

# CODE OF CONDUCT & SUSTAINABILITY

## Preamble

Our aim is to embed an understanding of sustainable corporate governance throughout the entire company. Six areas of action, which also structure this Code of Conduct, ensure that all our sustainability measures are better recognised and managed:

- Fair Business Practices
- Sustainability
- Labour Practices
- Human Rights
- Health and Safety

This Compliance and Sustainability Policy (the „Policy“) sets out our commitment to comply with all applicable laws, regulations and industry standards and to conduct our business in an environmentally and socially responsible manner.

## Compliance with Laws and Regulations

We are committed to complying with all applicable laws, regulations and industry standards, including those related to corruption, money laundering, sanctions, data protection and other areas. We will not engage in illegal or unethical practices or do business with parties that engage in such practices.

## Sustainability

We endeavour to conduct our business in an environmentally and socially responsible manner. Preamble We recognise the importance of sustainability and will work to minimise our environmental impact and promote sustainable practices in our operations. We will also endeavour to work with

suppliers and other business partners who share our commitment to sustainability.

## Implementation and Monitoring

This policy is implemented and monitored by our Sustainability Officer (SO). We will regularly review and update this policy to ensure that it remains current and effective. Violations of this policy will be investigated and appropriate action taken, including termination of employment or business relationships.

Our employees, contractors and other parties acting on behalf of our company are encouraged to report violations of this policy to the Commissioner. We will not tolerate retaliation against any person who in good faith reports a suspected violation of this policy.

## Our mission statement

The customer is at the centre of our activities. Our goal is a long-term relationship based on partnership. It is important to know the needs of the individual customer and to work accordingly. Satisfaction is the source of mutual success. Exchange means give and take.

**INNOFACT** pursues a systematic and organised process here. The company is committed to an open and constructive dialogue, in which it systematically contributes its interests. At the end of this process, there should be at least a mutual understanding of the different starting points and positions - or even better, an understanding of what a jointly targeted solution could look like, ideally supported by a joint project.

## I. Fair business practices

The following guidelines for fair business practices apply at **INNOFACT**:

### Business relationships

**Trust, fairness and a high degree of independence in business decisions characterise our dealings with business partners. Private interests and personal advantages must not influence our business decisions.**

### Active corruption

**INNOFACT condemns bribery and corruptibility, the acceptance and granting of advantages, fraud, money laundering and anti-competitive**

**practices. In order to maintain the trust of our customers, we refrain from any form of corrupt behaviour and avoid even the mere appearance of it. We may not offer, promise or grant unauthorised benefits to members of the public sector in Germany or abroad or to decision-makers in private companies in order to achieve favourable conduct or a favourable decision for INNOFACT AG. We must pay particular attention to this in the case of gifts and invitations to business meals and events.**

### Business relationships with competitors

**INNOFACT AG** is committed to free competition as an elementary component of the market economy - because it promotes efficiency, economic development and innovation.

### Business relationships with third parties

**In all business agreements and all business relationships with third parties, we pay particular attention to the legal requirements for safeguarding free competition. This applies in particular to agreements with competitors and other third parties if these agreements jeopardise competition.**

We do not participate in price fixing or prohibited coordination of market behaviour between competitors.

We are committed to fair dealings with our business partners and competitors and do not abuse existing room for manoeuvre. We also do not disseminate false information about our competitors' products and services or attempt to gain a competitive advantage in any other unfair way.

We expressly reject competitive espionage as a means of unfairly obtaining information about our competitors. In this context, we naturally also respect intellectual property rights.

### **Business relationships with suppliers**

**We maintain trusting and fair business relationships with our suppliers. Conversely, we expect our suppliers to treat us with the same respect and integrity that we show them.**

**Purchasing acts in accordance with the laws and regulations of the countries in which we operate. Suppliers are often also customers. We do not take unfair advantage of this and always separate the procurement and sales sides.**

### **Passive corruption**

**We make our business decisions exclusively in the interests of INNOFACT AG and put private interests to one side. We must not allow ourselves to be influenced in our business decisions by being offered or promised unauthorised advantages by suppliers and customers or by accepting such advantages. Nor do we demand unauthorised advantages from them. We want to avoid even the appearance of allowing our-**

**selves to be influenced in business decisions by benefits.**

**If gifts are offered by third parties, these may only be accepted if they are common practice and can be recognised as a courtesy or favour (promotional gifts with the logo of the giving company, such as calendars or pens). The Compliance Officer or management must be informed in the case of gifts whose value exceeds the usual amount.**

### **Data protection**

We protect the data and privacy of consumers/customers. At the same time, all business information of our partners and their trade secrets are treated sensitively and confidentially. We attach great importance to data protection and the confidentiality of the information entrusted to us. We will process your data in accordance with the provisions of the applicable data protection laws and are committed to taking appropriate data and IT security measures.

We will process your data in accordance with the provisions of the applicable data protection laws and are committed to taking appropriate data and IT security measures.

## Intellectual property

Intellectual property rights must be respected; technology and expertise must be transferred in such a way that intellectual property rights and customer information are protected.

## Avoidance of conflicts of interest

**INNOFACT AG** trusts that the personal interests of its employees do not conflict with the interests of the company.

## II. Sustainability

INNOFACT supports a sustainable corporate policy that focuses on the needs of today's society without jeopardising the opportunities of future generations. We fulfil our responsibility and comply with legal regulations and guidelines. All our processes are regularly reviewed and optimised with regard to resource and environmentally friendly implementation.

### Environment

**Where possible, team and customer events are always planned and organised with sustainability in mind. Free drinks for our employees and visitors are always purchased in returnable bottles.**

**INNOFACT AG endeavours to take environmental aspects into account in all processes. This includes in particular**

- Energy consumption and CO2 emissions
- Water consumption

- Waste management
- Promotion of sustainable consumption
- Reduction of energy consumption through awareness programmes for employees
- reduction of energy consumption by largely dispensing with air conditioning.
- Monitoring of direct CO2 emissions
- Measures to optimise transport and to reduce transport-related CO2 emissions: Utilisation of CO2-neutral shipping options.
- Measures to reduce CO2 emissions from business travel emissions from business travel (always check the extent to which teleconferencing or video can replace business trips)
- reduction of water consumption through awareness programmes
- awareness programmes for employees
- reduction of waste through employee awareness programmes
- Awareness programmes for employees
- There are implemented working procedures for recycling
- recycling of paper, cardboard and carton waste to recycle toner and ink cartridges

## Social standards

We support social and ecological organisations recognised for sustainability. As a responsible company, we take care of our employees. Good cooperation, parental leave, flexible working hours, home offices and regular training are part of our everyday life.

## Governance

We develop sustainable solutions in the field of market research and adhere to recognised standards. Our management acts as a role model in all aspects of sustainability. We are convinced that our efforts towards sustainability will further improve our competitive position in the long term. We review our sustainability principles at least once a year and adjust them if necessary.

## III Working practices

We work for the daily success of **INNOFACT AG**. We must respond to each individual. We take our responsibilities seriously and focus on promoting health, competence and commitment.

## Compensation

We offer our employees compensation and benefits that are fair and competitive. Our remuneration is in line with or exceeds industry market rates, ensuring a decent standard of living for our employees and their families. Our remuneration systems are linked to the performance of the company and individual performance. The pension scheme is an important element in our total remuneration packages.

## Further training and working hours

**Access to qualification and training programmes is based on the principle of equal opportunities for all employees. We comply with all applicable laws and agreements on working hours and paid absences.**

**We respect the right to rest and leisure, including paid holidays, and the right to family life, including parental leave and similar arrangements. Where possible, we endeavour to introduce more flexible working hours and forms of work in order to enable our employees to reconcile their work at the company with their private needs.**

**Overtime is only permitted if it is voluntary and does not exceed 12 hours per week, while employees must be granted at least one day off after six consecutive working days. The weekly working time may not regularly exceed 48 hours.**

## Forced labour

No forced labour, slave labour or comparable work may be used. All labour must be voluntary and without threat of punishment. Employees must be able to terminate their work or employment relationship at any time. Furthermore, there must be no unacceptable treatment of workers, such as psychological hardship, sexual harassment and humiliation.

## Freedom of association

The right of employees to form and join organisations of their choice, to engage in collective bargaining and to strike must be respected. Employees must not be discriminated against on the grounds of founding, joining or being a member of such an organisation. Workers' representatives must be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner.

## IV Human Rights

**INNOFACT** supports the United Nations Universal Declaration of Human Rights. The promotion of human rights standards in all business activities is in line with our company's values and management principles.

Our determination to promote the realisation of human rights is supported by our Corporate Compliance Policy. We pursue a clear policy of uncompromising condemnation of child labour in all our business activities.

**INNOFACT** firmly believes that respect for people is essential for exemplary business operations. With this position, we reaffirm our commitment to compliance with internationally recognised principles in the areas of human rights and working conditions. We expect the behaviour of our employees and business partners to reflect this commitment.

**INNOFACT AG**, Düsseldorf, den 23.01.2024