

Code of Conduct

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1. Preface on the importance of the Code of Conduct

All employees (as well as members of the management board) of the company Objective Software GmbH are bound by this Code of Conduct. It lays out the values, basic principles and course of action that determine all corporate activities of Objective Software GmbH. Responsible and ethical behavior towards employees, business partners, the society and the environment are an inherent part of our value system. The objective of the executive management is the compliance with ethical norms and the creation of a work environment that promotes integrity, respect and fairness.

It goes without saying that we conduct our business in compliance with laws and regulations. Violations are not only inconsistent with our values; they are also harmful to our reputation and can lead to significant legal consequences. Individuals who act in an unlawful manner, or even enrich themselves at the expense of the company, are harming the company, its shareholders and its employees. Such behavior diminishes the company's financial success, hampers its capacity to invest and grow, and can ultimately jeopardize the jobs it provides.

The Code of Conduct serves as a common guideline for our decisions and our actions. It outlines binding minimum standards for responsible behavior toward business partners and the public, as well as for our behavior within the company. By heightening awareness of legal risks it will help prevent any violations of relevant laws. All of us—Supervisory Board, Executive Board, and employees—are obligated to adhere to the principles laid out in this Code.

This Code of Conduct was approved by the management board of Objective Software GmbH.

2. Principles

2.1 Compliance with applicable law

Compliance with all applicable local, national and international laws and regulations wherever we do business is critically important to the success of our companies worldwide. The violation of laws and regulations can have severe consequences, such as criminal convictions, fines and reputational damage.

All managers are obligated to be familiar with the basic laws, regulations and corporate policies that are relevant to their areas of responsibility. Comprehensive knowledge of applicable laws and corporate policy is especially important for those managers who, because of their specific functions or appointed positions, have a special responsibility for ensuring compliance (e.g., managing directors, managers in Compliance, Finance, Human Resources, Legal, Audit, Risk Management).

In specific countries, industries or markets as well as with specific business partners, stricter rules than those described in this Code of Conduct may exist. In such cases, employees should assume that the stricter standard applies.

2.2 Freedom to speak without fear of retaliation

Being able to speak freely helps to prevent misconduct, and to detect and correct it, should it occur. We therefore value an open work environment where employees can approach their supervisors or management to raise issues or voice criticism without any concerns. Managers are responsible for encouraging open dialogue and for supporting their employees and addressing their concerns in a fair and impartial manner.

Intimidation or retaliation against employees who in good faith provide reports of suspected or actual misconduct must not be tolerated. Reporting misconduct “in good faith” means that an individual believes that what he or she is asserting is true, whether a subsequent investigation proves that report to be true or not.

2.3 Respectful treatment

We treat each other in a mutually respectful and trusting manner and seek to create a workplace environment that does not allow for discrimination.

Every individual is entitled to fair, dignified and respectful treatment. We are committed to equal opportunities and encourage a respectful and diverse workplace in which each individual’s unique value is recognized and each person is treated with courtesy, honesty and dignity. Harassment, bullying or intimidation is prohibited.

All decisions with respect to recruiting, hiring, disciplinary measures and promotion as well as other conditions of employment must be administered free from any illegal discriminatory practices. We do not tolerate discrimination against employees or applicants for employment because of race, national or ethnic origin, gender, pregnancy, marital or parental status, age, disability, religion or belief, sexual orientation or any other characteristic specified under applicable anti-discrimination law or company policy.

2.4 Conflicts of interest

We disclose potential or actual conflicts of interest in the workplace in a timely manner for proper review and resolution.

In our daily business we may be faced with situations in which a decision that is in the best interest of the company competes with our personal interests. A conflict of interest can make it difficult for an individual to make impartial decisions that are in the best interest of the company.

Employees with a real or potential conflict of interest must disclose it to their manager or their company’s senior management for prompt resolution.

2.5 Protection of company assets & anti-fraud

We value the responsible use and handling of any tangible or intangible company assets, such as products, work materials, IT equipment, or intellectual property.

Company assets should be used only for their intended business purposes and not for improper personal, illegal or other unauthorized purposes.

Every form of fraud is prohibited, regardless of whether company assets or third-party assets are affected. Adequate control measures should be in place to prevent any form of fraudulent activity (e.g., fraud, embezzlement, theft, misappropriation, tax evasion or money laundering).

2.6 Interactions with business partners

We act with integrity in our dealing with others, and also expect our business partners to obey the law. This demands that we know our contractual obligations to our business partners. We in turn take care that our business partners' practices are based on respect for the law.

National and international laws regulate the import, export or domestic trade of goods, technology, services, the handling of specific products, as well as capital movements and payments. Adequate procedures must be used to ensure that transactions with third parties do not violate current economic embargoes or regulations of trade, import or export controls, or regulations for the prevention of terrorism financing.

2.7 Product safety

We see ourselves as partners with our customers. Our business success is supported by a long-lasting relationship with our customers. We are, therefore, committed to providing our customers with safe, high-quality products and services.

Our products and services must not contain defects or unsafe features that could lead to the endangerment of health or damage to property.

3. Handling of information

3.1 Data privacy & protection

When we collect, retain, use or transmit personal data (e.g., names, addresses, phone numbers, dates of birth, health information) relating to employees, or customers or other third parties, we do so with great care and sensitivity and in compliance with applicable law and policy.

Personnel involved in the collection, retention, use, or transmission of personal data receive advice and support from the responsible legal departments and corporate data protection officers.

3.2 Financial integrity

All transactions and records relating to our business must be maintained and handled accurately and appropriately. All transactions, assets and liabilities must be properly documented and recorded in accordance with the legal requirements.

Maintaining recordkeeping integrity requires applying high standards of accuracy, completeness and accountability in all business dealings (HGB § 238 Abs. 1).

3.3 Confidentiality

Confidential information is information that is intended for the named recipient(s) only, not for internal dissemination or external release. It may involve records, reports, contracts, financial and personnel data, investigations, lawsuits, creative work, intellectual property, or new business plans or products, and may appear in many different forms (digital, physical, etc.).

Discussing confidential information in public places or engaging in unauthorized sharing of company or customer information with third parties—for example, with the media or the competition—constitutes a breach of confidentiality and may constitute a violation of applicable antitrust laws.

Employees with access to especially sensitive information (financial, human resources, legal, new product development, insider information on other companies, etc.) must observe strict confidentiality even with colleagues, and should seek legal advice before disclosing any such information to third parties. In such instances, it is important to evaluate whether to enter into confidentiality agreements.

Upon commencement of the work contract, all employees shall sign a non-disclosure agreement (NDA).

When using social media we are aware of our responsibility to our company's reputation. We do not share confidential or sensitive company information and respect the privacy of our colleagues and business partners.

3.4 Information exchange

We ensure a quick and smooth exchange of information within the company. Information is passed on accurately and completely to other departments, as far as there are no priority interests (for example secrecy) in exceptional cases. Relevant knowledge must not be unrightfully withheld, distorted or forwarded selectively.

4. People & Environment

4.1 Human rights, health & environment

We respect the dignity and individual rights of employees and third parties with whom we have business relations.

We uphold both the right to freedom of association and the right to engage in collective bargaining in accordance with applicable laws and regulations. We condemn forced or child labor and any form of exploitation or discrimination and strictly comply with applicable laws.

We strive for environmentally responsible procurement and use of natural resources (energy, water, materials and land) in the production and distribution of our products and the performance of our services.

We will provide a healthy and safe workplace for our employees by complying with all applicable health and safety laws and standards. Managers in particular must ensure that appropriate health,

safety and security practices and safeguards are in place to comply with applicable laws and management standards.

4.2 Fair working conditions

We comply with legal requirements for the protection of fair working conditions, including those regulating compensation, working hours, and privacy.

5. Implementation and monitoring

The rules that are laid down in our Code of Conduct form the core of our corporate culture. A uniform compliance with those principles is essential. Every single employee is responsible for making this happen.

Many concerns about workplace conduct can be resolved by raising them constructively with the persons directly involved or by seeking assistance from local contact persons. Other issues, such as illegal business practices, might be better addressed with somebody outside your local environment.

Retaliation against employees who raise concerns in good faith about suspected misconduct is prohibited. Employees who experience retaliation should contact the Data protection officer.

6. Your contacts for the Code of Conduct

6.1 Approach

If an employee has concerns or complaints about this Code of Conduct or knowledge about possible breaches of the herein included conduct guidelines, he or she is required to promptly inform his or her superior for clarification. This can take place in an anonymous or confidential way. If an employee is unsatisfied with the clarification, he or she may also inform HR.

6.1 Contacts in your immediate working environment

You can contact a person in your immediate working environment to discuss questions regarding the Code of Conduct or to report violations; for instance:

- > Your supervisor
- > The senior management of your company
- > The Human Resources, Legal, Finance or Audit departments, or, if applicable, your employee representatives.

7. Responsibility

All employees as well as the members of the management board of Objective Software GmbH are bound by the provisions of this Code of Conduct. Violation against this Code of Conduct will have consequences. In serious cases this may lead to a termination of the employment.

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please go to www.objective.de.