



Onventis Code of Conduct & Business Ethics

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## Purpose of the ONVENTIS Code of Conduct & Business Ethics

Ethical business practices are a material priority at **Onventis**. Our unfaltering commitment to ethics is critical to our success because it reflects upon and impacts every aspect of our business: our reputation with customers, our dealings with suppliers and subcontractors, our communications with regulatory agencies, our interactions with each other in the workplace.

The **Onventis** Code of Conduct & Business Ethics (hereafter the “**Code**”) describes responsibilities and commitments that all **Onventis** employees and directors are required to observe. It applies throughout the German-registered legal entity Onventis Holding GmbH, its parent company Onventis Group GmbH and Onventis Holding GmbH's subsidiaries throughout the world (collectively hereafter “**Onventis**”). It is intended to be an authoritative guide to behavior that is expected of every **Onventis** employee and director.

## Compliance with Laws and Applicability of the Code

All provisions of the Code apply to all directors, officers and other employees of **Onventis** and its affiliates worldwide. All provisions of the Code will be consistently and equally enforced with respect to all **Onventis** directors, officers and other employees.

Compliance means not only observing the law, but also conducting corporate business in a way that recognizes one's ethical responsibilities and fulfills them. Where local laws are less restrictive than this Code, compliance with this Code applies, even if the individual's conduct would otherwise be legal. On the other hand, if local laws are more restrictive than the Code, compliance with those laws prevails.

## Fair Employment Practices

**Onventis** is an equal opportunity employer and is committed to fair employment practices.

All **Onventis** employees are responsible for maintaining a workplace that continuously:

- Earns the trust of our clients, fellow employees and owners
- Demonstrates excellence in execution
- Cultivates creativity and innovation
- Promotes integrity and respect
- Fosters collaboration toward our shared goals and commitments

Associates who supervise people or projects have special responsibilities to:

- Base all employment decisions on job qualifications and merit
- Make all employment-related decisions without regard to a person's race, color, national origin, indigenous status, religion, marital status, sex, sexual orientation, age, physical or mental disability, veteran status, or other characteristics protected by law
- Maintain a work environment free of discrimination, harassment, sexual harassment, bullying and physical violence
- Respect employee privacy in their handling of non-public personal information and their treatment of employee confidences

## Diversity, Equity, and Inclusion

**Onventis** values diversity, equity, and inclusion as fundamental principles in fostering a culture of respect and belonging for all employees. We are committed to providing equal opportunities regardless of race, ethnicity, gender, sexual orientation, religion, age, disability, or any other characteristic protected by applicable law.



This commitment extends to recruitment, hiring, training, promotions, compensation, benefits, and all other aspects of employment. We strive to create an inclusive work environment where all voices are heard and valued. We actively seek to diversify our workforce, recognizing that a diverse and inclusive workplace fosters innovation, creativity, and better decision-making.

## Fair Play in Business

All employees of **Onventis** are required to conduct business fairly with **Onventis** employees, suppliers and business partners, clients, and those clients' customers. All **Onventis** business affairs and negotiations involving our representatives are to be conducted on an ethical, legal and arm's length basis, and all business decisions are to be made based solely on commercial merit.

**Onventis** does not accept manipulation, concealment, abuse of confidential information, misrepresentation of material facts, or other conduct or behavior that would negatively reflect on **Onventis'** reputation. We specifically prohibit bribes, fraud, extortion and corruption in the conduct of any **Onventis** business.

## Client and Supplier Relations

**Client Relations:** **Onventis** is committed to providing top-tier products and services while adhering to transparent and ethical business standards. We strongly emphasize the value of transparent and candid communication with our clients as the foundation for cultivating enduring partnerships. Should any challenges or apprehensions arise, we pledge to handle them promptly and in a highly professional manner, working together to seek resolutions that satisfy all parties involved. Our unwavering dedication includes the delivery of precise information regarding our products and services, guaranteeing the fulfillment of expectations and the preservation of trust.

**Supplier and Partner Relations:** **Onventis** is committed to fostering robust and ethical connections with our suppliers and partners. We advocate for equitable and transparent business practices that are mutually advantageous. Our procurement procedures are carried out with unwavering integrity, guaranteeing the selection of suppliers based on objective criteria and ethical principles. We hold our suppliers to the same elevated benchmarks of ethics, quality, and conformity that we maintain internally. We have established dedicated policies and procedures for evaluating suppliers in alignment with our standards.

## Anti-Corruption and Anti-Bribery

**Onventis** does not tolerate bribery and/or corruption in connection with business activities of any kind. In particular, it is unacceptable to provide third parties with inadmissible advantages or to demand such in commercial transactions, to be promised or to accept such advantages. In particular, it is considered improper if the nature and scope of an advantage is likely to unlawfully influence the actions and decisions of the recipient. Employees are reminded that beyond ONVENTIS Code of Conduct, they are subject to national and international law governing bribery and corruption.

Under no circumstances will we instruct our business partners offer on behalf of Onventis unlawful material or immaterial benefits in any form whatsoever to public officials or persons comparable to them (e.g. relatives of public officials, companies owned by public officials, etc.). This applies regardless of whether this is done directly or through the involvement of third parties (e.g. consultants or intermediaries).



## Gifts and Gratuities

**Onventis** recognizes that reasonable gifts and gratuities exchanged among **Onventis** (including its employees) and its clients, suppliers and business partners acknowledge special efforts, and reflect common social and business customs in the cultures of most nations where **Onventis** operates. However, inappropriate or excessive gifts and gratuities may violate laws and regulations and may also violate laws and regulations if an exchange of gifts or gratuities can be reasonably perceived as an inducement to secure preferential treatment.

**Onventis'** standards and the applicable laws for dealing with government employees and officials are more stringent than standards for commercial **Onventis** employees. In dealing with government employees and officials, it is our general policy that nothing of value will be given to such individuals.

## Political Activities

To avoid legal and reputation issues, **Onventis** requires that:

Employees engaged in political advocacy must scrupulously avoid creating any impression that they are speaking or acting on behalf of **Onventis**, and may not mention **Onventis** in any political, religious or social issue advocacy they may choose to privately pursue.

Employees considering running for public office or accepting a public position must inform the leadership of **Onventis**, and accept **Onventis'** decision about whether and how such position would affect the terms of their **Onventis** employment.

Employees are expected to abstain from participating in political activities during their working hours and from utilizing **Onventis** funds or resources for such purposes, unless explicitly sanctioned by the legal representative of the respective Onventis entity employing them.

## Political donations

ONVENTIS does not make any political donations. No employee of **Onventis** is permitted to make gifts in cash or in any other form (including loans) to political parties or affiliated organizations on behalf of **Onventis**. This policy encompasses gifts to political parties, persons affiliated to political parties or trade associations that are active in politics or public administration.

## Environmental Impacts

We monitor our CO<sub>2</sub> emissions annually and disclose information on our Scope 1, Scope 2 and Scope 3 emissions internally, as well as externally. We are continuously putting processes in place to better understand our environmental impacts and risks. We are working to reduce these impacts and promote environmentally-friendly policies.

## Health & Safety

Health and safety are paramount priorities at **Onventis**. We are dedicated to creating a work environment that ensures the well-being of our employees. At **Onventis**, we believe that a healthy and safe workplace not only fosters a positive work culture, but also underpins the foundation of our collective success.

### Work safety training

**Onventis** provides in-person and digital work safety trainings for every employee on the internal e-learning platform and each location has established emergency evacuation plans, which are also shared in the employee handbook.

## Information Security and Confidentiality

A large part of the business information of **Onventis** is confidential or legally protected, so that there is a duty of confidentiality. Such duty is governed by law, employees' employment contracts and in cases may extend to specific non-disclosure agreements entered into between Onventis, individual customers and other business partners as brought to employees' attention.

The confidentiality obligation relates in particular to intellectual property. This includes trade secrets, patents, trademarks and copyrights, but also business and marketing plans, designs, business papers, salary data and all other unpublished financial data and reports.

All personal information about employees, customers, business partners and suppliers as well as other third parties is used carefully at **Onventis** and treated confidentially in full compliance with data protection laws. The protection of this information must be met with the utmost care.

At Onventis, we uphold a strong commitment to information security management, demonstrated by our ISO 27001 certification, a testament to our dedication to maintaining the highest standards in data protection.

**Onventis** has provided digital data protection courses for employees, which they are obliged to take in the beginning and every year during their employment at the **Onventis**.

## Labor & Human Rights

**Onventis** is fully committed to upholding and respecting human rights. This commitment extends to the recognition and endorsement of internationally recognized human rights standards, including but not limited to the Universal Declaration of Human Rights (UDHR) as proclaimed by the General Assembly of the United Nations and the European Convention on Human Rights (ECHR).

**Onventis** ensures the provision of fair working conditions both within its organization and throughout its supply chain in strict accordance with the defined ILO (International Labor Organization) core labor standards. These global standards, acknowledged worldwide, are designed to enhance the working and living conditions of individuals across the globe. The ILO core labor standards include a range of fundamental principles, with an emphasis on prohibiting forced and compulsory labor, safeguarding the right to freedom of association, ensuring the right to collective bargaining, promoting equal pay for workers regardless of gender, preventing discrimination in employment and occupation, setting standards for the minimum age for employment, and the eradication of the worst forms of child labor. For more information, please refer to the full list of conventions, along with their official names, accessible at [ILO's website \(www.ilo.org/berlin/arbeits-und-standards/kernarbeitsnormen/\)](http://www.ilo.org/berlin/arbeits-und-standards/kernarbeitsnormen/).

## Child Labor

At **Onventis**, we are committed to upholding the highest standards of labor rights. We strictly prohibit the use of both child labor and forced labor in all our activities. No one should be employed below the legal minimum age for employment, and we categorically reject any form of involuntary or coerced labor.

## Whistleblower Protection

We have established robust mechanisms to actively encourage our employees to report any violations or concerns within the organization without fear of retaliation. We highly value the vigilance of our employees in upholding our standards and promoting a culture of transparency.

## Continuous Improvement

**Onventis** maintains a firm commitment to continually enhance its performance in the realms of ESG (Environmental, Social, and Governance) and ethical standards. We believe in a proactive approach to identify areas for improvement and tirelessly work towards ensuring the highest standards are met. Our dedication to ongoing progress mirrors our pledge to meet the evolving requirements of the business and ethical landscapes.

Frank Schmidt

CEO

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Signature

Tilo Schmalz

CFO

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