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# Code of Conduct

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## FOREWORD BY THE MANAGEMENT

At Valyue Consulting, we strive for exemplary quality in products and processes, but also in our behavior. Our corporate values form the basis for this. Because we are firmly convinced that respecting and upholding our Valyue values will continue to be the basis of our success in the future.

Committed to these Valyue business principles, we have established rules and procedures within our company to ensure that we can all live up to these high standards we set for ourselves.

These rules and procedures are constantly updated and adapted to current and legal requirements. They are accessible to all employees.

These principles are divided thematically into:

- Guidelines on working conditions and human rights,
- Guidelines on work and health protection,
- guidelines on company ethics, and
- Guidelines on environmental protection.

These guidelines are summarized in our Code of Conduct, which we also require of all business partners.

The following Code of Conduct therefore provides an overview of the most important contents of the abovementioned guidelines for us with regard to cooperation within the company and with external business partners, such as customers, suppliers, other business partners and the public. Strict compliance with these rules is one of the principles of good corporate governance for us, which is why we commit ourselves and all our employees to observing them.

**Ulrich Walenczak**

Managing Director

## 1. INTRODUCTION

**The trust placed in our company by our customers, suppliers, business partners and the general public depends to a crucial extent on the conduct of each individual employee.**

**The basis for this trust is constant respect for the law and all our internal rules. In return, we call on all business partners to comply with these rules as well.**

Valyue is aware of its responsibility to society and acts accordingly. We recognize the joint responsibility of the company and our employees for the common good. Therefore, with this Code of Conduct, we summarize the most important rules and thus continue the culture of honesty and decency that we have practiced for a long time.

At the same time, we provide each employee with a guideline to support him in acting on his own responsibility and in the best interests of the company. This personal responsibility is both a right and a duty. Each employee is responsible in his area of responsibility for ensuring that his conduct always complies with the rules summarized here. Due to their function as role models, we require our managers not only to communicate these rules, but also to set an example and demand that their employees comply with them. Our managers are the first point of contact for their employees in all matters relating to this Code of Conduct.

As a matter of principle, we comply with the laws of the countries in which we operate. This is in line with our fundamental values and applies regardless of any threatened penalties. Actions that are contrary to the law are not in the interest of our company because they are unethical, lead to serious damage to our reputation, and can result in criminal prosecution, damages, and loss of contracts.

Employees who act unlawfully must be aware that they themselves are at risk of prosecution. Acting in accordance with the law therefore serves the employee's own protection. Every employee is therefore obliged to inform himself about the regulations applicable in his area of responsibility and to comply with them. In cases of doubt, the manager must be consulted for clarification.

## 2. WORKING CONDITIONS AND HUMAN RIGHTS

Valyue is aware of its responsibility to society and acts accordingly. We recognize the joint responsibility of the company and our employees for the common good. For this reason, we are committed to the United Nations Universal Declaration of Human Rights and actively advocate compliance with it.

### 2.1 Working conditions

Productivity and humanity together are indispensable for sustainable corporate success. Valyue's economic success can only be ensured through and with our employees. For this reason, the following regulations apply.

#### 2.1.1 Wages and social benefits, working hours

Wages, salaries, social benefits and other claims arising from the employment relationship are settled directly by us in accordance with the statutory regulations after the end of each pay period. A statutory minimum wage may never be undercut. All overtime will be worked voluntarily by the employee and compensated accordingly. The maximum weekly working time must be respected.

#### 2.1.2 Freedom of association and assembly

The right of our employees to freedom of association and collective bargaining, as well as the right to form interest groups, are respected. An employee must not suffer any disadvantages as a result of being a member of a trade union.

### 2.2 Regulations on the observance of human rights

We therefore have a zero tolerance policy towards the use of child labor, forced or compulsory labor and human trafficking, as well as harassment and discrimination. Should a violation of any of the following regulations by one of our employees or business partners become known, immediate and without notice termination or liquidation of the employment or business relationship will follow. To ensure compliance with human rights, the following principles apply to us.

#### 2.2.1 Child labor and young workers

We do not tolerate child labor. Any activity that could endanger the development of young employees is prohibited.

### 2.2.2 Forced or compulsory labor and human trafficking

Any activities in our work environment are performed by our employees voluntarily and without force or threat of punishment. Forced labor, debt bondage, involuntary prison labor and slavery or human trafficking should not be used by any company and are strictly condemned by us.

### 2.2.3 Harassment

We respect and protect the dignity of our employees and treat them with respect. We are committed to ensuring that all employees can work in an environment free from sexual, psychological and physical harassment.

### 2.2.4 Non Discrimination

We offer equal opportunities to all employees and, as a matter of principle, do not tolerate any kind of discrimination based on ethnic origin, national and social origin, gender, religion or belief, political opinion, disability, age, sexual identity or any other reason.

## 3. WORK AND HEALTH PROTECTION

The protection of our employees is our top priority. For this reason, we have established extensive regulations on occupational safety, which are regularly trained. Every manager is responsible for knowing the safety regulations and instructing his employees accordingly or ensuring that they are instructed by third parties. All employees are equally responsible for ensuring consistent compliance. For more detailed information on occupational health and safety, please refer to the occupational health and safety directive.

### 3.1 Workplace conditions and environments

We ensure a safe and health-preserving working environment. This includes in particular the following fields of action.

#### 3.1.1 Use of operating equipment

As a precautionary measure against occupational accidents, all company facilities and equipment may only be used for the corresponding official purposes, unless private use is expressly permitted. All facilities are to be handled responsibly in order to protect tangible and intangible assets and to ensure their safety.

#### 3.1.2 Workplace ergonomics

In addition, we set up all workplaces in accordance with legal, safety and occupational health regulations so that work can be performed without accidents and with minimal stress.

#### 3.1.3 Health Promotion

We support this by providing ergonomic equipment and protective gear as well as preventive programs and health promotion measures that maintain and promote the health, performance and job satisfaction of our employees.

### 3.2 Accident and incident management

Our accident and incident management is based above all on the principle of prevention. In addition to the above-mentioned regulations for the direct occupational health and safety of our employees, this includes above all protection against fire, accidents and toxic substances.

### 3.2.1 Emergency Preparedness

We achieve protection on the one hand through preventive measures. These include clear work instructions and regulations on accident prevention. These are supported by various technical facilities. On the other hand, we achieve this protection through regular emergency training as part of our regular occupational safety instructions, participation in which is mandatory for all employees.

### 3.2.2 Accident report

Should an occupational accident or other malfunction nevertheless occur, this must be reported and documented immediately. The accident report must include the course of the accident, the consequences of the accident, the cause of the accident and the measures planned to prevent similar accidents in the future. These measures should be implemented as quickly as possible.

### 3.2.3 Fire protection

Behavior in the event of a fire is also taken into account in safety instruction. All our facilities and equipment are designed to minimize the risk of fire.

## 4. COMPANY ETHICS

High professionalism and absolute integrity represent a fundamental requirement alongside the high quality of our projects and services. It is therefore of the greatest importance for us to always make business decisions on the basis of objective criteria such as quality, reliability, competitiveness and with due regard for recognized compliance standards and the principles of good corporate governance. principles.

### 4.1 Dealing with business partners and third parties

#### 4.1.1 Corruption, extortion and bribery

We have a zero tolerance policy towards all forms of bribery, corruption, extortion and embezzlement that constitute an abuse of power for personal gain or to distort competition.

#### 4.1.2 Fair competition

We observe the rules of fair competition and support all efforts to enforce a free market and open competition on a national and international level. We therefore refrain from any order that can only be obtained by violating laws or other relevant regulations. In particular, agreements on prices and conditions, the sharing of markets and regions, the allocation of

customers and the coordination of supply, development or production strategies as well as concerted practices are prohibited.

#### 4.1.3 Money laundering

We ensure that the relevant legal provisions against money laundering, which is the smuggling of illegally generated money or illegally acquired assets into the legal financial and economic cycle, are complied with.

#### 4.1.4 Export controls and economic sanctions

We comply with all applicable import and export control laws, sanctions and embargoes that impose restrictions on exports or re-exports to certain destinations and prohibitions on transactions involving certain restricted countries, regions, organizations and individuals.

#### **4.2 Conflicts of interest**

We strictly separate business and private interests. We make our decisions on the basis of a solid factual judgment, which is not clouded by favoritism resulting from personal relationships and opinions. Business partners must not be favored in business decisions based on private interests. In addition, our employees do not use their employment with Valyue to obtain private benefits. Secondary business activities require the prior approval of management.

#### **4.3 Transparent handling and protection of information**

##### **4.3.1 Financial responsibility**

We document all significant business transactions in a traceable and timely manner. Financial records must be prepared in accordance with applicable law and generally accepted accounting principles. Both internal and external reports must be accurate and complete so that the recipient can form an accurate impression. Documents needed for internal inquiries or government investigations are not to be destroyed, removed, or altered.

##### **4.3.2 Publication of information**

Accordingly, we disclose information in accordance with applicable regulations and customary industry practices.

##### **4.3.3 Data privacy**

We use personal data of our employees and contractual partners exclusively for the purposes for which they are provided to us and treat them confidentially. We also use and protect non-personal data resulting from a business relationship in an adequate manner. Through our privacy policy, we also ensure that data worthy of protection is collected, processed, secured and deleted appropriately. Confidential content will never be published, disclosed to third parties or made available in any other form without authorization. ([www.valyue.de/Datenschutz](http://www.valyue.de/Datenschutz))

#### 4.3.4 Preservation of identity and protection against retaliation

We also place particular importance on protecting against retaliation and safeguarding the identity of employees, business partners or other third parties who report known or suspected misconduct or violations. Reporting cases of violations or suspected violations may in no case result in negative or repressive measures for the reporter.

#### 4.3.5 Patents and business secrets

The continuous further development of our proprietary technologies and improvements in our know-how are essential for maintaining competitiveness. No employee or business partner therefore may disclose new findings, confidential information or trade secrets to third parties in any form. This also applies after termination of the employment or business relationship.

## 5. ENVIRONMENTAL PROTECTION

We understand environmental protection to mean the protection of all natural resources, such as water, air or energy. This includes the following principles, compliance with which is the central task of every employee. But we also require our business partners to comply with these standards:

- Compliance with relevant environmental regulations, standards and thresholds,
- Protection of environmental elements from harmful effects,
- Avoidance or prevention of environmental damage,
- Minimizing the amount and hazardousness of waste,
- Minimization of material and energy consumption.

### 5.1 Management of natural resources

#### 5.1.1 Energy efficiency and resource consumption

In all work and activities, we try to keep the consumption of energy and other resources as low as possible. This also applies to all external companies working in our plant. In particular, this concerns air pollution control, the minimization of greenhouse emissions as well as water protection. In order to exclude environmental pollution, all equipment and vehicles are always kept in perfect technical condition.

#### 5.1.2 Waste prevention

All processes are designed to waste as few resources as possible and therefore keep waste to a minimum. We also use renewable energy and recycled resources, which further reduces the waste generated by our operations.

## 6. SCOPE AND IMPLEMENTATION

This Code of Conduct is binding for all Valyue employees. Our managers have a special responsibility. They are called upon to exemplify the rules of conduct and values of Valyue described in this Code and are the first point of contact when their employees have questions about the correct behavior in individual cases. It is also their responsibility to ensure compliance with this Code within their area of responsibility. In addition, we also require compliance with the Code from all business partners.

Questions regarding this Code or the proper conduct in individual cases will be answered by the respective supervisor or the management. Violations of this Code will not be tolerated and will result in disciplinary action. These range from a warning to termination of the employment or business relationship. All indications of such violations will be investigated. In the case of information provided in good faith, the person providing the information will be treated confidentially.

## INFORMATION ABOUT THE DOCUMENT

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**References and referrals :**

- Valyue Consulting Leitbild V1.0
- Richtlinie zu Arbeitsbedingungen und Menschenrechten V1.0
- Richtlinien zum Arbeits- und Gesundheitsschutz V1.0
- Richtlinie zur Unternehmensethik V1.0
- Richtlinie zum Umweltschutz V1.0

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