

CODE OF CONDUCT

K&P Computer - Germany



FOREWORD

Dear colleagues,

K&P Computer is an innovative, but also a very tradition-conscious company with a clear image of values. We have specified these values in the present "Code of Conduct". The guidelines describe which values are important to us and how we want to work and deal with each other today and in the future. Our own sense of responsibility, integrity and mutual respect are particularly important to us. Compliance with law and order and ethically correct conduct at all times are a matter of course. We should all be aware of the possible consequences of our actions for us and the reputation of our company. Continuity and the continued success of the company depend to a large extent on the way in which we conduct our business.

Nevertheless, the guidelines that have been formulated apply to everyone - to each individual employee, to executives and to management.

The Code serves as a guide whenever you need to make decisions in your daily work and in critical situations. Through the integrity of your personal behaviour you make a valuable contribution to K&P Computer. I would like to thank you for that.

Your



Karl-Peter Muenkel
CEO

PREAMBLE

K&P COMPUTER - RESPONSIBLE. LEGALLY COMPLIANT. VALUABLE.

This "Code of Conduct" summarizes the essential values and fundamental convictions that form the basis of our corporate actions. The Code serves as a guideline for responsible, ethically correct conduct at all times, in compliance with the legal regulations of all countries in which we operate. It is the foundation of mutual tolerance and appreciation.

The Company expects all employees*, all other persons working for the Company and all those with whom we do business to comply with the rules set forth herein. Our managers set an important example in this respect. They are responsible for knowing the applicable rules and laws within their roles and responsibilities, and for communicating and implementing them in their teams.

Violations of the Code of Conduct can have serious consequences not only for the individual personally, but also for the company. For this reason, punishable, deliberate misconduct will not be tolerated. Anyone who does not behave in accordance with our corporate guidelines must expect appropriate consequences. The sanction measures depend on the severity of the violation and range from warnings and warnings to termination without notice and civil claims for damages or criminal charges.

Specific regulations for some divisions or departments are supplemented by their own guidelines.

1. NON-DISCRIMINATION PRINCIPLE

The diversity and uniqueness of our employees is what distinguishes our company. We respect the personal dignity and personal rights of each individual. In accordance with our corporate principles, we do not tolerate discrimination based on ethnic or national origin, religion, belief, gender, age, disability, sexual orientation, skin color, political affiliation, social origin or any other legally protected characteristic. Harassment or other personal attacks on individuals will not be tolerated. We strictly reject child and forced labor and expect the same from our business partners.

2. BAN ON CORRUPTION

K&P Computer does not tolerate any kind of bribery, corruption or other illegal granting of advantages and avoids the mere appearance of it. All employees are strictly prohibited from directly or indirectly offering, promising, granting or accepting benefits. The prohibition of accepting and granting benefits does not only apply to financial benefits. Bribes can take many forms. These include, for example, granting excessive discounts or commissions, valuable gifts, generous invitations, free services or job offers. Corruption can result in fines for the company and criminal sanctions for the employee.

3. GIFTS, ENTERTAINMENTS, INVITATIONS

Donations in the form of gifts are common in business relationships. Invitations and hospitality may only be accepted by third parties or passed on to third parties if they are within the scope of normal business hospitality and are symbolic gifts appropriate to the circumstances. The same applies to invitations to events (e.g. entertainment). These may also only be accepted if they correspond to normal business practice, do not violate legal regulations and have been approved in advance by the supervisor. The acceptance and passing on of invitations, hospitality or gifts which give the impression of wanting to influence the business relationship in an inappropriate manner are generally prohibited. Regardless of their value, employees are not permitted to accept or offer gifts in the form of money, loans, commissions, etc. from third parties. In case of doubt, the employee should seek the advice of his direct superior.

4. AVOIDANCE OF CONFLICTS OF INTEREST

Conflicts of interest arise when personal interests conflict with the interests of the company. This can result in particular from the performance of a secondary activity. In order to avoid conflicts of interest every employee is obliged to separate private and business interests and to make decisions in the sense of K&P Computer. If there is the possibility of a conflict of interest, the respective superior or the management must be informed immediately.

5. FAIR AND FREE COMPETITION

K&P Computer pursues its corporate goals exclusively in compliance with the applicable competition rules. We expect the same from our business partners. Any kind of coordination or agreement with competitors that has the purpose or effect of restricting competition is not permitted. All employees are obliged to comply with the rules of fair competition and not to enter into any agreements, for example regarding prices, terms and conditions or market sharing.

6. OCCUPATIONAL HEALTH AND SAFETY

The safety and health of the employees has the highest priority for K&P Computer. We take our responsibility very seriously, guarantee occupational health and safety within the framework of legal regulations and offer a wide range of prevention and health promotion measures. It is equally up to each individual employee to comply with the safety regulations and to point out any grievances. Every accident entails the risk of personal injury.

7. FAIR WORKING CONDITIONS

Motivated and qualified employees are an essential success factor. Nothing is as fast-moving as the IT industry. Up-to-date knowledge is a must. We would like to encourage our employees to make use of the diverse training and further education opportunities we offer. In addition, K&P Computer advocates fair payment and equal opportunities with equal aptitude.

8. INTERNAL AND EXTERNAL COMMUNICATION

K&P Computer attaches great importance to clear and uniform communication, ethical correctness and respect in all types of communication. We do not tolerate any offensive content, harassing texts or pictures. This applies to all forms of personal, written or electronic communication as well as Internet platforms. In this context, we would like to point out that it is not permitted to call up questionable websites with offensive, discriminatory, pornographic, criminal or terrorist content on the company's own devices or communication lines. All private expressions of opinion and activities (including social media) must be clearly separated from company activities at all times.

9. INFORMATION HANDLING / DATA PROTECTION

Care in handling information is of great importance for our company. All employees are therefore requested to handle all information and IT systems conscientiously and carefully. Careless handling can result in considerable damage to our company, our employees or third parties. Special protection applies to confidential information that is not or not yet published. This includes strategic business plans, compensation, customer, supplier or applicant information as well as internal software know-how (KPC products). Unless required by law and approved by a supervisor, confidential information may not be disclosed or made available to third parties. Business partners and suppliers are also bound to secrecy.

The protection of personal data is important to us. K&P Computer complies with the requirements of the data protection basic regulation of the EU (DSGVO) and fulfils the regulations as well as all regulations for the protection of data and privacy. In case of doubt, employees are required to contact the K&P data protection officer.

10. DEALING WITH COMPANY ASSETS

Material and immaterial assets of the company are to be used exclusively for operational and not for personal purposes. Employees are encouraged to use Company property properly, carefully, responsibly and sparingly.

11. DONATIONS AND SPONSORING

As a responsible member of society, K&P Computer assumes social responsibility and makes donations (voluntary contributions without consideration) always transparently without connection to a business transaction and without expectation of consideration. K&P Computer does not make donations to political organizations, political parties or members of parliament. All sponsoring activities (donation with contractually agreed consideration for communication or marketing purposes) must be transparent, written and intended for a serious business purpose.

CONTACT K&P COMPLIANCE K&P Germany:

The first point of contact for uncertainties or questions about the Code of Conduct is the respective supervisor. In addition, you can also contact our representative or send an e-mail to compliance@kpc.de.

If you would like to remain anonymous, please use the "K&P Kummerkasten".



K&P COMPUT

Service- und Vertriebs-GmbH

