

GOB CODE OF CONDUCT

GOB



PREAMBLE

Through this Code of Conduct, GOB Software & Systeme GmbH & Co. KG ("GOB") establishes binding rules governing how GOB intends to conduct its business and what GOB stands for. GOB's Code of Conduct must be observed by all employees, every manager and every managing director. In doing so, GOB pursues its objective of fostering a corporate culture characterised by integrity, respect, fairness and responsible conduct.

GOB complies with the applicable laws of each jurisdiction in which it operates. In addition, GOB implements its own corporate mission statement in its day-to-day work. Many of the principles of conduct set out below are therefore established practices that GOB has long observed in its daily operations.

Upon entering into force, this Code of Conduct is supplemented by the Compliance Policy and the Guideline on Respectful Interaction. The need for further policies and guidelines will be reviewed as appropriate.



Tim Bellen
Managing Partners



Robert Küpper



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I. PRINCIPLES OF CONDUCT

GENERAL PROVISIONS

GOB expects all managing directors, managers and employees to act in accordance with this Code of Conduct.

Violations of conduct requirements, legal provisions, internal policies and rules may have serious consequences not only for the individual concerned, but also for GOB. Deliberate culpable misconduct will therefore not be tolerated.

Furthermore, cooperation within GOB and between GOB and its business partners is characterised by mutual respect and integrity.

WORKING ENVIRONMENT

Respect for Human and Labour Rights

GOB does not tolerate human rights violations. GOB condemns child labour and all forms of forced labour.

GOB respects the rights of all employees to freedom of assembly and freedom of association. GOB complies with statutory minimum wage requirements.

Equal Treatment and Non-Discrimination

GOB embraces diversity and is firmly committed to not discriminating against anyone on the grounds of sex, nationality, skin colour or origin, religion or belief, trade union activity, age, sexual identity or disability.

GOB treats all employees fairly and equally and expects them to treat one another in the same manner. Harassment and bullying have no place at GOB; GOB requires all employees to interact with one another respectfully and collegially.

Occupational Health and Safety

The safety and health of all employees are a fundamental priority in GOB's business activities. All employees ensure compliance with safety regulations in their working environment and, through prudent, forward-looking and safety-conscious conduct, avoid endangering themselves or others.

Environmental Protection

GOB is committed to the responsible and economical use of natural resources. Environmental and climate protection form part of its business activities. As a software company, GOB's opportunities to influence environmental and climate factors directly are naturally limited. GOB therefore pays particular attention to avoiding unnecessary consumption of resources and making effective use of available opportunities to conserve resources.

This includes, among other things, largely dispensing with paper-based processes, using digital work tools efficiently and implementing sustainable measures in the workplace. Examples include the use of an energy-efficient company building equipped with geothermal and solar technology, as well as initiatives to promote biodiversity and environmental awareness. GOB continuously reviews the areas in which further practical improvements are possible and economically viable.



BUSINESS RELATIONSHIPS

Fair and Lawful Competition

GOB believes in fair competition and seeks to succeed through its high standards regarding the quality of its products and services. GOB therefore strictly complies with laws that protect and promote competition, in particular the applicable competition and antitrust laws. Above all, this means that GOB does not enter into price-fixing arrangements or other agreements with competitors that allocate markets or customers or otherwise unlawfully restrict free and open competition. GOB likewise strictly rejects the exchange of competitively sensitive information or advance notification of intended price increases.

Prevention of Corruption

Corrupt conduct by managing directors, managers or employees will not be tolerated. When dealing with customers, suppliers, service providers and public authorities in Germany or abroad, benefits of value must not be granted to business partners or public officials in return for improper preferential treatment.

Such benefits must likewise not be accepted from business partners. These rules are non-negotiable for GOB, even where applying them means that GOB is unable to conclude a particular transaction.

Prevention of Money Laundering

GOB fulfils its obligations concerning the prevention of money laundering. Every employee must help ensure that third parties are not given the opportunity to use business relationships with GOB for money-laundering purposes.

Supply Chain Due Diligence

GOB observes human rights-related and environmental due diligence obligations in its supply chain. GOB expects its business partners to comply with the relevant standards for respecting human rights and protecting the environment. When selecting and evaluating business partners, GOB takes their compliance with these due diligence obligations into account.

INFORMATION AND TRADE SECRETS

Handling of Information

Trade secrets are safeguarded and protected under all circumstances. GOB takes all necessary measures, in particular to protect GOB's IT systems against external access. As an IT company, GOB assigns the highest priority to information security. GOB protects all business-critical data and systems through technical and organisational measures. GOB does not permit external persons to enter its business premises unaccompanied or to have uncontrolled electronic access to GOB data. It is also self-evident to GOB, and contractually stipulated, that information closely connected with GOB's activities must remain confidential even after an employment relationship has ended.

Data Protection

The protection of personal data, particularly that of employees, customers, suppliers and service providers, is of great importance to GOB. GOB collects and processes personal data only where this is legally permissible or where the data subject has given consent.

HANDLING CONFLICTS OF INTEREST

Conflicts of Interest and Transparency

Business decisions are made exclusively in GOB's best interests. Conflicts between the private interests of individuals, including those of relatives or other closely associated persons and organisations, and GOB's interests are to be avoided. Where such conflicts arise, they must be disclosed to GOB and appropriate measures must be taken to resolve them. Employees must disclose any secondary employment and any shareholdings or other interests they hold in competitors or business partners.

Lobbying and Association Activities

GOB always complies with the legal requirements governing permissible lobbying activities. GOB does not improperly influence legislation or politics and, when participating in business associations, strictly ensures impeccable conduct at all times, particularly conduct that complies with competition law.



II. CONSEQUENCES OF VIOLATIONS

GOB does not tolerate violations of the principles of conduct set out above.

All employees must be aware that any violations may also have further serious consequences for GOB.

Accordingly, misconduct or suspected violations will be investigated and pursued consistently and without exception, within the framework of the applicable legal provisions and irrespective of the rank or position of the person acting or affected, and sanctions will be imposed where appropriate.

This Code of Conduct is binding on every employee. Failure to comply with the above rules of conduct may result in serious consequences under civil, criminal and employment law, including termination of employment. All employees are expected to align their conduct with GOB's corporate mission statement, this Code of Conduct and the supplementary policies and guidelines, and to observe GOB's ethical principles in their professional activities.

III.

CONTACT PERSON AND CONTACT DETAILS

GOB encourages all employees to report violations of GOB's compliance framework, or corresponding suspected violations, of which they become aware. GOB's Compliance Manager is the designated contact person for this purpose.

Reports may also be submitted anonymously through GOB's whistleblowing system. The whistleblowing system can be accessed via the intranet.

GOB's Compliance Manager is also available to answer any other questions or receive information concerning the Code of Conduct, GOB's compliance management system or GOB's compliance framework.

If you have any questions or find yourself in a conflict situation, you may contact GOB's Compliance Manager at any time at: compliance@gob.de

IV.

FINAL PROVISIONS

Any supplements to this Code of Conduct in the form of specific policies or guidelines, for example to take account of country-specific requirements, must be observed.

GOB's management is responsible for this Code of Conduct. It applies to all GOB employees, irrespective of the legal basis of their employment.



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