evocenta^{**}



Code of Condcut

evocenta GmbH | 2023



Ladies and Gentlemen,

The responsible conduct of all members of our company is of great importance to us.

We are committed to our social responsibility as part of our global business activities. We therefore ensure fair, transparent and open interaction between customers, employees and suppliers and make our contribution to a sustainable, social and ecological corporate culture.

This Code of Conduct is a binding behavioral guideline for us, for our managers and for all employees in the areas of ethics, compliance, social affairs and the environment. It guides our daily actions.

We are convinced that acting with integrity, in a value-oriented and responsible manner is a success factor for our company, which we consistently anchor in our day-



to-day business.

We, the management of evocenta GmbH, the advisory board of evocenta GmbH and all our employees are committed to ensuring that all members of our company perform their daily work in accordance with this Code of Conduct.

Uwe Kamann, Managing Director of evocenta GmbH





INDEX

1.	PREFACE	4
2.	GENERAL PRINCIPALES	5
3.	ELEMENTS OF THE CODE OF CONDUCT	5
	3.1 ETHICS	5
	3.2 COMPLICANCE	7
	3.3 SOCIAL RESPONSIBILITY	12
	3.4 ENVIRONMENTAL PROTECTION	14



1. PREFACE

Our company thrives on the collaboration of individuals from diverse cultures and with a wide range of skills. This diversity, coupled with our interactions with customers, suppliers, and various organizations, fosters our innovation and economic strength.



At evocenta GmbH, we place great importance on promoting a shared understanding of integrity and responsible behavior. Therefore, this Code of Conduct establishes clear ethical standards, rules, and guidelines that apply equally to all employees of evocenta GmbH, including managers and directors. We also expect our service providers and suppliers to uphold their own Code of Conduct, aligning with the behavioral requirements outlined here.

Furthermore, our Code of Conduct reflects our commitment to the external world. It demonstrates to our customers, business partners, and the public that evocenta GmbH is a reliable and trustworthy partner, combining top-notch service with a sense of responsibility, integrity, and adherence to ethical and legal standards. The principles and values outlined in this code are mirrored in company-wide guidelines and regulations, guiding our daily business practices and forming an integral part of our corporate culture.



2. GENERAL PRINCIPALES

Every employee is obligated to familiarize themselves with the contents of the regulations in our Code of Conduct and to adhere to them. Managers, in particular, have a role model function and hold a special responsibility to ensure that all employees comply with the following regulations.

The Code of Conduct can be specified in more detail by internal regulations. These must be in line with the Code of Conduct and published in an appropriate manner within the company. Our Code of Conduct sets a minimum standard which takes precedence over more lenient national laws. Mandatory national laws take precedence in the event of conflict.

3. ELEMENTS OF THE CODE OF CONDUCT

The Code of Conduct of evocenta GmbH consists of four elements: ethics, compliance, social affairs, and environment.

3.1 ETHICS

Our work processes are guided by ethical and value-oriented principles. This includes fostering openness and transparency, especially in cases of grievances or misconduct. Our corporate guidelines provide the necessary guidance for our decisions and actions.

The ethical principles that govern our collective actions are based on appreciation, integrity, openness, transparency, and entrepreneurship.







APRECIATION

We treat all individuals with respect and utmost appreciation in our daily interactions. We approach them with attentiveness and tolerance.

INTEGRITY

Integrity is an integral part of evocenta GmbH's values. We ensure that our employees possess a sense of integrity and contribute to creating the necessary work environment for it.

CANDOUR

evocenta GmbH fosters working conditions that allow for open communication with our customers, employees, consultants, partners, and suppliers, promoting a free flow of information.

TRANSPARENCY

We embrace an open and constructive culture towards errors. The transparent handling of shortcomings and misconduct, and the resulting lessons learned, are recognized by evocenta GmbH as a key factor for success.

ENTREPRENEURSHIP

Every employee at evocenta GmbH is willing to take initiative and focus on the overall success of the company, placing the company's interests before their own.



3.2 COMPLICANCE

All employees of evocenta GmbH ensure compliance with laws, regulations, and voluntary codes in all company activities and interactions with customers and suppliers. This includes, among others, adherence to data protection regulations, confidentiality agreements, and measures for corruption prevention.



The compliance principles of our joint actions consist of the following building blocks:

LAWS AND REGULATIONS

We always execute our tasks in the most ethical manner, which requires strict compliance with applicable laws, regulations, and provisions in national, European, and international law. Additionally, internal guidelines help provide a framework within which every colleague in our company can act responsibly and autonomously.

These internal guidelines are continuously reviewed to ensure alignment with our corporate values and our definition of integrity. We place particular emphasis on the role model function of all our company's leaders.





DATA PROTECTION AND IT SECURITY

Data protection regulations are of the utmost importance to us. We respect the right to privacy and the personal data of our company members and partners. We ensure compliance with legal data protection requirements and security guidelines and handle the data entrusted to us with the utmost sensitivity. To uphold this commitment, every employee and supplier must sign a comprehensive data protection declaration before commencing work at evocenta GmbH. Work on computers, internal systems, and networks at the customer's premises is carried out exclusively for specific projects. Our employees must not disclose information, unless already known to the public, for personal gain or the benefit of third parties. This includes technical data, financial data, operational data, customer information, notes, and any other information related to our company's business activities and future plans.

FAIR COMPETITION

We are committed to the principles of a free-market economy and fair competition. Our business operates solely based on performance and in accordance with the principles of free and unhindered competition. We adhere to laws against unfair competition and always treat our competitors fairly. We do not make intentionally false or misleading statements. We engage suppliers, contractors, or intermediaries only after careful evaluation of their performance. We do not tolerate any behavior that obstructs or restricts competition.



PREVENTION OF CORRUPTION AND ANTI-CORRUPTION MEASURES

The key to the success of evocenta GmbH lies in the excellent quality of our services. Therefore, transparency is a core value within our company, and we strictly reject corruption and bribery. We expect not only our employees but also all external partners to adhere strictly to the legal regulations regarding bribery and advantage granting. We firmly oppose any unlawful behavior related to customer acquisition.

Our business partners can rely on the fact that each of our employees and suppliers acts in full compliance with the law. Every individual employee at evocenta GmbH personally ensures adherence to these principles.



CONFLICT OF INTEREST

We expect our employees to handle conflicts of interest with utmost integrity. Our employees are required to inform their superiors about any relationships with individuals or companies that could lead to conflicts of interest, such as family relationships, partnerships, business partnerships, or investments, in relation to transactions with evocenta GmbH.



INDIVIDUAL RESPONSIBILITY AND INVOLVEMENT

The skills and dedication of our employees are our most valuable resource. We expect our employees to act entrepreneurially and respect their individual responsibility. We value the involvement of colleagues in our projects and decision-making processes to achieve our common goals reliably and responsibly.

The principle of "Four-Eyes" is highly significant to us. Our employees are required to assess whether they can make significant decisions alone or if the involvement of other colleagues is necessary to avoid errors and possibilities of misuse. Therefore, for several internal regulations, we have implemented the obligation to involve at least two members of the company.



STANDARDS FOR ACCOUNTING AND REPORTING

The decision-making processes of evocenta GmbH rely on accurate and proper recordkeeping in our accounting. Security and personnel data, as well as financial information, are treated with the utmost confidentiality. All business transactions are disclosed following established procedures, auditing principles, and generally accepted accounting principles.



QUALITY

evocenta GmbH is committed to focused customer orientation, aiming for high customer satisfaction, meeting our customers' expectations for our work results, and strictly adhering to our commitments. All employees, consultants, and the entire management are dedicated to these values, enabling us to establish long-term customer relationships. Satisfied customers form the foundation of our growth and are a determining factor for our future. The quality of our services is the basis of our success. Therefore, we view quality as an ongoing process of continuous improvement.



INTELLECTUAL PROPERTY

We respect the intellectual property of our customers and suppliers, and we expect the same in return.

Intellectual property is a significant asset for all companies, and protecting it is essential for their existence. We handle all information from our business partners with strict confidentiality and do not disclose it to unauthorized individuals. This also applies, of course, to trade secrets.





3.3 SOCIAL RESPONSIBILITY

The evocenta GmbH acknowledges its social responsibility in our society. This includes respecting human rights, fair treatment of employees and partners, and adhering to the principle of equal treatment. The social principles of our joint actions consist of the following building blocks:

HUMAN RIGHTS

As an internationally operating company, evocenta GmbH particularly adheres to the principles of the United Nations "Global Compact." We respect human rights within our sphere of influence and conduct our business in a manner that makes us a preferred employer. We explicitly commit to abolishing all forms of forced and child labor.

ANTIDISCRIMINATION, DIVERSITY AND EQUAL OPPORTUNITIES

We view the diversity of our employees as a strength. Therefore, we promote workplace inclusion with the aim of achieving the highest level of productivity, creativity, and efficiency. We treat every individual with the same respect and fairness that we expect from others. We firmly reject any form of discrimination based on origin, gender, skin color, disability, religion, nationality, age, sexual orientation, worldview, or political orientation, provided it does not contradict the principles of a free and democratic society. Furthermore, we strictly sanction any verbal or physical harassment based on the aforementioned or any other grounds.



TOLERANCE AND RESPECT

In our interactions with employees and business partners, we foster a culture characterized by openness, tolerance, respect, politeness, fairness, and trust. Every employee can rely on their dignity and personality being always respected by others.

SOCIAL STANDARDS

We expect our managers and employees to adhere strictly to social standards. We do not accept illegal employment, violations of human rights or equal opportunities, violations of health and safety in the workplace, or violations of child and youth protection – neither within our own company nor among our business partners.



HELATH AND OCCUPATIONAL SAFETY

The safety and well-being of our employees are essential for our economic success. Therefore, we place great importance on compliance with our health and occupational safety guidelines. We strive to promote the physical and mental well-being of our employees sustainably. Our goals are sustainably high-performing and dedicated employees, as well as low sickness and accident rates.

RESPONSIBILITY FOR THE COMMON GOOD

A successful company, we take responsibility for the common good. The evocenta GmbH welcomes and supports the voluntary commitment of its employees. Additionally, the evocenta GmbH supports various

organizations and institutions that contribute to our community.





3.4 ENVIRONMENTAL PROTECTION

The enhancement of awareness for a responsible use of our natural resources is the concluding element of our Code of Conduct. We take our ecological responsibility very seriously, and it is integrated into our daily work.

Responsible environmental stewardship is an integral part of our business operations. We employ resource-efficient practices in our internal processes, while ensuring economic viability. We strictly adhere to the current environmental legislation in all the countries where we provide our services.

Our standard follows the environmental laws within the EU. We aim to use our natural resources responsibly and efficiently. Every employee is encouraged to avoid paper printouts and, whenever possible, opt for digital documentation. We ensure that our waste is disposed of in an environmentally friendly manner. Additionally, we encourage our employees to opt for video conferences whenever feasible instead of business trips by car or plane.



CONTACT AND ADRESS

HEAD OFFICE

evocenta GmbH Munscheidstr. 14 D-45886 Gelsenkirchen

Tel: +49 209 730 80 50 Mail: <u>info@evocenta.com</u>

OFFICE DÜSSELDORF

evocenta GmbH Am Seestern 8 D-40574 Düsseldorf

Tel: +49 221 210 900 16 Mail: <u>info@evocenta.com</u>





www.evocenta.com

