



# Group Policy: Code of Conduct

Version 1.0

**UNICEPTA**

# Contents

1	General document information .....	2
	Formal information .....	2
1.1	Document attributes .....	2
1.2	Document history .....	2
1.3	Original place of storage .....	3
1.4	Communication .....	3
1.5	Aim and purpose .....	3
1.6	Scope of validity .....	3
2	Our values .....	4
3	Our claim .....	5
4	Principles .....	5
5	Laws and regulations .....	6
6	Information Security and Data Protection .....	6
7	Respect and responsibility towards people and the environment .....	7
8	Living the code of conduct / Dealing with breaches of the Code .....	8

# 1 General document information

## Formal information

### 1.1 Document attributes

Attribute	
Document administration	ISB
Author	Jana Schulz
Releaser	Management board Works Council
Release on / from	09.08.2023 from Sebastian Rohwer (Management) 27.07.2023 from Works Council
Confidentiality	public
Last Review	24.07.2023
Review cycle	annual

### 1.2 Document history

Version	Date	Author	Comment
0.1	23.05.2023	Jana Schulz	Initial version
0.2	24.07.2023	Jana Schulz	Editing works council
1.0	09.08.2023	Jana Schulz	Release S. Rohwer

## 1.3 Original place of storage

N:\ISO\_Zertifizierung\Dokumente\Group Policy

## 1.4 Communication

The document is intended for internal and external use. It is to be made known to all employees of the UNICEPTA Group, as well as to all other stakeholders of the UNICEPTA Group.

## 1.5 Aim and purpose

The document lists all general principles and rules for the UNICEPTA Group. All employees must comply with them.

## 1.6 Scope of validity

This document applies to all stakeholders of the UNICEPTA Group.

## 2 Our values

Our values form the foundation of everything we do.

They convey how we work with each other and with our clients.

With our values, we aim to create a positive corporate culture so that all colleagues feel part of UNICEPTA, enjoy working for us, and can develop and grow.



**Together:** At UNICEPTA, the team wins.

We work together! This applies to all employees, regardless of personal and cultural experience, no matter where someone is employed with us, what the tasks are, whether they have been working for UNICEPTA for many years or just a few months.

This also applies to our clients, with whom we have a genuine partnership. We trust each other, work as equals and seek the best solution together.

Whether in a team or with our customers - we are open, we listen and we give each other feedback. Diversity, tolerance and cohesion make us unbeatable.

**Proficient:** At UNICEPTA, we know what we are doing.

We are competent, professional, reliable and we stand up for what we do. We believe in ourselves, are aware of what we can achieve and what responsibility we carry.

What does proficiency mean for us in practice? That we are self-confident and we speak our mind, even on uncomfortable topics. That we openly address mistakes and learn from them.

That we treat each other fairly and take everyone seriously. That we make use of our creative freedom and are proud of our achievements.

**Enthusiastic:** At UNICEPTA, we are passionate about what we do.

We are deeply enthusiastic about our work and give everything so that our clients and all team members are satisfied.

We know exactly what we want and pursue our goals on our own initiative and with inner clarity. We aim to convince through positive thinking, bold decisions and meaningful action. We are convinced that our work creates added value.

We inspire each other and do our job with all our heart. Passion and enthusiasm make us more agile and alive.

## 3 Our claim

UNICEPTA GROUP is aware of its role in society as well as of its responsibility towards its employees, customers, and business partners. The company commits itself to comply with clear principles, which form the framework of UNICEPTA's corporate and social activities.

UNICEPTA GROUP's customers can trust our services to provide them with valuable insights, on which they can base important decisions. Simultaneously, we also demonstrate our aspiration to provide a strong performance and continuously improve our quality and services.

## 4 Principles

UNICEPTA is a member of the United Nation's [Global Compact](#) Initiative and accepts its principles as its own. We comply with these values and support their dissemination with its day-to-day work:

1. Businesses should support and respect the protection of internationally proclaimed human rights; and
2. make sure that they are not complicit in human rights abuses.
3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
4. the elimination of all forms of forced and compulsory labor;
5. the effective abolition of child labor; and
6. the elimination of discrimination in respect of employment and occupation.
7. Businesses should support a precautionary approach to environmental challenges;
8. undertake initiatives to promote greater environmental responsibility; and
9. encourage the development and diffusion of environmentally friendly technologies.
10. Businesses should work against corruption in all its forms, including extortion and bribery.

As a signatory of the Diversity Charter ([Charta der Vielfalt](#)), UNICEPTA is committed to promoting diversity from within the company. We aim to increase the company's recognition, appreciation and inclusion of diversity, and to create a prejudice-free work environment.

UNICEPTA is committed to its corporate responsibility for society. We assume responsibility with our social commitment in selected partnerships and projects. The social commitment of our employees is therefore expressly supported.

## 5 Laws and regulations

Compliance with all applicable laws and regulations is a matter of course for the UNICEPTA GROUP. We conduct our business by legally and ethically sound means and expect the same from our employees, business partners, suppliers and customers.

Employees are obliged to know the basic laws, regulations and internal company guidelines that are relevant to their area. This applies in particular to managers.

In individual countries, there may be stricter regulations than those described in this Policy. In such cases, the stricter regulations must always be applied.

Any form of fraud, embezzlement, theft, misappropriation and tax evasion is prohibited.

We ensure not to violate applicable economic embargoes, sanctions lists or regulations on trade, import and export control or on combating the financing of terrorism.

We do not tolerate any form of bribery or corruption.

Monetary benefits from third parties are prohibited for employees. Benefits may only be accepted within the framework of generally accepted business practices and insofar as these do not influence the entrepreneurial decision.

In its relationships with suppliers, UNICEPTA ensures compliance with the regulations of the Code of Conduct. Therefore, UNICEPTA does not have business relationships with suppliers who are publicly known to violate the principles underlying the Global Compact.

We maintain a correct and legally sound relationship with all governmental and regulatory authorities.

UNICEPTA is party-politically neutral and does not make donations to political parties and organisations or foundations that are affiliated with a political party. However, we clearly distance ourselves from anti-democratic parties and strictly reject cooperation with them.

The protection of intellectual property is of great importance to us.

We conduct our business, record keeping and financial reporting in a proper and transparent manner.

## 6 Information Security and Data Protection

The concerns and requirements of its customers are of the utmost importance to UNICEPTA, as a result of which its main aim when it comes to customer satisfaction is information security. In order to guarantee customer satisfaction, high standards are applied to the availability, confidentiality and integrity of information. These values are to be maintained and constantly improved.

In order to be able to trace and record all activities and functions relating to information security in a transparent manner and in order to be able to guarantee a reasonable scope of protection, senior management identifies itself with the implementation of this information management system (ISMS) according to the ISO/IEC 27001 standard.

Compliance with data protection is an essential element of information security. When collecting, storing, processing or transferring personal data from employees, customers or other third parties, we take the greatest care and observe strict confidentiality as well as compliance with applicable laws and rules.

In everyday business, IT systems are used and data is processed. This requires appropriate security precautions, which are explained in separate policies and instructions. Failure to comply with these measures can have serious consequences, which is why it is essential to follow these instructions. The IT systems provided by the company are only used to fulfil business tasks.

## 7 Respect and responsibility towards people and the environment

UNICEPTA respects the dignity and personality of every employee. In its dealings with each other, UNICEPTA relies on team spirit, respect, openness and diversity. The company is committed to protect and further the development and promotion of its employees, as well as to the creation of equal opportunities.

UNICEPTA honours the right to employee participation and treats the works council with respect.

We strongly oppose any form of discrimination and are committed to the freedom and equality of all human beings without distinction of race, colour, sex, language, religion, political or other opinion, national or social origin, birth or other status.

Diversity is an essential part of UNICEPTA GROUP. We expect our employees to respect the dignity, privacy and personal rights of every person. We do not tolerate discrimination, bullying or insults.

We demonstrate our commitment of these principles by joining the United Nations Global Compact and signing the Diversity Charter.

UNICEPTA promotes occupational health and safety. We expect all our employees to comply with our health, safety and security regulations, promote a safe and healthy working environment and improve our health and safety culture.

The transformation to a sustainable society is one of the key challenges of our time. UNICEPTA is committed to the concept of sustainable development. For us, entrepreneurial action and social responsibility are inseparable. The main goals of corporate environmental protection are the avoidance of climate gas emissions and the protection of resources.



## 8 Living the code of conduct / Dealing with breaches of the Code

All employees are aware of the Code of Conduct and it is available to them on the intranet. They are required to follow the rules. Managers must actively promote the enforcement of this Code.

All employees are encouraged to report violations of this Code. They are assured that they will not suffer any disadvantage as a result of their report.

The following possibilities exist to report (possible) violations:

- Contact our Complaint Center (Beschwerdestelle according to §13 AGG)
- Contact your team manager or your HR contact person.
- Contact the works council
- Write anonymously to the works council via the email address [br\\_anonym@unicepta.com](mailto:br_anonym@unicepta.com)
- Anonymous or non-anonymous reporting via the [whistleblower system](#) for internal and external whistleblowers (Hinweisgeberschutzgesetz (HinSchG)/ Whistleblower Protection Act)

Every report is followed up. If the suspicion is confirmed, this will have consequences under labour law.