

Declaration of Principles



Präambel

Actief Holding Germany GmbH (hereinafter referred to as "Actief") with its subsidiaries Actief Group GmbH, Actief Personalmanagement GmbH and ADEM GmbH has been operating successfully and nationwide for more than 3 decades as a reliable partner of various industries in the field of temporary staffing and personnel placement. Actief is one of the 25 leading personnel service providers in Germany and provides industrial and commercial support and specialist personnel as well as experts from a wide range of disciplines.

Sustainable, economic action and the assumption of economic, ecological, social, civil and criminal responsibility are just as much a part of our self-image as compliance with applicable laws and regulations as well as globally valid standards. Our employees are obligated by our guidelines to always act responsibly and with integrity - this is our defining corporate culture.

We also expect the same from our business partners. For this reason, we expect our business partners to comply with all applicable laws and the principles set out in this Code of Conduct in order to ensure a lasting and sustainable relationship. In addition, business partners must make an appropriate effort to ensure compliance with the requirements by their business partners and along the supply chain.

The Code of Conduct is based on national and international requirements and conventions. The maxims of Actief's actions are based on, among other things

- the Universal Declaration of Human Rights of the United Nations (UN),
- the United Nations Guiding Principles on Business and Human Rights (UNGP),
- the conventions and recommendations of the International Labor Organization (ILO) on labor and social standards,
- the Organization for Economic Cooperation and Development (OECD) Guiding Principles for Multinational Enterprises,
- International sanctions lists such as COUNCIL REGULATION (EC) No 2580/2001 of 27 December 2001 (*) on specific restrictive measures directed against certain persons and entities with a view to combating terrorism.

Compliance with the following requirements is considered to be the basis for a successful business relationship between Actief and its business partners.

1. Social principles

1.1 Working conditions

Actief and its business partners comply with all applicable legal requirements regarding working hours and remuneration. Employment relationships are based exclusively on valid employment contracts. The payment of social security contributions, wages and salaries as well as the contractually agreed additional benefits shall be made in full and on time. All applicable regulations regarding working hours, overtime and vacation shall be observed. Wages and salaries and overtime shall be paid at least on the basis of the statutory minimum wage. The workplaces and company apartments are clean and all state-of-the-art protective measures have been taken to exclude health hazards.

1.2 Equal opportunities and non-discrimination

Actief and its business partners comply with the regulations of equal opportunity and the prohibition of discrimination. Discrimination based on gender, origin, race, skin color, religion, age, disability, sexual orientation or other factors is absolutely prohibited. A non-discriminatory work culture characterized by mutual respect and trust is encouraged. The provisions of the General Equal Treatment Act (AGG) are observed without exception throughout the entire employment relationship. Hiring of employees and promotions are decided on the basis of personal qualification and suitability.

1.3 Forced labor and child labor

Actief and its business partners reject all forms of forced labor, human trafficking as well as child labor. Each employee performs work voluntarily and not under threat of punishment. Business partners shall strictly comply with applicable laws and regulations regarding the minimum age for employment or work.

1.4 Freedom of association and collective bargaining

Actief and its business partners support the right of workers or their respective organizations to negotiate and conclude collective agreements at the appropriate levels and to take collective action to defend their interests in the event of conflicts of interest. Workers shall not be discriminated against on the basis of formation, affiliation or membership in such an organization.

1.5 Safety and health at work

Actief and its business partners comply with all applicable laws and regulations on occupational health and safety. Appropriate occupational health and safety systems shall be in place to take necessary precautions against health hazards and accidents.

2. Ecological principles

Actief and its business partners comply with all national and international laws and regulations for the protection of the environment. Careful use of resources, reduction of energy consumption and prevention of pollution and waste are prerequisites for responsible business practices. Business partners are expected to identify and minimize potential environmental risks through an efficient system.

Actief and its business partners comply with all applicable product safety regulations and requirements, particularly with regard to the safety, labeling and packaging of products and the use and disposal of hazardous substances and materials, and proactively inform Actief about environmental and safety aspects of their products.

3. Ethical principles

3.1 Relations with business partners and competitors

Actief is committed to open markets and fair competition and undertakes to comply with antitrust regulations. Business partners must therefore behave ethically, honestly and fairly. Any conduct that may serve to restrict or prevent competition is excluded.

3.2 Corruption and bribery

Actief and its business partners act honestly, fairly and transparently. We classify as corruption any behavior in which a person misuses the power or position of trust entrusted to him or her to obtain advantages for himself or herself or a third party. In relations with domestic and foreign, public or political officials, representatives of organizations or the private sector, business partners and their employees are prohibited from offering, promising, providing or receiving anything of value or financial benefits. This includes offering or receiving gifts, hospitality and services if it can be assumed that this may influence business conduct or business transactions. Thus, extortion, bribery or corruption is expressly prohibited.

3.3 International Trade Bans and Boycotts

Compliance with national and international trade and boycott regulations for employment relationships, exports, imports, transports and currencies is expected from business partners and their employees.

3.4 Money Laundering

Actief and its business partners comply with relevant legal obligations regarding money laundering and do not engage in money laundering activities. Business relationships are only maintained with business partners whose integrity is not in doubt.

3.6 Data protection

Actief and its business partners process personal data in compliance with the Data Protection Regulation (DSGVO). Furthermore, they strictly comply with all applicable laws and regulations on data protection and information security and protect in particular the personal data of customers, suppliers as well as employees.

3.7 Business Secrets

Business partners shall strictly maintain the confidentiality of Actief's information. This includes e.g. financial or price data as well as corporate strategies. Furthermore, any direct or indirect use of confidential business information, such as customer data, for the personal benefit of an employee or a third party is prohibited. These confidentiality obligations do not end with the termination of the employment relationship. This is documented, among other things, by a corresponding confidentiality agreement.

4. Consequences in case of violations

Actief considers compliance with the requirements formulated in this Code of Conduct as essential for the respective business relationship. If a business partner does not comply with these requirements, Actief reserves the right to take appropriate legal steps up to the termination of the business relationship.

It is in Actief's discretion to waive such consequences and to take alternative measures instead, if the business partner credibly assures and can prove that he has immediately initiated countermeasures to prevent future similar violations.

5. Reporting violations

Business partners are obliged to set up an effective complaints procedure. The use of the whistleblowing system must be subject to confidentiality and be accessible to all employees. This shall provide employees with the opportunity to report unlawful conduct and voice complaints without fear of being discriminated against.

Any person who wishes to report a violation of the Code of Conduct or a suspected violation of the law may submit the report to Actief by e-mail to risikomanagement@actief-group.de.

6. Reviews by Actief

Actief reserves the right to verify compliance with the requirements by appropriate means. This verification can be carried out by means of questionnaires / self-disclosure forms or by the use of experts on site. Such an on-site audit shall only take place after prior notice and in the presence of representatives of the Business Partner during regular business hours and in compliance with applicable law, in particular with regard to data protection. Any identified non-compliance with the sustainability requirements in the supply chain of a Business Partner shall be assessed by the Business Partner within a reasonable period of time and remedied on its own responsibility without any additional costs for Actief.