



# Code of Conduct

## Policy & Guideline

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## 1. Introduction

At collaboration Factory we believe that core values, among others, “Appreciation”, “Commitment and Transparency” and “Innovation and Sustainability”, are the foundation of our success along with every single person who contributes to our cplace ecosystem every day. Our Code of Conduct translates these values into the way we do business in our day-to-day actions. It sets principles to align our company and business partners with the high standards of integrity and with applicable laws and regulations.

The collaboration Factory Code of Conduct is binding for us, and all parties involved in our business. Thus, it applies to all persons working for or with collaboration Factory, regardless of the terms of engagement, be it board members, team leads, employees, consultants, partners, suppliers, or customers. We expect compliance with all governing laws, rules, and regulations of the countries in which collaboration Factory does business. Adherence to overarching conventions such as those of the United Nations (UN), the International Labor Organization (ILO) and any other relevant international provisions is also required.

We acknowledge that if the provisions in our business partner’s country are lower than our standards, this may imply short-term business disadvantages or difficulties. Nonetheless, our requirements are considered merely as guidelines and should be exceeded wherever possible.

## 2. How We Respect Human Rights

Rights At collaboration Factory we strictly reject child labor and do not accept it with our business partners. To that end, we expect compliance with all laws and provisions regarding the employment of young persons, so that no person whatsoever may be recruited or employed under the minimum age for legal employment, which is when compulsory schooling ends.

Further to this, we prohibit any form of people exploitation. All work performed must be on a voluntary basis. No employee involved in our business may be compelled to provide work or services by using force, fraud, or coercion.

Collaboration Factory prohibits all behavior contributing to a hostile working environment. We respect every individual’s dignity and treat all employees equally, regardless of their ethnicity, nationality or culture, their gender, age or sexual orientation, their disability, political orientation, world view or religion, membership in a trade union or other personal characteristics. We promote equal opportunities and prevent discrimination in the recruitment, promotion, and development of employees.

Furthermore, we do not tolerate any form of harassment, be it sexual harassment, workplace harassment or workplace violence.

### 3. How We Appreciate and Promote Work Performance

For collaboration Factory providing employees with a **safe and healthy work environment** is fundamental and must always be prioritized by us as well as by our business partners. We do this by complying with national and local regulations which represent the minimum requirements for us and by optimizing our processes and services to reduce individual risks and avoid work-related accidents.

Further to this, the **working time** must correspond at least to the applicable national legal requirements or the minimum standards of the respective national economic sectors.

All employees have the integral right to appropriate **remuneration** for the work they provide. Pay and other benefits must be fair and reasonable and at least comply with the current valid minimum wage or the minimum wage level standard of the respective industry. No additional deductions may be made from the wages as a disciplinary measure.

We respect the right of all employees to **assemble**, to promote their interests and **to collectively bargain** by forming and freely joining legally constituted representative bodies. In countries where the rights to freedom of assembly and freedom of association are legally restricted, employees nonetheless have the right to elect their own representatives.

### 4. How We Do Business with Integrity

At collaboration Factory how we conduct our business is particularly important. **Corruption**, meaning the abuse of entrusted power for private gain, is not tolerated. This specifically includes **bribery**. No person involved in our business may offer, provide, or receive any kind of benefit whatsoever to exert influence unlawfully or unethically. These can be, but are not limited to, financial benefits (i.e., payments, kickbacks, donations, loans, and gift vouchers), incentives (entertainment and hospitality), gifts or job offers, sponsorships and internships.

We only engage with partners and customers who conduct legitimate business and use legitimate funds. Under no circumstances do we participate in **money laundering**. In cases of doubt, any unusual financial transactions that could raise the suspicion of money laundering, specifically those involving cash, must be reported to our Legal department.

At collaboration Factory we are committed to **fair competition** and comply with all laws protecting competition and **antitrust**. We do not tolerate any unfair business practises leading to antitrust violations such as illegal information exchange, price fixing and market sharing. We also expressly reject espionage, theft, and other illegal methods to obtain information about competitors or their business activities.

Accurate and complete business records are essential for our company's business decisions and our accountability towards our business partners. Therefore, at collaboration Factory every employee, not only our finance department, is obliged to contribute to ensuring that our **books and financial records** are accurate and **compliant** with our internal controls, disclosure controls and our legal obligations.

Our business decisions are made exclusively in the best interest of the company. Any **conflicts of interest** with individual private interests must always be avoided. A conflict of interest occurs when your personal interest interferes with the interests of collaboration Factory. Potential conflicts of interest must be dealt with transparently and in accordance with applicable laws by providing notice to the employee's team lead and our Human Resource Department to resolve the issue where possible.

All **property** of collaboration Factory must be handled with care and **protected** from damage, loss, and misuse. It must primarily be used for business purposes, unless otherwise agreed. Our property includes tangible assets, such as computers, and more, as well as intangible assets, such as our intellectual property, our system and source code, company trademarks, and our relationships with business partners. These assets also encompass all property and resources belonging to our business partners, such as vehicles, appliances, machines, accesses, etc., which we use.

Our **intellectual property** is the core of our company's development and is therefore exceptionally valuable and worthy of protection. At collaboration Factory **information security** forms an integral part of our corporate culture. Our employees are bound to information security by the collaboration Factory information security guidelines. These guidelines address the requirements regarding the security of information processing within collaboration Factory. To this end, our information security complies to legal requirements, such as applicable data protection laws. It is flanked by our Information Security Management System (ISMS), which we use to manage and improve the confidentiality, availability, and integrity of our information on a permanent basis.

At collaboration Factory we do not disclose any **confidential business information** to unauthorized persons without prior authorization or unless required by law. All our employees and business partners are bound to confidentiality regarding company or business matters for the duration of their engagement by contract and separate Non-Disclosure Agreements. The obligation to maintain confidentiality continues even after the termination of an employment, unless otherwise agreed.

Further to this, we take our responsibility to protect the **personal data** of our employees and that of our business partners very seriously. All employees of collaboration Factory are obliged to comply with applicable statutory provisions for **data privacy** and **data security**, in particular with the European Union's General Data Protection Regulations (GDPR). Personal information is only collected, processed, and used if needed to fulfil specified tasks and business purposes and may only be passed on to authorized parties. Individual compliance with data protection laws includes treating personal data confidentially and storing it securely to prevent misuse.

Given the significant risks that the above stated principles pose to our business, any **infringements** will result in immediate sanctions against the parties involved. All our employees and business partners must comply and immediately **report any detected deficiencies** to our Legal department.

## 5. How We Grow and Give Back Sustainably

Collaboration Factory is driven by technological innovation and the pursuit of high quality. For future-proof growth we commit to **sustainability** by continuously improving our cplace ecosystem, increasing **energy and water use efficiency, responsibly managing our resources, such as water, air, and chemicals, as well as their use and quality** and **reducing our emissions and waste**. In this, we assume our responsibility to minimize our environmental impact by complying with environmental laws and standards and by being environmentally conscious in our day-to-day business. To strengthen our sustainability efforts continuously, we encourage our employees and business partners to use resources with consideration and to commit to environmental and climate protection as well.

## 6. How We Enforce our Code of Conduct

Our Code of Conduct is available to all parties involved in our business with and applies to every individual in our cplace ecosystem. Compliance to the principles laid down therein ensures that collaboration Factory can continue to offer a safe and supportive working environment and maintain high standards in business ethics.

**Breaches** of our Code of Conduct can be a serious threat to our business and can therefore result in disciplinary measures for our employees. However, any steps taken will always be in accordance with the principle of proportionality (appropriate, suitable and necessary). Any violation of our Code of Conduct by our business partners is an extraordinary cause for contract termination.

We invite all parties to address any **grievance issues** whenever **infringements** of our Code of Conduct are suspected openly and **without fear of retaliation**. All concerns raised will be taken seriously and treated with appropriate confidentiality and sensitivity. If you suspect any violations, you can either inform your team lead or, if circumstances make that impossible, inform our Legal department using the following email address: [legal@cplace.com](mailto:legal@cplace.com).

For any questions or further information regarding the principles laid out in our Code of Conduct or how they apply to you, please also contact our Legal department.

For further information on data protection or our Information Security Management System (ISMS) you can contact us under: [security@cplace.com](mailto:security@cplace.com).