.

We ensure a healthy and safe working environment for our employees by complying with workplace health and safety laws and regulations. In particular, managers are responsible for ensuring that adequate procedures and protective measures are in place to ensure workplace health and safety.

We strive for the responsible use and procurement of natural resources (water, energy, materials and land) in the production and distribution of our products and services.

We are guided by the principles of sustainability. We are aware of the scarcity of resources and our responsibility towards future generations and therefore ensure that our products and manufacturing processes meet the requirements of responsible product with regard to the three issues of ecology, economy and social concerns. All employees apply these principles at their workplaces.



# 3.

## DECISION-MAKING GUIDE



**IF YOU ARE UNSURE IN INDIVIDUAL CASES WHETHER A DECISION IS CONSISTENT WITH THE REQUIREMENTS OF THE CODE OF CONDUCT, CONSIDER THE FOLLOWING QUESTIONS:**

- Is my decision legal and consistent with the Company's rules?
- Can I make the decision in the best interests of the Company and free of any competing interests of my own?
- Can I in all good conscience make this decision?
- Can I readily disclose the decision to the outside world? Would it stand up to third-party scrutiny?
- Will my decision further the Company's good reputation?

If you can answer "yes" to all of these questions, your decision is presumably acceptable. If you have any lingering doubts about any of these issues, please seek qualified advice. The following section sets out the contact persons to consult.



# 4.

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CONTACT PERSONS FOR  
THE CODE OF CONDUCT





**AT OHB, YOU WILL ALWAYS FIND AN OPEN EAR IF YOU NEED TO ASK ANY QUESTIONS, RAISE ANY CONCERNS ABOUT POSSIBLE MISCONDUCT OR MAKE SUGGESTIONS FOR IMPROVING COMPLIANCE PROCESSES.**

Concerns about workplace conduct can often be resolved through constructive dialogue among those affected or with local contact persons. However, it may be better to voice concerns over certain issues outside the local work environment, in particular those relating to illegal business practices.

Employees who raise concerns over actual or suspected misconduct in good faith must therefore not experience any recriminations (see Section 2.1.4 "Addressing matters openly"). Employees who have experienced such reprisals should contact the OHB Compliance Department or the Equal Opportunities Officer.

The following contact points are available to both employees and third parties.

**4.1 Contact person in your immediate working environment**

You can turn to any person of trust of your choice in your immediate working environment at any time to ask any questions about the Code of Conduct or to report any violations of the Code. These are, for example:

- Your management
- Your line manager
- Your responsible compliance officer
- Your legal, financial or auditing department
- Your HR department
- Your employee representative/works council

## 4.2 Contact person at the central OHB SE departments

If you are unable to voice your concerns locally or if you cannot find adequate support there, you can contact OHB SE's central departments, particularly the Compliance Department. One of the core tasks of the Compliance Department at OHB SE is to provide support with inquiries about the Code of Conduct and to ensure that any reports of violations of the Code of Conduct are duly investigated. Investigations are conducted with the utmost confidentiality and in the light of data protection requirements. The OHB SE European works council and the local and national employee representatives are also available as contact persons.

In addition, you can approach any of the following central departments at any time:

### Compliance Department

Phone: +49-421-20209150  
Fax: +49-421-2020700  
compliance@ohb.de

### Legal Department

Phone: +49-421-20209150  
Fax: +49-421-2020700  
legal@ohb.de

### Equal Opportunities Officer

Phone: +49-421-20209072  
equalopportunity@ohb.de

### Internal Auditing Department

Phone: +49-421-20207086  
internalaudit@ohb.de

### Data Privacy Officer

Phone: +49-421-20209720  
datenschutz@ohb.de

### Human Resources Department

Phone: +49-421-20208  
codexathr@ohb.de

These departments all have the same address:

Manfred-Fuchs-Platz 2-4  
28359 Bremen. Germany  
Phone: +49-421-2020-8  
Fax: +49-421-2020-700  
[www.ohb.de](http://www.ohb.de)

### 4.3 „We.Create.Integrity.“ whistleblower system

A whistleblower system is also available at the **We.Create.Integrity** portal for reporting any significant violations of the Code of Conduct – particularly illegal business practices. This system operates in several languages and permits a confidential and specially encrypted dialogue with the OHB Compliance Department (anonymous on request).

You can access the **We.Create.Integrity** portal via the following link:

[↪ https://www.bkms-system.com/wecreateintegrity](https://www.bkms-system.com/wecreateintegrity)

OHB SE  
Legal & Compliance Department  
Manfred-Fuchs-Platz 2-4  
28359 Bremen  
Germany  
Phone: +49-421-2020-8  
Fax: +49-421-2020700  
[↪ www.ohb.de](http://www.ohb.de)

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The latest version of the Code of Conduct as well as updates and further information on compliance at OHB can be found at [↪ www.ohb.de](http://www.ohb.de)



**OHB SE**

Manfred-Fuchs-Platz 2-4  
28359 Bremen, Germany  
Phone: +49 (0)421 2020 9150  
Fax: +49 (0)421 2020 700

[legal@ohb.de](mailto:legal@ohb.de)  
[www.ohb.de](http://www.ohb.de)