

CODE OF CONDUCT

Version 1.0



CODE OF CONDUCT

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1. Introduction

1.1. We comply with all applicable legislation

The management board of Bike24 Holding AG and the executive managements of its subsidiaries are fully committed to comprehensive legal compliance and strict adherence to national and international conventions.

1.2. We are collectively responsible

This Code of Conduct conveys binding behavioral instructions that are of particular importance for corporate compliance. At the same time, it serves as an orientation aid for identifying possible compliance risks and finding responsible solutions. It is substantiated and supplemented by Bike24's internal guidelines. Every individual¹ working in and for our company - regardless of his or her position - is obliged to comply with the applicable law in all countries in which we operate as well as with this Code of Conduct and Bike24's internal guidelines. We expect each individual to familiarize himself with the principles and rules contained in this Code of Conduct, to incorporate them into his behavior and to take them into account in all decisions. The Code of Conduct must also be observed in all Group companies. Our managers act as role models and thus ensure that applicable law, this Code of Conduct and other internal guidelines are followed in their area of responsibility.

1.3. We do not tolerate compliance violations

Bike24 takes violations of the Code of Conduct extremely seriously. We clarify them without exception and take the legal consequences required in the individual case.

Although the Code of Conduct is based on a careful and comprehensive analysis of Bike24's compliance risks, it is not exhaustive, nor can it cover all matters from which risks to the company may arise. If you have any questions or doubts, please contact your supervisor or the Compliance Officer.

2. We respect human rights

Bike24 is committed to inalienable human rights and adheres to internationally recognized codes of conduct. As a core element of responsible corporate governance, we respect and support in particular the prohibition of child and forced labor as well as modern slavery along our entire value chain. We also demand human rights-compliant behavior from our business partners.

3. We do not tolerate discrimination

We treat each other and third parties with respect, fairness and appreciation. Bike24 is committed to the principle that no one may be discriminated against, favored, treated inappropriately or excluded on the basis of ethnic origin, skin color, nationality, faith, ideology, gender, age, physical constitution, appearance or sexual identity. At the same time, we recognize individuality and, in this

¹ The masculine form used in this policy includes the feminine form. We only refrain from using both gender forms in order to improve the readability of the text. The guideline is of course to be understood as gender-neutral and value-free.

sense, promote gender equality and inclusion by taking into account the individual needs of our employees.

The prohibition of discrimination applies to daily cooperation as well as to all personnel decisions. Decisions on hiring, training, job changes, promotions, compensation, benefits, disciplinary measures and terminations are made exclusively on the basis of objective criteria and personal competence.

Bike24 does not tolerate any sexual or other harassment.

4. The health of our employees is in the foreground

The health of our employees is important to us. Ensuring a safe and healthy working environment is therefore a very high priority at Bike24. Our employees pay attention to their own health and safety as well as the health and safety of third parties when carrying out their professional activities. This also and in particular applies with regard to the organization of working hours. Bike24 complies with all relevant laws and regulations on working hours as amended from time to time.

5. We make no compromises when it comes to environmental protection and product safety

5.1. Product safety

We make sure that the products sold by Bike24 comply with the relevant safety regulations.

5.2. Environmental protection

Bike24 is committed to environmental protection and strives to act as sustainably as possible. By reducing waste, CO₂ emissions and the consumption of energy, water and resources, Bike24 makes a constant contribution to the active protection of people and the environment.

Our employees are required to treat the environment with care and to comply with environmental protection regulations consistently and at all times.

6. Corruption and bribery in business transactions have no place in our company.

Bike24 stands for lawfulness and integrity and does not tolerate any corrupt practices by employees or business partners. No employee of Bike24 is permitted to unlawfully influence business partners, public officials or public institutions by favoring them or granting them advantages.

When accepting or granting benefits, we respect the applicable laws, this Code of Conduct and Bike24's internal policies. Furthermore, the granting and acceptance of benefits from business partners may not take place in connection with the initiation, award or processing of an order. Any cases of doubt must be clarified in advance with the supervisor or the Compliance Officer.

When dealing with public officials and elected representatives as well as governments, authorities and other public institutions, special legal conditions often apply, which we follow.

See closer

- Group Guideline on the Prevention of Corruption

7. Gifts, hospitality and invitations follow clear rules with us

Benefits in the form of gifts, hospitality and invitations are widespread in business relationships. As long as these benefits remain within reasonable limits and do not violate internal or legal regulations, they are not objectionable. However, if such benefits exceed these limits and are used to influence third parties, this may be punishable by law.

Our internal guidelines for handling gifts, hospitality and invitations to events govern which benefits are appropriate and which review steps must be observed when accepting and granting benefits. Please familiarize yourself with the guidelines for dealing with gifts, hospitality and invitations and strictly adhere to them.

See closer

- Group policy on gifts, hospitality and invitations

8. We strictly separate private and corporate interests

Bike24 employees are required to make business decisions in the best interest of Bike24 and not based on personal interests. You may not use your position at Bike24 to pursue your own interests or the interests of related third parties. Rather, private and company interests must be kept strictly separate. Existing or potential conflicts of interest must be disclosed and resolved in consultation with the superior or the Compliance Officer.

Personnel decisions may only be based on objective criteria. Sideline activities, including freelance work, are subject to approval.

Bike24 welcomes personal involvement in political parties, associations and other societies as well as political and social institutions, provided that this does not jeopardize the fulfilment of the duties under the employment contract. In the case of private expressions of opinion in public, our employees must avoid the appearance that it is the opinion of the company.

9. Sponsoring and donations are transparent with us

We see it as part of our self-image to get involved in society through donations and sponsoring.

Sponsoring measures must always be within Bike24's sponsoring strategy. They must be transparent and set out in the form of a written contract, and must be proportionate to their value in return.

Bike24 grants financial means in the form of a donation to charitable institutions in individual cases. We also attach great importance to transparency when awarding donations. The donation must not be related to a sales transaction and must not serve the personal interests of individual functionaries or employees of the institution.

Donations and sponsorships may only be granted after the approval process provided for this purpose has been completed.

See closer

- Group Guideline on Donations and Sponsorship

10. We stand for fair competition

Bike24 is committed to fair and free competition without restriction. Violations of the applicable antitrust and competition law regulations will not be tolerated.

10.1. We do not tolerate collusion between competitors

Agreements and concerted practices between competitors ("horizontal agreements") are prohibited if they are likely to prevent or restrict competition. This includes, for example, agreements on prices, offers, customer allocations, conditions of sale or purchase, production or sales quotas or the sharing of geographic markets. The prohibition of cartels concerns any coordination of competitive behavior among competitors. Any direct or indirect exchange of competitively sensitive information between competitors is also prohibited, e.g. on customers, pricing, costs, salaries, conditions of sale, operating methods, market shares, production volumes, bidding details or strategies.

See closer

- Guideline Antitrust Law

10.2. We do not tolerate vertical collusion

Many types of vertical agreements, i.e., between suppliers and customers or patent holders and licensees, are prohibited in the EU, the US and other countries. These include, in particular, restrictions on the customer's freedom to determine prices or supply conditions for its business partners. Restrictions on the customer's clientele (e.g. in geographical or application-specific terms), most-favoured-nation clauses, exclusivity obligations such as total coverage of requirements or exclusive supply as well as non-competition clauses are also prohibited.

See closer

- Guideline Antitrust Law

11. We actively counter the risks of money laundering and terrorist financing

It is our declared goal to only maintain business relationships with reputable partners whose business activities are in compliance with legal regulations and whose operating resources are of legitimate origin. Under no circumstances do we tolerate the involvement of our employees or business partners in money laundering or terrorist financing. For this reason, we follow internally established safeguards and certain due diligence requirements when dealing with customers and business partners.

See closer

- Guideline on the Prevention of Money Laundering and Terrorist Financing
- Guideline Business Partners Due Diligence

12. We prevent insider trading, respect our ad hoc publicity obligations and protect confidential information

As a listed company, Bike24 complies with all financial reporting obligations and places a high value on transparency. We diligently comply with our ad hoc publicity obligations.

Our employees are obliged to treat internal, non-public information as strictly confidential and not to exploit it for their own benefit or that of third parties. This applies in particular to information about special features of the course of business about which the public has not yet been informed. All information, documents, data carriers, etc. obtained or created within the scope of the employment relationship must be protected from access by unauthorized persons and must always be kept under lock and key. Violations of these regulations can cause serious damage to the company and may have consequences under civil and criminal law.

See closer

- Capital Markets Compliance Guideline

13. Data protection is our priority

We are aware of the importance of privacy and the personal rights of our employees, customers, suppliers and other third parties. We therefore treat personal data with the utmost care and confidentiality. The collection, storage, processing and other use of personal data is only carried out with the consent of the person concerned or on the basis of a contractual or legal regulation and only insofar as this is required by law or necessary for normal business operations.

Please contact our data protection officer in case of doubt.

See closer

- Guideline Data Protection

14. Compliance with customs and foreign trade regulations is our common task

In the context of cross-border economic transactions, Bike24 complies with all export control and customs laws and regulations applicable in the respective countries of business activity. Not only goods may be subject to export restrictions, but also, for example, the taking of items on business trips and the transmission or provision of data by electronic means, such as by e-mail or cloud.

Transactions with persons or companies on sanctions lists are generally prohibited.

All employees involved in the import or export of goods and services are obliged to inform themselves about the existing legal situation and to comply with all applicable laws and regulations, as well as with all existing internal guidelines and processes in this context.

See closer

- Guideline Foreign Trade Law

15. We expect all of our employees to protect company property

Bike 24 entrusts all of you with tangible and intangible Bike24 assets in the course of your business activities. We therefore expect you to handle company property responsibly. All Bike24 assets must be protected against loss, damage, theft, misappropriation, embezzlement and other misuse or unauthorized use. Company property may not be removed from the company without the consent of the relevant responsible office. If there are any suspicions regarding the commission of property offences by employees, these will be consistently clarified and, in addition to criminal law consequences, may also have consequences under labor law up to and including termination without notice.

With regard to the private use of the internet and electronic means of communication, any company agreements must be observed. No employee may use company property and facilities for private purposes without the express consent of the responsible office.

16. Consequences of a compliance violation

Each employee of Bike24 is responsible for complying with the applicable law and the Code of Conduct in the daily performance of his or her duties.

We take compliance violations very seriously. We consistently follow up on indications of violations. Depending on the type and severity of the violation, this may result in warnings, transfers to another workplace or even termination of the employment relationship without notice. In case of a financial loss of Bike24, claims for damages may also be asserted. In the event of criminal conduct, Bike24 also reserves the right to file for criminal charges and shall cooperate with the investigating authorities in order to clarify the violation.

17. Information on possible compliance violations

If you have concerns about whether certain conduct violates law, this Code of Conduct or any other Bike24 compliance guideline, or if you suspect that such a violation may or will occur, we ask that you report those concerns to your supervisor (if the supervisor is not the subject of your concern or question) or the Compliance Officer. The notification can also be made through Bike24's whistleblowing system.

<https://bike24.integrityline.com/frontpage>

will take place. You do not have to fear any demotion, penalties or other disciplinary measures.
