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# Code of Conduct

of

## CHRIST Group

Valid from 01/10/2021

Version: 1.1

# CHRIST

# Preface

## **Dear Reader,**

CHRIST Group, encompassing CHRIST Juweliere und Uhrmacher seit 1863 GmbH, VALMANO GmbH, and CHR Logistik & Service GmbH, is active in the jewellery and watches sector in Europe.

With its three retail brands CHRIST seit 1863, VALMANO, and BRINCKMANN & LANGE, CHRIST Group represents special jewellery ideas, top quality, and excellent service. Operating more than 200 CHRIST and BRINCKMANN & LANGE stores in Germany and Austria at the moment, it is the market-leading supplier of watches and jewellery in Germany. Successful expansion of its sales channels into the online area has now given the group a digital presence in a number of European countries as well.

CHRIST Group is made unique and authentic by its binding values for thought and action that offer an important reference for communication, ensure clarity, connect, and serve as the foundation on which the group's corporate culture and success are based. Every single employee is an ambassador. They all represent the group's mission statement and represent its values. Together, and based on a joint understanding, they act as the face of CHRIST Group and its brands, continuing to drive the story of success forward. The clear comprehension of values serves as a benchmark for all actions. CHRIST Group strives to be a desirable and reliable partner for everyone involved in shaping it.

We consider compliance with the law in our business activities a matter of course. Violations are not only contrary to our values, but liable to damage the reputation of our CHRIST Group. They may lead to severe legal consequences as well.

Anyone who is acting unlawfully or even enriching themselves at the expense of the CHRIST Group companies harms all members of our company from shareholders to the management and employees. Such action lowers CHRIST Group's economic success, investment and growth capacity and may eventually even endanger jobs.

The code of conduct as a common guideline for our decisions and actions specifies binding minimum standards for responsible action towards business partners and the public as well as for our interaction within the CHRIST Group companies. It draws attention to legal risks in order to help avoid violations of the laws. Every one of us, among the employees and management alike, must comply with the principles stipulated here. This code is binding across CHRIST Group.

**Hagen, Oktober 2021**



*Stephan Hungeling*

Dr. Stephan Hungeling  
Managing director (CEO)  
of CHRIST Juweliere und  
Uhrmacher seit 1863 GmbH



*Olaf Schepers*

Olaf Schepers  
Managing director (CPO, CSO)  
of CHRIST Juweliere und  
Uhrmacher seit 1863 GmbH



*Michael Berghoff*

Michael Berghoff  
Managing director (CDO)  
of CHRIST Juweliere und  
Uhrmacher seit 1863 GmbH

# Morally Sound Business Conduct

## **Risk Management, Financial Reporting, and Taxes**

WE value a disciplined and reasonable approach to risk. WE consider active risk management to be an essential component of the management of the CHRIST Group companies in order to identify, analyse, evaluate, control, and continually monitor our risks in a foresighted and consistent manner and to report on the current situation.

WE keep our books, records, and documents complete and correct. Our financial statements are subject to regular review by an independent annual auditor. Our accounting, financial reporting, as well as our supervisory reporting and disclosure are performed in time, accurately, correctly, comprehensibly, and truthfully.

WE explicitly commit to complying with all of our tax obligations.

## **Corruption/Bribery and Handling of Gifts**

WE reject any form of corruption and will not tolerate it under any circumstances. WE avoid any personal dependence on or obligation to our clients or suppliers. WE do not accept or make any gifts that must be assumed to influence business decisions or create an obligatory dependency when subject to neutral review.

WE only extend or accept invitations (travel, hospitality, miscellaneous events) that are socially appropriate and not intended to gain or grant any improper advantage.

## **Assets**

WE protect tangible and intangible assets of the CHRIST Group companies, including real estate, equipment, goods, cash, office equipment and stationery, information systems and software as well as industrial property rights and our know-how.

## **Donations and Promotions**

WE generally never donate to any political parties, individuals, for-profit organisations, or organisations that do not comply with the principles of CHRIST Group. The type and scope of donations to humanitarian and social institutions and projects are adjusted to our economic capacities and determined based on objective criteria.

### **Conflicts of Interest**

WE make business decisions only in the best interests of CHRIST Group. We avoid any conflicts with private interests or further economic or other activities, including those of relatives or otherwise affiliated persons or organisations, from the very beginning. If any such conflicts occur nevertheless, WE will resolve them in compliance with the law and the applicable CHRIST Group guidelines. This requires transparent disclosure of the respective conflict.

### **Competitive Agreements and Cartels**

WE are committed to fair competition and compliance with all competition and antitrust laws. Agreements on prices or other conditions, sales territories, or customers as well as any abuse of market power violate our principles.

### **Trade Control Regulations**

WE are familiar with the relevant trade-control laws and provisions and strictly comply with them. WE do not conduct any business with individuals, groups, or organisations on sanction lists.

### **Money Laundering**

WE comply with our legal obligation to prevent money laundering and do not engage in any money-laundering activities. WE will have any unusual financial transaction, in particular involving cash, that may lead to any suspicion of money laundering, thoroughly reviewed by our designated money laundering officer if there is any doubt.

# — Good Cooperation

## **Respectful Interaction**

WE always interact with each other fairly, appreciatively, and based on trust. WE enjoy work and communication and always act as role models in this respect. WE communicate transparently, practice an open feedback culture in all directions, and perform our tasks passionately and with great dedication.

## **Equality and Diversity**

WE promote equal opportunities and prevent discrimination in recruitment of personnel and in promotion or approval of training and further education measures.

WE treat all employees equally, irrespective of gender, age, skin colour, culture, ethnic origin, sexual identity, disability, religious affiliation, or world view. We consider a culture of equal opportunities, mutual trust, and mutual respect to be essential.

## **Human and Labour Rights**

WE observe and respect the fundamental rights of people around the world and support compliance with these rights. WE strictly oppose all forms of forced and child labour. We recognise every worker's right to adequate remuneration. Remuneration and other benefits shall be at least equal to the legal or industrial minimum wage of the respective country.

## **Occupational Health and Safety**

WE consider it part of our tasks to prevent risks for people at the workplace. Protecting the lives and health of all employees is a matter of course for us.

# Trusting Service

## **Our Quality Claim**

WE inspire and excite our customers at all times and everywhere – with passion, excellence, and innovation. WE attract our customers with tangible luxury and establish inspiring shopping experiences through individual advice.

WE practice professionalism and service focus at all times when interacting with our customers through any channel to provide true pleasure to them. WE make every customer feel special.



## **Confidentiality and Data Protection**

Protection of our customers' privacy is of the utmost importance to us. As a result, WE collect or use personal data only where this is either unavoidable for the respective job or legally required, and exclusively subject to the corresponding consent of the data subject or if permitted by law accordingly.

Beyond this, we want our data subjects to be aware of what data WE store and how WE use them at all times.

WE ensure protection of intellectual property and personal data as well as security of business data and trade secrets by taking adequate technical security precautions. WE never disclose any confidential information to any third parties or make them publicly available.

# Responsibility

WE act as if CHRIST belonged to us. WE keep looking for ways to improve and keep improving. Everyone takes proactive responsibility for success.

WE act dynamically and in a goal- and solution-oriented manner for the good of CHRIST Group at all times. WE work independently and consistently based on defined guidelines and framework conditions. WE are aware of our tradition while actively shaping the future and competing with the best. WE keep an eye on current trends and surprise by bringing about new ones.

# Whistleblower System

Reports and concerns of violations of this code of conduct, in particular in case of white-collar crimes, may be filed anonymously or confidentially. We maintain a multi-lingual system for this purpose that permits a confidential dialogue with the audit and compliance department of CHRIST Group, protected by special encryption. The whistleblower system can be accessed through the following link:

[www.bkms-system.net/CHRIST\\_Meldesystem](http://www.bkms-system.net/CHRIST_Meldesystem)

or from our corporate website at:

<https://www.christ-corporate.com/gruppe/compliance/>



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# Contact

## Advice and Further Information

If there are any concerns that you cannot address locally or if you do not receive adequate support there, you can contact the specialist departments at the headquarters at CHRIST Group, and specifically the audit and compliance department. That department's main tasks include support with inquiries concerning the code of conduct and ensuring that any references to violations are investigated. Investigations will be conducted subject to the greatest possible confidentiality and under consideration of data protection provisions.