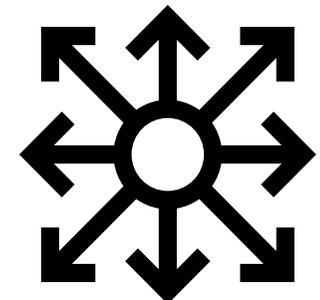
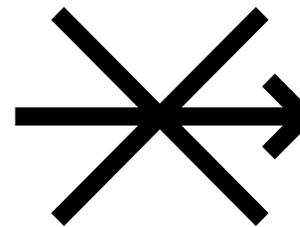
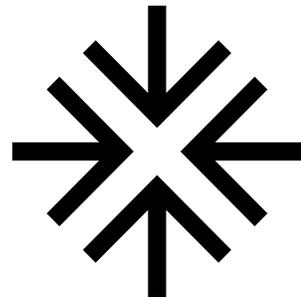
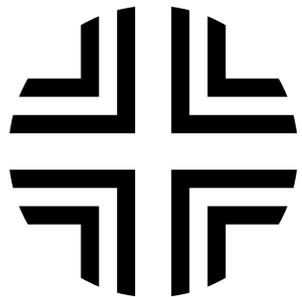
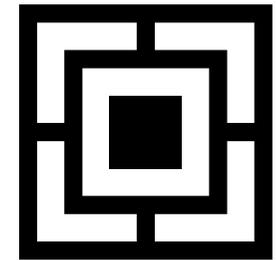
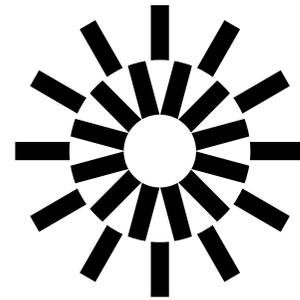
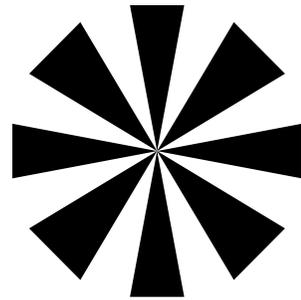
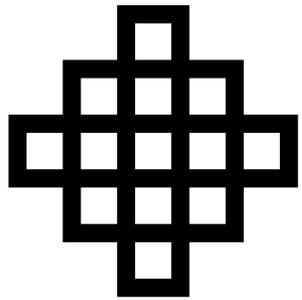


This Code of Ethics outlines our standards for doing business, underlines what we believe in, and gives examples of actions to take in any situation you could come across. It's your orientation tool, the base camp to always come back to.

Report any violation under → [canyon.integrityline.com](https://canyon.integrityline.com)

# THE CANYON CODE OF ETHICS



# THE CANYON CODE OF ETHICS

Dear team,

At Canyon, you've all got something in common. Whoever you are, wherever you come from, and whether you ride or don't — you can't miss the energy and creativity here. Everyone's brimming with it. It's noticeable from the moment you walk in.

I believe it's because we've all known that feeling. Gripping the handlebars, gliding along, with a grin across your face. It's in these little moments that you can feel like the freest person alive.

These shared experiences give us our common goal: to build the best bikes. Because we want as many people tasting that freedom as possible.

## We inspire to ride

...and we have strong moral compasses.

We're all guardians of Canyon's values, integrity, and success here: our actions reflect our brand, and so we always use our good sense of judgement.

This Code of Ethics outlines our standards for doing business, underlines what we believe in, and gives examples of actions to take in any situation you could come across. It's your orientation tool, the base camp to always come back to.

We expect all Canyon employees — as well as our athletes and our business partners — to share our commitment to the standards we set for ourselves in this Code. Especially as we continue to grow our business.

# INTRODUCTION

## We protect where we play

We're passionate about our multiple communities, enamoured with nature, and committed to becoming the world's most inspiring bike company.

So transparency, fairness, and integrity are the root of all business we do here. Working relationships based upon mutual respect are integral.

## We take responsibility

The Code of Ethics helps us to navigate scenarios safely and respectfully.

It's therefore vitally important that everyone takes time to read it, commit to it, and always refer back to it. Because in our global team, everyone is accountable for their own behaviour. Stick to your principles — especially in times of rapid change and intense competition.

Inspire to ride.  
And don't forget your why.

Yours,  
Nico de Ros Wallace  
CEO OF CANYON





CHAPTER 1  
**General Information**



CHAPTER 2  
**Our Employees**



CHAPTER 3  
**Society & Environment**



CHAPTER 4  
**Confidential Information**



CHAPTER 5  
**Responsible Business Conduct**



CHAPTER 6  
**Your Role**



CHAPTER 7  
**Consequences**



CHAPTER 8  
**Governance**

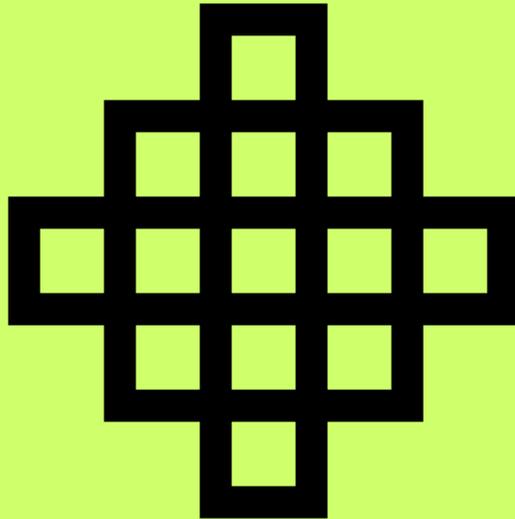




# WE USE OUR VOICE

## CHAPTER 1

### General Information



#### 1.1 Speak Up platform

We need the support of all our employees. So if you ever become aware of a violation of this Code of Ethics or our guidelines and values, we ask that you report it, even if it doesn't affect you directly. For this, you can use our official Speak Up platform, which can be found via → [canyon.integrityline.com](https://canyon.integrityline.com). And everything that you report — whether they're actual or suspected incidents — can be anonymous or not. It's up to you.

In accordance with our company values and of legal requirements, any form of retaliation against whistleblowers isn't allowed. The confidentiality of the whistleblower is maintained, and their identity is protected. In this context, retaliation means adverse conduct taken when an individual reports an actual or perceived violation of the Canyon Code of Ethics and/or practices that aren't allowed by this code.

#### 1.2 Policies and company agreements

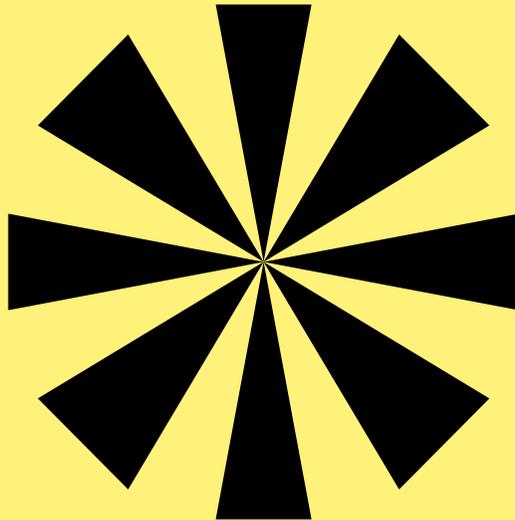
In addition to the Code of Ethics, the company has various other regulations, like policies or company agreements that support our cooperation. These are published on the intranet or in the usual ways. We ask that you read these documents and keep up to date with the newly published ones.



# WE FOLLOW OUR VALUES

## CHAPTER 2

### We are committed to our employees



#### 2.1 Safeguarding occupational health and safety (H&S)

It's of paramount importance for us to safeguard the health and safety of our employees at Canyon. We want the workplace to be a place that respects both the physical and mental health of our employees.

Example – What does this mean in practice?

- [...] You work at our assembly unit and you notice that one of the assembly lines is damaged.
  - Report this to the supervisor to repair it. Repairing electrical equipment by yourself could put your safety at risk and you should not do it.
- [...] You work in one of our warehouses, and you realise that one of the emergency exit doors is blocked with boxes and other material.
  - Emergency exit doors must never be blocked, not even temporarily. Report this to your direct supervisor to take the appropriate steps in order for the exit doors to be unobstructed again.

We ask that all employees at Canyon:

- Familiarise themselves with Canyon's policies and health and safety regulations
- Avoid putting their colleagues', business partners', and customers' health and safety at risk
- Actively contribute to a clean and safe working environment
- Complete the health and safety trainings when provided by Canyon.

#### 2.2 Providing a safe working environment

Being under the influence of alcohol or drugs during work hours doesn't add to a safe working environment. Canyon doesn't tolerate any behaviour that might harm yourself or others, jeopardise performance, infringe the law, or risk reputational damage to Canyon.

Example – What does this mean in practice?

- [...] You find out that a colleague is drinking alcohol in the office during work hours.
  - Drinking alcohol during office hours in Canyon premises is prohibited. So you need to report the case to the People department for them to act accordingly.

With this in mind, all employees at Canyon must:

- Refrain from drinking alcohol within Canyon premises during office hours
- Consume alcohol responsibly in any other work-related situation (such as a work event, or Christmas party)
- Respect our zero-tolerance policy regarding possession, consumption, or distribution of illegal drugs at Canyon or in any other work-related context.



### 2.3 Ensuring a workplace free from harassment, discrimination, and abuse

At Canyon, we value a fair, safe, and respectful working environment that promotes equal opportunities and is free from harassment, discrimination, or abuse.

We do not tolerate discrimination, sexual harassment, and any other form of inappropriate behaviour whether it's based on ethnicity, culture, religion, age, gender, and sexual identity or orientation. All of our recruitment, hiring, promotion and compensation practices/schemes within the company are based on objective indicators. Like performance, experience, skills, qualifications, and/or the needs of the company – and whether the person can meet those.

Harassment can create a hostile work environment and jeopardise an employee's opportunities to advance in the workplace. In this context, harassment can be defined as unwelcome verbal, visual, or physical conduct that creates an intimidating, offensive, or hostile work environment that ends up interfering with work performance.

Things like unsolicited slurs, jokes, insults, nicknames, gestures, or teasing is verbal harassment. Things like offensive posters, symbols, cartoons, drawings, computer displays or e-mails are visual harassment. And physically threatening another, blocking someone's way, or using other body language that shows hostility or aversion toward an individual is physical harassment.

This kind of conduct, although it might not be unlawful, violates the Code of Ethics.

When it comes to sexual harassment, all the above actions can be included. Sexual harassment also includes unwelcome or unsolicited sexual advances, requests for sexual favours, conversations regarding sexual activities, and other verbal or physical conduct of a sexual nature.

Unwelcome behaviour of a sexual nature includes

- The above conduct, advances, or requests for sexual favours that are made either explicitly or implicitly about a term or condition of an individual's employment
- The above conduct, advances, or requests for sexual favours used as a basis for employment decisions affecting the individual
- The above conduct, advances, or requests with the implicit or explicit purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Further examples of sexual harassment that violate an individual's personal boundaries and the Code of Ethics include:

- Unsolicited sexual advances, touching, assault, and blocking normal movement
- Unsolicited comments and messages about appearance, obscene or vulgar gestures, flirtations, whistling, and conversation about one's own or someone else's sex life
- Requests and/or demands for sexual favours in exchange for favourable treatment
- Derogatory cartoons, posters, and drawings.

Example – What does this mean in practice?

- [...] You hear a colleague using racist and sexist language towards another co-worker.
- We have a zero-tolerance policy against this type of behaviour. You must therefore inform your direct supervisor or report to our People department, even if you are not directly affected.
- [...] You are part of a recruitment process, and you found out that an applicant was rejected because of their origin, although this person was the best candidate for the job position.
- This is a discriminatory treatment, and you must report the case to our People department.

We stress that our employees:

- Do not undertake discrimination, harassment, or any other type of abusive behaviour
- Take responsibility for themselves and behave in a respectful, ethical manner
- Report unwanted and/or hostile behaviour.





### 2.4 Fostering a diverse, equal and inclusive workforce

Diversity enhances our work. We champion an inclusive workforce, because diversity directly impacts innovation, productivity, and performance as well as employee wellbeing.

When we refer to diversity, we're talking about the similarities and differences that exist among people, and how they're reflected in our workforce. Diversity encompasses age, ethnic background and nationality, gender and gender identity, physical and mental abilities, religion and worldview, sexual orientation, and social background. Equity encourages fair processes, treatment and possibilities for everyone. And inclusion is valuing our employees for who they are, what they bring, and their sense of belonging at work.

#### Example — What does this mean in practice?

[...] In your role as supervisor, you have received a request from one employee with physical disabilities to have a special office chair.

→ We strive for an inclusive working environment. We support employees to perform their jobs better. You must communicate such requests to the People department so they can individually check for all requirements and then initiate the necessary adjustment.

We expect all our employees to:

- Treat everyone as they wish to be treated themselves — with fairness and respect
- Understand and accept differences if/when disagreements arise
- Be open-minded to learning from different backgrounds, perspectives, and ideas when working on projects within teams.

### 2.5 Ensuring a healthy work-life balance

We are passionate about the work we do, and we value our private lives. Our employees deserve a healthy work-life balance. Overtime should be an exception to meeting short-term business demands, and always used responsibly. Employees are granted fair remuneration and Canyon adheres to local wage and compensation laws.

Structures and models are in place to recognise the needs of both Canyon and our employees. At the same time, we regularly review our working conditions, so that we can continue to offer a healthy working environment.

#### Example — What does this mean in practice?

[...] You are involved in a very demanding project with a strict deadline and must work longer. You are under pressure and feel stress and consequently work overtime.

→ Overtime should be an exception to meet short-term business demands. We always seek to achieve balance between the personal interest of our employees and the interest of the company. You can always contact your supervisor or the People department to discuss how the situation could be changed.

In this, we expect all our employees to:

- Contact their supervisors and ask for more information regarding our regulations surrounding working hours
- Follow our rules regarding working hours.

It's down to the Supervisors to monitor the working hours of their team members and make sure that any overtime is handled in line with working contracts and policies.





## 2.6 Protecting employee and customer data

Respect for privacy is fundamental, and so we protect the personal information of our customers, partners, and employees.

To remain respectful of everyone's privacy, all personal information is handled in a careful and legally responsible manner.

In this context, privacy refers to the right that we all have to know and, to a certain extent, control how our personal information is collected and used. As an example, this could be any personal information relating to an identified, or identifiable, person ('data subject'). An 'identifiable person' is anyone who can be identified, directly or indirectly, through location data, or an identification number.

This also extends to identifiable factors specific to the physical, physiological, genetic, mental, economic, cultural, and/or social identities of said person. Like a phone number, a credit card number, their bank account information, or a private address.

Example — What does this mean in practice?

[...] You have organised an internal workshop for all Canyon employees with external interest groups. Your colleague asks you to share the addresses of external participants for promotional activities.

→ Disclosing personal information cannot be done without prior authorisation of the affected persons. Personal information can only be used for the purpose for which it was communicated.

[...] You participated in an event organised by the company and found out that pictures of yourself were published on LinkedIn without your prior consent.

→ The disclosure of photos, in which the person is clearly identified requires prior consent. You must contact the Legal department, so they can take appropriate steps.

We expect that our employees:

- Only use personal information within their sphere of work in a transparent manner for authorised purposes
- Never disclose personal information to internal or external parties without prior authorisation
- Contact → [legal@canyon.com](mailto:legal@canyon.com) if they have any doubts regarding how to handle personal information.

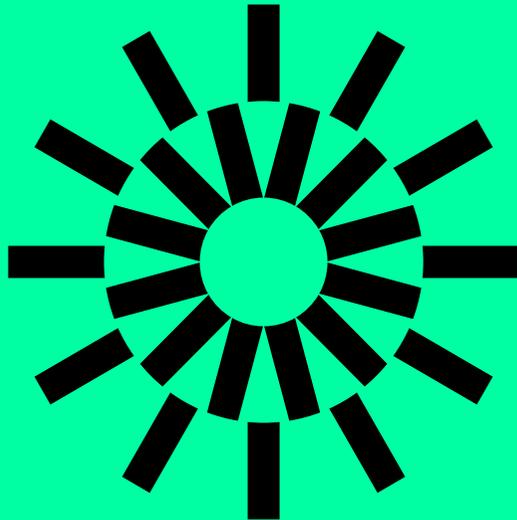




# WE PROTECT WHERE WE PLAY

## CHAPTER 3

### We are committed to society & the environment



#### 3.1 Protecting the environment

As a world-leading bicycle manufacturer, we protect the places where we play. It's at the very core of our values, and in our best interests, to respect our ecosystem. We believe that cycling can be a way to tackle the environmental challenges we face in this day and age. As such, we take responsibility to protect Earth's natural resources in the way we operate at Canyon and throughout our supply chain.

Example — What does this mean in practice?

- [...] You arrive in the office early one morning, and you notice lights are on in empty rooms and the heating was on maximum during the night.
  - At Canyon, we take our responsibility towards the environment very seriously. We aim at reducing energy consumption to the greatest extent possible. Take the initiative and turn everything off. If it is due to structural damage, notify the facility team as soon as possible so that they can take action.
- [...] When packing accessories, you notice that the use of the packing material could be bettered.
  - We attach great importance to using all resources wisely. Talk to your supervisor about your observation so that packaging processes can be optimised.

For more information, you can refer to Canyon's Forest Conservation Policy.

For this, we expect our employees to:

- Model environmentally conscious behaviour
- Use energy in a reasonable and efficient manner
- Avoid creating waste as much as possible and always recycle
- Work towards reducing the environmental footprint of the production and distribution of Canyon products within their sphere of work.

This can look like:

- Using resource-efficient products to avoid unnecessary emissions and pollution
- Using regenerative components and both recycled and recyclable materials where possible.





### 3.2 Being a corporate citizen

**As a company, we would like to nurture reciprocal relationships with our local communities. We're committed to actively encouraging more sustainability, fairness, and social engagement in the actions and efforts of Canyon, our partners and suppliers, as well as the ripple effect this has in society as a whole.**

**In this, we're committed to contributing to our local communities through engaging in strategic partnerships and volunteering programs.**

Example — What does this mean in practice?

[...] Since the beginning of 2021, we have been working successfully with Caritas workshops, whose employees support us in production & logistics.

→ We attach great importance to our social responsibility for society. Through our cooperation with Caritas, we contribute to enabling people with disabilities to participate in working life.

We encourage all our employees to:

- Actively participate in corporate initiatives offered at Canyon
- Join in with volunteering opportunities.

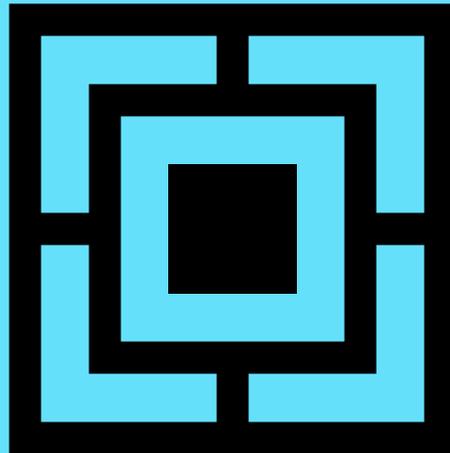




# WE SAFEGUARD OUR KNOWLEDGE

## CHAPTER 4

### Protecting our confidential information



Protecting our brand and business is of extremely high importance. We work hard to secure Canyon's confidential and protected information.

Confidential information is any information. Whether that's spoken words, documents, images, drawings, files, emails, information in applications, or in any other form that isn't intended to be in the public domain.

This includes information that concerns Canyon as a company, its employees, its suppliers, business partners, agents, and consultants. Like details of Canyon's information, disclosure of prices, technical information, or information about our manufacturing and/or design processes. These all encompass our trade secrets, which can include secret formulas, engineering information, processes and methods used specifically in our business processes. All trade secrets and confidential information are Canyon's protected information.

Basically, all the information that we create that affects the running of our business is confidential, and can only be used for professional purposes, unless it's been specified otherwise. A conscious disclosure of confidential information can only happen when it's been authorised by our Legal department under strict rules. Especially when it's covered by an NDA (non-disclosure agreement) and follows the relevant laws, for a certain purpose and at a certain time.

So in this context, cybersecurity is key. We store all information we generate in our IT landscape, protect digitally stored information, and secure it from unauthorised or inappropriate access, destruction, duplication, or modification.

Example — What does this mean in practice?

- [...] You are part of a team developing a very innovative technology to be used in our upcoming designs of Canyon bikes. You will present the status of the research. You are on the train with your laptop from work and you want to go through the presentation once again.
- Make sure no one has access to Canyon's confidential information. Do not retrieve this type of information in areas where third parties can access it or take note of it.

So for this, we expect our employees to:

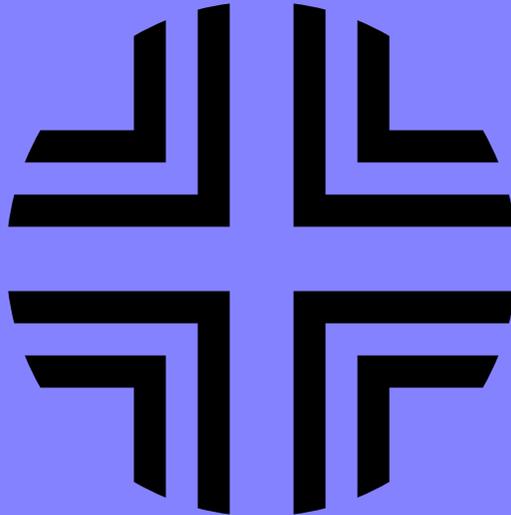
- Not disclose any confidential information outside Canyon, including to their family members and friends
- Follow our IT security policies to ensure confidential information is protected
- Protect Canyon's confidential information against unlawful use or unauthorised access.



# WE LEAD BY EXAMPLE

## CHAPTER 5

### We are committed to responsible business conduct



#### 5.1 Maintaining accurate records

We rely on the integrity of our records, and we provide our interest groups and partners with relevant information. We comply with the applicable reporting obligations.

Almost all the information that is gathered within the context of the work that we do is defined as a company record. This encompasses things like documents or emails that reflect financial information, to sales forecasts and presentations, and accounting records. All of this is particularly important for the sake of our financial integrity. So we make sure that our books and financial records are kept accurately, that we meet legal regulations, and that we meet the requirements of relevant partners (like shareholders and financing banks).

Example – What does this mean in practice?

[...] The budget of your department for the current financial year has been already used. But you found out that a colleague decided to place an order for new equipment anyway and included the expense in the next fiscal year when a new budget will be available.

→ Transactions must always be documented accurately. This is a serious violation of our Code of Ethics and can put our financial integrity at risk. Please report the case to the Legal department so they can take the necessary steps.

With this in mind, all Canyon employees must:

- Act with honesty and integrity when creating records, include all relevant and necessary information in due time, and ensure records are complete and accurate
- Refrain from altering or omitting information when documenting transactions that could lead to an inaccurate overall picture
- Report any suspicious transactions, or any requests to record inaccurate information to their supervisor or the Legal department
- Retain all documents and records aligned with Canyon's processes, policies, and accounting procedures.



### 5.2 Operating with financial integrity

We run our business with integrity, transparency, and in compliance with all laws and regulations applicable in each country where we operate. We only do business with customers, partners, and reputable companies that follow their country's applicable tax laws, and whose financial resources come from fair, legitimate origins.

We lay down strict measures that prevent money laundering and the financing of illegal activities. By money laundering, we mean the process where profits from criminal activities are "cleaned" to hide their illegal origins. Like organised crime that generates huge cash profits, such as trafficking in drugs, arms and human beings, as well as fraud.

In addition to this, we take measures to combat corporate tax evasion. Tax evasion is the illegal non-payment or underpayment of taxes, usually by misreporting or underreporting to the tax authorities. Some examples can include underreporting income, profits, or gains, or overstating deductions. We don't engage in any activities that involve illegal evasion of taxes.

#### Example — What does this mean in practice?

[...] You realise that a customer makes a high monetary value purchase in cash of over 10.000 Euros, or the maximum allowed by the country of the customer whichever is less.

→ High-value cash purchases are always at risk of having illicit origins. Before closing the sale, please contact the Legal department and ask them how to proceed.

All our employees at Canyon must:

- Follow our procedures to ensure financial integrity when we do business with our customers, partners, and companies
- Ensure tax compliance in every transaction we make
- Report any (suspicious) activity of a business partner or customer that indicates financial resources from a suspicious origin to → legal@canyon.com.

### 5.3 Complying with trade and export control regulations

As a global company, we comply with trade and export controls and other laws, regulations, and customs applicable in the countries where we operate.

At Canyon, we carefully make sure all applicable customs and foreign trade regulations are checked, implemented, and followed whenever we trade, transport, import, or export our goods.

We monitor applicable laws and new developments regularly, so that we are always up to date with trade and export control regulations. Trade and export control regulations prohibit or restrict trade of certain goods, technologies, or services on a temporary or permanent basis with certain territories, countries or with specific companies.

These measures can also consist of freezing funds or restricting access to financial services. So we do not conduct business in countries or with entities, companies or individuals that have trade restrictions, or are targeted under any international sanctions lists issued and maintained by the United Nations, United States of America, or the European Union.

#### Example — What does this mean in practice?

[...] You realise that one of your main business partners is located in a country or territory which is now on an international sanctions list. Your order for parts from this partner was placed before the sanction was enforced. The parts are important pieces of one of Canyon's bikes.

→ At Canyon, we do not conduct business in countries that are on international sanctions lists. Report the case immediately to the Legal department, so appropriate action can be taken.

In this, we expect all Canyon employees to:

- Be aware of the above-mentioned trade and export control regulations
- Contact the Legal department in case they have any doubt regarding whether (and to what extent) a business decision may fall under trade and export controls.





### 5.4 Avoiding conflicts of interest

Our business decisions are taken not in our personal interests, but in the best interests of Canyon.

A conflict of interest is when someone's personal interests interfere with, or take precedence over, the company's interests. These are very human and can arise at any time. But if an employee finds themselves in a situation where conflicting loyalties may cause them to seek personal gain for themselves, their friends, or their family at the company's expense, they may be faced with a conflict of interest.

Example — What does this mean in practice?

[...] Your supervisor asks you to review a few applications that they have selected as "finals" to fill in a position at the company. You find out that one of the candidates is a good friend of yours.

→ Make sure to report the situation to your supervisor as soon as possible. This way they can take the necessary steps for someone else to review the recruitment process, and you will not be exposed to a breach of our Code of Ethics.

In these situations, we expect our employees to:

- Make decisions in the best interest of Canyon
- Recognise and anticipate when a business or personal relationship may create either a conflict of interest (or the appearance of a conflict of interest)
- Report any personal or commercial relationship that may create an actual or potential conflict of interest (or the appearance of one) by using our Speak Up platform.

We ask our employees to be mindful of the potential implications in engaging in romantic relationships or connections with each other, or with business partners.

We welcome a close and trustful relationship between colleagues, and we respect the privacy of our employees. But it's worth noting that romantic relationships between employees — or between employees and business partners — can also create conflicts of interest. Especially if these occur within reporting lines. Under all circumstances, any situation of abuse of power, or conflict of interest, must be avoided in all romantic relationships between employees or between employees and business partners.

With this in mind, we expect our employees to:

- Make sure that any romantic relationship doesn't interfere with their job performance or jeopardise their employment contract
- Avoid situations of abuse of power, or conflict of interest in any romantic relationships they have with each other or with business partners.

### 5.5 Fighting corruption

We have a zero-tolerance policy towards corrupt practices including (but not limited to) bribery, fraud, and political influence in exchange for money or favours.

We never receive, offer, or promise anything of value in our business relationships in return for a contract, more favourable commercial terms, or any other advantage.

By bribery we mean offering, promising, giving, demanding, or receiving (both directly and indirectly). This includes money, unfair advantages, and any other things of value to obtain or retain business.

Fraud is the use of intentionally deceptive behaviour in order to obtain a monetary or personal benefit. Influence peddling (or 'traffic of influence') is the offering, granting, or providing an undue advantage to a person for them to exert their influence on the decision-making of a public official. Also, these behaviours are punishable by law.

Example — What does this mean in practice?

[...] A business partner offers you a commission if you choose them over a competitor in a procurement bidding selection process.

→ Never accept any form of money, favours, commissions from a business partner. These acts of corruption are punishable by law and oppose our Code of Ethics. Immediately inform the Legal department for appropriate action.

All of our employees at Canyon must:

- Conduct business relationships with integrity and in compliance with the law
- Immediately reject any bribes
- Never offer bribes to anyone under any circumstance
- Refrain from practicing fraud of any kind in their business relations
- Refrain from promising or giving any benefit or payment to another person to influence the decision-making of a public official.





5.6 Accepting and giving gifts, invitations, gratuities, or other items of value in a transparent manner and for legitimate business purposes.

Conflicts of interest can also happen through gifts, invitations, and other courtesies. A legitimate business reason for giving or receiving gifts would be to strengthen the relationship with a business partner, promote brand awareness, reinforce brand reputation, promote a company's new product, increase sales, or done as a part of Canyon's marketing strategy.

With this in mind, we can only accept and offer corporate gifts, invitations, and other items of value within legitimate business reasons, and within the limits written below:

Gifts to and from business partners

We accept and grant gifts to and from our business partners, customers, and suppliers, but only if they are corporate gifts, don't exceed 35 euros per calendar year per person limit, and have a legitimate business reason.

Corporate gifts are gifts with a company logo, or recognisable by a greeting card (they also usually consist of office supplies or things relating to the gift giver's brand or industry.) Corporate gifts with values higher than those allowed must be handed out to the People department, who collect these gifts for an annual company raffle. Monetary gifts of any kind (cash, money transfers, unauthorised discounts, or gift cards, etc.) aren't allowed. Personal benefits, like travel, free services, favours, or gratuities are also prohibited, especially when offered to family members or to close collaborators.

Invitations from and to business partners

We accept and offer invitations to business meals and business-related social events (like a workshop that will end with a dinner, for example) as long as they are based on legitimate business reasons and values.

Gifts to public officials

As a rule, gifts and invitations extended to public officials aren't allowed. These gifts and invitations, depending on the jurisdiction, may be considered bribes and therefore be punishable by law.

Example — What does this mean in practice?

There are three things to check before you can accept the gift. First, is it a corporate gift? Second, is there a legitimate business reason? And third, is it within the established maximum value limits?

If the answer to all three questions is yes, only then you can accept the gift.

[...] A Canyon supplier, with whom you have a long-standing business relationship, sends you two tickets to a concert as a birthday present.

→ On this occasion, an invitation to a concert is not a corporate gift, as the concert is not related in any way to our supplier or their industry. Also, the gift is not linked to a legitimate business reason, as it is a birthday gift. Finally, the value of the tickets is likely to exceed the allowed value limit. Therefore, the gift cannot be accepted.

We expect our employees to:

- Follow our policy on gifts and invitations and only accept or offer gifts and invitations from and to business partners if they qualify as corporate gifts, have a legitimate business reason, and do not exceed the limits set out in this policy
- Make use of Canyon's Speak Up platform in the event (or suspicion of) a breach of conduct
- Contact → legal@canyon.com in case they have any doubts about accepting a specific gift.





### 5.7 Competing on fair terms

We conduct our business at Canyon in compliance with antitrust and competition laws. These laws protect consumers and promote general welfare and economic growth. They do this by fostering market conditions in which the nature, quality, and price of goods and services are determined by competitive market forces.

So any coordinated action amongst participants to artificially fix or inflate prices, partition markets, or otherwise restrict trade is not allowed.

Example — What does this mean in practice?

[...] A former colleague of yours is now working at Canyon's main competitor. You meet them for a coffee and out of curiosity they ask you about the next plan of market expansion of Canyon. They are a good friend of yours. You are not sure what to do.

→ This type of information cannot be shared with competitors under any circumstances. Please refrain from disclosing such information, even among friends.

We expect our employees to:

- Never enter into anti-competitive agreements with competitors, also regarding the fixing of prices, division of markets, territories, or customers
- Never share information about prices, business opportunities, customers, markets, territories or business processes with our competitors
- Recognise, anticipate and avoid interaction with competitors, business partners, or other third parties that may violate antitrust laws
- Immediately terminate any interaction with a competitor, business partner, or other third parties that may violate antitrust laws.

### 5.8 Complying with our signature policy

We take our representation with third parties very seriously. We follow strict signature rules that need to be observed in all business dealings, for the most cases external business transactions.

Example — What does this mean in practice?

[...] You are about to hire the services of a consultancy firm for a project at Canyon. You need to first send out the non-disclosure agreement (NDA) to share confidential information. You believe that your signature would be sufficient as you are Head of Department.

→ At Canyon we strictly follow the principle of dual control, meaning that at least two persons with the appropriate authorisation must sign. Please check our policy and in case of doubt, resort to the Legal department.

We expect our employees to:

- Follow the rules set out in our Canyon Signature Policy, and contact → legal@canyon.com in case any doubts about the process arise.

### 5.9 Promoting our values

Everything we do at work represents Canyon.

So whether we're on the phone, in our showroom, or at an event, we should always role model Canyon's core values. These are integrity, honesty, passion, and personal accountability. And in any form of communication, we should hold ourselves accountable for any information we share. We're brand ambassadors, after all.

Example — What does this mean in practice?

[...] You are working for Canyon at an event wearing company clothing to be recognisable as a contact person onsite. An event participant approaches you, leaves inappropriate comments about Canyon's customer service, and tries to engage you in a discussion.

→ As a brand ambassador at an event, always try to behave positively in the spirit of the company. Stay polite and don't engage in unnecessary discussions. Refer to our official communication channels if you can't help the customer at that moment.

We expect our employees to:

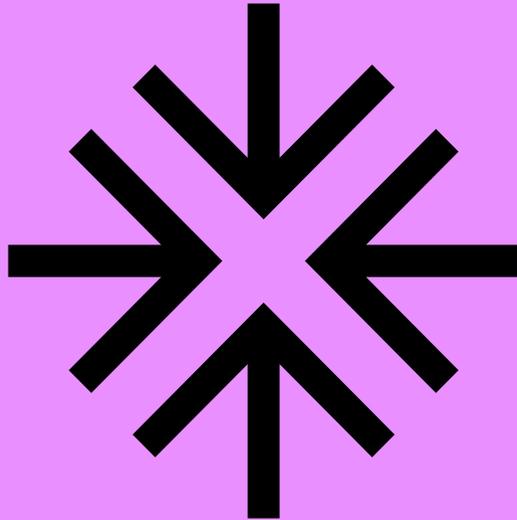
- Align their actions with our company goals and core values
- Contribute to the positive external representation of our company.





# WE TAKE RESPONSIBILITY

## CHAPTER 6 Your Role



**Take advantage of training and always ask your supervisor if/when you have doubts.**

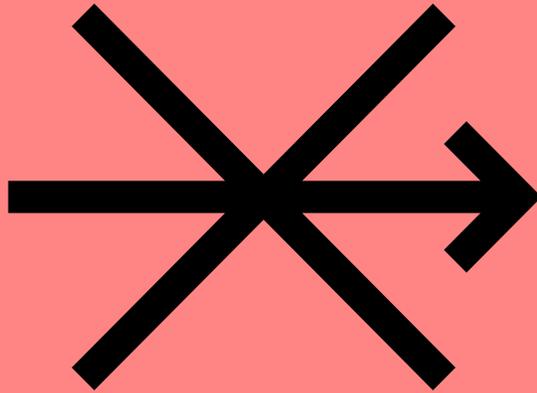
All staff are given the opportunity (and are required) to read through and agree to Canyon's Code of Ethics. You can access all information via our internal platforms, the intranet, and posters. We expect our employees to familiarise themselves with our guidelines and attend training courses when they're offered, because we want everyone to understand where the boundaries are. In case of doubts or questions about the applicability of the Code of Ethics, seek guidance from → [legal@canyon.com](mailto:legal@canyon.com), or your supervisor.

Please always report non-compliance to protect yourself and Canyon as specified in → 1.1.



# WE UPHOLD OUR INTEGRITY

## CHAPTER 7 Consequences



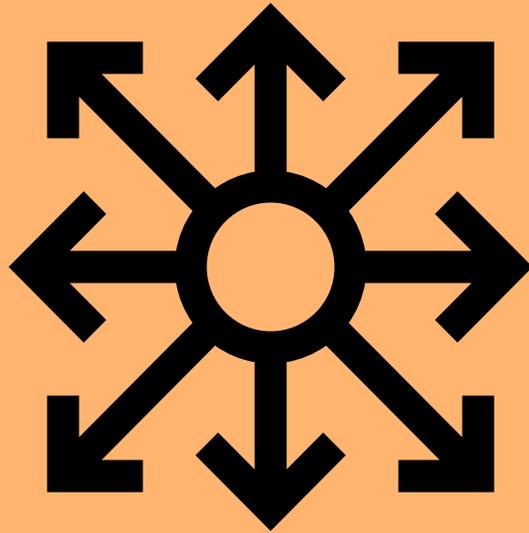
We are all guardians of Canyon's culture, values, integrity, and success, and we're always accountable for our own behaviour. If there are allegations of possible violations of this Code of Ethics that are raised, Canyon will investigate these and take appropriate measures.

Violations of the provisions of this Code of Ethics may result in reasonable disciplinary action against the violating individual, up to (and including the) termination of employment.



# WE BELIEVE IN A HOLISTIC APPROACH

## CHAPTER 8 Governance



The ESG Governance policy applies, which is available to read on the intranet.

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