

## Code of conduct

### 1 What is correct behaviour?

PRODATA is in constant relationship with a variety of different people and organisations, as well as with representatives of a wide range of interests. Our corporate image depends on how our employees conduct themselves in everyday business. There is no alternative to personal integrity and sound judgement. If you are faced with a difficult situation, you should ask yourself the following questions:

1. Is my action or decision legal?
2. Does it comply with the letter and spirit of this Code and other guidelines?
3. Is it correct and free from personal interest?
4. Does my action or decision stand up to public scrutiny? How would it appear in a newspaper report?
5. Does my action or decision protect PRODATA's reputation as a company with high ethical standards?

If you can answer 'yes' to all the questions, then the action or decision is most likely correct and in line with the guidelines below.

### 2 Our ethical commitment

#### 2.1 Laws and ethical principles

PRODATA strives for a sustainable development of its business based on economic performance and corporate responsibility. We meet the diverse interests of our clients and business partners through conduct with integrity, fairness and honesty. Excellence in both our business development and ethical conduct is our goal.

We act with integrity and comply with the legal requirements applicable to our business in all regions and countries. We recognise that laws and ethical standards may differ in the countries in which we operate due to national circumstances.

#### 2.2 Human rights

PRODATA is guided by the principles of the United Nations Global Compact. We respect the principles of the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, adopted in 1998, in accordance with national laws and practices. We respect human rights within our sphere of influence and conduct our business in a manner that makes us an employer of choice. We are expressly committed to the elimination of all forms of forced and child labour.

### 3 Our business practices

#### 3.1 Focus on quality

Our commitment to quality is central to our business. To achieve the highest quality standards, we are constantly working to improve our structures and processes for the benefit of our customers. This applies to our products as well as to our services and management - and of course to our conduct.

#### 3.2 Customer satisfaction

"Making our customers successful" is our top priority, because we know that their success guarantees our own.

Our knowledge of the global and local wishes of our customers and of the requirements of the markets determine our actions. The customer is always at the centre of our business processes, projects and activities. We know that we are measured by our ethical, social and ecological behaviour as well as by the quality of our services. We therefore strive for excellence in all these areas in order to maintain the trust of our customers.

### **3.3 Transparency**

We are committed to dealing openly with our customers, employees, suppliers, business partners and other organisations and institutions. Transparency and honesty have priority in our communication - both internally and externally. The public is given access to information in accordance with internationally recognised standards of corporate governance.

### **3.4 Dialogue with business partners**

We are committed to dialogue and partnership with our business partners around the world. We share the basic principles of ethical behaviour, social commitment and environmentally sound action with our suppliers, subcontractors, representatives and consultants. We communicate our guiding principles to our business partners and motivate them to base their actions on the same standards.

## **4 Our standards for cooperation**

### **4.1 Individual responsibility and involvement**

The skills and commitment of our employees are our most valuable asset. We expect our employees to act in an entrepreneurial manner and respect their personal responsibility. We attach importance to involving colleagues in our plans and decision-making processes in order to reliably and bindingly achieve our common goals.

### **4.2 Mutual respect and openness**

It is part of our corporate culture that the relationships between directors, managers and employees at all levels, in all divisions and all regions are guided by mutual respect, openness, honesty and a common understanding of trusting cooperation. Mutual feedback as well as active and open communication characterise our dealings.

We conduct fair and open discussions and deal constructively with differing opinions. We encourage our colleagues to address their ideas and concerns openly and directly. Team spirit requires open-mindedness.

We expect our employees to always achieve business success in compliance with laws, ethical standards and the Code of Conduct.

PRODATA clearly opposes any form of violence and assault in the workplace, this includes threatening and intimidating behaviour.

Every employee is encouraged to contribute to an atmosphere of respectful interaction that excludes any form of personal harassment - including workplace harassment, unwanted sexual advances, unwanted physical contact, indecent propositions or a work environment marred by offensive jokes, remarks and humiliation.

Each of our workers has the free choice to join or not join a trade union/workers' representation of their choice without threat or intimidation. We recognise and respect the right to bargain collectively within the framework of applicable laws.

### **4.3 Diversity**

We see the diversity of our employees as a strength. We promote inclusion in everyday work with the aim of achieving maximum productivity, creativity and efficiency.

The essential criteria in the selection and development of our employees are skills and qualifications.

We do not discriminate against anyone on the basis of gender, ethnic origin, nationality, religion, age, disability, sexual orientation and other legally protected characteristics.

#### **4.4 Health management and occupational safety**

We are convinced that the safety and well-being of our employees are essential for our economic success. We attach great importance to following our health and safety guidelines. We strive to sustainably promote the physical and mental well-being of our employees. Our goals are sustainably efficient and committed employees as well as lower rates of illness and occupational accidents. We pursue health promotion as a key element for sustainable productivity and quality of our services. We create shared value through our commitment to health and safety.

Our health and safety policy at all locations worldwide also includes the prohibition of illegal drugs in the workplace.

#### **4.5 Company property**

Each employee is responsible for the protection and proper use of PRODATA's property. The private use of company property, including work services, auxiliary and operating materials, equipment, buildings and other economic goods, is prohibited - unless expressly permitted by separate agreements. Intellectual property is a valuable asset that must be protected from unauthorised use and disclosure. This includes trade secrets, data and information, including but not limited to client data, confidential information, copyrights, trademarks and logos, as well as client lists, business opportunities and product specifications - and applies regardless of whether the intellectual property is owned by PRODATA, affiliated companies or business partners.

#### **4.6 Legal procedures**

Our employees must refrain from all activities that could involve PRODATA or its employees in unlawful practices. This applies to the deployment of personnel as well as to the use of company assets. Lawsuits, court proceedings and investigations concerning PRODATA must be responded to swiftly and appropriately in order to protect and defend the company. Employees who are threatened with a lawsuit, other legal proceedings or an investigation in a business matter must contact the management immediately.

### **5 Integrity in our business practice**

#### **5.1 Standards for accounting and reporting**

PRODATA bases its decision-making processes on the correctness and accuracy of accounting records. Particular importance is attached to the confidential treatment of security and personnel data, as well as accounting and financial data. All business transactions must be recorded in our books in accordance with established procedures and auditing standards and generally accepted accounting principles. These records contain the necessary information about the respective transactions.

#### **5.2 Conflicts of interest**

We expect our employees to act ethically when dealing with conflicts of interest. Our employees should inform their supervisors about relationships with persons or companies with whom PRODATA does business that could lead to conflicts of interest - such as family relationships, partnerships, business partnerships or investments.

## **5.3 Fair competition**

We are committed to the principles of a free market economy and fair competition. We conduct our business exclusively according to the performance principle and on the basis of free, unhindered competition. We employ suppliers, agents or other intermediaries only after careful and fair performance evaluation. We are required by law to make business decisions in the best interest of the company and independent of any arrangements or agreements with competitors. PRODATA and its employees will refrain from any conduct that violates antitrust laws.

## **5.4 Bribery and corruption**

We are convinced that the excellent quality of our services is the key to our success. We therefore maintain transparency in our dealings with our customers, suppliers and authorities and comply with international anti-corruption standards, such as those set out in the UN Global Compact, as well as applicable anti-corruption and bribery laws.

## **5.5 Gifts and advantages**

Gifts and other benefits are permitted if they are customary and ethical. None of our employees may demand gifts or other personal benefits from customers, suppliers or other business partners. The acceptance and giving of gifts and other benefits is prohibited in particular if it appears likely to influence pending business decisions or violates a law, regulation or guideline.

## **5.6 Money laundering**

PRODATA expects its employees to strictly comply with all anti-money laundering laws and regulations - including those rules and regulations that require currency transactions with Blocked Persons to be reported.

## **5.7 Trade regulations**

PRODATA believes that free trade contributes to wealth and prosperity in the world. We always strive to comply with applicable laws, including sanctions and embargoes, as we serve our customers wherever they are.

## **5.8 Data protection**

Our employees must not disclose information, unless it is already known to the public, for their personal gain or for the benefit of others. This includes technical data, financial data, operational data, customer information, memos and other information relating to our company's business and its operational activities and future plans. Employees must comply with relevant laws and company regulations with respect to personal data, particularly that of customers, employees. Personal data of natural persons and (if legally equivalent) legal entities may only be collected, processed and used in accordance with the respective requirements.

## **6 Our corporate responsibility**

Our corporate responsibility is an expression of our will to make a positive contribution to society and the environment. As a global company, our actions have an impact on the society in which we work and the world in which we live. We want to live up to our responsibility as a global company and have therefore integrated our corporate responsibility into our corporate strategy. Our responsibility is reflected by our orientation towards fundamental charters and initiatives such as the Universal Declaration of Human Rights, the United Nations Global Compact and the OECD Guidelines for Multinational Enterprises.

We strive to act responsibly in all our operations, bringing our core competencies to bear to make the planet a better place through the expertise of our employees.

We focus our efforts on improvements in areas where we believe we can have the highest positive impact:

## **6.1 Environmental protection and socio-economic development.**

We advocate and support the spread of environmental and social standards worldwide. We consider the commitment of our employees and their active participation as an important success factor for our efforts.

We recognise that we will also be judged by how we conduct ourselves outside our immediate work environment, and therefore ask our employees to respect the local culture and show understanding of the issues facing the communities in which they operate.

We recognise the impact of our operations on the environment and are committed to improving our environmental performance through preventive environmental measures and the use of environmentally friendly technologies.

Through systematic identification and use of environmental innovations, we strive to continuously improve our environmental performance through environmental audits and risk management in order to use natural resources more efficiently. The benchmark for our processes and services are the highest national and international environmental standards.

## **7 Information and reporting channels, exemptions and amendments to the Code of Conduct**

### **7.1 Information**

To understand policies, make difficult decisions or help PRODATA achieve our Code of Conduct, you may need help. You have various options for doing so:

- Talk to your superiors.
- If you have questions about specific guidelines, please contact the respective department.

### **7.2 Notification of an infringement**

If you become aware of a possible violation of this Code of Conduct, we encourage you to report it. You can contact your superiors or directly the management.

Your report will be treated confidentially. Employees who in good faith report information about non-compliance with the Code of Conduct will not be discriminated against. In the interest of an open working atmosphere and to enable efficient processing of your report, we ask you to state your name when reporting a possible violation. If this is not possible for you, we will also accept anonymous reports.

However, information about the identity of employees who have reported a possible violation may need to be disclosed to persons or authorities involved in the investigation or subsequent legal proceedings if required by applicable law.

### **7.3 Measures, derogations and amendments**

In the event of violations of this Code of Conduct, PRODATA will take action and take appropriate measures to properly resolve the matter. As a matter of priority, PRODATA will attempt to settle the matter by explaining the meaning of our Code of Conduct to affected employees and thereby persuading them to change their behaviour. However, it is also possible to implement labour or disciplinary measures within the framework of the applicable regulations in the event of violations of this Code of Conduct.

Exceptions to compliance with the Code of Conduct will not be permitted without good cause. Only the management can approve such regulations.

PRODATA will review this Code of Conduct regularly and the management will decide on any amendments.