



# **CONSILIO CODE OF CONDUCT**

Version: 4.2

Date of Version: April 3rd, 2023

# TABLE OF CONTENTS



<b>1. BUSINESS PRINCIPLES</b> .....	<b>4</b>	<b>PRODUCTS</b> .....	<b>18</b>
<b>2. POLICY ON SOCIAL TOPICS</b> .....	<b>5</b>	<b>9. WHISTEBLOWING AND PROTECTION AGAINST REPRISALS</b> .....	<b>19</b>
2.1. Child Labor and Young Employees .....	5	<b>10. ANTI-CORRUPTION AND ANTI-BRIBERY</b> .....	<b>19</b>
2.2. Employee Compensation and Benefits .....	5	<b>11. CSR/SUSTAINABILITY REQUIREMENTS FOR SUPPLIERS</b> .....	<b>22</b>
2.3. Working Hours.....	6	11.1. Environmental Protection .....	22
2.4. Forced or Compulsory Labor and Human Trafficking .....	6	11.1.1. Decarbonization .....	22
2.5. Freedom of Association and Collective Bargaining .....	7	11.1.2. Reporting on Greenhouse Gas Emissions .....	23
2.6. Ethical Recruitment .....	7	11.1.3. Noise Pollution .....	23
2.7. Non-discrimination, Non-harassment, Diversity, Equality, Inclusion, and Women's Rights .....	8	11.1.4. Animal Welfare.....	23
2.8. Land, Forest, and Water Rights, and Forced Evictions .....	9	11.1.5. Reuse and Recycling.....	24
<b>3. CONSILIO'S APPROACH TO OCCUPATIONAL SAFETY AND HEALTH</b> .....	<b>10</b>	11.2. Use of Police Forces or Private Security Services .....	25
3.1. Incident and Accident Management .....	12	11.3. Data Protection and Data Security.....	26
3.2. Handling of Chemicals .....	12	11.4. Conflicts of Interest, Export Controls and Economic Sanctions....	26
<b>4. ENVIRONMENTAL PROTECTION</b> .....	<b>13</b>	11.5. Fair and Free Competition .....	27
<b>5. ENERGY MANAGEMENT</b> .....	<b>15</b>	11.6. Financial Responsibility and Disclosure of Information .....	27
5.1. Decarbonization .....	15	11.7. Whistleblowing and Protection Against Reprisals .....	28
5.2. Reporting on Greenhouse Gas Emissions.....	16	11.8. Intellectual Property and Counterfeit Products .....	28
<b>6. QUALITY MANAGEMENT</b> .....	<b>17</b>	11.9. Communication of CSR/Sustainability Requirements to Suppliers.....	29
<b>7. FINANCIAL RESPONSIBILITY AND DISCLOSURE OF INFORMATION</b> .....	<b>18</b>	11.10. Process for Auditing CSR/Sustainability Requirements at Suppliers.....	29
<b>8. INTELLECTUAL PROPERTY AND COUNTERFEIT</b>		<b>12. TRAINING</b> .....	<b>30</b>

# 1. BUSINESS PRINCIPLES



The CONSILIO Code of Conduct actively requires sustainable business activities and strategy from suppliers and business partners of CONSILIO GmbH. The Code aims to define a common standard and level of commitment to responsible-minded business operations.

This Code of Conduct formulates the standards of CONSILIO GmbH as well as the requirements for suppliers and business partners in relation to the following:

- Upholding internationally recognized human rights derived from the UN Declaration of Human Rights
- Compliance with the Declaration on Fundamental Principles and Rights at Work from the International Labour Organization (ILO)
- Prohibition of child labor and forced labor
- Compliance with environmental legislation as well as preventive measures for environmental protection and energy management
- Implementation of measures for active quality management
- Compliance with all legal regulations and standards
- Compliance with and promotion of the core principles of business ethics in general, and corruption and bribery in particular

# 2. POLICY ON SOCIAL TOPICS



## 2.1. CHILD LABOR AND YOUNG EMPLOYEES

No recourse to child labor is permitted at any time during our partnership. All business partners and suppliers of CONSILIO GmbH are required to comply with the recommendations from the ILO conventions on the minimum age for admission to employment and the use of child labor. This minimum age should not be lower than the minimum school-leaving age and should be at least 15 years in all cases. However, a lower age is permitted in those countries whose economy and educational establishments are less well-developed in general. The minimum age is 14 years in these countries. A minimum age of 13 years applies for light work. The minimum age for hazardous work is 18 years. CONSILIO GmbH has declared its commitment to upholding all conventions on child labor and young employees, and requires all of its business partners and suppliers to comply with these fundamental standards.

## 2.2. EMPLOYEE COMPENSATION AND BENEFITS

CONSILIO GmbH complies in full with legislation on employee compensation and benefits. Compensation meets or exceeds the legal minimum wage or the industry-typical minimum wage, whichever of these is the higher. For overtime, employees receive at least the minimum statutory overtime pay in addition to their normal compensation. Overtime hours are always worked on a voluntary basis and employees must be granted at least one day of rest after six consecutive working days. Appropriate overtime rates must be paid in countries where no legal requirements have been set. All employees have the right to earn a level of income during their regular working

week that is sufficient to cover the employee's basic needs while also providing them with a certain amount of disposable income. If this is not currently the situation with our business partners and suppliers, they shall introduce measures as appropriate for increasing their employees' compensation and living standards by means of improved compensation systems, employee benefits, care programs, and other allowances.

### 2.3. WORKING HOURS

Except in unprecedented circumstances, the regular working week for employees at CONSILIO GmbH, including overtime, must not exceed 60 working hours. This rule may be supplanted by legal provisions that envisage a lower maximum number of weekly working hours. A maximum of 48 working hours for a regular working week (excluding overtime) must not be exceeded. Overtime is agreed on a consensual basis and is not required routinely. Employees receive at least 24 consecutive hours of free time per week as well as an annual vacation for which an appropriate level of compensation is paid. CONSILIO GmbH also expects its business partners and suppliers to comply with these standards.

### 2.4. FORCED OR COMPULSORY LABOR AND HUMAN TRAFFICKING

Forced or compulsory labor is prohibited. Employees of CONSILIO GmbH may terminate the employment relationship by complying with an agreed period of prior notice. Employees must not be required to surrender their ID card, passport, or work permit as a precondition for

their employment. Compliance with this policy is also required from the business partners and suppliers of CONSILIO GmbH.

### 2.5. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

CONSILIO GmbH acknowledges the right of employees to form and join organizations of their own choosing. CONSILIO GmbH provides its employees with the services of an ombudsman for the purpose of mediation and dispute resolution. Business partners and suppliers shall develop and implement mechanisms for the resolution of disputes within the industry, including employee complaints, while safeguarding the effective exchange of information between employees and their representatives. If a collective agreement is in place, business partners and suppliers shall recognize this agreement, and allow their employees to participate actively in collective bargaining.

### 2.6. ETHICAL RECRUITMENT

CONSILIO GmbH has declared its commitment to organizing its recruitment process along ethical lines. All applicants and candidates are treated equally, and with respect and honesty. The application procedure is therefore based on the values of integrity, transparency, trust, and individual ability. CONSILIO GmbH expects its suppliers to apply the same standards.

## 2.7. NON-DISCRIMINATION, NON-HARASSMENT, DIVERSITY, EQUALITY, INCLUSION, AND WOMEN'S RIGHTS

CONSILIO GmbH, its suppliers, and its business partners jointly declare their commitment to a policy of fair and equal treatment for hiring and employment practices. All decisions concerning employment, pay, employee benefits, professional development opportunities, assigned tasks, promotion, disciplinary measures, and dismissals are based solely on the capabilities of employees to perform the activities in question. CONSILIO GmbH has declared its commitment to making these decisions independently and without regard to personal attributes or viewpoints, race, national origin, gender, religion, age, disability, familial status, membership of an organization, sexual orientation, or political opinions.

In addition, CONSILIO GmbH prioritizes equality, diversity, and inclusion in its workforce. Above all, women's rights, and the rights of minorities and indigenous peoples are to be upheld at all times. The same is expected of all business partners and suppliers of CONSILIO GmbH.

Furthermore, CONSILIO GmbH, its suppliers, and its business partners jointly declare their commitment to guaranteeing the safety and security of their employees. This includes protection from physical violence, the threat of such violence, and other harassment. The threat of physical punishment or the toleration of harassment of individual employees – such as members of unions, or members of an ethnic or religious minority – will incur disciplinary measures and have legal consequences. Furthermore, CONSILIO GmbH has declared a zero-tolerance policy for all forms of harassment (defined as any degrading and dehumanizing treatment or the threat of such treatment, including sexual harassment, sexual abuse, physical punishment, psycho-

logical or physical coercion, or verbal abuse) of employees in the workplace, and will investigate all such incidents to the fullest extent. Compliance with this policy is also required from the business partners and suppliers of CONSILIO GmbH.

## 2.8. LAND, FOREST, AND WATER RIGHTS, AND FORCED EVICTIONS

The unlawful forced eviction or disenfranchisement of persons will not be permitted following the acquisition, development, or other use of land, forests, and waters whose usage secures the livelihoods of these individuals. The same is expected of all business partners and suppliers of CONSILIO GmbH.

### 3. CONSILIO'S APPROACH TO OCCUPATIONAL SAFETY AND HEALTH



As a responsible-minded company, the health and physical wellbeing of our employees is the most important goal of all for CONSILIO GmbH. To safeguard and guarantee health and safety in the workplace, our approach aims to prevent injuries and medical conditions while promoting safe, healthy, and efficient working practices.

This approach at CONSILIO GmbH is based on the principle of preventive action and follows a process of continuous improvement. CONSILIO GmbH has declared its commitment to complying with legal minimum standards as well as its own internal targets. These include fire safety, accident prevention, and the safe handling of toxic substances. Appropriate lighting, ventilation, and heating systems are provided. An evacuation and escape plan is provided to employees on all CONSILIO GmbH premises, and escape routes/emergency exits are marked out in accordance with legal requirements.

Adequate numbers of clean sanitary facilities are available free of charge to employees at all times. CONSILIO GmbH also promotes ergonomic working practices for its employees by providing height-adjustable desks.

At CONSILIO GmbH, responsibility for safety and health is borne equally across the company hierarchy. With the specification and adjustment of improvement measures, employees collectively contribute to ensuring that we meet this top-priority target. Internal audits carried out by our Safety Officer help ensure an effective level of

occupational safety and health, and to manage the working environment. Offices and staff facilities are also inspected routinely to confirm that they are in a good condition and eliminate any risks in relation to workplace safety. Preventive care is another element of our approach to occupational safety and health, with comprehensive medical consultations, including free eye tests, being provided by the company physician. Employees can also talk to management about possible options for contributions towards staff memberships of fitness studios or sports clubs.

CONSILIO GmbH strongly believes that safe and healthy working practices are possible only if employees are informed about workplace hazards, their duties in relation to occupational safety, and internal company rules. Routine instruction is used to ensure that all employees are always up-to-date.

To guarantee a safe and healthy working environment, CONSILIO GmbH expects the following:

- All employees of CONSILIO GmbH participate actively in the creation of a good working environment. Staff must have the chance to submit suggestions for improvement that can be integrated into products, processes, and facilities. Employees can contact the company executive, management staff, or the Safety Officer, or use the digital communication channels that have been set up for this purpose.
- A company-internal employee survey with the aim of identifying potential improvements within the company is carried out on a quarterly basis. Every two years, a survey conducted by TOP JOB also assesses employee satisfaction within the company.
- Employees of CONSILIO GmbH are encouraged to participate actively in the identification of actual and potential risks of accidents, injuries, and health hazards.

- Occupational safety and health should become an essential part of processes and day-to-day working practice.
- Company executive and management staff shall respond to the suggestions submitted by employees, and shall take care to ensure that risks are reduced and improvements are implemented.
- All employees shall inform visitors they are responsible for about applicable health and safety rules.

### 3.1. INCIDENT AND ACCIDENT MANAGEMENT

CONSILIO GmbH takes a proactive approach to ensuring that risks to which all employees are exposed are minimized by introducing appropriate measures with the aim of avoiding work-related accidents.

### 3.2. HANDLING OF CHEMICALS

For activities involving chemicals, CONSILIO GmbH complies in full with regulations and specifies corresponding protective measures. CONSILIO GmbH requires a responsible-minded approach to handling chemical substances,

and also expects all of its business partners and suppliers to comply with these safe working practices.

## 4. ENVIRONMENTAL PROTECTION



Compliance with applicable environmental law is a key priority at CONSILIO GmbH, and also implies conformity to the legal minimum standards and regulations at all times. The company considers it self-evident that natural resources like water, raw materials, and energy must be handled economically. CONSILIO GmbH acts to keep its environmental impacts, including waste, waste water, noise, and carbon emissions, to an absolute minimum. Environmental protection is not viewed as an end goal but as a process that must be continuously modified and improved. CONSILIO GmbH has appointed an Environmental Protection Officer to monitor and drive this process.

CONSILIO GmbH sees environmental protection as a fundamental part of day-to-day work. Thanks to their proactive and sustainable working practices, employees always consider the environment before deciding to make paper copies or printouts. This also reduces the volume of paper waste over the long term. All waste is always separated as far as is possible. Our sanitary facilities are always stocked with products made from recycled materials. All materials required are always purchased in large quantities and then repacked for use into smaller containers, with the aim of reducing plastic packaging waste. Plastic waste is also reduced by ensuring that refillable pens are used rather than disposable writing implements. Containers for used batteries are provided to ensure these are disposed of properly. Faucet aerators are used in all fittings with the aim of reducing water consumption. Digital filing systems and the use of digital media for all business purposes helps to further reduce the volume of paper waste produced. Travel expenses – and therefore

carbon emissions – are also saved by the use of web apps for participating in online meetings. Rail is the company's preferred travel option and reduces company carbon emissions further in comparison with air travel. Renewable energy sources provide the electricity for sites operated by CONSILIO GmbH. Hardware procurement looks at the country of origin, ecological production conditions, and energy efficiency when evaluating potential suppliers.

CONSILIO GmbH employees are routinely informed about the latest environment protection measures introduced. This information is provided both ad hoc and as part of required annual training for employees.

CONSILIO GmbH has declared its commitment to minimizing its noise pollution, and to ensuring compliance with applicable local and national legislation at all times.

Environmental management training sessions are conducted on an annual basis.

CONSILIO GmbH expects its partners and suppliers to conduct their business in an environmentally-aware and sustainable manner, and to prioritize environmental protection efforts.

## 5. ENERGY MANAGEMENT



Alongside environmental protection, CONSILIO GmbH is also committed to implementing an efficient energy management system with the aim of reducing energy consumption sustainably over the long term. This approach includes the following measures:

- Employees must switch off electronic devices if leaving their desks for more than 30 minutes.
- As a general rule, all electronic devices must automatically switch to standby following a period of inactivity of more than five minutes.
- Appliances like dishwashers provided by the company must be switched on and used only when needed. Appliances must always be switched off when not in use.
- An intelligent control system for the HVAC systems means that electricity is consumed only when these devices are actually being operated.
- All lights must be switched off when leaving the room.
- During winter, heating systems must be switched off before opening windows and while windows remain open.
- All electronic devices must be used only for business purposes or other purposes for which express permission has been granted.

### 5.1. DECARBONIZATION

CONSILIO GmbH continues to concentrate on its decarbonization strategy, which aims to achieve a transition to clean sources of energy in supplier companies in the supply chain and to achieve carbon



neutrality on its own premises. With this strategy, CONSILIO GmbH aims to ensure the achievement of an overall reduction in emissions.

This Code will be updated to include future topics of interest. In addition, compliance with all energy-related legal or other regulatory requirements is audited at least once each year, with measures then being introduced in the event of non-fulfillment. Energy consumption is also audited at least once a year, with the aim of identifying potential improvements and therefore further reductions to energy consumption over the long term.

## 5.2. REPORTING ON GREENHOUSE GAS EMISSIONS

CONSILIO GmbH has declared its commitment to comply with all national and supranational requirements to publish reports on its greenhouse gas emissions as a business. As of this writing, CONSILIO GmbH is not required to publish a report on greenhouse gas emissions.

CONSILIO GmbH also requires all of its business partners and suppliers to comply with this or similar policies on energy management.

# 6. QUALITY MANAGEMENT



CONSILIO GmbH deploys quality management methods based on the FMEA (Failure Mode and Effects Analysis) methodology to guarantee and safeguard error-free processes both in customer projects and in its internal projects. This involves conducting a risk assessment for each project, with the aim of avoiding errors at an early stage as well as raising awareness about quality even at the project outset. Accordingly, all quotations, inquiries, and contracts are initially reviewed with the purpose of guaranteeing their completeness and feasibility.

All deliverables completed by CONSILIO GmbH in customer projects are also subjected to a final inspection with the aim of guaranteeing the quality of the work as agreed. Tests appropriate to the deliverable in question are carried out and the results are recorded in the project documentation.

Goods receipt inspections for quality and damage are carried out for all bought-in products, with non-fulfillment being recorded.

CONSILIO GmbH employees receive training in quality management at least every two years as a routine measure and on an ad hoc basis following changes to the methods used.

CONSILIO GmbH also expects all of its business partners and suppliers to deploy suitable quality management methods.

## 7. FINANCIAL RESPONSIBILITY AND DISCLOSURE OF INFORMATION



CONSILIO GmbH has declared its commitment to the principles of good accounting and record-keeping. Financial reporting is completed according to legal requirements and follows the Generally Accepted Accounting Principles (GAAP). Clear and precise information is provided on a prompt and ongoing basis, and is communicated in compliance with applicable national and supranational law.

## 8. INTELLECTUAL PROPERTY AND COUNTERFEIT PRODUCTS



CONSILIO GmbH respects the protection of third-party intellectual property and complies in full with applicable legislation. Counterfeit products are neither purchased nor placed on the market.

## 9. WHISTEBLOWING AND PROTECTION AGAINST REPRISALS



CONSILIO GmbH encourages all employees to report their concerns in relation to serious infringements of the Code of Conduct, or violations of national or supranational law, on the part of any individual occupying an important role or leadership position, without this employee having to fear or risk any unfair treatment, discrimination, or disadvantages by making such a report. To facilitate this, a corresponding procedure is set up, with which employees can express their concerns in complete anonymity.

## 10. ANTI-CORRUPTION AND ANTI-BRIBERY



The following section describes the eight-point plan adopted by CONSILIO GmbH to avoid corruption and bribery within its organization.

1. Lead by example: act in a way that shows you neither support nor tolerate any form of corruption. Corrupt behavior damages the corporate image of CONSILIO GmbH by causing trust in the company to be lost, and therefore weakening the basis for its cooperation with business partners, customers, and suppliers. All persons working at the company are therefore required to act in a way that sets an example for their colleagues, subordinate employees, and members of the public. Management staff in particular have an important role to play in combating corruption.

2. Rebuff any attempt at corruption immediately and inform your supervisor or the company executive without delay. When liaising with external business partners or suppliers, make sure that you establish the rules of play from the outset and reject corruption in any shape or form. Ensure that you keep to the letter of the law at all times, and observe all legal prohibitions on the acceptance of gifts or rewards. Never give the impression that you are looking for partners to “sweeten the deal.” Be assertive and proactive: reject gifts offered or send gifts back with a note explaining that company rules prevent you from accepting them. A useful approach here is to have a gift sent back by the HR Department with a formal rejection letter. This makes it even clearer to the gift-giver that CONSILIO GmbH rejects this kind of practice as an organization and not merely at a personal level. Act to protect your colleagues by always disclosing any attempts at corruption on the part of external parties.
3. If you suspect that someone is likely to ask you to grant them some form of unfair advantage, make sure you attend the meeting with a colleague as a witness.
4. Carry out your work so that work results can always be verified. Your working practice should be clear and transparent to everyone.
5. Keep your professional and private life separate at all times. Also consider whether private interests may conflict with your duties as a company employee. Corruption is often initiated by third parties attempting to expand professional contacts to the private sphere. You should therefore make it clear to personal contacts that you make a strict distinction between your professional and private life, so as to avoid all suspicion of taking bribes. If, while carrying out a specific task for the company, you identify a potential conflict between your duties as an employee and your private interests or the interests of third parties with whom you are particularly close, inform your supervisors so that they can respond appropriately and, for example, relieve you of your duties in this specific case. If you work (or intend to work) an additional job – including voluntary work – ensure a clear distinction between this

job and your work as a company employee.

6. Help your team to discover and investigate corruption in any shape or form. Notify your supervisor or the company executive if you have any reason to suspect corrupt behavior. Corruption can only be prevented and countered if we all feel responsible for CONSILIO GmbH as an organization.
7. Help CONSILIO GmbH to identify problems in its organizational structure that could favor attempts at corruption. All employees are required to provide organizers with corresponding details, so as to clarify the situation, and help to make workflows and procedures as transparent as possible.
8. Ensure that you attend training on corruption prevention. This kind of training will help you become assertive and proactive in handling corruption.

CONSILIO GmbH also requires all of its business partners and suppliers to implement this eight-point plan, and to reject and combat all forms of corruption.

# 11. CSR/SUSTAINABILITY REQUIREMENTS FOR SUPPLIERS



## 11.1. ENVIRONMENTAL PROTECTION

CONSILIO GmbH is keen to ensure that its business partners and suppliers also conduct their operations sustainably in other areas. These include the following:

- Water quality and consumption
- Air quality
- Soil quality
- Management of natural resources and avoidance of waste
- Responsible management of chemicals
- Biodiversity, land usage, and deforestation

Insofar as these areas are not covered by CONSILIO's environmental policy, CONSILIO GmbH reserves the right to require compliance with additional regulations on the part of its suppliers and business partners, depending on the type of business and industry in which these suppliers and business partners are active.

### 11.1.1. Decarbonization

CONSILIO GmbH expects its suppliers and business partners to focus on a decarbonization strategy that, for example, aims to achieve a transition to clean sources of energy in supplier companies in their supply chain and to achieve carbon neutrality on their own premises. This strategy aims to ensure the achievement of an overall reduction in emissions.

### 11.1.2. Reporting on Greenhouse Gas Emissions

CONSILIO GmbH requires its suppliers and business partners to comply with all national and supranational requirements to publish reports on their greenhouse gas emissions as a business. As and when required, CONSILIO GmbH expects its suppliers and business partners to submit reports on their greenhouse gas emissions.

### 11.1.3. Noise Pollution

CONSILIO GmbH expects its suppliers and business partners to minimize their noise pollution, and to ensure compliance with applicable national and supranational legislation at all times.

### 11.1.4. Animal Welfare

Suppliers and business partners of CONSILIO GmbH shall comply with applicable national and supranational legislation on animal welfare.

This approach shall include the following key measures:

1. Every animal has the right to receive the water, feed, and care necessary to ensure it can lead a healthy and happy life.
2. The welfare of animals must be considered regardless of their purpose – whether for food, research, or as companions.
3. Animal cruelty and abuse is illegal, and will not be tolerated.
4. All animals should be kept in a safe and clean environment that corresponds to their individual needs.
5. Animal experiments should be conducted only in the absence of an alternative method, with lab animals being treated with the greatest possible respect and care.
6. Educational and informative approaches should be used to raise public awareness about animal welfare topics.

7. Independent monitoring and implementation of animal welfare law should be organized to ensure compliance with this legislation.

This animal welfare policy should form the basis for protecting animals in general while raising awareness about animal welfare

#### 11.1.5. Reuse and Recycling

Going forward, CONSILIO GmbH expects its suppliers and business partners to continue to expand their activities in relation to reuse and recycling, with the aim of minimizing their ecological footprint over the long term. These activities shall include the following measures:

1. The reuse and recycling of materials are important measures that help to reduce waste and conserve resources.
2. Companies and individuals alike should be encouraged to use reusable products, and to separate their waste with the aim of simplifying recycling processes.
3. Governments should create incentives for businesses to implement environmentally friendly practices and to reduce their use of disposable products.
4. Recycling centers should be set up with the aim of simplifying and promoting the recycling of materials.
5. Educational activities and public relations work should be used to inform the general public about the importance of reuse and recycling.
6. Independent monitoring and implementation of environmental legislation should be organized to ensure an effective approach to the reuse and recycling of materials.
7. Progress in relation to reuse and recycling should be monitored and audited on a regular basis to ensure that the targets set have actually been achieved.

This policy on reuse and recycling aims to reduce environmental impacts by cutting waste and improving the use of resources.

## 11.2. USE OF POLICE FORCES OR PRIVATE SECURITY SERVICES

CONSILIO GmbH expects its suppliers and business partners to refrain at all times from deploying private security services or police forces that act unlawfully in any way or violate any of the other rules as set out in this Code of Conduct. This also includes the following specific rules:

1. The use of private security services should be limited to situations in which public safety cannot be guaranteed by any other means.
2. Private security services should be licensed, and their personnel trained to carry out their tasks effectively, lawfully, and while upholding human rights.
3. The use of police forces should comply with applicable laws and procedures, and should be restricted to situations where public safety and order need to be guaranteed.
4. The use of excessive force or discrimination by any member of the police or a security service against individuals based on their race, gender, or other characteristics should not be tolerated.
5. Physical force should be deployed only as a last resort and appropriate de-escalation tactics should always be employed first with the aim of resolving situations peacefully.
6. Independent monitoring and auditing of police and security service personnel should be organized to ensure that their methods are lawful and uphold human rights at all times.
7. The training provided to security services should be updated and improved on a routine basis with the aim of ensuring that such personnel are familiar with the latest technologies and methods for crime prevention and guaranteeing public safety.

This policy on the use of police forces and private security services aims to ensure that public safety can be guaranteed without violating the rights and freedoms of ordinary citizens.

### 11.3. DATA PROTECTION AND DATA SECURITY

The business partners and suppliers of CONSILIO GmbH shall comply with all national and supranational legislation on data protection and data security, and, in addition, shall observe the privacy policy as well as any other confidentiality or secrecy agreements as made with CONSILIO GmbH.

### 11.4. CONFLICTS OF INTEREST, EXPORT CONTROLS AND ECONOMIC SANCTIONS

Personal relationships and private interests have no influence on day-to-day business decision-making at CONSILIO GmbH. For this reason, we avoid all interactions with our suppliers and business partners that conflict or could conflict with our obligations as a company. In particular, this may be the case if we have a financial, personal, or familial relationship with a certain supplier, customer, or business partner. All employees of CONSILIO GmbH are required to disclose any potential conflicts of interest to the company executive.

CONSILIO GmbH conducts its business in compliance with applicable export controls and economic sanctions, so as to ensure the safe transaction of the company's business at all times. The same is expected of all business partners and suppliers. CONSILIO GmbH rejects all business conducted outside the scope of these provisions.

### 11.5. FAIR AND FREE COMPETITION

Business partners and suppliers of CONSILIO GmbH are expected to comply with antitrust legislation and other laws that regulate and promote competition within the market, and to reject all forms of corruption, blackmail, bribery, and unfair competition, as core principles of business, and to implement these as a matter of company policy. CONSILIO GmbH conducts its business within the applicable legal frameworks at all times. In addition, CONSILIO GmbH commits to upholding fair competition within all of its business relationships. The company rejects all forms of anticompetitive practice and price-fixing, particularly with regard to invitations to tender. All decisions are made without exchanging confidential information with co-competitors. The company executive and employees of CONSILIO GmbH shall not negotiate benefits for themselves or third parties or accept bribes for doing the same.

### 11.6. FINANCIAL RESPONSIBILITY AND DISCLOSURE OF INFORMATION

CONSILIO GmbH expects its business partners and suppliers to observe the principles of good accounting and record-keeping. Financial reporting must therefore be completed according to legal requirements and follow the Generally Accepted Accounting Principles (GAAP). Clear and precise information is provided on a prompt and ongoing basis, and is communicated in compliance with applicable national and supranational law.

## 11.7. WHISTLEBLOWING AND PROTECTION AGAINST REPRISALS

CONSILIO GmbH expects its business partners and suppliers to introduce policies in line with the German Whistleblower Protection Act that encourage all employees to report their concerns in relation to serious infringements of the Code of Conduct, or violations of national or supranational law, on the part of any individual occupying an important role or leadership position, without this employee having to fear or risk any unfair treatment, discrimination, or disadvantages by making such a report.

## 11.8. INTELLECTUAL PROPERTY AND COUNTERFEIT PRODUCTS

Business partners and suppliers of CONSILIO GmbH respect the protection of third-party intellectual property and comply in full with applicable legislation. Counterfeit products are neither purchased nor placed on the market.

Going forward, the above CONSILIO GmbH policies will be continuously expanded and amended during our cooperation with other businesses, so as to further ensure the fulfillment of all sustainability requirements within the company and its network.

## 11.9. COMMUNICATION OF CSR/SUSTAINABILITY REQUIREMENTS TO SUPPLIERS

In negotiations with business partners and suppliers, their policies will be audited with respect to sustainability and the relevant part of the Code of Conduct. In doing so, CONSILIO GmbH expects the same standards to be met that CONSILIO GmbH requires of its own policies.

## 11.10. PROCESS FOR AUDITING CSR/SUSTAINABILITY REQUIREMENTS AT SUPPLIERS

The process for auditing requirements of business partners and suppliers is based on the policies as set out in this document. Other policies may be audited, depending on the size of the CONSILIO GmbH business partner or supplier and the industry in which they are active. In doing so, CONSILIO GmbH bases its negotiations with business partners and suppliers on the provisions of this policy, as well as other legal and ethical requirements. On signing an agreement with the company, all business partners and suppliers of CONSILIO GmbH are also required to sign the CONSILIO GmbH Code of Conduct.

CONSILIO GmbH expects its Tier 1 suppliers to define and implement the same or similar standards as defined in this Code of Conduct. Tier 1 suppliers are also required to communicate these requirements along their supply chain.

## 12. TRAINING



All CONSILIO GmbH employees receive annual training on the subjects of compliance, sustainability, environmental protection, occupational safety, and the other principles as set out in this Code of Conduct.



**CONSILIO GmbH**

Einsteinring 22 | 85609 Aschheim | Telefone +49 (89) 960575-0

Fax +49 (89) 960575-10 | [info@consilio-gmbh.de](mailto:info@consilio-gmbh.de) | [www.consilio-gmbh.de](http://www.consilio-gmbh.de)