alseda
CONSULTING



Our Code of Conduct

Valid for alseda GmbH and its affiliated companies
as well as all business partners

1 GENERAL PRINCIPLES

The principle: responsible and lawful conduct

Responsible and lawful conduct

We act responsibly and comply with the laws applicable to our activities. We expect the same of our business partners. This Code of Conduct establishes internal rules of conduct for alseda GmbH. Business partners are bound through appropriate agreements. They pass on the requirements to their relevant suppliers and subcontractors and work to ensure compliance. Mandatory legal requirements remain unaffected.

We process personal data relating to customers, employees and business partners only on a lawful basis, for specified purposes and to the extent necessary. We protect these data through appropriate technical and organisational measures and retain them only for as long as legally permitted and necessary. The Data Protection Officer advises the responsible functions and monitors compliance with data protection requirements within the scope of their statutory duties.

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References to persons in this Code of Conduct apply equally to everyone, regardless of gender.

2 WORKING TOGETHER

2.1 RESPECT FOR AND PROTECTION OF HUMAN RIGHTS

We respect human rights and provide fair and humane working conditions. We expect the same of our business partners. Our conduct is guided by the Universal Declaration of Human Rights, the fundamental labour principles and core labour standards of the International Labour Organization, and the minimum requirements of the Ethical Trading Initiative Base Code. We comply with any stricter mandatory legal safeguards.

2.1.1 EMPLOYMENT IS FREELY CHOSEN

Forced labour, bonded labour, involuntary prison labour and human trafficking are prohibited. Employees may end their employment in accordance with the applicable notice requirements. Identity documents must not be withheld as a means of coercion, and deposits must not be required to prevent employees from leaving their employment.

2.1.2 FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED

We respect employees' right to associate freely, form or join trade unions of their choice, and bargain collectively over working conditions. Employee representatives are not subjected to discrimination and are able to perform their duties. Where legal restrictions exist, we do not obstruct legally permitted independent forms of employee representation.

2.1.3 WORKING CONDITIONS ARE SAFE AND HYGIENIC

We provide safe and hygienic working conditions. Workplace hazards are identified and prevented or reduced through appropriate protective measures. Employees receive appropriate instruction before starting work and when relevant changes occur; this instruction is repeated and documented where necessary. Clean sanitary facilities and drinking water are available. Where required, suitable facilities for storing food are provided. Accommodation provided by the employer must be clean and safe and meet employees' basic needs.

2.1.4 CHILD LABOUR IS NOT USED

Child labour is prohibited. The minimum age for regular employment must meet the statutory minimum and must not be below the age at which compulsory schooling ends or, as a general rule, below 15 years. Only exceptions expressly provided for under applicable law and International Labour Organization standards are permitted. The right to education is respected. Under this Code, persons under 18 are not assigned to night work or hazardous work. If child labour is identified,

measures must be taken to protect the child concerned and secure their access to education.

2.1.5 EMPLOYMENT ARRANGEMENTS ARE PROPERLY REGULATED

Before starting work, employees receive understandable information about their rights, duties, working conditions and remuneration. Working conditions are documented in the form required by law. Employment relationships are structured in accordance with applicable law. Obligations under employment and social security law must not be circumvented through bogus self-employment, abusive fixed-term contracts, subcontracting arrangements or other contractual structures.

2.1.6 MINIMUM WAGES AND ADEQUATE REMUNERATION

We pay at least the applicable statutory minimum wage and any binding higher sectoral or collectively agreed wages. Wages and other remuneration due are paid on time, regularly and in full. Employees receive understandable information on how their remuneration is calculated. Wage deductions as a disciplinary measure are prohibited. Other deductions are permitted only on a lawful basis and, where required, with the express consent of the person concerned. In addition, we aim to provide remuneration that covers basic living needs and a reasonable amount of discretionary income.

2.1.7 WORKING HOURS ARE NOT EXCESSIVE

We comply with statutory and binding collectively agreed limits on working hours, breaks and rest periods. The stricter safeguards in this Code also apply. Contractual normal working hours, excluding overtime, must not exceed 48 hours per week. Overtime is voluntary, limited and used responsibly; it does not replace regular employment. Overtime is paid at a rate of at least 125% of the normal hourly rate. Binding higher rates take precedence. Total working time, including overtime, must not exceed 60 hours in any seven-day period. This limit may be exceeded only if all conditions in clause 6.5 of the Ethical Trading Initiative Base Code are met: permission under national law, an appropriate freely negotiated collective agreement, suitable health and safety safeguards, and demonstrable exceptional circumstances. Employees receive at least one day off in every seven-day period or, where legally permitted, two days off in every 14-day period. Employees in Germany are subject, in particular, to the daily maximum working hours and averaging periods, breaks, rest periods, and Sunday and public holiday protections under the German Working Time Act. Deviations are permitted only within the limits allowed by law.

2.1.8 EQUAL TREATMENT AND PROTECTION AGAINST DISCRIMINATION

We do not tolerate discrimination in recruitment, remuneration, training, promotion or termination of employment. Discrimination on racist grounds or on grounds of ethnic origin, caste, nationality, religion or belief, age, disability, sex, marital status, sexual identity or orientation, trade union membership or political opinion is prohibited. Decisions concerning employees are based on objective, legally permissible criteria.

2.1.9 PROTECTION AGAINST VIOLENCE AND HARASSMENT

Physical violence, physical disciplinary measures, threats, sexual and other harassment, verbal abuse and intimidation are prohibited. We treat everyone with respect and protect their dignity.

2.2 OBLIGATIONS TOWARDS BUSINESS PARTNERS

We fulfil our legal and contractual obligations when providing our services. We honour commitments made to business partners and provide accurate information about our services.

2.3 FAIR CONTRACT AWARDS AND COMPETITION

We comply with our customers' lawful procurement procedures and the applicable rules for public tenders. Bids contain accurate information. We do not obtain improper advantages or use unlawfully acquired confidential information about competitors. Agreements that restrict competition, particularly those concerning prices, bids or the allocation of markets and customers, are prohibited. Contract award decisions must not be influenced by personal benefits.

3 ENVIRONMENT

We comply with applicable environmental laws and binding environmental requirements. We use energy, water and other resources efficiently and work to reduce the negative environmental impact of our activities. Where relevant to the activity concerned, this includes production and transport, the management of waste, wastewater and hazardous substances, the reduction of greenhouse gas emissions, and the protection of biodiversity and forests. We expect our business partners to act accordingly.

4 COMPLIANCE AND CORRUPTION PREVENTION

Corruption, bribery, extortion and embezzlement are prohibited. In connection with our business activities, gifts and other benefits must not be promised, offered, given, requested or accepted. Questions or concerns about corruption may be

addressed to the Anti-Corruption Officer, whose contact details are available on our website under "Compliance". Reports are treated confidentially, subject to disclosures required or permitted by law. The right to contact competent external reporting offices or authorities remains unaffected.

Business partners provide accurate information about their activities, structure and services in the course of our cooperation. Statutory and contractual disclosure obligations are fulfilled while maintaining data protection and the protection of confidential information.

5 CONFLICTS OF INTEREST

Business decisions are made in the company's interests and on the basis of objective criteria. Employees disclose actual or potential conflicts of interest, particularly those arising from personal relationships or their own financial interests, to the responsible manager. In the event of a conflict of interest, the person concerned is excluded from the relevant decision until suitable arrangements have been made.

6 COMPLAINTS AND REPORTS OF BREACHES

alseda GmbH establishes an accessible and confidential reporting channel for breaches of this Code or applicable law and makes the contact details available. Reports are reviewed impartially by authorised persons and necessary action is taken. The identity of the reporting person, persons concerned and other persons named in a report is protected, subject to statutory exceptions to confidentiality. Persons who report to the best of their knowledge and with reasonable grounds to believe that the information is true must not suffer a detriment because of their report. This also applies where a suspicion is not substantiated. External reporting channels remain available. Where the German Act for the Better Protection of Whistleblowers applies, its requirements concerning reporting channels, procedures and protection are observed.

7 IMPLEMENTATION AND RESPONSE TO BREACHES

Management ensures that this Code is communicated and implemented in the relevant areas. Identified breaches are reviewed and appropriate remedial action is taken. Measures concerning employees and business partners comply with applicable law and contractual agreements. The Code is reviewed when significant legal or operational changes occur.

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