

Code of Conduct

for ALLGEIER Business Partners

ALLGEIER stands for sustainability in its IT services, business processes, supply chain and business relationships with its business partners, subcontractors and their sub-suppliers. This includes the obligation you hereby accept to comply with our compliance guidelines ("Code of Conduct" / "CoC"). ALLGEIER reserves the right to change the CoC requirements in an appropriate manner and assumes that these changes are accepted.

The business partner declares herewith compliance to the ALLGEIER CoC requirements below.
Business Partner will inform about and train such commitment to its employees incl. sub-suppliers.

- **Prohibition of corruption and bribery** object to any form of and not to engage directly or indirectly in any form of corruption or bribery and not to grant, offer or promise any benefits to a government official or to any other counterparty to influence official action, decision and/or to cause any presumption of advantages
- **Abstention of money-laundering** refrain from any form of concealment of the source of funds from illegal transactions
- **Fair competition, anti-trust laws and intellectual property rights** to comply to any national and international competition laws, not to participate in price fixing, market or customer allocation or bid rigging with competitors and not to infringe third party intellectual property rights
- **Conflicts of interest** refrain from all conflicts of interest that may adversely affect business relationship
- **Respect for the basic human rights of employees** to promote equal opportunities for and treatment of its employees irrespective of skin color, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex or age, e.g.
 - to respect the personal dignity, privacy and rights of each individual
 - not to tolerate unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment or discrimination
 - not to tolerate any conduct which is sexual, coercive, threatening, abusive or exploitative
 - to refuse to employ or make anyone work against his will
 - to provide fair remuneration and to guarantee the applicable national statutory minimum wage
 - to comply with working hours regulations
 - to respect the right of free association of employees and to neither favor nor discriminate against members of employee organizations or trade unions.
- **Compliance to personnel leasing, national and cross-border works regulations** incl. respect for social, tax, labor law incl. transfer pricing regulations in this respect
- **Prohibition of child labor** not to engage workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, to employ no workers under the age of 14
- **Health and safety of employees** to take responsibility for the health and safety of its employees

- to take reasonable precautionary measures against accidents and occupational diseases
- to provide training in health and safety issues;
- to undertake an occupational health & safety management
- **Environmental protection** to observe as applicable, e.g., but not limited to the regulations as defined below, as well as their respective transpositions into EU member states' legislation
 - for transports, warehousing and handling of hazardous goods
 - EC 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals ("REACH")
 - EC Directive 2011/65/EU regarding the Restriction on the Use of Certain Hazardous Substances in Electrical and Electronic Equipment ("RoHS")
 - EC Directive 2002/96/EC and the succeeding Directive 2012/19/EU, dealing with the recycling and disposal of waste electrical and electronic equipment ("WEEE")
 - EC Directive 2006/66/EC on Batteries and Accumulators and Waste Batteries and Accumulators
 - to minimize environmental pollution, make continuous improvements in environmental protection and to set up a reasonable environmental management system
- **Supply chain** to comply with the principles of non-discrimination with regard to supplier selection and treatment
- **Conflict Minerals** to avoid usage of raw materials which directly or indirectly finance armed groups who violate human rights
- **Objection to financing of terrorism**
- **Legal compliance** with any laws, codes, norms and any regulations of the applicable statutory legal regime