



code of conduct

syskomp group

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Dear colleagues,

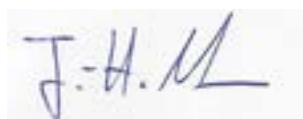
Protecting and safeguarding the good reputation of the syskomp group is extremely important to us. Inappropriate behaviour on the part of individuals can seriously damage our reputation and the trust our customers, employees, business partners and the public place in us. Consequently, we are all jointly responsible for our company's good reputation.

As an SME, the syskomp group has an obligation to act responsibly and lawfully – and this commitment is also very much part of our corporate DNA. The legal framework within which the syskomp group operates varies from country to country. We are also required to comply with international agreements, such as those relating to anti-corruption, sustainability and the protection of human rights. On this basis, we have drawn up rules of conduct for our company and set these out clearly in the syskomp group code of conduct.

Each and every one of us – whether a manager or a more junior employee – has a responsibility to act in accordance with the principles enshrined in the syskomp group code of conduct. As a set of rules and guidelines, this code of conduct provides information about how we should act in everyday business situations.

It is our expectation that employees will comply with the law, abide by the rules and act in accordance with our principles, both now and in the future. Breaches of the syskomp group code of conduct cannot and will not be tolerated.

We are counting on all of you to prove yourselves worthy of the trust we put in you. We also urge each and every one of you to live up to our company standards in relation to fair, ethical and lawful conduct.



Jan-Hendrik Aschmann

Managing Director/CEO of the syskomp group

Principles

Our corporate principles reflect the values that form the basis of our everyday work in the syskomp group, whether this takes place in house or externally.

These values determine the way we think and act.
We stand for integrity, reliability, innovation, sustainability and a results-based approach.

Our business ethics and integrity safeguard our credibility. We take it for granted that all employees will abide by the syskomp group code of conduct rules, the laws and regulations of the countries in which they work, and the syskomp group in-house policies.

Employees must demonstrate honesty and fairness in every aspect of their business activities and meet their obligations reliably. We expect the same of our partners. In the event of any discrepancies between the terms of the syskomp group code of conduct and the customs, legal requirements or other rules in a country in which the syskomp group operates, the stricter regulations must be followed.

It is our firm belief that ethical and economic values are interdependent and that the business world must strive to interact fairly and act within the framework of the prescribed standards.

All employees must avoid situations of conflict between their own personal or financial interests and those of the syskomp group.

The code of conduct constitutes the next level of the basic corporate principles and policies. It sets out fundamental requirements for lawful and ethical conduct on the part of syskomp group employees.

Implementation and responsibility

This syskomp group code of conduct outlines important legal provisions and regulations from our corporate policies.

These principles are at the very core of our corporate culture. Company-wide compliance with these principles is absolutely essential – and responsibility for this lies with each individual employee. All employees are obliged to familiarise themselves with the syskomp group code of conduct.

Managers bear a particular responsibility in this regard. Line managers must communicate the importance and contents of this syskomp group code of conduct to their staff, lead by example and help employees to implement it. Line managers are role models and are responsible for ensuring their staff follow the principles. This should not restrict employees' scope to act autonomously within the permitted boundaries.

Conduct as part of business activities

Compliance with laws and regulations

At the syskomp group, all business matters must be conducted in such a way and business processes designed such that they comply with all applicable laws and official orders, obligations that have been entered into voluntarily and other regulations.

All employees are personally responsible for abiding by the law in their area of responsibility.
Staff make an important contribution to the reputation of the syskomp group by means of their demeanour, actions and conduct.

Every syskomp group employee has an obligation to abide by the regulations. Any instructions that deviate from these regulations, leading to a breach of the basic rules described here, are prohibited.

Existing policies, management decisions etc. that apply to personal conduct in the syskomp group and are known in some other way must be adhered to.

Any breach – not only of mandatory legal provisions, such as those relating to competition law, but of other regulations, too – can result in immeasurable financial loss for the company and damage to its reputation. Equally, any such breach can lead to claims for damages being brought against personally liable shareholders, the executive board, the responsible managers and employees who are directly implicated. In addition, improper or culpable conduct may also be involved, which can result in a preliminary investigation being launched by the competent authority.

Compliance with the code of conduct

Compliance Officers

The Managing Director of the syskomp group, the Operations Managers of the corporate sites and members of the HR staff are all Compliance Officers. They are responsible for receiving information about any potential breaches of the code of conduct and acting as points of contact for questions relating to its principles.

Compliance is the responsibility of each and every employee.

Reporting breaches

All employees have an obligation to report violations of the law or breaches of the code of conduct or other relevant policies. As a general rule, employees should always report any such violations or breaches to their line manager. If this seems inappropriate in a particular case, due to special circumstances, all employees are free to notify a level of authority above the line manager instead.

In principle, all information received will be treated in confidence.

If the Compliance Officer approached decides there are sufficient initial grounds to suspect the principles contained in this code of conduct have been breached, other departments may also be brought in and involved in further fact-finding measures.

Any employee who approaches a Compliance Officer will not suffer any disadvantage as a result. This does not apply if employees report themselves; in this case, however, the fact the employee has volunteered the information will count to a reasonable extent in their favour.

Breaches and sanctions

Breaches of this code of conduct may have repercussions in terms of the employment relationship and its continued existence, and may also result in claims for damages.

Conflicts of interest and accepting benefits

Offering or granting benefits

If personal interests influence business decisions, this always constitutes a conflict of interest. To prevent this situation from arising in the first place, all employees must keep their personal and business interests separate and make decisions in the company's interests, free from any bias.

All employees must avoid situations of conflict between their own personal or financial interests and those of the syskomp group.

Personal benefits from business relationships

Employees must not give – or attempt to give – any illicit benefits to business partners, their employees or any other third parties in connection with business activities of any kind.

syskomp group employees are not permitted to give gifts, favours, hospitality or other benefits to third parties with the aim of obtaining unfair advantage or orders for the syskomp group or other people.

Courtesy gifts that, up to a certain level, are in line with customary business practices must be dealt with in accordance with both the binding law applicable in the country in question and the in-house policies. If there is any doubt, employees should first seek their line manager's decision.

Employees must not use their position or role in the company to ask for, accept or obtain any personal benefits.

Employees are permitted to accept low-value occasional gifts. Any offer of other gifts or benefits for employees themselves or those close to them must always be refused. In such cases, employees have an obligation to report the offer of the gift or benefit to their line manager.

Business transactions with family members

As a general principle, business transactions with a syskomp group employee's family members should be avoided.

However, in one-off cases, these may be approved by the responsible managing director. Family members include spouses, parents, children, other relatives and life partners living in the same household as the employee.

Foreign trade, export control and terrorism checks

Compliance with all national, multinational and other foreign trade regulations is mandatory. These include customs regulations and trade and production controls. All employees are obliged to abide by legal requirements and syskomp group policies.

Transfer prices are set in accordance with internationally recognised principles – the arm's length principle.

No support will be provided for any potential tax evasion by business partners.

Donations and sponsorship

syskomp group donations are always made transparently, voluntarily and in the spirit of social commitment with no expectation of anything in return. To ensure transparency, the purpose of the donation, recipient and acknowledgement of the donation are all documented.

The syskomp group makes no direct or indirect donations to political organisations, parties or individual politicians.

Unlike donations, sponsorship does involve getting something in return, such as communication or marketing activities for the syskomp group. All sponsorship activities must be based on written contracts and commensurate with the sponsorship payments.

Fair competition

The syskomp group is committed to fair competition. It considers this a key requirement for the social market economy and abides by the relevant laws to protect competition.

The syskomp group has an obligation to commit to fair and open competition on markets around the world.

In the case of doubt and to avoid risks, legal advice should therefore be sought before any measure is taken that could result in a breach of the applicable law or other regulations.

The sale of our products and the procurement of materials and services are governed by national and international regulations, including the provisions of competition law.

Compliance with competition rules by all market players ensures equal opportunities on the market and is therefore absolutely essential. The information that may be exchanged between competitors is also regulated. We expect our competitors, customers and suppliers to abide by the rules of competition. They can expect the same of the syskomp group and this is also expected of all syskomp group employees.

The following actions are therefore particularly prohibited:

- Discussions with competitors that involve agreements about prices or capacity.
- Agreements with competitors about non-competition, the submission of sham bids in response to an invitation to tender or the division of customers, areas or production programmes.
- This also applies to informal talks or agreements or any action that results – or is intended to result – in one of the restrictions of competition referred to above.

Company property

As a basic principle, all employees must handle our company property with care. We use operating resources and equipment economically, carefully and in accordance with their intended purpose.

Personal, non-permitted use of company property is prohibited.

As a general rule, use of company resources for employees' personal purposes is forbidden; approval must be granted for any exception to this rule. This also generally applies to sending emails and the use of phones, computers (e.g. installing external software) and the internet. Employees must abide by these policies.

Secondary jobs

Employees are only permitted to hold a secondary job if the relevant HR department has consented to this in advance. Consent will generally be given as long as the secondary job does not affect the syskomp group's business interests in any way.

Documentation and communication

Dealing with in-house knowledge

Knowledge that is relevant to the activity must not be wrongfully withheld, falsified or passed on selectively. Information must be passed on to other departments accurately and in full unless, in exceptional circumstances, other interests take precedence (e.g. duties of confidentiality).

All employees are obliged to ensure the prompt and seamless exchange of information within the company.

All business transactions must be documented properly and in full in compliance with the legal provisions and other regulations applicable to the syskomp group.

Correct reporting

All records and reports (e.g. accounting records, business reports, audit reports, etc.) that are drawn up in house or issued externally must be correct and truthful. Data logs and other records must always be complete, accurate, up-to-date and system-compatible.

Public communication

Official statements, especially to the media, may only be made by individuals who have been expressly authorised to do so.

The right to freedom of expression fundamentally applies to public comments by syskomp group employees. Employees must ensure their public image does not damage the reputation of the syskomp group. When expressing their personal opinions, employees should avoid making reference to their role or job within the company.

Data protection

We abide by the relevant data protection legislation and the applicable syskomp group rules designed to protect the data belonging to employees, customers and business partners or other third parties. Protecting personal data is particularly important. Any shortcomings that are identified must be reported to the employee's line manager or the responsible Data Protection Officer without delay.

Protecting the personal data of our staff, customers and business partners is extremely important to us.

Personal data may only be collected, processed or used in the syskomp group if this is necessary for specific, explicit and legitimate purposes. This also applies to the exchange of data between different organisational units and companies in the syskomp group.

It is essential to maintain high standards of data quality and technical security to guard against unauthorised access.

The use of data must be transparent for data subjects and their right of access and right to rectification must be safeguarded, along with their right to object, their right to restriction of processing and their right to erasure where appropriate.

The relevant national legal provisions must be adhered to.

Keeping trade and business secrets

Trade and business secrets must be kept confidential. This also applies to other information when it is in the interests of the syskomp group and its contractual partners and customers that it remains confidential. Information of this kind must not be passed on to unauthorised individuals without permission. This obligation continues to apply even after the employment relationship has come to an end.

Trade and business secrets must be kept absolutely confidential.

Non-disclosure

All information that has not been made publicly accessible must be treated as confidential and must not be disclosed to unauthorised third parties either during the employment relationship or after it has come to an end. This does not apply if prior written consent has been obtained from an authorised representative of the syskomp group or if the disclosure is based on a legal obligation, e.g. a requirement to give a witness statement in a judicial procedure. In such a case, where possible, the responsible authority (line manager) should be notified about this form of disclosure in advance.

Direct or indirect use of confidential business information, both during the employment relationship and after it has come to an end, for personal benefit, for the benefit of third parties or to the detriment of the syskomp group is prohibited.

syskomp group employees have an obligation to play their part in actively protecting confidential data from access by third parties as stipulated by the existing policies.

Protecting the rights of third parties

All employees must respect the applicable proprietary rights of third parties and refrain from any unauthorised use of these rights. Employees must not obtain or use secrets belonging to a third party without authorisation.

Employees and human rights

The syskomp group respects and supports compliance with internationally recognised human rights.

We call upon all employees to create an atmosphere of respectful interaction and to vigorously oppose any discrimination on the basis of race, ethnic origin, nationality, gender, religion or ideology, a disability, age or sexual identity.

Human rights

In the course of their business activities, all employees must respect the rights and the national, cultural and ethnic characteristics of each and every individual with whom they come into contact. Business decisions should be shaped by the company's purpose and interests.

Anti-discrimination

Equal opportunities and equal treatment are upheld, irrespective of ethnic origin, skin colour, gender, religion, nationality, sexual orientation, social background or political views.

Employees are, in principle, selected, appointed and promoted on the basis of their qualifications and skills, unless other criteria are prescribed by national law.

These principles apply even if, in particular countries, conduct and business practices are tolerated that are in opposition to this code of conduct.

Work on the basis of free will

The syskomp group opposes any knowing use of forced or compulsory labour, including bonded labour or compulsory work by prisoners.

No child labour

Child labour is prohibited. The minimum age for permitted employment as stipulated by the regulations of the country in question is respected. Children's health and safety must not be compromised. Their dignity must be respected.

Remuneration

An employee's remuneration is fixed by contract. It is negotiated by the employee and the executive management and documented in the employment contract. When deciding on the remuneration, minimum wage, qualifications and the relevant employment market situation are all key factors.

Freedom to form associations

As stipulated by law, all employees have the right to form employee associations and conduct collective negotiations for the regulation of working conditions.

Recording of working hours

All employees have an obligation to abide by the daily working hours applicable to them and to take the correct breaks. Employees must use the terminals provided to record their working hours. They must clock in and out when they start and finish work. They must also clock out if they leave the company premises for any non-business-related or personal reasons. Employees must also clock out before taking a smoking break. In the event that the time-recording terminals stop working, times will be recorded by employees' line managers.

Legal notice

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