

## COMPLIANCE GUIDELINE

Dear customers, business partners and employees,

Since our founding in 2000, we have strived to not only offer excellent services as a professional partner for event technology, but also to represent moral and ethical values at the highest level. Our work and our actions are based on cooperation in a spirit of partnership between equals, characterised by mutual respect, integrity, and a passion for innovation.

‘Compliance’ for us is the totality of all measures that guarantee the lawful and ethical conduct of UEBERKOPF and all its employees.

This Compliance Guideline serves as a common foundation that reflects our values. It is not only a set of rules, but also a promise – to ourselves, and to everyone we interact with. It is a code of conduct for all employees, business partners, and suppliers, to the extent that we can exert and influence on them.

### INTRODUCTION

The principles and behaviours set out here serve as orientation in our daily work and in our business relationships. They embody what is important to us, and what we expect from ourselves and our partners. This document also serves to promote trust and transparency between us and our stakeholders.

Our basic principles of cooperation are:

- Compliance with all applicable laws
- Refraining from corruption
- Respect for human rights
- Compliance with laws against child labour
- Observance of the laws of international commerce
- Protection of the health and safety of all employees
- Compliance with national laws and international standards relating to occupational safety, environmental protection, and data protection (privacy).
- Compliance with these principles in our own supply chain

### BASIC PRINCIPLES IN INTERACTIONS WITH EACH OTHER

Our relationships with business partners, employees and society are based on integrity, openness, honesty, respect, and fairness. We value the diversity and uniqueness of each individual and encourage open, honest, and constructive dialogue.

## TOGETHER FOR A BETTER FUTURE

We recognise the important role that companies play in society. Therefore, we place great emphasis on social responsibility, environmental protection, and sustainability. We encourage our business partners to work with us to find innovative ways to make positive changes in the world and to find responsible solutions.

## TRANSPARENCY AND RESPONSIBILITY

All our actions and decisions are transparent and we take responsibility for our actions. We strive to communicate openly and understandably, and expect the same level of integrity and transparency from our business partners and employees.

## PROHIBITION OF BRIBERY AND CORRUPTION

Bribery and corruption are unacceptable and clearly contradict our values. All employees and business partners are required to avoid any form of payment, gift or inducement that is not legally or ethically appropriate.

## DEALING WITH GIFTS AND INVITATIONS

Invitations and small gifts are customary in business transactions, but must remain within reasonable limits. They may therefore only be accepted or given if they comply with the applicable legal provisions and have no influence on business decisions.

To avoid even a semblance of corruption:

- Employees must refuse invitations and gifts if they are obviously or presumably connected with a specific expectation of some kind of consideration. The same applies to gifts to business partners.
- Employees are permitted and encouraged to participate in professional events. The same goes for organising professional events.
- Invitations to and participation in social, civic and recreational events in the business environment are permissible if they are within reasonable bounds. They must not give the impression of harming fair competition or mixing interests.

## COOPERATION WITH BUSINESS PARTNERS

We assume that all our business partners also comply with legal regulations. A fair exchange as equal partners is important to us and we strive for stable, long-term business relationships. When making purchasing decisions, quality and sustainability principles have a high priority in the selection process. Local suppliers are given special consideration.

## DATA PROTECTION / PRIVACY

The protection of personal data is essential. Every employee is obligated to handle personal data sensitively at all times and to use and store it only in accordance with the applicable privacy and data protection laws.

## PROTECTION OF THE COMPANY'S ASSETS

Each person in charge must set up and structure their area of responsibility in such a way that the company's assets are protected against loss and misuse. The company's assets may not be used for private purposes.

## CONDUCT TOWARDS COMPETITORS

As a matter of principle, we maintain a respectful and cooperative relationship with competitors. Competition law and antitrust law must be observed at all times. No confidential information or conditions may be exchanged or agreed with competitors.

## CONSEQUENCES OF COMPLIANCE VIOLATIONS

Adherence to our compliance guidelines is not only a sign of our integrity, but also crucial for the trust that our business partners, customers and employees place in us. Appropriate action will be taken if these policies are violated. This can range from disciplinary action for employees to termination of the business relationship with external partners. Any reported violation will be thoroughly investigated and appropriate action will be taken in each situation. We encourage everyone to report concerns or identified breaches confidentially and guarantee that no action will be taken against those who report breaches in good faith.

## CONTACT

Our Compliance Officer is available both internally and externally to answer any questions regarding this Compliance Guideline. All information will be treated confidentially.

Should a compliance violation become known, it is mandatory to inform the Compliance Officer immediately.

**Contact:** Jochen Becker – [compliance@ueberkopf.de](mailto:compliance@ueberkopf.de)

## QUESTIONS OR CONCERNS AS AN EMPLOYEE

If you are an employee and have any questions or concerns:

- Contact your direct supervisor
- If clarification with your direct supervisor is not possible or not desired, contact your site manager.
- If clarification with your site manager is likewise not possible or not desired, then contact the Compliance Officer. They can be contacted at any time at [compliance@ueberkopf.de](mailto:compliance@ueberkopf.de)
- If you would like to report a concern anonymously, please use the feedback button on our social intranet.

## READING LIST

Everyone should know and have read the following documents:

- The Basic Law of the Federal Republic of Germany ([www.bundestag.de/grundgesetz](http://www.bundestag.de/grundgesetz))
- The United Nations Charter on Human Rights ([www.un.org/depts/german/menschenrechte/aemr.pdf](http://www.un.org/depts/german/menschenrechte/aemr.pdf))
- The ten principles of the Global Compact ([www.globalcompact.de/fileadmin/user\\_upload/Bilder/Mediathek\\_Main\\_Page/Publikationen\\_PDF\\_speicher/DIE-ZEHN-PRINZIPIEN-1.pdf](http://www.globalcompact.de/fileadmin/user_upload/Bilder/Mediathek_Main_Page/Publikationen_PDF_speicher/DIE-ZEHN-PRINZIPIEN-1.pdf))


A heartfelt thank you to all who walk this path with us and share the importance of acting ethically.

Through our collective efforts to live these guidelines, we can ensure that our work is not only successful, but also ethical and responsible.

Hamburg, 19 May 2022



Jan Thommen  
– Management –



Michael Steuber  
– Management –