

HAUFE GROUP CODE OF CONDUCT FOR BUSINESS PARTNERS

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Code of Conduct for Business Partners of the Haufe Group

The Haufe Group has devised a Code of Conduct for Business Partners, summarising key ethical, environmental and social standards, and expects its business partners to comply with the principles of the following Code of Conduct along the entire chain of business partnerships.

“Business partners” mean all natural or legal persons who have business or customer contact with the Haufe Group, including but not limited to suppliers, subcontractors, sales partners, consultants, authors, trainers, etc.

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1. Introduction

The Haufe Group is one of the most innovative international media and software companies in the fields of law, economics, taxes and information processing. The Haufe Group has made it its goal to develop and market innovative products and solutions with high practical benefit for its customers in order to make its customers even more successful. A key concern for the Haufe Group is ensuring fair, equitable and sustainable business operations from the start of every product development and throughout each individual step right up to marketing to the end user.

In order to achieve lasting and profitable growth, while also sustainably adding value for the company itself and the economy as a whole, the Haufe Group expects its business partners to treat their own employees, resources and the environment responsibly.

The Haufe Group has set up internal codes of conduct and compliance policies, under which employees have undertaken to act with responsibility, decency and loyalty, and to show respect for their fellow people and the environment.

To ensure that these values are also implemented externally, both successfully and efficiently, compliance with these standards by the business partners of the Haufe Group is of high importance for fair, equitable and sustainable business processes. The objective of this Code of Conduct is not only to prevent situations that might jeopardise the integrity of employees of the Haufe Group and its business partners, but also aims to establish principles for doing business that uphold the applicable laws and human rights while respecting environmental concerns.

2. Compliance with laws and applicability

This Code of Conduct for Business Partners sets out the principles of the Haufe Group and is based on its commitment to the **United Nations Global Compact**, the **UN Universal Declaration of Human Rights** and the International Labour Organization's **Declaration on Fundamental Principles and Rights at Work**.

The business partner shall ensure that all applicable legal regulations are observed. The Haufe Group assumes that its business partners are aware of national and international laws, policies and declarations. Individual points of particular importance to the Haufe Group are reiterated again below.

3. Integrity, anti-corruption, antitrust law

In order to maintain integrity and effectively fight against corruption, the Haufe Group expects its business partners to refrain from any form of corruption and from acts that could be interpreted as such. All business partners undertake not to offer employees of the Haufe Group any services, invitations, travel, gifts or other benefits that may influence the conduct of such persons in their relationship with the business partner.

The business partner must encourage the fight against money laundering, tax evasion, fraud and other criminal practices within the scope of its abilities in all its business relationships, the business partner will adhere to the rules of free and fair competition and will not violate competition or antitrust laws.

All sponsorship activities of the business partners shall be consistent with applicable laws, and must not be intended as means of directly or indirectly obtaining unfair advantages from a business partner.

4. Occupational safety, no discrimination, no child labour

If the business partner has its own employees, it will ensure appropriate occupational health and safety, and create a safe and healthy working environment consistent with international standards that prevent accidents and illness.

In particular, any forms of harassment, physical violence, slavery, forced, compulsory or child labour by the business partner will not be tolerated. In particular, the supplier warrants that its subcontractors also do not use forced, compulsory or child labour. The business partner guarantees that it will treat its employees respectfully and with dignity.

The business partner ensures that neither its employees nor other employees connected to it are subject to discrimination of any kind, in particular on the basis of their ethnic origin, age, ideology, religion, disability, gender or sexual orientation. Employees are not to be treated inhumanely, sexually harassed, abused, or physically punished. They must not be mentally or psychologically forced to do anything and shall not be verbally assaulted. The threat of such treatment is similarly prohibited.

The business partner will guarantee its employees fair working conditions, compliance with laws on training and remuneration, and employee protection provisions on the right of association and assembly. It will also offer its employees the possibility of collective bargaining.

5. Conflicts of interest

The avoidance of conflicts of interest is key for an enduring business relationship and of reciprocal benefit.

The business partner shall avoid situations, whereby the interests of his or her employees may potentially be in conflict with those of the Haufe Group. Any situation which could potentially be regarded as a conflict of interest shall be disclosed to the Haufe Group immediately by the business partner.

6. Environmental protection

The Haufe Group expects its business partners to comply with any applicable environmental laws, regulations and standards. Furthermore, our business partners will be committed to demanding and promoting sustainable, environmentally conscious and considerate use of resources by their employees. The business partner shall ensure that its business activities have no negative impact on the local environment or the population at its location.

7. Privacy

If the business partner comes into contact with confidential or personal data of the Haufe Group or its employees, it will treat such data as confidential and protect them against theft and misappropriation. If necessary, the supplier takes measures to protect accessible information. If the business partner becomes aware of data obviously not intended for it, it shall inform the Haufe Group of this without delay. Further details are regulated in the respective general privacy agreements.

8. Implementation and consequences

To implement the regulations of this Code of Conduct, it is also the business partner's responsibility to notify the Haufe Group of any violations that become known to it. The business partner will ensure that its employees have the opportunity to report any violations of laws or this Code of Conduct to a manager or to the Haufe Group, both anonymously and without any personal consequences.

In order to enforce the above regulations, the Haufe Group reserves the right to verify compliance with the above after prior and reasonable notice.

Violations of the regulations of this Code of Conduct can have repercussions for the primary contractual relationship between the Haufe Group and the business partner in the form of contract termination or claim for damages. The business partner will assist in the investigation of violations and, in turn, will do what is necessary to prevent further violations.

The business partner shall report any violations by employees of the Haufe Group without delay after they are discovered.

The business partner may report any violations directly to the Compliance Officer or it can use the anonymous whistle-blower system of the Haufe Group.

Compliance Officer: complianceofficer@haufe.com

Whistleblower system: <https://whistleblowerportal.haufegroup.com/hinweisgeber/informationen.html>