



Code of Conduct

ec4u expert consulting ag

english

ec4u

Code of Conduct der ec4u

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Prepared by Corporate Finance

Contact person: Anja M. Benesch, +49 (0) 721 46476-536, anja.benesch@ec4u.com

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Management Letter



Dear colleagues,

We founded ec4u in the year 2000 and can be proud of the success achieved in over fifteen years, a period that has seen numerous internal changes. From the beginning with just a handful of employees, we have grown into a mid-sized consulting firm with several offices across Central Europe. In addition to these changes, much has transformed outside of ec4u: in recent years, enterprises have been becoming increasingly aware of their social responsibility.

One of our policies from the start was to deal fairly with each other. In addition to compliance with the law, we also want to grasp the opportunity to voluntarily contribute to social and ecological sustainability and to act responsibly. As a consulting firm, our opportunities diverge from those of a traditional company - which is no less reason for us to lay down specific action items.

Having published certain policies in the past, this Code of Conduct should enable us to orient ourselves and develop a comprehensive consciousness. We understand this as a binding code that accompanies us in our daily tasks.

We consider it indispensable to pursue a culture of compliance that is embedded deep in our daily business. As your company's management, we will make every effort to run our enterprise in accordance with these guidelines, while counting on your backing. Thank you for your commitment along a path marked by contributions from each of you to the long-term success of ec4u.

Your chairman – on behalf of the entire board of directors,



David D. Laux
CEO

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Scope & Compliance

Scope

This Code of Conduct applies to ec4u expert consulting ag and its affiliates. It governs every individual, from top to bottom. It is inseparably bound with the content of all our current policies and will be enhanced by specific ones in detail. Our current policies shall remain in force.

Our staff is crucial, but also the supply chain. Hence, we have incorporated an excerpt from our Code of Conduct into a supplier & business partner statement. For instance, when we place orders with suppliers, our decision is influenced not just by economic and procedural criteria, but very heavily by social and ecological aspects. In order to abide by our Code of Conduct and do justice to the ten principles of the UN Global Compact, we have called upon our business partners to adhere to our principles and to pass these down to others in the supply chain.

Compliance

All persons concerned have the responsibility to read and understand our Code of Conduct carefully. Our representatives would be happy to assist on how to adhere to and execute our Code of Conduct, and to answer any questions or concerns you may have.

Reporting a violation

We would appreciate hearing from you, if you are involved and suspect that our Code of Conduct is being violated. You can contact any of our representatives, who are bound to maintain strict confidentiality.

Exceptions / Amendments

Exceptions to the Code of Conduct cannot be authorized without just cause, whereby only our board may approve such actions. We review our Code of Conduct regularly and amend it as deemed appropriate.

Persons to Contact

We would appreciate hearing from you, if you are involved and suspect that laws or regulations are being violated. Normally you should get in touch with your direct supervisor. For specific issues or suggestions, please contact any of the following persons. Your suggestions are always welcome.

Internal representatives

CSR & Environment Representative

Anja M. Benesch

Corporate Finance & Procurement

+49 (174) 1880 - 536

anja.benesch@ec4u.com

Equal Opportunity Representative

Christoph Schmidt

Human Resources

+49 (174) 1880 - 492

christoph.schmidt@ec4u.com

Occupational Medicine & Safety Representative

Sarah Sellgrad

Office Management

+49 (152) 5461 – 5025

sarah.sellgrad@ec4u.com

Compliance Representative

Michelle Kühn

Legal & Compliance

+49 (174) 1880 - 661

michelle.kuehn@ec4u.com

IT & Information Security Representative

André Enzmann

IT – Internal Services

+49 (174) 1880 - 455

andre.enzmann@ec4u.com

External representatives

Data Protection Representative

Dr. Sebastian Kraska

Attorney-at-law

Business graduate

External Data Protection Representative

+49 89 1891 7360

skraska@iitr.de

datenschutz@ec4u.com

Workplace Safety Specialist

Olaf Adamzig

Safety Engineer / Cert. Office Eqpt. Specialist (zbb)

ias health & safety GmbH

+49 (160) 704 3325

olaf.adamzig@ias-gruppe.de

Company Physician

Dr. med. Renate Gerardy

ias health & safety GmbH

+49 (721) 913 79 - 314

renate.gerardy@ias-gruppe.de



The UN Global Compact & its ten principles

ec4u

We support the UN Global Compact and have signed up to adopt its ten principles in our corporate strategy and culture. We convey our commitment clearly to stakeholders and the public. Each employee is called upon to internalize these ten principles. We will publish our annual Communication on Progress covering our corporate principles, actions, goals, and assessments of how well we fulfil these principles.

HUMAN RIGHTS

- Principle 01:** Businesses should support and respect the protection of internationally proclaimed human rights, and
- Principle 02:** Make sure that they are not complicit in human rights abuses.

LABOUR

- Principle 03:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 04:** The elimination of all forms of forced and compulsory labour;
- Principle 05:** The effective abolition of child labour; and
- Principle 06:** The elimination of discrimination in respect of employment and occupation.

ENVIRONMENT

- Principle 07:** Businesses should support a precautionary approach to environmental challenges;
- Principle 08:** Undertake initiatives to promote greater environmental responsibility; and
- Principle 09:** Encourage the development and diffusion of environmentally friendly technologies.

ANTI-CORRUPTION

- Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

<https://www.unglobalcompact.org>

Overview of Code of Conduct

Our Code of Conduct comprises four building blocks.

E | Ethics

Ethical principles are the foundation of our actions. Ethical issues confront us daily, consciously and unconsciously. This includes the redress of grievances and an open dialog on inappropriate behavior. Our Company Guidelines help us in our decisions and actions, every day.

C | Compliance

All of us are expected to comply with the law, company policies, and voluntary codes of conduct – in every task we perform here. These include respecting the privacy of personal information, making true statements in marketing, and preventing corruption.



Building Blocks of our Code of Conduct

4 | Social

The number '4' means 'for' our employees, who form the core element of our success. Among others, this building block encompasses employee advancement, anti-discrimination, health and safety at the workplace, a work-life balance, and maintenance of social standards.

U | You & the environment

The letter "U" stands for "You & the environment" and represents our awareness of environmental resources that we use daily, complementing the three aforementioned facets. We take our responsibility towards the environment very seriously, and have thus defined actions and goals to manage our ecology in a sustainable manner.

- Company Guard Rails
- Human rights
- Child- & forced labour
- Company Spirit
- Business partners
- Corporate citizenship

Company Guard Rails - Our Guiding Principles

Our Company Guard Rails form the foundation of our common activities and must be applied at all times.

- **Respect** is the manifestation of the vigilance, attentiveness and tolerance with which we approach and encounter others.
- **Customer orientation** describes our vigilance and willingness to understand and react according to the specific needs of our clients.
- **Quality** describes our aspiration to provide exceptional performance in all our own and joint endeavors.
- **Individuality** describes our knowledge and actions relating to the uniqueness and sovereignty of each and every individual - a uniqueness which in its totality constitutes the success of ec4u.
- **Entrepreneurship** describes the ability and intention of our proactive and focused engagement, ensuring the success of the ec4u group by putting entrepreneurial interests first.



Company Guard Rails

Human rights

At ec4u, we have adopted the human rights principles under the UN Global Compact and abide by such rights in accordance with the respective national legal framework.

Child- & forced labour

We reject any form of child and forced labour, and require our business partners to follow suit. Minors should be given the opportunity to get professional and other forms of training to become future employees.

Company spirit

Two of our outstanding characteristics are a flat hierarchy and an open and supportive atmosphere at work. Yet, we expect a high degree of professionalism and dedication, as demonstrated by the company management every day. Competence, performance, willingness to work, and customer service are what make projects run smoothly and become successful.

We place great value on targeted project management, which our customers appreciate. If we wish to be among the best in the business, we should not set the bar too low.

Consequently, our employees and business partners are obligated to adhere to the law and our Code of Conduct when performing their duties – to ensure that they do not let personal interests override their decisions.

Business partners

“WE ACT IN AN ETHICALLY CORRECT MANNER AND EXPECT THE SAME FROM OUR BUSINESS PARTNERS.”

Compared with manufacturers, our ability as a consulting firm to influence the supply chains is minimal. Still, we expect our business partners to act fairly and comply with all laws, and demand the same from ourselves.

Corporate citizenship

We preferably deploy our expertise in matters of corporate citizenship. That is why we sponsor the David-Kopf University Award, regularly confer social awards, set up projects with universities and grant the Excellence Award for the best thesis.

We also like to get involved in areas outside our sphere of expertise: hence, we donate to the ARCHE organization for children & youth and to the Tafel Durlach.

Similarly, we support the UN Global Compact and the German Global Compact Network, and constantly back and apply the ten principles.

- Compliance with the law
- Data protection
- IT & information security
- Quality
- Marketing & advertising
- Conflicts of interest
- Preventing & combating corruption
- Intellectual property rights
- Gifts & invitations
- Money laundering

Compliance with the law

We naturally comply with all laws and regulations, whether local, national, or international. Transparency is the key word in dealings with officials, pursuant to the law.

All managers are required to be conversant with the basic laws that govern their areas of responsibility.

Data protection

“OUR HIGHEST PRIORITY IS TO PROTECT ALL INFORMATION ON OUR BUSINESS PARTNERS AND EMPLOYEES AND THEIR PERSONAL PRIVACY.”

One needs to not only comply with the law on data protection, but also properly handle the sensitive information. Hence, each employee has signed a declaration of compliance concerning privacy of personal information, secrecy of proprietary information, bank secrecy and secrecy of telecommunications.

Moreover, all employees attend training on privacy, in which they learn the extent to which they may process the information and what data/personal privacy means in their daily work. Furthermore, responsible marketing also means observing the regulations on market-related activities, documentation, and information storage.

“IT IS CRUCIAL FOR US TO WIN THE CONFIDENCE OF OUR CUSTOMERS.”

Mutual trust in teamwork is indispensable for the success of a project. Consequently, it is important to work transparently and process information along the lines of “as much as necessary, but as little as possible.” Contact information is released to a third party only with the consent of the one concerned.

In case of doubt, we consult our data protection representative.

IT & information security

Our additional agreements “Private Use of email and Internet services” and “Use of a Smartphone” are an important constituent of the employment agreement signed upon joining us. One must use all company equipment in a responsible and economically appropriate manner.

Computers and internal systems at customer premises are to be used solely for project tasks. Installation or use of services to facilitate anonymity or for file sharing is strictly forbidden.

Quality

“THE HIGHEST STANDARDS OF QUALITY AND OUR PASSION GUARANTY THE SUCCESS OF CUSTOMER RELATIONSHIP MANAGEMENT (CRM) FOR BOTH OUR PARTNERS AND CUSTOMERS.”

Customer satisfaction is spotlighted in all our thoughts and actions, enabling us to build long-term relationships and truly achieve a win-win situation for both sides.

Happy customers are, undoubtedly, the foundation of our growth and the determining factor of our future. We strive to deliver perfect services that have neither defects nor features that may damage assets. The quality of our services is the foundation of our success. Therefore, we view quality as an ongoing process of improvement - an aspect that we also expect from our business partners.

Marketing and advertising

We observe the Unfair Competition Act (UWG), and do not intentionally make any misleading or untrue statements. False statements on our products and services harm the customer. Hence, especially employees in the marketing and sales departments adhere to the provisions of the UWG.

Conflicts of interest

We respect the personal interests of our employees – but do not let these influence our business decisions. We avoid situations in which one’s personal or financial interests clash with those of our company and of our business partners.

Preventing & combating corruption

“WE BANK ON OUR PERFORMANCE, CUSTOMER ORIENTATION, AND EXCELLENT QUALITY TO BEAT COMPETITORS – AND REJECT ILLICIT BEHAVIOUR.”

The quality and value of our performance are underscored by business sustainability and success. At ec4u, we have clear policies to combat corruption. We reject any behaviour that is corrupt, damaging to us, illicit, or involves bribery. Corruption generates massive material and immaterial damage in situations involving criminal offenses.

Our business partners can count on us acting absolutely legally in accordance with regulations. Each employee bears personal responsibility for such compliance.

Intellectual property rights

As a consulting firm, we are particularly obligated to protect intellectual property rights, which cover all property derived from the work of the mind or intellect. IP rights are valuable assets, and include inventions, marks, patents, copyrights, studies, proprietary information, etc.

Corporate intellectual property rights must always be protected. Hence, our employees are required to keep all proprietary information confidential that they become aware of while performing their tasks, and to not disclose such information to a third party. We treat trade secrets of competitors, business partners, and customers like we treat our own. No copyrighted, licensed, or confidential information may be used for personal or other gains, without the consent of the intellectual property rights holder.

Gifts & invitations

We neither accept gifts that may awaken the impression of a personal benefit, nor do we give such gifts to gain undue advantages. We do not accept gifts, donations, etc. that exceed customary limits.

Money laundering

We demand strict compliance of all laws and regulations to combat money laundering from our employees and business partners. The law defines money laundering as especially the concealed transformation of illegally obtained funds or other assets into ostensibly legitimate business domains.

- Employees
- Anti-discriminatory practices
- Adherence to social standards
- Work-life balance
- Atmosphere at work & equal opportunities
- Health & safety at work
- Foster junior employees
- Further education & training

Employees

“OUR EMPLOYEES GUARANTY OUR SUCCESS.”

Only enterprises that understand what it means to find the right employees, keep them loyal over the long-term, promote and protect them, can count on sustained success. As an employer, we would like our employees to grow - professionally and personally - for which a responsible human resources policy is the basic requirement.

Hence, we have regularly employee meetings to assess their development and performance and we foster an open dialog. Exchanges among colleagues are crucial, along with mutual respect and esteem.



ec4u team

Anti-discriminatory practices

At ec4u, we reject any form of discrimination arising from ethnicity, nationality, religion, gender, age, ideology, or sexual orientation.

We condemn verbal or physical harassment as well as mobbing resulting from any of the aforementioned grounds or other reasons. We believe in treating each employee with respect and dignity.

We will act against any sign of violation - while protecting the interests of the concerned.

In order to effectively combat discrimination, we have appointed an Equal Opportunity Representative. Employees who feel they are harassed or treated unfairly or wish to point out an injustice faced by another may seek advice from or file a complaint with this representative.

Adherence to social standards

We expect all our managers and employees to observe social standards.

We do not accept illegal employment, violations of human rights, endangerment to health and safety at the workplace, or violation of child welfare - whether at ec4u or at our business partners.

Work-life balance

For us, motivation, joy, and the willingness to work have the highest priority. For this, one must achieve the right work-life balance.

We promote a work-life balance by allowing employees with children to work out of their homes, which is our method to help dismantle the culture favouring one's presence in the office.

We underpin the right to equal opportunities and take measures to encourage a work-life balance and support women.

Atmosphere at work & equal opportunities

We believe in a culture of openness, fairness, and mutual respect for each other. Our daily lives revolve around a trustful, estimable, and attractive workplace - and each one of us makes a contribution. Our corporate culture is ingrained with this approach that promotes respect and dignity at the workplace for all employees.

We foster equal opportunities for all, and practice this principle both when we hire employees and help them develop.



Awards won by ec4u

Health & safety at work

Comprehensive health management ensures healthy working conditions, healthy social relationships, and nurtures our employees' bodies, minds, and souls.

We take the health of our employees and safety at work seriously. We are committed to preventing accidents, injuries, and illnesses caused by work and to protect our employees. We foster awareness and knowledge of health and safety issues through workouts at the office, information notices, allowances for fitness centres, team events and much more.

Our in-house work-safety specialist and the company physician ensure that workplace ergonomics are in order and that employees undergo medical check-ups and screenings. We have even trained employees as first-aiders at some of our offices to boost safety at work. Moreover, we appointed safety officers, who are available to guide employees and answer their questions.

Foster junior employees

"JUNIOR STAFF DEVELOPMENT IS VERY IMPORTANT IN OUR FIRM."

We invest in training, education and development of our junior employees, evidenced by the fact that trainees make up 12% of our staff. Almost every department enjoys the support of trainees, dual students, or students working on their theses or master's degrees. Proper training calls for thorough organization, professional mentoring, and acceptance and awareness of all colleagues. We deem it important to pass on our knowledge and work effectively in teams. We consider diversity in the ages of our employees as an opportunity and shape it actively.

Further education & training

As a consulting firm, our success is highly dependent on the know-how and capabilities of our employees. For further education, we apply the 3E model – a scheme in which employee development measures are ideally divided into three areas and applied to different degrees.

“OUR 3E MODEL:
EXPERIENCE – EXPOSURE – EDUCATION.”

“Experience” covers all tasks and challenges that cultivate development by changing the areas of work and new roles. “Exposure” covers coaching, feedback, mentoring, and setting examples. These two practical facets are complemented by the traditional facet of “Education”, which includes training provided in specific areas.

- Responsibility
- Measures & targets
- Environmental policy
- Sustainable procurement

Responsibility

Protecting the environment is very important to us, and we are fully aware of the seriousness of climate change and our limited resources. Devising and executing a corporate-specific environmental policy is the foundation for responsible management of our world's resources. We observe all applicable laws and regulations in our corporate undertakings.

We take our responsibility for the environment seriously, strive to minimize environmental damage, and work unceasingly to reduce our footprint even further. Hence, we have defined key policies that require us to apply environment-friendly business practices.

Measures & targets

Protection of our environment will be an issue for years to come, with increasing relevance in private and public areas. For this reason, we wish to and must make our contribution to climate change and the conservation of resources. Each year, we supplement our regular measures with definitive goals.

Environmental policy

The first step in establishing a system to manage our environment is to define an environmental policy.

"SUSTAINABILITY IS EASY FOR YOU."

We have laid down our environmental aspects and targets in writing and monitor them constantly (see environmental report). We guaranty that – in concert with our corporate social responsibility – all our business activities and services are economic, social, and environment-friendly.

The damage we cause to the environment is monitored regularly, because we wish to reduce this continuously. We conserve all materials.

Our employees work primarily in Europe, but also conduct customer projects around the world. Thus, it is not possible to avoid significant travel. That is why at ec4u we prefer to use trains or other public transportation to travel to easily reachable destinations.

Sustainable procurement

We always give preferential treatment to business partners that value sustainability. We require our suppliers to take due consideration of both ecological aspects along their supply chain and the ten principles of the UN Global Compact. At regular intervals, we benchmark various service providers and manufacturers to identify those who pay greater attention to sustainability and environmental protection.

Contact us:

ec4u expert consulting ag
Zur Giesserei 19-27B
D-76227 Karlsruhe

Phone: +49 (0) 721 46 476-100
Fax: +49 (0) 721 46 476-299

Mail: info@ec4u.com
Web: www.ec4u.com

ec4u