



# Our Compliance-Guidelines

Valid for alseda GmbH and  
its affiliated companies

## 1 PREAMBLE

**Our actions are guided by integrity. This extends to dealing with our customers and suppliers, employers, shareholders and the public.**

Both our strategic considerations and our day-to-day business are always based on high ethical and legal standards. Everyone at alseda shapes the style and the image of the company, both internally and externally, through his or her personal appearance, actions and behavior.

Inappropriate behavior by even one employee can cause considerable damage to the company. We are all required to take care of the public image of our company.

Honesty, sincerity and fairness are the benchmarks for dealing with each other and with our partners and the public.

Because sustainable growth is the goal of our work, we at alseda are not only interested in results, but also in how these results are achieved. We never tolerate illegal or unfair practices or discriminating behavior to reach our goals.

Our compliance policy contains binding rules that apply equally to all of us. It obligates us to act accordingly and to refrain from doing anything that contradicts these rules.

alseda GmbH  
Frank Bergmann  
(Managing Director)

Equal rights are important to us. Therefore, all corresponding terms such as „colleague“, „employee“, etc., always include people of all genders and serve only the textual simplification.

## 2 ESSENTIAL REQUIREMENTS

### 2.1 LAW-BINDING BEHAVIOR

For alseda, compliance with the law is the highest priority. We all undertake to observe the statutory provisions of the legal systems within the framework of which we act. Violations of the law must be avoided under all circumstances. The same applies to all applicable internal regulations adopted by the company.

Every employee must expect disciplinary consequences in the event of a breach of his or her contractual duties, irrespective of the sanctions provided for by law.

### 2.2 MUTUAL RESPECT, HONESTY AND INTEGRITY

We respect the personal dignity, privacy and personal rights of everyone. We work together with women and men of different nationalities, cultures, religions and skin colors. We do not tolerate discrimination or any ostracism on the basis of sexual inclinations or other reasons, nor do we tolerate sexual or other personal harassment or insults. We are open and honest and stand by our responsibilities. We are reliable partners and only make commitments that we can keep.

These principles apply both to our internal cooperation and to our behavior towards external persons.

## 3 BASIC RULES FOR THE DEALINGS AT ALSEDA

### 3.1 MANAGEMENT, RESPONSIBILITY AND SUPERVISION

Supervisors bear responsibility for the employees entrusted to them. They must earn their recognition through exemplary and personal behavior, performance, openness and social competence. They set clear, ambitious but achievable targets, lead in a spirit of trust and give their employees as much personal responsibility and freedom as possible. To this end, alseda has drawn up management principles that must be observed by every employee in a management position.

Employees with management responsibility conscientiously fulfill the associated organizational and supervisory duties. This also includes actively communicating the compliance policy and ensuring that it is observed.

They bear special personal responsibility for ensuring that no violations of laws and internal guidelines occur in their respective areas of responsibility

### 3.2 FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

alseda recognizes the right of employees to organize themselves. There are employee representatives at all sites who represent the rights of the employees. This can be contacted confidentially by any employee.

### 3.3 CHILDLABOUR AND PROTECTION OF MINORS

alseda generally rejects child labor and any exploitation of children and adolescents and obligates its suppliers to make corresponding declarations. All regulations for the protection of young employees are observed. Young people under the age of 18 are not employed at night or under dangerous conditions.

### 3.4 CONTRACTS, WAGES AND WORKING HOURS

Any work performed at alseda is voluntary and governed by an employment contract. Any employee may leave alseda at any time subject to the statutory and/or contractually agreed notice period.

We ensure that our employees are not paid less than the minimum wage. The minimum wage requirements are applied. Payment is made on a monthly basis. Before starting work and for each payment, each employee receives detailed and comprehensible information about the composition of the remuneration.

alseda does not make illegal or unauthorized deductions from salaries, nor is salary deduction used as a disciplinary measure. Overtime is worked and remunerated on the basis of applicable laws and company agreements.

Working hours comply with statutory regulations (e.g. Labor Act, Federal Vacation Act) and are described in the employment contract. Overtime is voluntary in accordance with the company agreements.

### 3.5 SAFETY AT WORK

Responsibility toward employees and colleagues demands the best possible precautions against accident hazards. This applies to the technical planning of workplaces, facilities and processes as well as to safety management and personal behavior in everyday work. The working environment must meet the requirements of a health-oriented design.

Each employee shares responsibility for occupational safety in his or her area. All occupational health and safety regulations must be strictly applied. Information from employees regarding deficiencies in occupational safety must be followed up by the respective person responsible for occupational safety.

### 3.6 DEALING WITH COMPANY PROPERTY

We treat the equipment and resources of alseda entrusted or provided to us with care and consideration.

Unless otherwise stipulated in the company or in individual contracts, the equipment and facilities in offices (e.g., telephone, copier, PC including software, machines, tools) may only be used for business purposes. Under no circumstances may

information be retrieved or passed on that incites racial hatred, violence or other criminal acts or contains sexually offensive content

The use of private equipment for business purposes is generally not permitted (e.g., recording with private camera / video equipment, use of private notebook). Exceptions to this are regulated separately (e.g., use of private car for short trips).

## **4 DEALING WITH BUSINESS PARTNERS AND THIRD PARTIES**

### **4.1 FREE COMPETITION**

alseda is fully committed to competition by fair means and in particular to strict compliance with antitrust law. The appearance of its own conduct restricting competition is also to be avoided.

Every employee is obliged to comply with the rules of fair competition. In the event of third-party misconduct, the Legal Department is to be informed.

All collusion between companies that restricts competition must be strictly avoided. Even a mere exchange of information can be forbidden.

Detailed information and rules for our employees on the subjects of:

- Exchanging information agreements with competitors
- Market information procedures and market statistics
- behaviour when dealing with customers and suppliers

are listed in the "Information Security Guideline" as well as in special work instructions for Purchasing and Sales, which every employee must be aware of.

### **4.2 BATTLE AGAINST CORRUPTION**

#### **4.2.1 GENERAL**

Corruption cannot be accepted as an evil because of its power to destroy the economy and society as a whole. Corruption undermines citizens' trust in the integrity and functioning of the economy and also causes considerable damage to business and the national economy. For the purposes of this guideline, corruption is any misuse of an official function to obtain an advantage for oneself or a third party.

Our goal is not only to consistently pursue cases of corruption that arise, but also to counteract corruption in the long term with the help of preventive measures.

Sensitivity to the dangers of corruption is necessary in all areas of work.

However, special attention is required where information or decisions of particularly high material value are involved, for example when orders are placed, contracts are concluded, or the correct performance of services is monitored or checked.

In the event of a concrete suspicion of corruption, i.e. if there are indications of corrupt behavior that are not merely based on suspicions, the employee must inform the superior immediately. The superior shall not be informed if he or she is suspected of corruption. In this case, the next higher-level supervisor must be informed. Alternatively, the compliance officer or the external ombudsman's office can be informed.

#### **4.2.2 OFFERING AND GRANTING BENEFITS**

Therefore, no employee may offer or grant unauthorized benefits to others - directly or indirectly - in connection with business activities, either as a monetary payment or in the form of other benefits.

Employees who conclude contracts with consultants, intermediaries, agents or comparable third parties must ensure that these also do not offer or grant any unauthorized advantages.

Regulations within the scope of sales promotions are listed in a special sales promotion guideline. Benefits to business partners or their employees outside the measures described therein are strictly prohibited.

Promotional items can be given out on special occasions as a small gift to customers, business partners and guests. Care must be taken to ensure that no customary right can be derived from this and that the focus is always only on the positive corporate image. More detailed information is contained in the special internal regulation "Issue of promotional items".

Invitations to appropriate business meals may be issued.

#### **4.2.3 REQUESTING AND ACCEPTING BENEFITS, GIFTS AND OTHER PERKS**

No employee may use his or her official position to demand, accept, obtain or be promised advantages. The acceptance of gifts and other benefits is therefore generally not permitted.

So-called scatter advertising items, which are given out to customers in larger quantities (e.g. lanyard, ballpoint pen, calendar, chocolate) with a low value can be accepted.

If gifts or benefits cannot be refused in view of the business relationship, they must be reported to the supervisor. The management or the company management will decide on their use.

Invitations to reasonable business meals may be accepted.

### **4.3 AVOIDING CONFLICTS OF INTEREST**

We make business decisions free of extraneous considerations for the benefit of alseda. In order to rule out conflicts of interest in our actions from the outset, the following rules apply:

1. Any personal or family interest that may exist in connection with the performance of official duties shall be disclosed to the disciplinary supervisor.
2. Suppliers must not be favored or hindered in the competition for contracts for personal or other extraneous reasons.
3. The supervision of suppliers or other service providers who work for alseda and who at the same time also work or are to work privately for the supervising employee is to be avoided.
4. Any secondary employment of an employee shall require the express prior consent of alseda's personnel department. Secondary employment for a company which at the same time has a business relationship with alseda is not permitted.
5. If there is a recognizable risk of a conflict of interest, the employee concerned shall inform his/her superior without being asked to do so.

## 5 SECRECY AND DATA PROTECTION

### 5.1 PROTECTION OF SECRECY

We treat the data and information entrusted to us with care and discretion. We know that the know-how and business secrets of alseda as well as of the companies cooperating with alseda are valuable and must be protected.

We therefore observe our internal regulations for the protection of confidential information and business secrets and disclose internal information to third parties only to the extent necessary and permissible.

In particular, confidentiality must be maintained with regard to internal matters of our company and our partners which have not been disclosed to the public or which are not absolutely necessary for the specific task in cooperation with business partners (e.g. suppliers, service providers, consulting companies). This includes, for example, details relating to the organization of the company and its facilities, as well as business, research and development processes and internal reporting figures. The obligation to maintain confidentiality shall continue to apply even after termination of the employment relationship.

The basis of any trusting and effective cooperation is a commitment to truthfulness. This applies equally to relations with shareholders, employees, customers, business partners, the public and all government agencies. All records and reports prepared internally or given externally must be correct and truthful. According to the principles

of proper accounting, data collection and other records must always be complete, correct, timely and system compatible.

## 5.2 DATA PRIVACY AND DATA SECURITY

The protection of personal data and compliance with the data protection regulations applicable to alseda is important to us. We therefore comply in particular with the European General Data Protection Regulation and the Federal Data Protection Act and ensure that the applicable principles for the processing of personal data are observed at all times.

We take all necessary measures to protect the personal data we collect or process. Personal data may only be collected, processed or used to the extent necessary for specified, explicit and legitimate purposes.

alseda has appointed an internal data protection officer whose contact details can be found on the website under "Data protection".

## 6 SUSTAINABILITY AND SOCIAL RESPONSIBILITY

### 6.1 ENVIRONMENT AND TECHNICAL SAFETY

Protecting the environment and conserving its resources are corporate goals of high priority. Those responsible for the environment / safety ensure compliance with the law and high standards. Everyone must cooperate in their place in an exemplary performance in these areas.

### 6.2 QUALITY MANAGEMENT

alseda attaches great importance to the quality of its products and services. As a manufacturer of software, we are subject to a special duty of care and are committed to these defined quality guidelines. These obligations are laid down in our process and work instructions and are binding for all our employees.

We are committed to putting only reliable software products on the market. We pay special attention to the use of energy-saving methods in the entire production and delivery process.

In addition, the requirements of our "Co-dex for Sustainability" apply to the entire company as a voluntary self-commitment.

### 6.3 SOCIAL RESPONSIBILITY

We see ourselves as a responsible, important employer at our sites and accept the associated social and regional responsibility. This is achieved through open communication and active commitment to the region. We are an integral part of public life in our regions and a constructive partner for society. We expect our suppliers to act

sustainably with respect for people, animals and the environment. We therefore demand compliance with the criteria of our Supplier Code of Conducts.

## 7 REPORTING VIOLATIONS

### 7.1 COMPLIANCE-REPRESENTATIVE

As an internal contact for employees, business partners and customers, alseda has appointed a Compliance Officer who advises the Executive Board on compliance matters, monitors the observance of these compliance guidelines and acts as a contact person at alseda for employees, business partners and other third parties in all compliance matters.

The compliance officer performs these tasks independently of instructions. He has a direct right of presentation to the management. The Compliance Officer shall maintain confidentiality about the personal circumstances of employees of which he has become aware, even after the end of his period of service with alseda; this shall not apply to the Executive Board in the event of a well-founded suspicion of corruption. Files containing personal data which are created by the officer shall be treated in the same way as personnel files regarding the technical and organisational measures to be taken.

The contact details of the Compliance Officer can be found on alseda's website under "Compliance".

### 7.2 FURTHER CONTACTS FOR REPORTING VIOLATION

Any employee may bring to the attention of his or her disciplinary superior, the Head of Human Resources, the Head of Legal Affairs, the Head of Quality Management or the Employee Representative any circumstances that suggest a violation of the Compliance Policy or indicate violations regarding the quality of our products and services.

Concerns or complaints about discriminatory behavior can be addressed by any employee directly to the company complaint office for general equal treatment in the personnel department.

Each case is thoroughly investigated. Where appropriate, appropriate action will be taken. All information and documents will be treated confidentially.

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