



Code of Conduct Social Responsibility

Foreword of the management of Amaneos

Dear employees,

Dear business partners,

The Code of Conduct of Amaneos is at the heart of our business and corporate philosophy. It embodies our corporate values and thus our own standards for our daily actions. This Code of Conduct is a set of mandatory and non-negotiable guidelines for all employees and companies that are part of Amaneos in all business units and countries, including the members of the management, the employees, all the representatives of Amaneos, such as consultants, agents and independent subcontractors, together with anyone who is equivalent to an employee in functional terms (for example, temporary staff) and the suppliers of the companies at Amaneos.

At Amaneos, we take responsibility towards our stakeholder, our employees of all companies, our partners and the general public. For us, it is a matter of course that this responsibility includes compliance with all laws and regulations that apply to us. This always applies and everywhere. In addition, we always act fairly and respectfully toward third parties. We all fulfil this responsibility and will continue to do so in the future.

The Code of Conduct sets a worldwide standard that unites all the members in all companies of Amaneos. The Code is an example of our vision and of the way we think and act within the Amaneos network. We all have a duty to review and understand the Code of Conduct and Ethics so that we can act with honesty and integrity in all of our business dealings. We deal openly and respectfully with each other and with third parties. We conduct our companies with honesty, integrity and openness, and with respect for the human rights and interests of our employees. We shall similarly respect the legitimate interests of those with whom we have relationships. We are committed to providing transparency across all our companies.

The solid foundation for all decisions and corporate action are our values and our commitment to fully complying with applicable laws and generally accepted social and ethical principles. This forms the basis for a permanently successful relationship with our customers and the economic success of our company.

Sincerely,

Fabio Morandi

Fabio Morandi

Chief Executive Officer

Our Values

A certain set of common values should be shared among all companies that are part of Amaneos to define the cultural core DNA. This Code of Conduct specifies and helps the continued implementation of these values by establishing the minimum standards of behaviour in all circumstances. Building on these general set of values, each company defines its own corporate philosophy.

Entrepreneurship

We think and act entrepreneurially by being active, operational and local and by pursuing a sustainable, long-term strategy. We do not only want to provide suggestions, but see ourselves as a partner, of the various companies in our portfolio. As entrepreneurs, we want to bring about positive changes for which we also take responsibility. We deal with the associated risks in a dutiful and responsible manner. Together, we turn risks and losses into opportunities and successes for profitable growth.

Integrative management

Our Management leads and serves by example. They work to bring the entire company forward and everyone of its employees. Our goal at Amaneos is that everyone helps each other and people rely on each other and work together.

Personal Integrity

Personal integrity includes the physical, psychological and moral integrity of the individual. A good working atmosphere is the best prevention, it include respect, trust, open communication and conflict culture is the best prevention. We practice open and honest communication and try to minimize unnecessary conflicts. Thus, we create an environment where people can contribute to a successful turnaround on a personal level for each employee as well as on a corporate level.

Sustainability

Acting and doing business sustainably is an integral part of our corporate philosophy. For us, sustainability is inextricably linked with economic success. That is why we have anchored all aspects of sustainability in our daily actions. This concerns the protection of the environment, our social commitment and compliance with our corporate guidelines (Environmental, Social, Governance (ESG)). ESG goes beyond environmentally friendly measures and includes social aspects and principles of good corporate governance.

Protection of company assets

All companies of Amaneos must protect the tangible and intangible and respect them with third parties. We reject any form of extortion, fraud, theft or embezzlement, regardless of whether company assets (e.g. work equipment, IT equipment) or third-party assets are involved. The private use of company property is only permitted if individual law, collective law or company regulations or company practice provide for this.

Rules on accounting and finance

Companies part of Amaneos are committed to accurate accounting, record keeping and to maintaining a system of internal controls. In addition, the companies must conduct the financial reporting and the businesses with integrity and transparency. The companies need to prepare and publish periodic financial statements in accordance with applicable national and international accounting standards.

Competition and antitrust laws

All employees of the Amaneos companies are committed to fair competition in all business relationships. No agreements that restrict competition or are relevant under antitrust law (e.g. on prices or markets) are made in the course of business activities. All companies comply with applicable competition and antitrust laws and avoid unlawful restrictions on competition in our dealings with competitors, customers or suppliers. Employees who are particularly confronted with these issues as a result of their work (e.g. in sales or purchasing) must familiarize themselves in detail with the applicable competition and antitrust laws.

Tax laws and customs duties

At Amaneos, we are aware of the legal obligation to comply with tax and custom duties. Every company and every responsible employee of each of the companies must therefore ensure that all taxes and duties are determined, recorded, declared if necessary and paid to the relevant tax authorities completely, correctly and on time.

Unless there is an in-house expert to assist with the preparation of the import documents, the tool should be shipped by a freight forwarder who will also take care of the correct customs clearance.

Prevention of money laundering and terrorist financing

Amaneos complies with the applicable regulations on the prevention of money laundering and terrorist financing. Money laundering occurs when funds, assets or substitute items for such assets derived from criminal acts are brought into the legal economic cycle.

Terrorist financing occurs when funds or other assets are provided to support terrorist goals or associations.

Export controls and sanctioned parties

Certain goods, services and information are subject to restrictions on export to or import from certain countries. In the context of international business transactions, the companies must comply with all export control regulations, and, in the case of cross-border transactions, they must carefully check whether any export control restrictions apply to goods, services or information.

In addition, countries, or potential business partners (companies and individuals) could be on embargo or sanctions lists. Before entering a business transaction, the companies ensure that sanctions are not violated in the execution of the transaction.

Transactions with sanctioned individuals and countries or goods and services regulated under export control law can have serious consequences for Amaneos and the responsible employees in the companies of Amaneos.

Employment laws

Respect for and observance of human rights as well as the protection of health and the environment are essential components of our corporate responsibility. At Amaneos, we strictly reject any form of forced or child labor. We recognize the right of all employees to form trade unions and employee representatives on a democratic basis within the framework of national regulations. The right to adequate remuneration is recognized for all employees. Remuneration and other benefits correspond at least to the respective national and local legal standards or the level of the national economic sectors and regions.

All companies of Amaneos offer equal opportunities for all and prevent discrimination in the hiring of employees as well as in the promotion or granting of training and development measures. We treat everyone fairly and with dignity. We treat each other with respect and trust. Companies of Amaneos create a work environment that is free from discrimination and harassment. When companies are part of Amaneos they commit to treat all employees equally, regardless of gender, age, skin color, culture, ethnic origin or gender origin, sexual identity, disability, religious affiliation, or world view. Everyone is required to always comply with these standards of conduct.

Occupational health and safety environmental laws and other regulations

All companies of Amaneos have made it the mission to create a healthy and safe working environment. Each one of must comply with the applicable safety standards. The companies ascribe a high priority to safety in the workplace and strive for an accident rate of zero. Pollution must be prevented or reduced as much as possible. The companies strive to improve environmental protection in our business activities, to minimize the use of resources (in terms of energy, water, etc.) and to conserve natural resources.

Political commitment

All employees of the Amaneos companies can become politically and socially involved in their free time within the scope of the given opportunities. As an active member of society, Amaneos and the companies are also involved in various ways. Donations and other forms of social commitment are made exclusively in the interests of Amaneos. The companies attach great importance to political neutrality and therefore do not make any financial contributions such as donations or sponsoring measures with political objectives. This means that the companies do not make donations or comparable contributions to political parties, party-like organizations, individual elected officials, or candidates for political office in Germany or abroad.

Bribery and corruption

All Ameneos companies condemn any form of corruption and bribery, whether active or passive, direct or indirect. The companies do not offer or grant personal benefits to representatives or employees of other companies or public administrations in connection with official activities. The companies grant gifts or invitations only in an appropriate form and amount. The companies also do not accept any personal benefits in connection with our business activities for our companies, in particular gifts or invitations in an inappropriate form or amount. Even the appearance of corruption and bribery must be avoided at all costs.

Conflicts of interest

At Amaneos, we communicate honestly and transparently. All companies of Amaneos disclose potential or actual conflicts of interest in the workplace in a timely manner for review and definition of necessary measures. A conflict of interest exists when a private interest of an employee could collide with the interests of an Amaneos company. This may also include the fact that a partner or close relative has conflicting interests, for example working in a responsible position for a competitor.

Business decisions may only be made based on objectively comprehensible business criteria and not under the potential influence of personal interests or relationships.

Confidential information

Amaneos and its companies protect confidential information from unauthorized disclosure and use. We use sensitive or confidential data, information, and documents from Amaneos, its companies or third parties only in connection with the professional duties. We also observe any restrictions on use by the owner of the information.

Employees of the companies will not disclose confidential information to third parties unless they have explicit permission for such disclosure from the owner of the information in question or a clear legal obligation.

Data privacy

At Amaneos, we respect the privacy of the employees and business partners. The Amaneos companies protect the personal data of employees and third parties. Therefore, Amaneos and its companies collect, store, use and transfer personal data and information only in accordance with applicable laws and guidelines. In doing so, the companies observe that the collection, storage, processing, and other use of personal data may only take place with the consent of the person concerned or based on a contractual or legal basis. The companies of Amaneos treat such information confidentially both during and after the termination of the employment relationship with an Amaneos company.

Interacting with colleagues and business partners

Amaneos and its companies always behave fairly and act with integrity and respect toward each other and third parties.

We do not tolerate any form of bullying, coercion, or other harassment. Neither on a sexual nor on a physical, psychological, or other level. The companies of Amaneos are committed to providing equal employment opportunity to all qualified employees and applicants. An employee must comply with all laws and regulations prohibiting discrimination with respect to age, physical appearance, gender, ethnic origin, nationality, religion, medical condition, disability, marital status, sexual orientation, political or philosophical beliefs, union membership or any other characteristic protected by law or regulation.

Any observation or experience any form of abuse or harassment, may report to the Human Resources Department or also through the office responsible for compliance in the company. Employees will not be harmed if such reports are made in good faith.

Respect for others means respect for their dignity and personal integrity, their self-respect, their property, and their contribution to the overall success of Amaneos and its companies. We protect the reputation of Amaneos and all companies of Amaneos in our public statements. We conduct the business responsibly and do not engage in practices that harm Amaneos and the company's reputation or are contrary to our values.

At Amaneos, we meet the highest standards of ethics and integrity in the performance of our work. Even when performing actions that are lawful or not regulated by law, we always ensure that our actions are honest and ethical. Amaneos' assets and the assets of the companies must be used only for their intended business purposes and not for improper personal, illegal, or other unauthorized purposes.

Environment, Health and Safety

We give a high priority to protecting the environment and natural resources and to avoiding unnecessary waste in both our development and production processes. Amaneos complies with the relevant environmental legislation. We will immediately rectify any deficits in this area.

We also give high priority to health and safety throughout our organization. All companies of Amaneos are aware of its responsibility for its employees and guarantees to take precautions against accidents. Employees are also responsible for ensuring that their everyday working environment is safe and healthy. Our processes guarantee that we comply with legal regulations and provide healthy workplaces. Any potential deficits in this area will be rectified immediately.

Reporting possible Violation

Any employee or third party who learns of violations of the provisions of this Code of Conduct or otherwise becomes aware of violations of the law, harmful conduct or risks that endanger the company is required to report them.

At Amaneos, we practice open communication. Normally, therefore, the direct supervisor is the right contact person for questions, possible errors, or indications of irregularities.

If an employee prefers in an individual case - for whatever reason - not to contact the supervisor directly, the office responsible for compliance in the company is available as an independent function.

In addition to information from employees, we also expressly welcome information from our business partners, suppliers and other third parties. These should first contact their contact person or the office responsible for compliance in the company. If they do not wish to do so, third parties are also invited to report indications of violations of legal provisions or this Code of Conduct via the Whistleblower portal of the company.

All companies of Amaneos has its own Whistleblower portal that follows the same processes and standards.



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