

Code of Conduct for Analyse & Design cc GmbH (Code of Conduct)

Treating each other with respect, whether it's between colleagues or in our external communication with the customer, is the most important basis for a successful partnership. The management and all of our staff are committed to complying with the values and rules in this Code of Conduct.

Infringements are not ignored but followed up in detail and subjected to disciplinary measures that may, in some circumstances, lead to the termination of the employment contract or business relationship. Of course, this Code of Conduct is not able to cover all areas, but it serves as a guide to how we conduct business and how we deal with one another in our day-to-day work.

1. General rules of conduct

It is important to Analyse & Design cc GmbH that all staff, team leaders and the management within the company comply with all of the provisions set out in order to protect our fellow humans and the environment.

For this reason, each member of staff shares the responsibility for the protection of people and the environment in his or her working environment. Compliance with all of the relevant laws and regulations concerning environmental protection and occupational safety must be ensured. In areas where there are neither guidelines on environmental protection, safety or health, nor internal corporate guidelines or specifications, the member of staff must make an independent decision following a consultation with his or her superior.

We know that all raw materials are finite. For this reason, the responsible and efficient use of natural resources is very important to us.

The selection of suppliers, advertising materials or other external services is done based on environmental, economic and social criteria.

Because we respect the dignity of each individual, we also respect the personal rights and privacy of staff, customers and people with whom we do business. We do not tolerate any kind of discrimination in our business activities.

Analyse & Design cc GmbH rejects all forms of forced labour in the strictest terms. Should a member of staff notice evidence of forced labour or child labour in a direct or indirect form, the management must be informed immediately.

2. Cooperation between staff

Our staff are committed to working together in a respectful, friendly way. They communicate openly and honestly, as well as fairly and respectfully.

In order to ensure a successful partnership with the customer, it is absolutely necessary to share important information with one another. For this reason, we do not want to see people withholding important information.

No member of staff may be subjected to discrimination or harassment in his or her working environment as a result of his/her age, disability, country of origin, gender, political views, race, religion or sexual orientation. Should problems arise in this context, they will be taken seriously, treated confidentially and resolved without delay. All staff and management are evaluated based on their performance.

3. Confidentiality/data privacy

The responsible handling of our customers' data is very important to us. For this reason, the unauthorised sharing or improper use of confidential data will not be tolerated.

Personal and confidential data is processed or used by our staff only within the context of specific tasks within a project and must be protected from access by unauthorised colleagues and third parties.

The member of staff is obliged to maintain secrecy of all confidential information and processes that become known while carrying out the activity, during the course of his or her work and also after the end of the working relationship.

The member of staff is also obliged to comply with the provisions of the German Federal Data Protection Act [BDSG] and all measures to protect data from falsification, destruction or unauthorised disclosure.

In addition, the member of staff shall inform the management immediately if:

- he/she has suspicions of a data privacy infraction
- data confidentiality has been compromised
- other irregularities in the context of fulfilling the contract, or
- he/she becomes aware of any other weak points or risks in security-relevant areas.

4. Intellectual property and copyrights of third parties

For us, the unrestricted protection of intellectual property and copyrights of third parties goes without saying and is a binding requirement. For this reason, we do not participate in the unauthorised use, modification, replication or distribution of software or other intellectual property. We do not use any fraudulent or illegal methods in order to obtain internal corporate information or confidential information from other companies.

5. Handling company property and the property of our business partners

Each member of staff is obliged to handle company property and the property of our business partners confidentially.

Items assigned to the member of staff for business use, including notebooks, mobile phones and leased vehicles, are the property of the company and must be returned immediately upon the termination of the working relationship.

Equipment or items belonging to the company may not be subject to private use or removed from the company premises without the express prior consent of the management.

6. No attempted poaching of staff or customers

The staff and management are not permitted to actively poach customers or staff of customers either for their own company or for third parties, i.e. by approaching them directly.

7. Conflicts

The staff are obliged to fulfil the tasks assigned to them as part of their work both conscientiously and to the best of their ability, and to represent the best interests of the company. However, members of staff may find themselves in situations that could lead to a conflict with company interests. As a result, staff should avoid such situations where personal or financial interests may oppose the company's own interests. They may not pursue their own interests in the context of their work and may not use their business connections resulting from their work either directly or indirectly outside of the company for their own benefit or to the benefit of third parties.

In the event of social conflicts between staff, or if staff do not comply with the Code of Conduct, the Managing Director must be informed immediately. The Managing Director shall clarify the situation from an independent perspective, work on potential solutions and will then make the relevant decisions.

Gifts and donations from business partners to our staff may lead to conflict situations that may jeopardise the clear judgement of our staff in corporate decision-making and also the reputation of the company. In order to prevent such conflicts of interest, it is only permissible to accept or give gifts within a usual, reasonable and ethically responsible context. Accepting gifts or donations must not be done with the aim of acquiring an unfair business advantage and may not violate the law.

Conversely, the staff must not offer our customers gifts, other donations or benefits in return for preferential treatment in the order of goods or services.

8. Competition

We will attain our business aims using fair, legal means. We comply with competition law, i.e. we do not participate in unlawful agreements or arrangements between companies that intend to prevent, restrict or distort competition. This goes for our staff and our management alike.

9. Money laundering

A number of countries, among them the countries of the EU, including Germany, have passed laws against money laundering. No member of staff may pursue measures either alone or in collaboration with third parties that violate German or international laws against money laundering. In the context of this Code of Conduct, "money laundering" refers in particular to the channelling of funds or other assets resulting either directly or indirectly from criminal activity into the legal economy. If there is any doubt about the legitimacy of financial transactions, the management must be informed in good time.

10. Contact partner

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