

CODE OF CONDUCT



CODE OF CONDUCT FOR SUSTAINABLE,
SOCIALY RESPONSIBLE, AND
ETHICAL ACTION

Table of Contents

0.	Document Information	3
0.1.	Responsibility	3
0.2.	Change history.....	3
0.3.	Distribution.....	3
0.4.	Document Agreement	3
0.5.	Content and Scope of this Document	3
1.	General	4
2.	Legal and Compliant Conduct	4
3.	Corporate Social Responsibility	4
3.1.	Integration and Inclusion	4
3.2.	Human and Children’s Rights / Forced Labor.....	4
3.3.	Health and Safety.....	5
3.4.	Fair Working Conditions	5
3.5.	Trade Secrets / Personal Data Protection	5
4.	Ecology and Economy	5
4.1.	Environment and Resources	5
4.2.	Mobility	5
4.3.	Growth	6
5.	Corruption / Competition and Antitrust Law	6
5.1.	Avoidance of Conflicts of Interest with Customers and Business Partners	6
5.2.	Avoidance of Personal Conflicts of Interest.....	6
5.3.	Gifts, Business Dinners, and Events	7
5.4.	Donations and Sponsorship	7
5.5.	Zero Tolerance for Corruption	7
5.6.	Protection of Competition	8
6.	Conclusion.....	8

0. Document Information

0.1. Responsibility

ROLE	COMPANY/DEPARTMENT	ZUSTÄNDIGKEIT
Processor	akquinet GmbH / Personal	Creation and maintenance
Approver	akquinet GmbH / Management	Creation and release

0.2. Change history

The change history is maintained in document management.

0.3. Distribution

This document applies to all employees of akquinet GmbH and all subsidiaries (collectively „AKQUINET“) and will be made available in regularly updated versions.

0.4. Document Agreement

The information contained in this document is copyrighted. No part of this document may be reproduced or transmitted in any form or by any means without the prior written permission of AKQUINET.

0.5. Content and Scope of this Document

The following pages contains a summary of our values, which we already live by and which are embedded in our company, in our „Code of Conduct“. In this way, we ensure that our values are not just buzzwords, but form the basis of our daily actions and our working culture.

With our corporate values of „freedom, respect and cooperation“, we create added value and are successful as AKQUINET. The „Code of Conduct“ serves as the basis for our common understanding and defines the principles of our cooperation with each other, as well as with customers and business partners. This allows us to create a positive working environment and ensure that all employees act appropriately and work in harmony with each other.

1. General

AKQUINET is an internationally active, continuously growing IT consulting company with headquarters in Hamburg, Germany. The company is aware of its social role and its responsibility toward customers, business partners, and employees. The success of our company depends to a large extent on mutual trust. With this Code of Conduct, we commit ourselves to the principles that guide our business and social activities. Our managers have a particular responsibility to implement these principles, which serve as a guide for the independent actions of our employees. The aim of this Code of Conduct is to further strengthen confidence in the performance and integrity of the AKQUINET Group.

This AKQUINET Code of Conduct concretizes and complements the values we already live by. It cannot and should not provide detailed instructions for all situations. Rather, it represents the general framework and basic instructions on which AKQUINET's actions are based. Its implementation is therefore determined, where necessary, by internal company regulations and instructions, with existing guidelines applying alongside the Code of Conduct. Local adaptations may be made to take account of specific circumstances. However, the current Code of Conduct will always be the basis.

Our Code of Conduct is based on the principles of the United Nations Global Compact <https://www.unglobalcompact.org/what-is-gc/mission/principles>.

2. Legal and Compliant Conduct

The objectives of the Code of Conduct can only be achieved if all stakeholders are involved. The requirements of this Code of Conduct are therefore equally binding on all AKQUINET employees. They are obliged to comply with the laws and official regulations applicable in their working environment, as well as with internal instructions and guidelines. Employees are required to act honestly and fairly in their work environment and to avoid conflicts between the personal and business interests of AKQUINET or its customers. All employees are strongly encouraged to contact either management or the Human Resources Department if they suspect non-compliant behavior. A report can also be made anonymously through our web-based whistleblower system, AKQUINET. In this way, we can prevent small problems from becoming big ones. Managers have a role model function. They are responsible for their own conduct and that of the employees in their area of responsibility, and for ensuring that all procedures and policies are properly followed to avoid reputational and legal risks.

3. Corporate Social Responsibility

3.1. Integration and Inclusion

AKQUINET promotes equal opportunities and diversity. We consider both to be essential to our reputation and business success. No employee or applicant will be discriminated against on the basis of gender, marital status, cultural origin, skin color, nationality, identity, age, disability, religion, or sexual orientation. Decisions regarding the selection, training, and promotion of employees are made solely on the basis of job-related criteria.

We respect and value the skills and commitment of each individual, regardless of individual limitations or weaknesses, and ensure that we work together in a respectful and supportive manner. We embrace diversity and are particularly committed to the professional inclusion of people with disabilities. When AKQUINET was founded in 2002, we chose to locate our headquarters on the premises of the Evangelische Stiftung Alsterdorf in Hamburg. Together with the Foundation, we have set up a non-profit company in which 40% of the employees are people with disabilities. At AKQUINET, we have made it our mission to offer these people long-term, qualified employment, to give them the opportunity to develop and to contribute their strengths to the company. Inclusion is a matter of course for us.

3.2. Human and Children's Rights / Forced Labor

We respect and support compliance with internationally recognized human and children's rights. If a German standard (e.g., the Youth Employment Protection Act with regard to child labor) provides for stricter standards, we will give priority to these standards. We reject all forms of forced labor.

3.3. Health and Safety

We ensure health and safety in the workplace within the framework of national regulations. We support continuous development to improve the working conditions of our employees.

AKQUINET respects the dignity and personality of each employee. Interaction is characterized by mutual respect, fairness, team spirit, professionalism, and openness. Managers act as role models and prove to be competent interlocutors, especially in conflict situations. They are responsible for their own conduct and the conduct of employees in their area of responsibility, and for ensuring that all procedures and policies are properly followed to avoid reputational and legal risks.

3.4. Fair Working Conditions

We respect our employees' right to freedom of association within the framework of applicable national laws and regulations.

AKQUINET is committed to ensuring that employees are able to reconcile their business interests with their private lives. Special attention is paid to the compatibility of family and career.

3.5. Trade Secrets / Personal Data Protection

Employees must maintain secrecy about all confidential matters of the company, its contractual partners and customers, in particular trade and business secrets, of which they have become aware in the course of their work for AKQUINET, both during and after leaving the employment relationship. Official documents and data carriers must be protected against access by unauthorized third parties.

Personal data may only be collected, processed, or used to the extent necessary for specified, explicit, and legitimate purposes. The use of the data must be transparent to the data subject. Their rights of access, rectification and, where appropriate, objection, blocking, and deletion must be respected.

4. Ecology and Economy

4.1. Environment and Resources

We are committed to protecting the environment for present and future generations. To this end, we support initiatives for greater environmental responsibility and are committed to the development and dissemination of environmentally friendly technologies. In this way, we promote environmental awareness in our business operations.

The responsible use of resources begins in our daily lives. In their work, employees should strive to conserve natural resources and ensure that AKQUINET's business operations have as little impact on the environment as possible through material savings, energy-saving design, waste avoidance, and recycling. Every employee should consider environmental and social criteria in addition to economic aspects when selecting suppliers, advertising materials, or other external services. In addition, AKQUINET's property and equipment, business documents and working materials may not be misused for private purposes or made available to third parties if this could be detrimental to AKQUINET's interests.

4.2. Mobilität

We enable people to work from anywhere. Video conferencing is part of our daily collaboration, both internally and externally with our customers and partners.

We support the use of public transport in Hamburg and the use of bicycles with a financial subsidy through our bicycle leasing offer.

Our fleet management promotes electric mobility, including the provision of e-charging stations at our headquarters.

4.3. Growth

Excellence is a prerequisite for business success. AKQUINET therefore promotes talents who contribute to the sustainable success of the company through both their performance and their social skills. AKQUINET offers appropriate opportunities for both professional and personal development, and encourages employees to take advantage of these opportunities.

As a company, we are committed to steady and healthy growth.

5. Corruption / Competition and Antitrust Law

5.1. Avoidance of Conflicts of Interest with Customers and Business Partners

AKQUINET strives for sustainable and mutually beneficial business relationships with all customers and business partners.

Every employee must therefore ensure that the interests of our customers are taken into account in a fair manner. The interests of individual customers or business partners must not be given priority at the expense of other customers.

AKQUINET takes great care to ensure that its employees are not exposed to conflicts of interest or loyalty in the course of their work. Potential conflicts should be identified and avoided at the earliest possible stage.

5.2. Avoidance of Personal Conflicts of Interest

If employees come into conflict between their personal interests and their professional duties or the interests of AKQUINET or its customers, this can damage the reputation of these employees and of AKQUINET as a whole.

Employees should therefore avoid such situations in the interests of AKQUINET as well as in their own interests.

Specifically, the following applies:

- I. Sideline activities that interfere with the temporal scope of the contractual obligations or the competitive interests of AKQUINET are not permitted. Secondary activities require the prior approval of the line manager and the HR department. Temporary voluntary activities do not need to be reported to the employer.
- II. There must be no financial interests in companies that could be affected by the employee's or AKQUINET's professional decisions (listed companies are excluded).
- III. Contracts awarded to relatives/cohabitants or other close associates of employees must be notified in advance to the line manager, if known. This also applies to transactions with companies in which relatives are directly or indirectly involved, with the exception of a < 3% shareholding in a listed company.
- IV. Where possible, there should be no direct reporting lines between children, parents, spouses, or partners.
- V. No entrepreneurial positions (e.g., board of directors, executive management, board of directors, supervisory board, advisory board) should be taken with customers, business partners or competitors without the prior consent of management.

If in doubt, management should be contacted. The perception of third parties is crucial. Even the appearance of a personal conflict of interest is damaging.

5.3. Gifts, Business Dinners, and Events

Gifts and entertainment in business are much more restrictive today than they were a few years ago. They may only be given or accepted if they are a gesture of courtesy in line with general business practice and if any improper influence on a business decision or official act can be ruled out from the outset. This also applies to gifts and invitations on the occasion of or in connection with official company events, conferences, or symposia:

- I. Gifts, meals, and entertainment for informational, promotional, or entertainment purposes must never be used to obtain an improper business advantage and must never be to an extent or in a manner that could compromise the professional independence and judgment of those involved.
- II. Employees can protect themselves from misunderstandings by observing the following rules:
 - a. There is no objection to reasonable hospitality and entertainment that is directly related to business.
 - b. There are no concerns about promotional gifts.
 - c. In principle, there are no concerns about gifts with a market value of up to €40 gross (benchmark), unless they are given shortly before the conclusion of contracts or negotiations, or are sent to the private address, or are given in some other non-transparent way.
 - d. Cash or monetary substitutes such as checks or gift vouchers must never be accepted.
 - e. Invitations for representational purposes or with a predominant or partial entertainment element are only permitted
 - i. after specific consideration of customary business practice and appropriateness.
 - ii. when representatives of the host are present.
 - iii. if the attendance is not frequently repeated.
 - iv. travel and accommodation costs are not borne by the inviting business partner.

In case of doubt, management should be consulted.

5.4. Donations and Sponsorship

Management decides on donations and sponsorship. They must not be used to obtain indirect unfair advantages from business partners.

5.5. Zero Tolerance for Corruption

AKQUINET is committed to complying with all anti-bribery and anti-corruption laws and regulations, including the [UK Bribery Act](#) and the [Foreign Corrupt Practices Act \(FCPA\)](#). Furthermore, AKQUINET takes into account the [United Nations Global Compact](#) and takes action against all forms of corruption, including extortion and bribery (see Section 3 a) IV).

AKQUINET's success in the market is based on performance, flexibility, and service readiness and must not be achieved through fraudulent donations. Our business partners rely on the professional judgment of our employees. AKQUINET therefore does not tolerate any form of bribery or corruption, nor the acceptance or granting of advantages.

Anyone who fails to comply with the rules on gifts and entertainment set out in Section 4.3 runs the risk of being prosecuted for corruption offenses. Even the promise or solicitation of an undue advantage may be punishable.

Invitations and donations to public officials must always comply with their internal gift and entertainment policy. Granting benefits to public officials may constitute the criminal offense of giving or receiving undue benefits for the mere fact that the act is performed based on the individual's official position. The intent to unduly influence the official in the performance of their duties is not required. Public officials can be anyone entrusted with the performance of public duties, not just civil servants and public officials.

5.6. Protection of Competition

AKQUINET does not participate in any illegal restrictive agreements and practices, in particular agreements on prices, conditions, and market sharing with competitors. Before employees deviate from the procedures provided for in cooperation agreements, they shall clarify with management that this will not have any inadmissible effects under competition law.

In contacts with competitors and business partners, AKQUINET employees shall not discuss internal matters such as prices and sales or financing conditions, costs, market overviews, organizational processes, or other confidential information from which the competition or business partners could gain a competitive advantage.

6. Conclusion

The objectives of the Code of Conduct can only be achieved if all stakeholders are involved. Therefore, the requirements of this Code of Conduct are equally binding on all employees.

AKQUINET employees are obliged to comply with all laws and official regulations relevant to their working environment, as well as internal instructions and guidelines.

Employees are required to act honestly and fairly in their work environment and to avoid conflicts between the personal and business interests of AKQUINET or its customers.

All employees are strongly encouraged to contact either management or the Human Resources Department if they suspect non-compliant behavior. A report can also be made anonymously through our web-based AKQUINET Whistleblower System. In this way, we can prevent small problems from becoming big ones.

Violations of these rules can result in significant reputational and legal damage to the affected employees, their colleagues, and AKQUINET, including fines and criminal proceedings. In addition, violations that constitute a breach of employment contract obligations may result in AKQUINET taking action under labor law.

akquinet GmbH, Hamburg, 05.05.2025

Dr. Volker Gerd Fischer, Martin de Groot (Management)