

Public



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Code of Conduct

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Preface

Since its founding in 2004, INFOMOTION GmbH (referred to in the following as INFOMOTION) has been on a steady growth trajectory. With 10 locations in Germany, Austria and Switzerland, over 550 employees, and over 350 customers (as of 03/2023), INFOMOTION is considered a leading expert and partner for data & analytics solutions.

Our high commitment to quality, through which we successfully implement our expertise in customer projects, serves as our strategic foundation. We also put people and personal character at the heart of everything we do.

Because of this, INFOMOTION's central concern is to ensure that members of the executive board, managers, and all employees act in an ethical manner and with integrity, and that they strictly observe relevant legal regulations applicable to INFOMOTION. We believe that integrity and ethical conduct are key assets which form an important foundation of trust for our customers, partners, suppliers, employees, and the public - thereby securing our long-term success as a business.

Because of this, we must all comply with this Code of Conduct and all associated internal guidelines and instructions, as well as all applicable laws and other legal provisions as part of our compliance obligations. Together, we are responsible for the reputation of our company.

Company managers bear particular responsibility for authentically embodying and exemplifying compliance with all applicable legal regulations and ethical obligations, and serving as a point of contact for their employees.

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1 Introduction

The purpose of the Code of Conduct is to promote integrity and ethical behavior and to avoid misconduct - including unintentional misconduct. We follow all applicable laws, and reject unethical and illegal behavior of any kind.

The Code of Conduct, therefore, sets forth basic principles for INFOMOTION's responsibilities as a member of society, as a business partner, and as an employer. More detailed regulations derived from these basic principles are outlined in internal guidelines and instructions.

The following conduct principles combine basic ethical values with our expectations for compliance conduct by our employees. Together, we protect the company by addressing problems when we see them.

This Code of Conduct applies to our companies, and to all employees including managers and executives. In addition, we expect all of our suppliers to comply with the basic principles that underly our Code of Conduct.

All employees, members of the executive board, and managers are personally responsible for compliance with the Code of Conduct within their respective areas of responsibility, and make an important contribution to upholding INFOMOTION's reputation with their behavior and actions. All managers are expected to authentically exemplify the claims behind this Code of Conduct, and ensure that it is disseminated throughout and complied with in their business areas. The general management bears ultimate overall responsibility, and leads by its good example.

In addition, a governance organization has been established to support all employees. It consists of the Compliance Officer and Compliance Committee, as well as the Data Protection Officer, the Information Security Officer (ISO), the Occupational Health and Safety Specialist and Human Resources.

The following key questions serve as a point of orientation which individuals can use to ensure their actions conform to the principles of this Code of Conduct:

- Does my planned decision / action conform to this Code of Conduct?
- Am I promoting the reputation of INFOMOTION in a positive way through my conduct?
- Do I understand the risks and potential consequences of my actions?
- Will my conduct stand up to review by third parties?

All employees and external persons are encouraged to report suspected violations of internal and external regulations. INFOMOTION has implemented a whistleblower system and other mechanisms for this purpose. Alternatively, they can always contact the Compliance Officer at the email address compliance@infomotion.de.

Anyone who submits a report in good faith regarding a potential violation of the principles of this Code of Conduct or other compliance regulations will receive the support of management, and will not experience any negative consequences. Confidentiality will be ensured to the extent possible under the law. Anonymous tips submitted through the whistleblower system or within INFOMOTION will also be pursued.

Violations of the provisions of this Code of Conduct and additional valid regulations may result in consequences under labor law, civil law, or criminal law.





2 Human rights and employee well-being

All employees of INFOMOTION should be aware of their social responsibility. Specifically, this responsibility rests on the following principles:

2.1 We respect others, and one another

We attach great importance to a culture of mutual respect, and offer equal opportunities to all. We do not discriminate against anyone, and we do not tolerate harassment or discrimination on the basis of origin, gender, religion, worldview, age, sexual orientation, external appearance, or other individual characteristics. We love diversity, work actively to foster inclusion, and create an environment that fosters the individuality of each person in the interest of the company as a whole. Selections, hiring decisions, salaries, continued training, and promotions are based solely on the skills, experience, conduct, work performance, and proven potential of the person in question to fulfill the requirements of the corresponding position.

We comply with all applicable laws on working hours and compensation. We promote a good work/life balance, for instance through child care subsidies and a company pension plan. We respect, protect and promote human rights as fundamental, universal standards. We reject any form of child, forced, or compulsory labor and all forms of modern slavery and human trafficking. This applies not only to collaboration within our company, but also, fundamentally, along our supply and value creation chains. This means these expectations apply to the conduct of and conduct towards business partners as well.

2.2 We look out for one another

We take our responsibility for the safety and health of our employees seriously. We ensure occupational safety and health protection. By continuously improving working conditions, and through a wide range of preventative and health promotion measures, we maintain and support the health, capabilities, and satisfaction of our employees.

All employees are required to observe safety, health and environmental considerations in their everyday work, and help us make improvements in these areas. Managers are also responsible for ensuring a safe working environment for their teams. This includes identifying potential safety risks and how to manage them.

3 Integrity

All INFOMOTION employees uphold the interests of the company and conduct themselves with integrity at all times.

3.1 We foster transparent communication

We value clear, open and consistent communication with employees, business partners and the public in an honest and legal manner.

Our information policies are based on providing prompt notification in accordance with relevant legal and regulatory provisions. We ensure that published information is precise, and does not contain any misleading representations or significant omissions. This applies to all information, regardless of whether it is advantageous or disadvantageous for INFOMOTION.





All employees should use caution in situations where others could believe they were communicating as official representatives of the company, for instance when using social media.

We also cooperate with external reviewers and authorities, whether in the framework of written inquiries, special on-site reviews, or unannounced investigations.

3.2 We separate professional and private interests

We work at all times to avoid conflicts between private and business-related interests, or even the appearance of such conflicts. This means that we make our decisions, for instance on hiring new employees or on purchasing goods or services, exclusively based on objective criteria. We never let ourselves be influenced by personal interests and relationships.

We do not take part in external (business) activities that would be in competition with INFOMOTION, not even through contributing our knowledge.

Conflicts of interest must be avoided.

3.3 We play fair

We carry out our business activities exclusively based on the principles of efficiency and the market economy, as well as free and unimpeded competition. We like to measure ourselves against the competition, always complying with the law and observing ethical principles. We do not enter into agreements with competitors, do not share information with them, and do not unreasonably restrict the freedom of our suppliers and customers.

If INFOMOTION holds a dominant position on a market, we do not misuse it through unequal treatment of customers and suppliers or through granting inappropriate prices or issuing acceptance terms.

We only collaborate with business partners who act with integrity.

3.4 We are incorruptible

We avoid corruption: We never grant unjustified advantages, nor do we accept such advantages, regardless of their type – not even if doing so is common, or would be favorable to INFOMOTION. This also means that we grant considerations, donations, and sponsorships of any kind only under certain conditions:

Gifts, hospitality, and invitations are common in business relationships. We recognize this, however we do not grant such monetary or other valuable considerations either to influence a decision in the interest of INFOMOTION in an unlawful manner, or as a reward for such a decision. We ensure that we never create the impression of granting an improper benefit.

We value making a positive contribution to the well-being of our society through donations for charitable purposes, sponsorships, and other initiatives. We give monetary and in-kind donations to selected areas, such as science and research, sports, and charitable purposes. We grant donations and sponsorships only if they comply with internal framework conditions and follow a transparent approval process.





3.5 We protect corporate property

All employees use corporate property responsibly, and protect it against damage, misuse, and loss:

Work materials, such as computers, company cell phones and other equipment provided by INFOMOTION is used primarily for business-related purposes, and must be handled carefully.

As an IT company, protecting company know-how is highly important, from an economic and business policy perspective. All non-public information about INFOMOTION is considered the confidential property of the company. Product developments, concepts, and work processes are particularly important to our success. All employees must treat confidential information as secret at all times, and protect it against unauthorized use or access.

We also respect the intellectual property of competitors, business partners, and other third parties.

4 Data protection and information security

We protect the personal data of employees, former employees, customers, suppliers and other data subjects. We collect, process, use, and store personal data only in accordance with legal regulations, e.g., based on a documented legal basis, only for the purposes necessary, and ensuring that the rights of data subjects are protected.

Information security is a key concern of INFOMOTION, as a leading expert and partner for data & analytics solutions. We follow the requirements of the ISO/IEC 27001 standard. Regular inspections and suitable safety precautions (passwords, approved technologies and licensed software) are implemented to ensure the protection of intellectual property and personal data.

Failure to observe necessary security measures can have serious consequences, such as data loss, theft of personal data, copyright violations or misuse of data (for instance by hackers). We undertake to use IT systems provided by INFOMOTION and/or customers only to complete business-related tasks and not for personal purposes that are inappropriate or prohibited, nor for unethical or illegal activities.

All employees are obligated to take the measures necessary to protect IT system security against internal and external abuse and threats (such as preventing misuse of assigned passwords, or the prohibition against downloading inappropriate content from the internet).

5 Sustainability

INFOMOTION primarily develops, produces and sells IT services in German-speaking countries. Our company's mission is to be a provider of sustainable and custom-tailored IT solutions. In our work, we are aware of our responsibility for the environment.

As a commercial enterprise, we are responsible for the environmental compatibility and sustainability of our services and locations. We use environmentally-friendly, advanced and efficient technologies to save non-renewable energy sources and raw materials and to reduce waste. By doing so, we want to be a transparent and responsible member of our society.

