

SATIS&FY

satis&fy AG \ Industriegebiet Dögelmühle \ 61184 Karben

Our Compliance Guidelines

Dear Customers, Business Partners and Employees,

Since being founded in 1993, satis&fy has earned a reputation as a reliable and fair employer and partner. These values, coupled with interdisciplinary methods and committed, creative people, make satis&fy an important and respected player in the international event market.

This compliance guideline is intended to be our ethical and legal compass. We are committed to acting economically and socially ethically, as well as environmentally, conscious at all times. It contains the basic rules for our behaviour at satis&fy towards our business partners and the public.

satis&fy expects that all employees, and particularly managers, adhere to the rules of the compliance guideline – always and regardless of where they are located.

Karben, February 20th, 2020

Nico Ubenauf
CEO

***Note:** To make this report easier to read, we have refrained from referring to specific gender designations. This in no way implies discrimination against any gender. When we speak of customers, business partners or employees, we equally refer to, of course, all employees, business partners and customers regardless of their gender. Thank you for your understanding.*

satis&fy AG
Industriegebiet Dögelmühle
61184 Karben bei Frankfurt
Phone: +49.6039.9120.0
Fax: +49.6039.9120.950
frankfurt@satis-fy.com
www.satis-fy.com

Vorstand
Nico Ubenauf, Chris Fleck

Aufsichtsratsvorsitzender
Hans Eick

Registereintrag AG Frankfurt/Main, HRB 72436
Ust.-IdNr.: DE 159169725

Sparkasse Oberhessen
IBAN: DE45 5185 0079 0027 1605 22 · BIC (SWIFT-Code): HELADEF1FRI

Vereinigte Volksbank Maingau eG
IBAN: DE35 5019 0000 0006 0100 08 · BIC (SWIFT-Code): FFVBDEFFXXX
IBAN: DE61 5019 0000 1001 7027 06 · US-Dollar

Deutsche Bank
IBAN: DE84 5007 0010 0093 1758 00 · BIC (SWIFT-Code): DEUTDEFFXXX

Definition and scope of application

In 2003, the satis&fy guidelines were jointly developed and published with company employees and management. This is a transparent collection of the basic ethical values that shape the company and serve as a benchmark for actions and interactions, both internally and externally. Every employee within satis&fy should adhere to these.

As a more specific derivation from the satis&fy guidelines, the current compliance guideline should be understood as a Code of Conduct, which regulates, supports and guides cooperation, collaboration and diverse business relationships.

For us, "Compliance" means the entirety of all measures intended to ensure the legal and ethical behavior of satis&fy and all its sectors and employees with regard to all legal and company-specific rules and regulations. This guideline applies to all employees and board members of satis&fy as well as to our business partners and suppliers, to the extent that we can influence them.

With this declaration of conformity, we want to guarantee the legality at all levels of our actions and recognize and further develop standards for our industry, but also do justice to our own values, which are reflected in the guidelines of satis&fy, during implementation.

Basic Behavioural Requirements

With team spirit, legally compliant and always fair

satis&fy expects from Suppliers as well as Employees and Customers:

- compliance with all applicable laws,
- refrain from corruption,
- respect for human rights,
- compliance with the laws against child labor,
- compliance with legal regulations of international trade,
- protecting the health and safety of all employees,
- compliance with relevant national laws and international standards for occupational safety, environmental protection and data protection,
- that these points are also implemented and adhered to in your own supply chain.

Information Obligation

Every employee is required to remain informed about the laws, regulations and internal instructions applicable to his area of responsibility. For this purpose, he is provided with a legal cadastre with all valid and current laws concerning his activity. If you have any questions or concerns, you should seek advice from the legal department or the relevant specialist department.

Complaint Management

Our aim is to always provide our customers with high-quality, needs-based products and services. Our measuring instrument is the degree of satisfaction of our customers with our service.

However, it can happen that we do not fully meet expectations. In this case, our customers have a comprehensive complaint management system at their disposal, which they can ideally reach directly through the supervising project manager, the site manager or the compliance officer. We take every suggestion and criticism seriously and always see complaints as an opportunity to improve our service and thus respond more specifically to customer concerns.

For internal complaints within the working groups, the entire organization or towards managers, a complaint management system that is transparently communicated is available to the employee at all levels, which documents incidents, supports optimization measures and reports results to the management of satis&fy AG.

Communication and Information

The guiding values of our communication culture are openness, respect, team spirit, a sense of responsibility, honesty, fairness and clarity. Communication and information take place transparently within the teams and departments.

Prohibition of Bribery and Corruption

Corruption damages competition, is inconsistent with our corporate values and exposes satis&fy and each of its employees to a liability risk. We are committed to maintaining the highest standards in our business activities. We do not grant or accept any unlawful or unjustified advantages.

A conflict of interest arises when one's own interests conflict with those of the company. Our employees are guided solely by the company's interests in fulfilling their professional obligations and avoid activities that are detrimental to business interests or the fulfilment of these obligations. Therefore, they do not abuse their position, company information or company property for personal purposes or improper third-party gain.

Invitations, Gifts and Events

Invitations, gifts and event invitations are part of human and polite interaction. The employees may issue invitations and give gifts to business partners and accept invitations and gifts from them, provided that these are within reasonable limits.

To avoid the appearance of corruption, the following applies:

- Employees must decline invitations and gifts if they are clearly or presumably linked to a specific expectation of some form of consideration. The same applies for gifts to business partners.
- Participation in specialist events by employees is permitted and encouraged.

The same applies to the implementation of specialist events.

- Invitations to participate in social, corporate and leisure events in a corporate environment are permitted if within reasonable limits. They must not give the impression of harming fair competition or mixing interests.

Combating Money Laundering

We assume and demand that our business partners and suppliers, like us, comply with all applicable laws. satis&fy only works with business partners who apply the legal framework.

Cooperation with customers and suppliers

As a company, we have a duty to be interested in and question the value chain of the products and services we purchase. We must use our shopping behavior to contribute to the demand for good work and ethically correct services.

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We expect our employees, suppliers and service providers to participate in achieving the environmental objectives and to make a visible commitment to this.

Service providers, dealers and manufacturers are treated honestly and fairly by us. We maintain stable, often long-term business relationships with our suppliers, all of which are characterized by appreciation. Our purchasing behavior is always based on quality and our sustainability values. It goes without saying for satis&fy that local suppliers are given special consideration when procuring goods and services.

Privacy

The employees are obliged to handle personal data sensitively in all business processes. Personal data may only be collected, used and stored in accordance with applicable data protection laws. This applies to employee data as well as to data from customers, suppliers, competitors and others.

More specifically, data processing may only take place if the data subject has given prior consent or if this is permitted by law for other reasons. Use personal data sparingly; their processing must be necessary in any case. To ensure effective data protection, satis&fy has appointed a data protection officer and issued a corresponding data protection guideline that is freely accessible.

Protection of Company Assets

Each supervisor must establish an organization within their area of responsibility that protects company assets from loss and misuse. Company assets may not be used for private purposes.

The purchase and sale of company assets must be transparent, traceable, economical and at fair market conditions. Personal interests of individual employees must not influence decisions and financial transactions.

Behavior towards Competitors

Competition and antitrust laws must be observed. No terms may be exchanged or agreed upon with competitors. These rules must also be considered in association work.

Consequences of Compliance Violations

Adherence to the compliance guideline is consistently required. Compliance violations can have the following consequences for employees:

- warning,
- termination,
- claims for damages by third parties and by satis&fy,
- fine,
- Imprisonment.

Compliance violations can have the following consequences for satis&fy:

- claims for damages by third parties,
- costly litigation,
- additional official requirements,
- fine and profit skimming,
- tarnished image.

The Compliance Officer is available internally and externally with a high level of confidentiality for any queries arising from these compliance guidelines. If you become aware of compliance violations, you are obliged to inform the compliance officer immediately:

Leif-Erik Wilhelm

LeifErikWilhelm@satis-fy.com

If you as an Employee have concerns or questions:

- Talk to your supervisor or the relevant specialist department, for example with the HR department on employment contract issues.
- If it is not possible to clarify with the supervisor or the responsible specialist department or if there are still concerns, the compliance officer is available as a contact person.
- The person responsible for compliance can be addressed directly at any time, if desired also confidentially and anonymously.

The contacts at satis&fy are the following:

compliance@satis-fy.com

complaintmanagement@satis-fy.com

dataprotection@satis-fy.com

health@satis-fy.com

worksafety@satis-fy.com

ecomanagement@satis-fy.com

sustainability@satis-fy.com

diversity@satis-fy.com

equality@satis-fy.com