

Code of Conduct

We have divided our Code of Conduct into six topics:

- 1. Our Client Interactions
- 2. Our Employee und Interpersonal Interactions
- 3. Our Interaction with Data
- 4. Fair Competition and Conflicts of Interest
- 5. Sustainability Efforts
- 6. Protection of Corporate Assets

1. Our Client Interactions

We are committed to advising and supporting our clients with the best possible expertise and to the best of our conscience, having the client's best interests at the forefront of our operations.

Our work is guided by the framework of the German Communications Code. Standard values that we pursue in accordance with this code are transparency, integrity, fairness, honesty, loyalty and professionalism.

2. Our Employee and Interpersonal Interactions

Fair and respectful employee interactions are a strong part of Engel & Zimmermann's corporate culture.

Mutual trust, team spirit and appreciation for each other form the basis for cooperation. This also applies to work we do for our customers: We take care to ensure that the convictions of our employees are in harmony with the work they have set out for them. We do not tolerate discrimination or harassment of any kind. No one will be discriminated against on the basis of their gender, origin, sexual orientation, religion, appearance or age. We also do not tolerate verbal or physical conduct that demeans or degrades others or that others perceive as inappropriate.

We promote equal opportunities in every respect, regardless of gender, age or origin, for example.

Additionally, throughout the hiring process, all applicants have equal opportunities.

We are committed to compensating our female and male employees appropriately. Interns also receive compensation for their work.

We do our best to make sure that our employees adhere to their statutory working hours and to provide safe and healthy working conditions.

3. Our Interaction with Data

As a communications consultancy firm, we often gain deep insight into our clients' internal business. Strictly protecting and preserving this confidential information - especially from the media and interested third parties - is of utmost importance for us. This principle is a cornerstone of our business philosophy. All employees, whether salaried or freelance, are required to maintain the confidentiality of client matters at all times, even in their closest personal environment.

In addition, all Engel & Zimmermann employees are contractually bound with a non-disclosure agreement as it relates to confidential processes and internal matters of the agency as well as on key business figures, unless these are generally and publicly accessible. Confidentiality relating to other employees' affairs must be maintained at all costs and personal information about them must not be shared with third parties.

The obligation to protect all trade secrets of Engel & Zimmermann as well as of their customers applies when leaving the workplace, during business trips and when choosing passwords. The obligation to maintain secrecy does not expire upon termination of the employment relationship, but also applies to former employees.

We respect and train the handling of DSGVO-protected personal data.

4. Fair Competition and Conflicts of Interest

We are committed to fair competition and comply with applicable antitrust and competition laws. Payments that are made or received by the company must always have an appropriate and real value in return. We only maintain business relationships with reputable partners who conduct legitimate business activities.

Any private connections with business partners - this applies to suppliers and service providers as well as to customers - must be disclosed internally before entering into a possible business relationship.

It is customary in agency life to give business partners and customers small gifts - but the value of the goods must always be appropriate. Under no circumstances should a situation occur in which a gift could be misinterpreted as a bribe or undue influence.

Gifts and favors should never be exchanged in return for a service or good. Personal conflicts of interest are to be avoided wherever possible.

Gifts and favors may be accepted by our employees, but only up to a value that they themselves deem is acceptable. They should be able to do this without any doubt and it should be able to be openly communicated to third parties.

Invitations from business partners may only be accepted if they serve a business purpose and are not unreasonably frequent or luxurious.

5. Sustainability Efforts

Engel & Zimmermann assumes responsibility with regard to environmental protection and complies with the applicable regulations.

We are committed to designing our business processes in a sustainable manner, to using resources sparingly, to minimizing environmental impact and to continuously improving our sustainable actions.

In order to validate our measures in the areas of environment, economy, and social aspects, the company has had itself certified annually by the ZNU, the German Center for Sustainable Management.

Social and regional commitment is important to Engel & Zimmermann. This includes continuous and voluntary support of the Dominik Brunner Foundation for Civil Courage. The foundation strives to educate the population about civil courage and supports projects for the prevention of violence.

It also offers help to people who are victims of violence because of their courageous actions.

6. Protection of Corporate Assets

All employees are obliged to treat the company's property with care and responsibility. This includes inventory, work equipment and IT equipment. The same applies to the handling of rented or leased property such as agency premises or rented vehicles. Company property or assets may only be used for company purposes.

Important Concluding Notes

Whenever this Code of Conduct refers to employees, it applies to all managers and executive positions as well.

Employees can contact a member of the management team or the Human Resources department without restriction if they have any questions or suggestions on the subject of compliance; the same goes for reporting violations of the rules. If requested, any information given will be treated in a strict, confidential matter and will not lead to disadvantages relating to the employee's job.

We take any disregard of the Code of Conduct or other internal guidelines very seriously. In extreme cases, violations of the Code of Conduct may also result in consequences under labor law or criminal law.

Last Updated: January 2023