

Code of Conduct Policy

Introduction

At ILI.DIGITAL GmbH, we strive to conduct our business according to the highest standards of ethical conduct. We respect the law, honor our internal policies, value our esteemed customers, and treat our employees with the utmost respect and dignity. This Code of Conduct outlines our expectations towards our employees, management, and business partners.

In Short

- We respect and follow human rights.
- We comply with laws and internal regulations.
- We behave appropriately within the company as well as with clients, authorities, officials and business partners.
- We treat secrets confidentially and ensure this with proper methods and most recent technological standards.
- We never act corruptly, neither to our advantage nor to the advantage of anyone else.
- We anticipate and avoid situations of personal or financial conflict of interests between us and any of our business partners.
- We deal responsibly with our corporate assets.

Section 1: Core Values

At ILI.DIGITAL GmbH, our driving force is the commitment to influence change. Embracing game-changing innovation by implementing cutting-edge technologies is, at the core of our operations and reflects our collective ethos. We firmly believe that lasting success is rooted in accountability and deliverability. This means taking responsibility for our actions towards our clients, employees, and other business partners, ensuring a foundation of trust and integrity. This understanding can be summarized in our core values:

Sense for Opportunities: By fostering a culture of opportunity awareness and proactive action, we ensure that our company remains at the forefront of innovation and competitiveness.

Ability to Execute: We consistently deliver outstanding results with integrity, honesty, and respect for all, ensuring high-quality outcomes and accountability in every task.

Entrepreneurship: We are accountable for our actions, understanding that compliance with this Code is a responsibility of all staff, while fostering a strong mindset to drive growth and embrace challenges.

Section 2: How to behave

At ILI.DIGITAL AG, we believe that a respectful, inclusive, and safe work environment is crucial for fostering productivity and well-being. Our commitment to these principles are essential to maintaining the integrity and excellence of our workplace. This section outlines the standards and expectations for all employees to ensure our work environment remains conducive to professional growth and personal respect. (Read annex 1)

Sense for Empathy: Empathy is essential in our workplace. We expect all employees to actively listen, understand, and respect the feelings and perspectives of others to create a supportive and collaborative environment.

Ability to Empower: Empowering others is a cornerstone of our culture. We encourage employees to support and uplift their colleagues, fostering an environment where everyone can develop their skills and reach their full potential.

Respect: Respect is fundamental to our interactions. We treat all employees, customers, and partners with fairness, dignity, and consideration. Harassment in any form and discrimination against employees is unacceptable. (Read Annex 2)

Section 3: Professional Conduct

At ILI.DIGITAL GmbH, we uphold the highest standards of professionalism in all our business interactions and activities. This section details our expectations for employee conduct in professional settings, ensuring that our operations are carried out ethically and responsibly.

Conflict of Interest: Employees must diligently avoid any situation that might lead to a conflict between personal interests and the responsibilities of their role at ILI.DIGITAL GmbH. Any potential conflicts must be reported to your direct manager or to the Chief of Culture and Human Relations Officer immediately to maintain transparency and integrity in our operations.

Protection of Company Assets: Every employee is entrusted with the responsibility to use and manage ILI.DIGITAL's assets—both physical and intellectual—carefully and wisely. Misappropriation, misuse, or unauthorised use of company assets is strictly prohibited and can result in disciplinary action.

Section 4: Compliance with Laws

At ILI.DIGITAL GmbH, we are committed to conducting our business in accordance with all applicable laws and regulations of the jurisdictions in which we operate. This adherence reinforces our dedication to lawful and ethical business practices, underpinning our company's integrity and public trust.

Legal Compliance: All employees must conduct business in full compliance with the laws and regulations of the countries in which ILI.DIGITAL GmbH operates. This includes adhering to laws regarding fair competition, anti-corruption, data protection, and all applicable trade restrictions.

Anti-Corruption: The Company maintains a zero-tolerance policy towards corruption in any form. All employees are required to follow the highest standards of integrity and ethics in all business dealings and relationships, both internally and externally. (Read Annex 3)

Data Protection and Privacy: Employees must ensure that personal and sensitive information is handled in accordance with relevant data protection laws. This includes securing such information and limiting access to those who need it to perform their job functions. (Read Privacy & Security Guideline)

Section 5: Confidentiality and Privacy

At ILI.DIGITAL, we recognize the importance of confidentiality and privacy as fundamental aspects of our professional responsibility and commitment to our stakeholders. This section outlines our policies to protect sensitive information and respect privacy rights, ensuring that all employees understand and adhere to these principles. (Read Privacy & Security Guideline)

Confidential Information: Employees must treat all non-public information about ILI.DIGITAL's business activities, strategies, operations, and clients with the utmost confidentiality. Unauthorised disclosure, whether intentional or accidental, can have severe consequences for the company and our clients.

Privacy of Information: We are committed to protect the privacy and security of personal data we collect, use, and handle, whether concerning employees, customers, or third parties. All processing of personal data will be conducted in accordance with applicable privacy laws and company data protection policies.

Section 6: Relations with Customers and Partners

At ILI.DIGITAL, our relationships with customers and partners are built on a foundation of trust, professionalism, and mutual respect. This section details our commitments and expectations in managing these critical relationships, ensuring that all interactions uphold our company's values and standards.

Ethical Interactions: All employees must conduct themselves ethically in all dealings with customers and partners. This includes providing honest information, honouring commitments, and avoiding any form of deceptive practices.

Customer Satisfaction: We are committed to delivering high-quality services and products that meet the needs and expectations of our customers. Employees are expected to address customer concerns promptly and strive to resolve any issues that arise to maintain customer satisfaction and loyalty.

Respect for Agreements: Employees must ensure that all agreements with partners and customers are conducted transparently and are honoured. This includes commit to all terms and conditions of contracts and respecting the rights and expectations of all parties involved.

Confidentiality and Trust: Maintaining the confidentiality of customer and partner information is fundamental. Employees are required to safeguard sensitive information and use it only in ways that are authorised by the customer or partner and compliant with applicable laws.

Section 7: Reporting and Enforcement

At ILI.DIGITAL GmbH, we uphold a commitment to integrity and transparency in all our business practices. This section outlines the mechanisms for reporting misconduct and the procedures we follow to enforce our Code of Conduct. Ensuring an environment where ethical concerns can be raised without fear of retaliation is crucial for maintaining our corporate ethics.

Reporting Misconduct: Employees are encouraged to report any suspicion of misconduct or breach of this Code of Conduct to their direct manager or to the Chief of Culture and Human Relations Officer. All reports will be treated confidentially, and employees are protected from retaliation for making good-faith reports of suspected misconduct.

Disciplinary Actions: If the investigation concludes that a violation of the Code of Conduct has occurred, ILI.DIGITAL AG will take appropriate disciplinary action. The nature of the disciplinary action will depend on the severity of the breach and the circumstances surrounding the case.

Continuous Improvement: We are committed to continuously improving our policies and procedures. Feedback on our processes for reporting and enforcing the Code of Conduct is always welcome and can be directed to the CCHRO.

Conclusion

Compliance with this Code of Conduct is essential to ILI.DIGITAL's success and reputation. By embracing these guidelines, we ensure that our workplace remains ethical, inclusive, and respectful, fostering an environment of trust and accountability.

Credits

Thank you to the dedicated members of the leadership team who have contributed invaluable insights and guidance to the creation of this Code of Conduct. Your vision and commitment have been the driving force behind bringing this important initiative to life.

Annexes

Annex 1: Guidelines for Workplace Conduct

At ILI.DIGITAL AG, we are committed to maintaining a professional, respectful, and inclusive work environment. The following guidelines outline expected behaviour for all employees in relation to dress code, communication, office cleanliness, and interactions with colleagues and clients.

1. Dress Code

Professional Attire: We encourage you to dress in a way that makes you feel comfortable and confident. However, we aim to maintain a professional appearance, so we generally follow a "business casual" style.

Dress for Virtual Meetings: Professional attire is required for virtual meetings with clients or external partners.

2. Communication Standards

Respectful Language: Use respectful, clear, and professional language in all communications.

Email Etiquette: Emails should be polite, concise, and free of errors. Avoid informal language when communicating with clients or partners.

Non-Verbal Communication: Be mindful of body language, maintaining eye contact and showing engagement.

3. Clean Office Policy

We take pride in keeping a clean and organised office space to create a professional environment for both employees and visitors. The following practices help ensure our office stays clean and welcoming:

Clean Desks: Please do not store personal items on your desk. Before leaving each day, clean your desk using the provided cleaning supplies. Glass spray and towels can be found in cabinets in each small office—ask a colleague if you're unsure where to find them.

General Cleanliness: If you notice crumbs or dirt, feel free to use the vacuum cleaner to keep the office tidy. Keep glass surfaces free of fingerprints to maintain a polished look.

End of Day Duties: If you're the last person to leave the office:

Turn on the dishwasher after ensuring all dishes are properly aligned and the plastic wrapper is removed from the detergent tab.

Turn off all lights and air conditioning units in every room.

4. Interactions with Colleagues and Clients

Respect: Treat all colleagues fairly and with respect. Avoid gossip, exclusion, or any form of harassment.

Conflict Resolution: Address conflicts calmly and constructively, and escalate issues to management if necessary.

Client Relations: Maintain a polite and professional demeanour in all client interactions. Be attentive and address concerns promptly.

Confidentiality: Safeguard company, client, and colleague information and share it only when authorised.

Diversity and Inclusion: Support an inclusive workplace by respecting all individuals, regardless of background or identity.

Annex 2: Harassment, Coercion and Discrimination Policy

1. Harassment

At ILI.DIGITAL AG, we promote an environment that guarantees the dignity of all employees. Any kind of harassment, whether moral or sexual, either internally or from clients or even business partners won't be tolerated.

Moral Harassment: Involves repeated abusive behaviours, such as verbal attacks or subtle actions aimed at lowering someone's self-esteem. This can manifest as:

- Social isolation
- Professional persecution
- Intimidation or personal humiliation

Sexual Harassment: Involves unwanted physical, verbal, or non-verbal actions, including:

- Subtle sexual references
- Unwanted attention or physical contact
- Requests for sexual favours or coercion

2. Coercion

Coercion refers to the act of compelling someone to act or make a decision against their will by using force, threats, or undue pressure. It often involves manipulating a person's choices or actions through intimidation, fear, or other forms of control. Coercion can take various forms, such as:

- **Physical coercion:** Using or threatening physical harm to force someone to comply.
- **Emotional or psychological coercion:** Using emotional manipulation or intimidation to control someone's decisions.
- **Economic coercion:** Threatening financial harm or withholding resources to pressure someone.

3. Discrimination

Discrimination refers to the unfair or unequal treatment of individuals or groups based on characteristics such as race, gender, age, religion, disability, sexual orientation, or other

protected attributes. It involves prejudiced actions or policies that result in disadvantages or exclusion of certain people. Here are some examples that can be considered discrimination:

- **Racial discrimination:** Treating someone unfavorably because of their race or ethnicity.
- **Gender discrimination:** Unequal treatment based on a person's gender, such as paying women less than men for the same job.
- **Age discrimination:** Unfair treatment of someone because of their age, like refusing to hire older workers.
- **Disability discrimination:** Treating someone unfairly because of a physical or mental disability, or failing to provide reasonable accommodations.

Annex 3: Anti-corruption policy

The Company maintains a zero-tolerance policy towards corruption in any form. All employees are required to adhere to the highest standards of integrity and ethics in all business dealings and relationships, both internally and externally. This policy applies to every level of the organization and to all third parties acting on behalf of the company.

1. Prohibited Activities:

Employees must strictly avoid any actions or behaviors that could be interpreted as corrupt, unethical, or in violation of anti-corruption laws. Prohibited activities include, but are not limited to:

- Offering, giving, receiving, or soliciting bribes, kickbacks, or any other form of improper benefit or advantage, whether in cash or in-kind.
- Engaging in fraud, embezzlement, or any form of financial misconduct.
- Facilitating or participating in any activities that compromise the integrity of business transactions, such as favoritism, manipulation, or conflicts of interest.
- Making payments to government officials or business partners with the intention of influencing their decisions or securing an unfair business advantage.

2. Gifts and Hospitality:

Employees should be particularly cautious when offering or receiving gifts, hospitality, or entertainment. These actions should be of a reasonable value, lawful, and directly related to the Company's legitimate business purposes. Anything that exceeds normal business practices or could be perceived as an attempt to influence decision-making must be avoided.

3. Reporting Suspicious Activity:

If an employee becomes aware of or suspects any activity that violates this Anti-Corruption Policy, they have a duty to report it immediately. Suspicious activity or concerns must be reported to your direct manager or to the Chief of Culture and Human Relations Officer. All reports will be treated confidentially, and employees are protected from retaliation for making good-faith reports of suspected misconduct.

4. Reporting Suspicious Activity from Clients:

Employees who become aware of any client engaging in corrupt practices are required to report this immediately to your direct manager or to the Chief of culture and human relations officer.

This ensures that the consequences are clear and severe enough to protect your company while maintaining ethical business standards. It also signals to clients that your organization takes anti-corruption seriously, potentially deterring corrupt practices.

5. Consequences of Violations:

Any violation of this Anti-Corruption Policy will be treated as a serious disciplinary matter and may result in disciplinary action, including termination of employment.