

# Code of Conduct

## Introduction

As an employer, we are aware of our social responsibility. Therefore, ethical and sustainable actions are fundamental values of our company. With this Code of Conduct, we, as Melissa Data GmbH, hold to the values that guide us. We expect our employees to respect these values and to follow the principles laid down here in their daily work and in their acquaintance with each other.

### I. Compliance with law and order

For us, compliance with the law is an essential basic principle of economically responsible action. We observe the applicable legal prohibitions and obligations at all times, even if this entails short-term economic disadvantages or difficulties for the company or individuals. If national laws are more restrictive than the regulations in force, national law takes precedence.

### II. Prohibition of discrimination

We reject any form of discrimination in the work environment. No one may be discriminated against or preferred on the basis of aspects such as gender, ancestry, language, home country and origin, marital status, age, disability, faith, religious or political views.

### III. Human dignity; rejection of any form of sexual harassment

Any behavior that disregards the human dignity of another person, or that harasses another person, is prohibited. We reject any form of sexual harassment of employees.

### IV. Human and workers' rights

We are committed to the United Nations Universal Declaration of Human Rights and support its observance. We strictly reject any form of forced labor and child labor. We recognize the right to adequate remuneration for all employees. In this context, remuneration and other benefits correspond at least to the respective national and local legal standards or the level of the national economic sectors/industries and regions.

### V. Equal opportunities

We are committed to promoting equal opportunity and diversity and to ensuring that all employment decisions (e.g., hiring, promotions, compensation issues, training and development) are made solely on the basis of the individual's skills and qualifications.

## VI. Combating all forms of corruption

Within the framework of our business relationships, we respect the principles of fair and free competition. Therefore, we reject all forms of corruption, including bribery and extortion. Decision-making processes must not be influenced in any way by improper benefits (cash, benefits in kind, pleasure trips, etc.).

The acceptance or the granting of benefits to third parties, in particular of financial nature, is prohibited. The acceptance of invitations and gifts is permitted up to a maximum value of €100. In addition to the specified value limit, aspects such as the timing, frequency and appropriateness also count. Furthermore, whether a gift is socially customary in the context of the situation, the local circumstances and the hierarchical position of the giver and recipient.

Employees undertake to behave loyally towards the employer. Conflicts of interest are to be avoided and possible conflict situations are to be reported at an early stage. Should a personal interest or conflict of interest exist, this must be disclosed.

## VII. Money Laundering Prevention

Employees are requested to have unusual financial transactions, in particular involving cash, which may give rise to suspicion of money laundering, checked by the management or the responsible finance department, in case of doubt.

## VIII. Confidential Company Information

We take the necessary steps to appropriately protect confidential information (e.g. business documents) from access or insight by employees, who are not involved, and other third parties. We are responsible for ensuring that confidential information is not passed on to third parties in any unauthorized manner.

## IX. Data protection and information security

The protection of personal data has a particularly high priority for us. In addition to the general confidential regulations (e.g. § 17 UWG<sup>1</sup>), the data secrecy according to the GDPR must be observed. In particular, it is prohibited to process, disclose, make accessible or otherwise use protected personal data of our company and our customers without authorization for a purpose other than that which is part of the respective legitimate task fulfillment. This obligation to maintain data secrecy continues even after leaving the company. Employees, who handle data in this regard, receive advice and support from the company data protection officer.

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<sup>1</sup> UWG = Gesetz gegen den unlauteren Wettbewerb (Law against unfair competition)

## X. Sustainable environmental and climate protection

We are committed to sustainable environmental and climate protection as well as resource efficiency. In the development and sale of our products and services, we ensure that any impact on the environment and climate is kept as low as possible. Employees have the responsibility to use natural resources such as water, energy, work equipment and land sparingly and to contribute to protecting the environment and climate through their individual behavior.

## XI. Compliance with the *Code of Conduct*, contact persons and grievance procedures

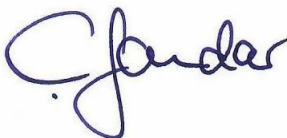
Reports of violations of this ***Code of Conduct*** can be communicated at any time to the direct supervisor or managing director, or anonymously to our headquarters, *Melissa Data Corp.* via [compliance@melissa.com](mailto:compliance@melissa.com).

Employees, who report indications of violations to the responsible persons will not be disadvantaged in any way, in particular, they will not be subject to disciplinary measures unless an untrue fact was deliberately alleged. The strictest confidentiality is maintained; the identity of whistleblowers is protected.

Violations of the Code of Conduct and legal provisions may, depending on their severity, result in consequences under employment and liability law and also lead to criminal sanctions.

By signing, the employee confirms that he or she has read the ***Code of Conduct*** and that it is part of the employment contract.

September 2021



Managing Director Melissa Data GmbH