

OSTHUS Code of Conduct



September 2017

OSTHUS Code of Conduct

The OSTHUS Code of Conduct summarizes the fundamental principles and basic rules of our actions as well as our conduct within the company, towards business partners and the public. It provides our employees, managers and management a framework of guidelines on legal, environmental, social and ethical issues.

Statement by the CEO on the significance of the Code of Conduct

Ladies and gentlemen,

Our common mission is to connect data, people and organizations to accelerate innovation for the benefit of mankind.

Our compass is geared towards sustainable benefits for our customers and gives us direction and strength. Continuous learning, taking on responsibility, trust and a focus on results are our core values. We work together with our customers in international and interdisciplinary teams and solve the central technical and technological challenges of our customers based on our innovative strength.

The people who work in our company are the most important asset of our company. Investing in them is the foundation of our innovative strength and efficiency. Responsible and ethical conduct towards our employees, business partners, the environment and society is important to us and an integral part of the corporate culture at OSTHUS. We see each individual, taking into account their talents and abilities. It is our goal to enable everyone to build on their strengths and to find and develop their role.

Working within the legally prescribed limits, such as labor law, occupational safety, data protection and data security, is just as important as working responsibly in dealing with the environment, ethics and human rights. Breaches of these laws are incompatible with our values and corporate culture. The integrity of the company is an important building block in our sustainable marketing and in dealing with our customers. By living according to our compass and values, our customers' trust in our company, our competence and our results constantly advance. In this way, we can follow our mission and contribute to a sustainable development of the environment and society. Activities that contradict our Code of Conduct or directed against the company's economic success are consistently pursued to be avoided. This way we sustainably secure the company, guarantee our customers long-term support and secure jobs for our employees and thus their financial basis for their families. A stable corporate policy also allows us to have a positive impact on our environment in order to be able to make an active contribution here as well.

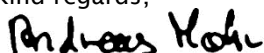
The Code of Conduct provides us with a basis for our actions and represents a minimum standard for accountable and socially responsible work. It gives us orientation for our conduct within the company, towards our customers, the environment and society.

Further, the code of conduct sensitizes us to potential risks and helps us to avoid violations of the law. Each of us is obliged to adhere to the principles laid down here and to inform the responsible persons of any deviations from them. I would like to point out once again that our corporate culture is based on the following values:

- **Learning:** Lifelong learning and further development is a basis for our continuing success and for our social commitment in everyday life. We take into account new social and technical trends.
- **Responsibility:** We know and respect the laws and regulations that are relevant to us and are aware of our social responsibility. Managers practice our values and corporate culture in a credible manner and take consistent action against any conduct that is not in accordance with the law or the company's core values.
- **Trust:** The trust placed in our colleagues, our business partners and, above all that, the trust placed in us is the basis for a sustainable cooperation. Personal integrity and transparency are the basic prerequisites for this. Managers have a special role model function here. By trust, we also mean trusting in others.
- **Results:** We focus on results and creating sustainable value. This enables us to deliver the best possible service to our customers and to act with integrity and without conflicts of interest.

The continuous development and growth of our company largely depends on our commitment to social responsibility and our reputation as a trustworthy business partner. We thank you for your contribution to this through the integrity of your personal behavior.

Kind regards,



Andreas Mohr (CEO)

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1 PRINCIPLE REQUIREMENTS

1.1 Open Feedback Culture

„We cultivate an open feedback culture in order to work together on the improvement process and to identify misconditions.“

- The open feedback culture contributes decisively to the early recognition and correction of upcoming problems and, in general, reduces their frequency. The management therefore has to encourage their employees to express their opinions openly. Simultaneously, confidential information also has to be treated appropriately in order to ensure that employees are also prepared to provide critical feedback in the future without fear of reprisals.
- OSTHUS employees deal with open feedback justly and without prejudice. The feedback itself should also always be factual and should not offend or discriminate against others.
- Feedback from employees must not be suppressed. Should an employee feel that he or she is not being listened to properly, or should there be no response in general, he or she has the opportunity to approach the contact person for sustainability management.

1.2 Trust and Respect

„We work together with our customers to master their most important challenges and deliver 100% solutions. Customer orientation, reliability and quality are the basic prerequisites for a trusting and respectful joint work.“

- Trust is the most important basis for working with our customers. Trust also allows us to openly address problems and to accomplish difficult projects together.
- OSTHUS employees are obliged to treat the customer with respect, even in difficult situations. This ensures a sustainable customer relationship.
- When dealing with our colleagues, we also pay attention to respectful interaction. OSTHUS is guided by the idea of "understanding without agreeing", which ensures that we take care to understand each other, even if we disagree with the opinions of others.
- In principle, we give every employee or customer a head start of trust.

1.3 Compliance

„We comply with national and international law.“

- Compliance with legal requirements, both nationally and internationally, is a matter of course for us. This is how we ensure our success in Germany, Europe and worldwide. Violations of applicable law may result in severe penalties, as well as claims for damages or loss of image.
- Only if the relevant laws and regulations are known, we are able to comply with them. Managers are therefore obliged to know the relevant laws, regulations and standards for their area of responsibility, to comply with them and to communicate them to the employees accordingly. Comprehensive knowledge is particularly necessary for managers who bear a particular responsibility for ensuring compliance due to their function or position on the board (e.g. managing directors, executives in the areas of finance, human resources and legal affairs).

OSTHUS Code of Conduct

- 🕒 We work for various customers worldwide and have partners from different countries. In different regions of the world, the law is interpreted differently. To comply with all rules and regulations, we ensure that we comply with the strictest interpretation of applicable law.
- 🕒 If there are doubts or uncertainties regarding the current legal situation, an (external) legal expert should be consulted in order to obtain a reliable assessment of the situation.

1.4 Conflicts of interest

„We deal with conflicts of interest openly and transparently.“

- 🕒 OSTHUS is an independent IT service provider. We evaluate solutions, products and suppliers neutrally and without being biased by personal preferences. The focus is always on the customer's benefit and not on economic- or other advantages for OSTHUS.
- 🕒 Should we, however, find ourselves in a conflict of interest, we will deal with it openly and transparently. This can happen, for example, if we consult a customer in an area where one of our partners provides services. We will always inform the customer about such conflicts of interest.

1.5 Protection of corporate assets and the fight against fraud

„We handle company property carefully and sustainably.“

- 🕒 OSTHUS provides employees with a pleasant and high-quality working environment. All employees are encouraged to treat the working environment and equipment with care. Thereby, we achieve a long-lasting use of the resources used.
- 🕒 We make sure that the company's own funds are only used for the intended purpose. Misuse for private purposes is prohibited.
- 🕒 Any form of fraud is prohibited.

2 EXPERIENCE WITH BUSINESS PARTNERS AND THIRD PARTIES

2.1 Relationships with business partners

„We treat our business partners with respect.“

- 🕒 Our business partners are treated as partners in the literal sense of the word. Mutual respect and appreciation is the basis for cooperation. This is the only way to build lasting relationships with our partners.
- 🕒 If we detect any complaints or problems with our partners, we will discuss it openly with them. We are also open to comments from our partners. This is the only way we can ensure constant improvement and create a sustainable business relationship.

2.2 Dealing with political institutions and authorities

„ We pay attention to a legally correct relationship with government organizations and authorities. “

- 🕒 We pay attention to the correct handling of / adherence to political institutions and authorities. If questions arise, employees can call the internal legal contact person at any time. In addition, it is possible to obtain support from external legal advisors to ensure compliance with legal requirements.
- 🕒 When dealing with authorities, a contact person from management always has to be consulted to be able to answer inquiries correctly and law-abiding. This is the only way to ensure that we can meet the requirements of authorities throughout the company.

2.3 Protection against corruption and bribery

„We condemn all forms of corruption and bribery.“

- 🕒 OSTHUS does not allow any form of bribery or corruption.
- 🕒 Donations, for example in the context of invitations or in connection with advertising measures that serve the purpose of promoting business relations or presenting products or services, are - as far as reasonable - permissible.
- 🕒 However, such benefits may only be accepted or granted, if they serve a legitimate business purpose and are not accepted or granted in return for an unlawful advantage. The contribution shall not be unreasonably high in value and shall not disproportionately exceed the recipient's limits of business practice or standard of living. As a rule, donations to public officials should be avoided.

2.4 Fair competition

„In competition with others, we pay attention to transparent and respectful interaction.“

- 🕒 We deal with competitors in accordance with the legal requirements. Bribes or other direct influence, in form of for instance donations, are not permitted.
- 🕒 Should we obtain information from our competitors that should not be freely available, we will report this to the respective competitor so that he or she can investigate these points.

2.5 Safety of our services

„We are committed to providing our customers safe services to the best of our knowledge and belief.“

- 🔄 We make sure that we keep an eye on the topic of safety in working with our customers and draw our customers' attention to safety-related topics.

3 HANDLING OF INFORMATION

3.1 Protection of intellectual property

„We value and respect intellectual property of any kind.“

- Intellectual property are images, texts and general intellectual property (IP) which is protected by copyright laws or trademark- or patent rights. We respect and protect both, our own intellectual property and the intellectual property of customers and partners.

3.2 Data privacy

„We protect personal data and respect the privacy of employees and customers.“

- Data protection focuses on the storage, processing and transfer of personal data.
- OSTHUS ensures that personal data is always treated in accordance with applicable law. This is ensured by an external data protection officer.
- OSTHUS employees can also anonymously contact the external data protection officer to ensure that relevant reports are not withheld due to employees' concerns (whistleblower process).
- All relevant information can be found in our privacy policy.

3.2.1 Financial integrity

„Our accounting records and financial statements must accurately reflect our business transactions in sufficient detail.“

- Our company's business transactions and documents must be correct and duly. We record and document all business transactions, assets and liabilities in accordance with the legal requirements. To maintain our value of transparency, our annual financial reports are published every year in accordance with legal requirements.
- Accuracy, completeness and a sense of responsibility are essential in all business processes to ensure duly documentation and preservation of records.

3.3 Insider trading

„We protect insider information and prevent insider trading.“

- An employee may have access to information about OSTHUS, our subsidiaries, or information about our customers or partners that is not publicly known and may be beneficial for the employee. The use of such non-public information about our companies, customers or partners for the personal benefit or the benefit of third parties is strictly prohibited and potential violation of the law.

3.4 Information on services

„We do not intentionally provide misleading information about our services.“

- 🚫 In our public relations work, we present our services transparently and truthfully.
- 🚫 Wrong information would lead to a loss of trust by the customer or would reflect false facts on the part of the customer.
- 🚫 In particular, offices entrusted with public relations have to exercise special due diligence. This applies especially to Marketing and Sales.

3.5 Use and security of IT systems

„We pay attention to the security of our IT systems and use them as intended.“

- 🚫 We use our internal IT systems as intended and adhere to specifications, if necessary for a system.
- 🚫 Employees report security-related problems to the central infrastructure of OSTHUS or to the ISMS Manager to be able to quickly close security gaps.
- 🚫 Due to the increasing number of attacks on companies, employees are particularly sensitized to the handling of email attachments, downloaded data or other data coming from outside.

3.6 Confidentiality and Public Relations

„We protect confidential information from unauthorized use and disclosure.“

- 🚫 Confidential information is processed with care. Confidential information includes but is not limited to, for example, sensitive customer information, financial data, applicant information, contracts, court documents or insider knowledge. This information can be available on various media such as paper, electronic documents or emails.
- 🚫 By applying of the 4-eye principle, we pay attention to what information we disclose to the public.
- 🚫 We also ensure that information is not forwarded to unauthorized recipients within the company. This especially applies to the areas of Human Resources, Finance and Corporate Development.
- 🚫 We respect the confidentiality agreements concluded with our customers and ensure enforcement by means of training and technical measures.

4 DEALING WITH PEOPLE AND THE ENVIRONMENT

4.1 Human rights

„We pay attention to every employee and customer in the same way, while respecting human rights.“

- The employees are our highest and most important asset. We treat every employee, candidate and client equally, irrespective of gender, color, religion, political affiliation, origin, disability, marital status, sexual orientation or other characteristics. This commandment does not only apply to face to face contact but also in the context of Internet use, email or other means of communication through which a conduct could be carried out that discriminates against or harasses another employee, candidate or customer. OSTHUS will take disciplinary action in the event of infringement.
- Undesirable behaviors are, for example:
 - Unwanted sexual innuendoes, requests for sexual favors or other verbal or physical conduct of a sexual nature implicitly or explicitly containing a condition for employment of the employee.
 - Undesirable physical contact including touching, influencing an individual's normal working movement, obscene gestures or attacks.
 - The wholly or partially negative assessment of an employee's performance by his or her supervisor, based on age, gender, race, national origin, color of his or her skin, disability, weight, marital status or other characteristics. If a disabled employee is not qualified for the essential tasks of the position due to his or her disability, this is an exception to the rule. The OSTHUS management has to explicitly examine the employee's performance within the framework of the acquired qualifications and find an appropriate other task.
 - Repeated comments, derogatory remarks, slander, jokes, threats, or suggestive or offensive statements that relate to certain characteristics of an employee.
 - Inappropriate impairment of an employee's work performance or the creation of an intimidating, hostile or offensive work environment through repeated discriminatory behavior.
 - Publication or dispatch of derogatory posters, cartoons, drawings or pictures.
- For OSTHUS, it is important that any employee who believes that he or she is subject to any discriminatory conduct immediately informs the person in charge of the Human Resources department or the management so that immediate remedy or preventive action can be taken in the event of suspicion stated in detail ("immediately" means within 72 hours after the report of the alleged harassment).
- We ensure a healthy and safe working environment for our employees by complying with the laws and regulations on health and safety at work. It is the responsibility of management in particular to make sure that adequate procedures and safeguards are in place which ensure health and safety at work.
- If an employee identifies opportunities for improvement, he or she can contact our appointed safety officer or our occupational safety officer at any time to initiate change measures.

4.2 Health

„We pay attention to maintaining the health of our employees, both preventive and in case of health impairment.“

- We pay special attention to the health of our employees and offer preventive measures tailored to the sedentary work.
- We are active in the field of occupational safety and health.
- In our occupational safety documentation, all relevant information that we commit ourselves to in this context can be looked up.
- Every employee who has a contagious illness, such as for instance flu, is advised not to come into the office to avoid infection of other colleagues.

4.3 Environment

„We are only part of the environment and we thus pay attention to the sustainable use of resources.“

- 🔗 We take care to protect and preserve the environment. The use of resources such as paper, energy or other materials has to be elaborated carefully.
- 🔗 Before printing documents or emails, every employee is required to check whether it is necessary and, if the printout is necessary, whether black and white printout is sufficient or a colored print is needed..
- 🔗 Every employee is required to check if a trip is necessary or if a web meeting or a conference call is sufficient. If a trip is necessary, consider which form of travel (car, train, airplane) is most adequate. At least the efficiency and possible climate impact has to be taken into account. Our global travel policy provides information about our travel guidelines.
- 🔗 We take care not to waste energy. Unused equipment must therefore be switched off or put into a power-saving mode. This applies to the devices directly used at the workstation as well as to virtual machines (VMs) used in projects. Unused VMs should be deactivated or archived. This minimizes the use of electricity, air-conditioning, hard disk space and hardware and therefore makes a decisive contribution to conserving resources.
- 🔗 Every employee supports the environment by means of the waste separation system defined at OSTHUS, to make a positive contribution in the context of recycling and waste management.

5 ASSISTANCE FOR THE CODE OF CONDUCT

5.1 Guidelines for decision making

To ensure that a decision is made in compliance with the OSTHUS Code of Conduct, the following questions can be asked:

- 🔗 Is my decision legal and in line with the company's rules?
- 🔗 Can I make the decision in the best interest of the company and free from competing interests of my own?
- 🔗 Can I reconcile the decision with my own conscience?
- 🔗 Can I easily disclose the decision externally, i. e. would it also withstand third party review?
- 🔗 Will my decision safeguard the good reputation of the company?

If each of these questions can be answered with "yes", the decision is probably justifiable. If there are doubts about one of these questions, the following section lists appropriate contacts to clarify the issues in detail.

5.2 Contact persons

Every OSTHUS employee can contact people in his or her immediate work environment to ask questions about the Code of Conduct, make suggestions for improvement or report violations of the Code. These are, for example:

Area	Contact person (role)
Labor Law	Head of HR
Industrial safety	The internally designated safety officer or the external safety officer
Data privacy	External data privacy officer
Discrimination and human rights	Head of HR
Infrastructure	Head of Infrastructure
Information security	ISMS Manager
Legal	Head of Legal
Environment and procurement	Head of Procurement
Sustainability	Representative Sustainability

In the quality management manual, every employee can check who has the corresponding role at OSTHUS.

Our management board members Andreas Mohr, Wolfgang Colmsan and Dr. Torsten Osthus can also be contacted for all important employee concerns.