



Code of conduct for freelancers

August 23

Code of conduct for freelancers



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Contents

- 1. *Preliminary remark*..... 4
- 2. *General core values*..... 4
- 3. *Prevention of corruption and avoidance of conflicts of interest* 5
- 4. *Combating money laundering and terrorist financing* 5
- 5. *Fair competition, purchasing and documentation*..... 5
- 6. *Fair employment and equal opportunities*..... 6
- 7. *Protection of the environment*..... 6
- 8. *Mutual respect* 7
- 9. *Data protection, data security and confidentiality*..... 7
- 10. *Insider:inside rules*..... 7
- 11. *Transparency and communication*..... 8
- 12. *Stay on the premises of the Adler Group*..... 8
- 13. *Miscellaneous* 8

1. Preliminary remark

If necessary, the Adler Group employs freelancers to carry out temporary projects or to bridge personnel bottlenecks.

With their contractual commitment to the Adler Group, we expect our freelancers to share the values, principles and behaviour of our cooperation. In addition to compliance with laws and generally applicable standards, integrity and correct behaviour are prerequisites for working with the Adler Group.

For a good contractual relationship, it is essential that both contractual partners can rely on and trust each other in the course of their cooperation. We can only maintain this basis if we ensure that unfair behaviour is also ruled out among the freelancers contractually bound by the Adler Group.

This Code of Conduct applies to all Adler Group freelancers. All regulations contained herein are binding and apply to all Adler Group companies in Germany and abroad.

2. General core values

In addition to complying with laws and other regulations, the Adler Group expects its contractual partners to act with integrity, honesty and loyalty in their business activities and in all situations related to these activities. With this behaviour, we stand up for what is anchored in our values.

Our business model places the long-term satisfaction of our customers at the centre of everything we do.

The environmentally friendly utilisation of resources, the use of innovative technologies and the careful selection of competent business partners are the basis for the Adler Group's professionalism.

Our processes and work results are subject to strict quality standards and continuous monitoring. Our business relationships are based on reliability. We are demanding but fair towards our partners.

At the Adler Group, cooperation within the company and with its business partners is characterised by respect, trust and appreciation.

The Adler Group's value-orientated corporate governance is based on integrity. We are committed to complying with legal requirements. This standard applies equally to our business partners. Our communication is characterised by transparency, timeliness and openness.

The Adler Group is committed to its shareholders, investors and stakeholders. Innovative strength, cost awareness as well as efficiency and effectiveness in all corporate processes are intended to steadily increase the Adler Group's earnings and thus its value.

3. Prevention of corruption and avoidance of conflicts of interest

In fulfilling their contractual obligations to the Adler Group, no Freelancer may accept favours or benefits - in any form whatsoever - from business partners of the Adler Group, or allow themselves to be promised or offered or promised such that could reasonably be expected to influence the Adler Group's business decisions or transactions or even give the appearance of doing so. This does not apply to low-value gifts. Invitations must remain within the limits of customary business hospitality. Further information on this can be found in the value limits of the Adler Group's Anti-Corruption Policy.

Business or personal connections to employees and/or business partners of the Adler Group must be disclosed immediately by the Freelancer if they could lead to potential conflicts of interest. The disclosure must be sent by e-mail to compliance@adler-group.com. Alternatively, a postal notification can be sent to Adler Group S.A., George-Stephenson-Str. 17, 10557 Berlin, for the attention of the Compliance Department.

4. Combating money laundering and terrorist financing

All applicable statutory provisions on money laundering and terrorist financing must be complied with, and all relevant information for a business partner check must be provided in full to the Adler Group upon request. If the Freelancer becomes aware of possible indications of money laundering in the course of working with the Adler Group, he/she must immediately report these to the Compliance Department by e-mail to compliance@adler-group.com.

5. Fair competition, purchasing and documentation

Our freelancers must comply with applicable antitrust and competition laws as well as import and export laws for products, goods and services, including those relating to economic and trade sanctions. They shall not act with unfair methods and shall refrain from abusive agreements or agreements that restrict competition.

The Adler Group selects its business partners and thus also its freelancers carefully and exclusively on the basis of their performance and reliability, and no unfair business practices are tolerated.

Freelancer:in and Adler Group mutually undertake not to actively poach any employees of the other contracting party.

Freelancers shall keep their business books and records in full compliance with the applicable laws and regulations.

6. Fair employment and equal opportunities

The Adler Group is committed to fair employment conditions and rejects undeclared work, forced labour and other illegal employment of employees. Illegal employment relationships can jeopardise legal jobs and prevent the creation of new legal jobs. Every business partner of the Adler Group, including its freelancers, undertakes to comply with the applicable occupational health and safety regulations. The protection of children is an essential anchor of international human rights. The Adler Group is committed to these fundamental rights, categorically rejects any form of child labour and expects its business partners to behave accordingly. The Adler Group's freelancers provide their employees with safe workplaces and ensure fair working conditions. They comply with the applicable legal and contractual regulations on working hours, holidays and minimum wage and reject undeclared work and any form of unethical or illegal working and living conditions, in particular child labour, forced labour and modern slavery. There is no discrimination of any kind, regardless of whether it relates to age, ethnic origin, nationality, gender, gender identity, physical and mental abilities, religion and ideology, sexual orientation or social background. The dignity and privacy of employees are always respected. Physical disciplinary measures do not take place.

The Adler Group's freelancers recognise the freedom of association and collective bargaining autonomy of employees and observe the core labour standards of the International Labour Organisation ('ILO') and the Universal Declaration of Human Rights.

7. Protecting the environment

The Adler Group strives for a high level of environmental protection and thus wants to contribute to achieving the EU climate targets. The applicable environmental protection laws must be complied with and negative effects on the environment must be minimised. The Adler Group itself is committed to the environmentally friendly use of resources.

Avoiding waste as far as possible and protecting the climate are high priorities.

It must be possible to trace the origin of purchased goods or materials and ensure that they have been produced ethically and in accordance with environmental protection requirements. Insofar as these are legally relevant, the requirements of the Supply Chain Act must be observed.

At the request of the Adler Group, the Freelancers provide environmental management audits, insofar as they have conducted such audits.

8. Mutual respect

The Adler Group rejects any kind of discrimination and takes action against it. No one may be disadvantaged or harassed because of their origin, skin colour, gender, sexual orientation, religion or ideology, physical or mental constitution or age. We do not accept insults, tactlessness or other offensive remarks based on personal characteristics. We also expect our freelancers to be tolerant, polite, respectful and fair and to contribute to a productive and pleasant working and business environment.

9. Data protection, data security and confidentiality

Special legal regulations exist for the protection of personal data. These are fully complied with by the Freelancer, so that personal data is carefully protected against unauthorised access and misuse.

Personal data is handled sparingly. It is only collected and processed if it is necessary on the basis of a legal basis or consent. As soon as the data is no longer required and is not subject to a statutory retention period, it is deleted.

Freelancers shall take technical and organisational measures to ensure that personal data provided to them is not lost or inadvertently disclosed. Care is taken to ensure that no other persons have unauthorised access to this data. Data is always exchanged on the basis of a corresponding contractual agreement.

The Freelancers of the Adler Group undertake not to share confidential information from the business relationship with third parties and to protect the intellectual property of the Adler Group.

All applicable data protection laws and regulations and the provisions of the Trade Secrets Act are complied with and everything necessary is done to protect this information.

In addition, reference is made to the provisions on data protection and confidentiality pursuant to Section 13 of the Adler Group's General Terms and Conditions.

10. Insider rules

The Adler Group includes companies listed in both Luxembourg and Germany that are subject to the provisions of the EU Market Abuse Regulation and the statutory provisions of the German and Luxembourg securities trading laws, including the ban on insider trading. An insider is anyone who, for example, obtains information about management's plans for corporate transactions, the Adler Group's sales and profitability, significant contracts or business relationships, financial information, etc. that is not generally available to investors at the time the information is obtained but would influence their investment decisions if they were aware of it.

If a Freelancer obtains such information, he/she may not buy or sell shares in listed Adler Group companies until the information becomes public knowledge.

11. Transparency and communication

Communication with the public is the sole responsibility of the Adler Group's management. Only employees and service providers commissioned and authorised by the Company's management answer questions from investors, analysts and journalists and make statements about the Adler Group.

Freelancers therefore do not answer external questions about the Adler Group uncoordinated, but pass them on to the Communications and Investor Relations department. This ensures that the Adler Group's statements are reliable and stringent and that non-public information is adequately protected.

12. Stay on the premises of the Adler Group

As soon as Freelancers are on the premises or at the sites of Adler Group companies, they are subject to the general rules of conduct established by the Adler Group and the statutory provisions on occupational health and safety.

The personal sphere of others must be respected. Sexual harassment and bullying are prohibited.

13. Miscellaneous

The Freelancer grants the Adler Group the right and opportunity to verify compliance with the provisions of this Code of Conduct. Contractual Partners who violate the Code of Conduct will be temporarily or permanently excluded from future contract awards by the Adler Group. The Adler Group also reserves the right to terminate the Freelancer's assignment in the event of a proven violation of this Code of Conduct.

Violations of the law and rules must be prevented on both sides of a business relationship in order not to damage the mutual trust of the business partners. We therefore appeal to our freelancers to provide us with appropriate information in the event of possible misconduct on the part of the Adler Group. The following reporting channels are available:

- Compliance department of the Adler Group (internal reporting office): compliance@adler-group.com
- Electronic whistleblowing system: <https://adler.integrityline.org/>
- External lawyer of trust of the Adler Group:
Dr Rainer Frank, 030 318685-933 or vertrauensanwalt-adler-group@fs-pp.de

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- External federal reporting office (only responsible for breaches of the law in accordance with the Whistleblower Protection Act):

https://www.bundesjustizamt.de/DE/MeldestelledesBundes/MeldestelledesBundes_node.html

The Adler Group is happy to support its freelancers with questions on all topics addressed in this Code. Please feel free to contact us at compliance@adler-group.com.

Editor:

Adler Group

Compliance & Risk Management

compliance@adler-group.com