



CODE OF CONDUCT FOR BUSINESS PARTNERS

ALLGEIER PUBLIC is committed to lawful, ethical and responsible conduct. This applies both to its own business activities and to its cooperation with customers, business partners and suppliers (Business Partners).

This Code of Conduct sets out the fundamental requirements that ALLGEIER PUBLIC expects its Business Partners to meet. These include, in particular, compliance with applicable laws and regulations, integrity and fair business practices, the protection of data and information, respect for human rights, and responsibility towards employees, the environment and society.

ALLGEIER PUBLIC reserves the right to amend the requirements of this Code of Conduct as appropriate, in particular due to legal, regulatory or organizational changes. The latest version of this Code of Conduct is published on the ALLGEIER PUBLIC website and is available at any time under [Terms and Conditions - Allgeier Public](#).

The Business Partner undertakes to comply with the principles set out below or with equivalent standards of conduct. Furthermore, the Business Partner shall ensure that its employees are informed of the requirements of this Code of Conduct, or equivalent standards of conduct, that are relevant to their activities and are appropriately made aware of or trained on the topics relevant to their duties. Where the Business Partner engages subcontractors, it shall ensure that such subcontractors comply with the requirements of this Code of Conduct, or equivalent standards of conduct, that are relevant to the services they provide.

- **Compliance and Legal Compliance**

Compliance with applicable laws, regulations and applicable standards. Promotion of a corporate culture of integrity, transparency and responsibility as well as appropriate handling of identified compliance violations

- **Prohibition of Corruption and Bribery**
Taking action against any direct or indirect form of corruption and bribery; for example, not granting, offering or promising benefits to a government official or any other counterparty in order to influence official acts or decisions and/or to obtain an improper advantage
- **Prevention of Money Laundering and Terrorist Financing**
Compliance with applicable regulations on the prevention of money laundering and terrorist financing
- **Fair Competition, Antitrust Law and Intellectual Property Rights**
Compliance with national and international competition and antitrust laws. No participation in price fixing, market or customer allocation or other anti-competitive agreements. Respect for and protection of third-party intellectual property rights
- **Conflicts of Interest**
Avoidance of conflicts of interest and prompt disclosure of actual or potential conflicts of interest that may affect the business relationship
- **Data Protection, Information Security, Artificial Intelligence**
Protection of personal data and compliance with applicable data protection laws; protection of information, trade secrets and IT systems through appropriate technical and organizational security measures; artificial intelligence must be used responsibly and in compliance with applicable legal, regulatory and contractual requirements
- **Respect for the Fundamental Human Rights of Workers**
Promotion of equal opportunities and treatment of workers irrespective of skin color, race, nationality, social origin, disability, sexual orientation, political or religious beliefs, gender or age, for example by:

 - respecting the personal dignity, privacy and rights of each individual
 - not tolerating inappropriate treatment of workers, such as psychological hardship, sexual or personal harassment or discrimination
 - not tolerating conduct that is sexually coercive, threatening, abusive or exploitative
 - refusing to employ or require anyone to work against their will
 - ensuring fair remuneration and guaranteeing the applicable national statutory minimum wage
 - complying with working time regulations
 - respecting the right to freedom of association and neither favoring nor discriminating against members of employee organizations or trade unions
- **Prohibition of Child Labor**
No employment of workers under the age of 15, or, in countries subject to the exception under ILO Convention 138, no employment of workers under the age of 14
- **Compliance with Regulations on Temporary Agency Work (German Employee Leasing Act, AUEG), National and Cross-border Employment**
Compliance with legal requirements in connection with temporary agency work as well as national and cross-border employment relationships, in particular labor, social security, tax and residence law requirements
- **Occupational Health and Safety**
Assuming responsibility for the health, safety and well-being of employees, in particular by:

 - implementing appropriate measures to prevent occupational accidents and work-related health hazards
 - regularly informing, raising awareness and, where appropriate, training employees on health and occupational safety topics
 - establishing and maintaining appropriate occupational health and safety measures and processes
- **Environmental Protection and Sustainability**
Responsible use of natural resources and compliance with the applicable environmental regulations. Environmental impacts are to be avoided where possible and continuously reduced. In particular, the following is expected:

 - compliance with applicable environmental requirements
 - responsible use of energy, water and other resources

- avoidance and proper disposal of waste and environmentally hazardous substances
- consideration of environmental and sustainability aspects in business processes
- continuous improvement of environmental performance through appropriate organizational or technical measures
- **Supply Chain and Responsible Procurement**
Promotion of a responsible and sustainable supply chain. When selecting and managing suppliers, the principles of integrity, non-discrimination, human rights, sustainability and legal compliance must be appropriately taken into account. The use of raw materials that directly or indirectly support or finance armed conflicts or serious human rights violations must be avoided
- **Reporting of Violations and Incidents**
The Business Partner shall promptly inform ALLGEIER PUBLIC of any actual or suspected violations of the requirements of this Code of Conduct, as well as any other incidents that affect or may affect ALLGEIER PUBLIC, the business relationship or the provision of the agreed services.
This applies in particular to violations of legal, regulatory or contractual requirements, personal data breaches (especially in the context of processing activities carried out on behalf of ALLGEIER PUBLIC), information security incidents, cyberattacks, the loss, unauthorized disclosure or manipulation of information and data, and any other events that may result in legal, regulatory, financial or reputational risks for ALLGEIER PUBLIC
The following contact points are available for reporting violations and incidents:
 - Compliance matters: compliance@allgeier-public.eu
 - Data protection incidents and data protection-related matters: datenschutz@allgeier-public.eu
 - Information security incidents and IT security events: isb@allgeier-public.eu

Without prejudice to the reporting channels above, concerns regarding actual or suspected legal violations, other serious irregularities or misconduct may also be reported confidentially or anonymously through the whistleblowing system of the **Allgeier Group**.