



# Code of Conduct

ENGLISH

## DEAR EMPLOYEES,

QUiNFOS stands for responsible entrepreneurship, and we draw our strength from the diversity of business and revenue models in Business Information and Solutions. Companies affiliated with QUiNFOS make use of their digital products, data, and services to increase market transparency and provide a framework for legally compliant action. Therefore, responsibility, integrity, and sustainability are a fundamental part of our culture, and this is what we stand for as a management team.

Our cooperation is characterized by mutual trust and appreciation, which we also show to our business partners and expect from them in our cooperation. We do not condone any violations of the law and do not tolerate discrimination or harassment.

Our **Code of Conduct** provides us with important information and guidance and is intended to help us make the right decisions in our day-to-day business, also regarding our business partners. We are convinced that the combination of entrepreneurial action and ethical principles is one of the pillars of our success. It is our goal to protect and maintain this reputation. By acting consistently in accordance with our corporate culture, each individual in all QUiNFOS companies, as well as our business partners, contribute to upholding this position.

Therefore, it is important that we all adopt the Code of Conduct within our company. It is a key element in our overriding goal: to do the right thing together to secure the future. For us - and future generations.

**YOUR MANAGEMENT**

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## OUR VALUES

Our Code of Conduct is based on our corporate values. These are:

- **AMBITIOUS**
- **CONSISTENT**
- **OPEN**
- **QUALITY CONSCIOUS**
- **SUSTAINABLE**

These values lay the foundation for our interactions at QUINFOS. We are determined to live a corporate culture in which we treat each other fairly and with respect, act transparently and with integrity, communicate honestly, and take responsibility for our actions. In doing so, we are aware of our special role as part of the DuMont media and technology company: we represent and promote a cosmopolitan and democratic society. We work in a results-oriented manner with a social aspiration and see this as a holistic challenge - especially with a view to future generations. Particularly as a family-owned company, we see our actions as an integrated approach to ensuring economic, ecological, and social performance.

To this end, we aim to operate in an environmentally and socially responsible manner in accordance with internationally defined sustainability standards (ESG). Moreover, we are part of a group of companies whose overarching cohesion is characterised by a spirit of innovation and knowledge transfer.





## OUR CODE OF CONDUCT

Our Code of Conduct reflects these core values for which QUiNFOS stands and to which we orient ourselves when we act in the market. It not only sets out legal regulations and our own requirements for sustainable business practices. It also provides all employees, right up to the top management level, with a **framework** for conduct in the workplace. The aim of our Code of Conduct is to document our aspirations to all our internal as well as external stakeholders. The Code of Conduct also ensures transparency and helps protect the company from practices that could result in criminal proceedings, heavy fines, or damage to our image.

However, formulating the Code of Conduct as a guide is not enough. It must be accompanied and supported by **role models**. Leading by example is primarily the responsibility of QUiNFOS managers, who must set a credible example of legally impeccable conduct with integrity. At the same time and in addition, they must also ensure that employees are aware of the Code of Conduct and the behavioral requirements described therein and act accordingly.

It is also important to us that the contents and values of the Code of Conduct do not end at internal **boundaries**. In the case of direct service and supply companies where, due to the nature of their business activities, the geographical location in which they conduct their business or other factors, there may be higher human rights or environmental risks, we ensure compliance with the provisions of this Code of Conduct by accepting those of our suppliers.



# OUR FOCUS ON SUSTAINABILITY

Our Code of Conduct is based on the three fields of action of our sustainability program, namely **“E” for Environmental**, **“S” for Social** (workforce and social activities) and **“G” for Governance**. Due to the importance of the legal framework for our actions, we will first discuss the **“G” for Governance**.



# GOVERNANCE

## How we intend to run our business.

Compliance with all applicable **laws and regulations** at the local, national and international level is a matter of course for us at QUIFOS and its business partners. In particular, employees with budgetary or personnel responsibilities are required to know the basic laws, regulations, and internal company rules relevant to their area of responsibility. Any violation of applicable laws or regulations may result in serious consequences for both QUIFOS and our employees, such as criminal prosecution, labor law action, or damages. Therefore, we will investigate indications of any violations and, if confirmed, stop and punish them.

At QUIFOS, we are committed to the principle of fair **competition**.

We are committed to compliance with applicable antitrust and competition laws. In almost all countries, certain relationships and agreements with other market participants (including competitors, supply, distribution, or trading companies) that restrict fair competition are prohibited by law. These may include, for example, price-fixing agreements, the division of customer or sales territories between competitors, anti-competitive boycotts, and other unfair methods of competition.

Bei der Erhebung, Speicherung, Verarbeitung oder Übertragung **personenbezogener Daten** halten wir uns an die Regelungen der geltenden Datenschutzgrundverordnung.



We take appropriate steps to ensure that **transactions with third parties** do not violate applicable economic embargoes, sanctions lists, or trade, import, and export control regulations. If it becomes apparent during this process or during subsequent cooperation that business partners are acting inappropriately or illegally, legal assistance must be sought immediately.

We at QUIFOS do not tolerate any form of **bribery** or corruption, be it by public officials or in dealing with business partners. We do not grant any gifts in kind and limit invitations to appropriate hospitality.

Our business partners and their employees must also behave in such a way that no personal dependence, obligation, or influence arises. Business conduct based on fairness and compliance with the applicable national and international standards is expected from everyone. We are committed to ensuring that business partners implement anti-bribery and anti-corruption guidelines to be followed in all areas of business.

**Benefits** in the form of invitations or gifts are permitted under certain conditions if they serve the purpose of promoting business relationships or presenting products or services. Such benefits may only be accepted or granted if they do not constitute consideration for an unlawful advantage. Both donations and sponsoring activities are permitted in principle but may not be used to obtain unlawful business advantages. We refrain from any kind of concealment of donations that could give rise to corruption risks.





When collecting, storing, processing, or transferring **personal data**, we comply with the regulations of the applicable general data protection regulation.

At QUIFOS, we treat **company property** and other company assets responsibly.

We make our **purchasing decisions** fairly and with integrity based on objective criteria such as quality, price, service, reliability, availability, technical performance, contract fulfillment, resource and energy efficiency, and environmental sustainability.

To ensure proper **documentation** and record keeping, accuracy and completeness, as well as accountability, are essential in all business operations.





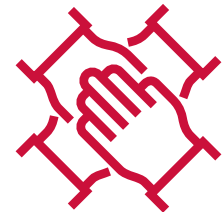
## SOCIAL

### How we want to treat each other.

At QUIFOS, we are stronger together. The decisions we make are designed to look out for each other and treat everyone fairly and with respect. We are convinced: the strength of our culture will be the deciding factor in successfully securing the future of the company.

Every **person** at QUIFOS has the right to be treated fairly, with dignity and respect. We are committed to diversity and equal opportunity and stand for a **working environment** based on respect and tolerance. Everyone is valued. Sexual harassment, discrimination, racism, bullying, abuse of power, intimidation or threats, and other forms of harassment will not be tolerated.

We respect the human rights, personal rights, and dignity of our **employees** and all third parties. QUIFOS strictly rejects forced labor, child labor, all forms of modern slavery and human trafficking, as well as any form of exploitation, and we ensure strict compliance with relevant laws.





As a matter of principle, we make sure that no persons who are younger than the legally required minimum working age are employed in the respective country. QUINFOS' business partners are obliged to take the necessary measures to prevent the employment of persons below the legal minimum age. The minimum age for admission to employment may not be lower than the age at which compulsory education ends and in no case lower than 15 years. Domestic standards for the protection of children and youth employees shall be complied with. The exceptions of the ILO core labor standards apply. Children shall be protected from economic exploitation, the performance of work that is hazardous, that may interfere with the child's education, and that may jeopardize the child's health or physical, mental, spiritual, moral, or social development.



We oppose any form of forced prison labor, which includes non-voluntary work performed for the purpose of rehabilitation and employment of prisoners in correctional institutions.



No employee shall be directly or indirectly coerced into employment by force and/or intimidation. Employees will only be employed if they have voluntarily made themselves available for employment.

We do not tolerate any discriminatory **behavior** based on ethnic origin, nationality, gender, sexual orientation and identity, pregnancy or parenthood, marital status, age, religion, ideology or disability, or on any other basis covered by a prohibition on discrimination.

All employees shall be treated with **dignity and respect**. No employee may be subjected to verbal, psychological, physical, sexual and/or physical violence, coercion, or harassment. We also require our business partners to ensure that the wages paid to employees are at least equal to the statutory **minimum wage** or the minimum wage customary in the industry. If there are no statutory or industry-standard minimum wages, the direct business partners must ensure that the wages paid are essentially sufficient to cover the basic requirements of the employees, considering additional individual circumstances (such as purely





secondary income activities, part-time employment, etc.). For us at QUIFOS, dealing honestly with each other is of great importance: we want and encourage an open **exchange of opinions**. We want to motivate each other to give and accept feedback, even if it sometimes involves delicate messages. We can do this without fearing negative consequences. Feedback is a gift. It allows us to change and improve things on our end. Such a feedback culture is important and helps QUIFOS to permanently improve its products and business practices.

We are equally open about our own **mistakes**. We share with each other what we have learned from our mistakes. In this way, we prevent others from repeating the same mistakes. In this way, we help make our organization and our Group of companies more resilient. Our managers play a crucial role in terms of feedback and error culture. They are the ones who, in their functional area, encourage all employees to speak their minds openly, participate in decision-making, and make their voices heard when they have concerns.

That's why we encourage free and critical **thinking** and value an **open working** environment in which employees can approach their supervisors or management with critical issues without hesitation. We will not tolerate intimidation or reprisals against employees who report actual or suspected misconduct in good faith and not against their better judgment.



We believe that concerns about **workplace conduct** can often be resolved through constructive communication among individuals or with local contacts. It is important to us that all employees find a sympathetic ear when there is a need to raise a concern. Anyone with a concern can first discuss it with the relevant manager or with the contact person in the local HR department or the company representative specifically designated for the issue. Most likely, they can best assess the situation and help find solutions, or they can inform the employee whom they may approach.

We comply with regulations to ensure fair **working conditions**, including those on pay, working hours, and privacy. Our compensation systems ensure that remuneration is in line with the market, function and performance, taking into account business-specific characteristics.

We comply with laws and regulations on **occupational safety and health** and ensure a healthy and hazard-free working environment for our employees. Ensuring safety and health at work is an integral part of our corporate culture at QUINFOS.



## SPECIFIC CHALLENGES IN EVERYDAY WORK AND COMMUNICATION

In our day-to-day work, each of us may be faced with business decision-making situations in which the interests of the company conflict with our personal interests. Conflicts of interest can mean that decisions are no longer made impartially in the interests of the company.

For this reason, we believe it is important that employees who are affected by a potential or actual **conflict of interest** quickly inform their superiors or the management. That way, clarification can be achieved quickly. Should there be any uncertainty in an individual case as to whether a decision is in line with the requirements of the Code of Conduct, it helps to ask oneself whether the decision could also be represented to third parties without any problems. In other words, whether it is compatible with one's own conscience and whether the decision is in the best interests of the company.



**Confidential information** and the handling of it are part of the daily work routine for many employees at QUiNFOS. This is defined as non-public information that is intended only for a restricted group of people and not for internal dissemination or external publication. This includes, but is not limited to, documents, reports, contracts, financial data, personnel information, investigations, litigation, creative works, intellectual property, and business or product plans. Discussing confidential information in public or disclosing information about the company or its customers to third parties without authorization is a breach of confidentiality obligations, unless there are legal exceptions to this (for example, under whistleblower systems).

Especially those employees who have access to this particularly sensitive information are obliged to observe strict confidentiality.

QUiNFOS is committed to **protecting whistleblowers**. Employees who, in good faith, report illegal or dishonest acts of which they have become aware under the Whistleblower Protection Act, do not have to fear any repercussions within the framework of the applicable rules of the Whistleblower Protection Act - even if the suspicion later turns out to be unfounded. We will investigate reports immediately and appropriately with the help of trained personnel as part of an orderly process and, if necessary, conduct a formal investigation. If it is determined that misconduct has occurred, QUiNFOS will take appropriate action against the individuals responsible. We pride





ourselves on providing the public with ongoing information about the work of QUiNFOS. In doing so, we make sure that we adhere to some fundamental rules. If we are contacted by journalists or the media and are not authorized to make statements, the request must be referred to the appropriate communications department or responsible office.

When we comment about QUiNFOS on social media such as Facebook, Twitter, LinkedIn or Instagram, online message boards, or other online forums, we should not share confidential, non-publicly known information, or content that is solely for internal purposes under any circumstances. In our private social media accounts, where we express our personal opinions, we should take care not to give the impression that we speak for QUiNFOS.





## ENVIRONMENT

### How we want to protect the environment.

It is important to us at QUIFOS to work in a way that provides sustainable livelihoods for future generations. Therefore, protecting the **environment** and climate forms an essential part of our corporate responsibility. We are a family business, and our actions are understood as an integrated approach to ensure economic, ecological, and social performance. We aim to operate in an environmentally and socially responsible manner in accordance with internationally defined sustainability standards. We maintain a responsible approach to our resources such as energy and water. QUIFOS is specifically committed to successively converting our fossil-fueled vehicle fleet to climate-friendly models and to promoting climate-friendly mobility for our employees.



We comply with all applicable **environmental regulations** and internal environmental guidelines. We aim to increase resource and energy efficiency in the production and distribution of our products and services, minimize negative impacts on the environment, and reduce our current company-related carbon emissions by 40% by 2030 and 90% by 2040. At the same time, we will annually offset our remaining **carbon footprint** through climate protection projects that meet the highest standards.



At QUiNFOS, we are committed to providing our customers with safe, high-quality **products** of impeccable quality. Products must not have defects or dangerous properties that could affect health or damage property.

We also ensure that our business partners, who may be exposed to higher environmental risks due to the nature of their business, the geographical location of their operations, or other factors, comply with the provisions of this Code of Conduct by accepting **those of our suppliers**. We encourage them to work continuously to avoid and reduce environmental impacts. Applicable procedures and standards for waste management, the handling and disposal of chemicals and other hazardous substances, as well as for emissions and wastewater treatment, must be complied with. The protection and preservation of natural resources must be given special consideration. As far as we become aware of reasons for special environmental risks at business partners, we will work towards the fact that QUiNFOS itself or a third party authorized by QUiNFOS may, if necessary, carry out the verification of compliance with the principles established according to this Code of Conduct.

## WHISTLEBLOWER PORTAL

As part of the EU Whistleblower Directive adopted by the European Union in October 2019 and the Whistleblower Protection Act (HinSchG) adopted in December 2022 and approved by the German Federal Council in May 2023, we have implemented a **whistleblowing channel** with an external ombudsperson for whistleblowers. With this independent, impartial and confidential system, we want to ensure that violations can be reported by employees as well as business partners and persons who are in (professional) contact with QUINFOS, in order to identify and prevent possible misconduct at an early stage and to avert damage from all parties involved. The legal regulations as well as the internal regulations of the principles of our Code of Conduct serve as a basis for this.

[Link to the whistleblowing channel:](https://whistleblowersoftware.com/secure/QUINFOS)

<https://whistleblowersoftware.com/secure/QUINFOS>

[QR code to the whistleblowing channel:](#)



# IMPRINT

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