Tyczka GmbH

Code of Conduct of the Tyczka Group

PREAMBLE

As a family-owned business with over 100 years of history, the Tyczka Group stands for the safe, reliable, and responsible supply of liquefied petroleum gas (LPG), industrial gases, and hydrogen. Our products and services are of great importance to industry, commerce, mobility, energy supply, and residential applications. At the same time, they require a particularly high degree of safety awareness, integrity, technical expertise, and responsibility toward people and the environment.

This **Code of Conduct** elaborates on our corporate values and management guidelines, complements our Sustainability Report, our SHEQ Policy, and our Tax Strategy, and derives principles for our conduct from them. It is binding for employees, managers, executive boards, and governing bodies of all domestic and foreign companies within the Tyczka Group, as well as—where applicable—for individuals acting on behalf of or at the request of a company within the Group.

We act lawfully, fairly, with safety in mind, sustainably, and respectfully. Violations of laws, internal rules, or minimum ethical standards endanger not only our company but also our employees, business partners, customers, the public, and the environment.

RESPECT AND FAIRNESS

Fairness and respect, as well as the rejection of all forms of discrimination, form the foundation of our actions.

Everyone serves as a role model through their behavior and fosters a respectful and trusting working relationship.

HONEST RELATIONSHIPS

Business partners - customers, intermediaries, suppliers, and service providers - are treated equally and fairly, and we always ensure that our actions are ethically sound. We maintain good and open working relationships with government agencies and other public authorities.

We provide compensation only for measurable and proportionate services that benefit the company and based on clear agreements. Products and materials are always procured in a legal and ethical manner.

We do not tolerate any form of corruption. Our relationships with business partners are completely transparent within the respective company, particularly with regard to the

potential gain of personal benefits. The law and our internal policies set the framework for the acceptance and giving of gifts and benefits.

We comply with the relevant legal regulations governing employment and compensation of employees (in particular the Working Hours Act and the Minimum Wage Act) as well as those aimed at preventing illegal employment (e.g., any form of forced or compulsory labor, child labor, and undeclared work). We adhere to international labor standards and protect recognized human rights.

We also expect our business partners to act in a lawful, ethical, and responsible manner. In the event of significant violations of our requirements, we reserve the right to take appropriate measures, up to and including the termination of the business relationship.

FAIR COMPETITION

We are committed to fair and undistorted competition in compliance with all rules of competition and antitrust law. Agreements or concerted practices that violate antitrust law are prohibited.

In particular, agreements with competitors regarding prices and market conduct, as well as the exchange of confidential market and corporate information, are prohibited. We immediately and unequivocally reject any such inquiries we receive from third parties.

We are committed to preventing money laundering and terrorist financing. We identify our business partners and comply with applicable regulations regarding anti-money laundering, sanctions monitoring, and export controls.

DEALING WITH GOVERNMENT AGENCIES AND PUBLIC OFFICES

We maintain a professional, cooperative, and transparent relationship with government agencies, regulatory bodies, auditing agencies, emergency services, and public institutions.

All information provided to government agencies must be complete, accurate, and verifiable. We handle government audits, inspections, and inquiries in a professional manner.

INNOVATION

We are constantly working to further develop and improve our processes and products.

Expanding into new business areas is a key component in ensuring the long-term viability of our corporate group. We develop relevant ideas and pursue them through innovative projects.

In doing so, we also use digital technologies and artificial intelligence responsibly, securely, and in compliance with the law to promote innovation, improve processes, and tap into new business opportunities.

SAFETY, HEALTH, ENVIRONMENT, AND QUALITY

Our customers rely on the quality, safety, and availability of our products and services. We fulfill our product responsibility through meticulous processes, qualified personnel, and transparent information.

We ensure safety for ourselves, our partners, and third parties. Preventing hazards is our top priority, and compliance with binding obligations (laws, regulations, standards, internal policies, etc.) is a fundamental part of our operations. This applies in particular to the handling of the products we distribute, as well as the technical equipment at our customers' sites and in our own facilities.

Decisions with significant legal, personnel, or economic implications must not be made solely based on automated or AI-supported results unless accompanied by appropriate human review.

Furthermore, the health of our employees is of the utmost importance to us. We support health-conscious behavior through appropriate measures.

SUSTAINABILITY AND CORPORATE SOCIAL RESPONSIBILITY

In everything we do, we are mindful of our responsibility to future generations and base our decisions on this principle. We also fulfill our social responsibility throughout our supply chains.

We regularly report on our sustainability efforts to an appropriate extent.

We support those in need through donations and other means. We promote projects that contribute to energy supply for future generations.

As a corporate group active in the energy, gas, and hydrogen sectors, we also see ourselves as part of the transformation toward safer, more efficient, and affordable solutions.

INFORMATION SECURITY, CONFIDENTIALITY, AND DATA PROTECTION

We are committed to complying with all legal and company regulations regarding information security and data protection. Information, data, technical documentation, customer data, price lists, cost estimates, contract terms, strategies, operational and security plans, and know-how are valuable corporate assets.

We protect the personal data of employees, customers, suppliers, and business partners. Personal data may only be processed lawfully, for specific purposes, transparently, and limited to the extent necessary.

When using AI applications, special care must be taken to ensure that no personal data, customer data, employee data, or other confidential information is processed or disclosed, unless this is expressly permitted, technically secured, and legally permissible.

COMMUNICATION AND SOCIAL MEDIA

We communicate objectively, respectfully, and responsibly. Official statements on behalf of the corporate group may only be made by authorized individuals.

Social media must always be used in a way that does not damage the reputation of our companies in any way and that protects the rights of third parties.

If AI applications are used to create text, images, presentations, translations, analyses, or other communication content, the results must be carefully reviewed before use. AI must not be used to create or disseminate misleading, manipulative, discriminatory, offensive, or defamatory content.

ACQUISITIONS AND INVESTMENTS

When acquiring or investing in companies, we ensure compliance with the fundamental principles of our Code of Conduct as part of our social due diligence process.

ORGANIZATION AND HANDLING OF VIOLATIONS

Within the corporate group, the Chief Compliance Officer of Tyczka GmbH is responsible for maintaining the Code of Conduct.

Our employees, business partners, and other third parties are encouraged to report violations of laws, the Code of Conduct, or other internal policies anonymously through our whistleblower portal or by other means to the company's Chief Compliance Officer. Violations are carefully investigated, and an appropriate and consistent response is taken.

FINAL PROVISION

This Code of Conduct is an integral part of our corporate culture. It does not replace all detailed guidelines, but rather provides the overarching framework for conduct characterized by integrity, safety, and responsibility.

Each and every one of us plays a part in ensuring that our corporate group continues to stand for safety, quality, responsibility, and trust in the future.

Geretsried, August 2026